

Date: 2 February 2021

Your Ref:

Our ref: 210202/Williamson G/Lebus S/PR/FC

Rt Hon Gavin Williamson MP  
Secretary of State  
Department for Education  
Sanctuary Buildings  
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Simon Lebus  
Interim Chief Regulator  
Ofqual  
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# NASUWT

## The Teachers' Union

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General Secretary  
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Dear Gavin and Simon,

### **Awarding of grades in summer 2021**

Following the closure last week of the joint DfE/Ofqual consultation on how grades should be awarded in summer 2021, I wanted to highlight some additional important points that it was not possible for the NASUWT to address fully through use of the online survey template.

The NASUWT is acutely aware that the necessary but difficult decision to cancel this summer's examination series creates hard choices for the Government and the regulator. The Union has been clear that there are no viable options that are entirely problem-free or that can avoid confronting a series of difficult trade-offs between a range of legitimate objectives. The Union has sought to engage constructively with the DfE and with Ofqual throughout by recognising the scale and complexity of this challenge and will continue to do so as work to develop a solution for awarding this summer progresses.

### **Recognising pressures on centres and their staff**

As you will be aware, the implications of the pandemic for the operation of the education system have resulted in entirely unprecedented pressures on teachers and school and college leaders. Therefore, it is imperative that the solution for qualifications in the summer of 2021 takes full account of these pressures and avoids adding excessive and unnecessary workload burdens on staff in centres. This consideration has particular importance for the ways in which assessments will be undertaken within centres, including any procedures for internal and external moderation.

Experience confirms that approaches to centre-based assessment can generate significant workload demands. While it is recognised that some form of centre-based assessment is the most appropriate means by which candidate performance can be recognised in many general, vocational and technical qualifications, it is important to note that in this instance, such an approach would be used as a replacement for externally marked examinations. As a result, additional assessment-related workload burdens would be generated for teachers and school leaders that would not be present in normal circumstances.

It is, in part, for this reason that the NASUWT strongly supports the production by awarding bodies of externally-set assessments. The Union also believes that serious consideration should be given to the use of external marking for these assessments, not only as a means of limiting workload burdens but also to ensure that consistent assessments are undertaken according to clear criteria. Further, there should be an expectation on centres that all candidates should undertake these assessments apart from those individual candidates whose circumstances would impair their ability to access these assessments meaningfully and fairly. In such cases, centres should be able to draw upon wider evidence to support their assessments, although it will be important to ensure that expectations on centres and their staff in this respect are manageable and proportionate. In all circumstances, it is critical to recognise that professional, candidate and public confidence in the awarding process this summer will necessitate assessment that is unambiguous and applied according to well understood, common criteria.

Centres will have an important role to play in ensuring that they take all possible steps to create sufficient time to allow assessments to be carried out effectively and for staff to access relevant training and support. The NASUWT, therefore, expects the Government to make clear that centres should support the work of teachers and school and college leaders by allowing them to focus their attention on teaching and leading teaching and learning and using their professional judgement to support awarding. In particular, schools and colleges must be subject to a clear expectation that unnecessarily burdensome practices, including those highlighted as inappropriate in the reports of the Independent Teacher Workload Review Group on marking, planning and assessment, must be discontinued where they are in place. The DfE should also draw attention to the 2018 report of the Teacher Workload Advisory Group on the use of data, *Making Data Work*, and its important recommendations on minimising data-related workload burdens.

The Government must now take the opportunity to strengthen the requirements to ensure that schools now must demonstrate that they have given due regard to the recommendations set out in these reports by confirming that these recommendations must now be followed by schools as part of their arrangements for assessment and teaching and learning.

It should be made expressly clear to centres that teachers and school leaders should not be required to undertake awarding-related tasks that do not require the skills, talents and expertise of a qualified teacher and that they should not be required to undertake training or other activities outside their directed time.

## **Awarding and appeals**

The NASUWT recognises that it is important that candidates should have access to an effective appeals mechanism so that errors in awarding can be corrected.

The use of awarding body external assessments wherever possible will be important in this respect as they will provide the most effective means of ensuring that assessment is conducted according to clear and consistent criteria. Where such assessments cannot be used, it will be essential for awarding bodies to establish unambiguous guidelines on the use of wider evidence.

It is right that the responsibility for awarding grades will remain with awarding bodies. It should also be made clear that assessment evidence provided to awarding bodies is submitted by centres on a corporate basis and is not the responsibility of any individual teacher or school leader.

The NASUWT notes that the proposals in the consultation leave open a range of possible options for the management of appeals. The Union looks forward to further engagement with the DfE and Ofqual on this issue but is clear that the outset that arrangements should be established in such a way that they deter groundless or speculative appeals and do not encourage second-guessing of centres' assessments.

## **Further contingency planning**

The NASUWT notes that the proposals set out in the consultation document appear to be based on an assumption that students will return to their centres for face-to-face teaching in the relatively near future. In light of the disruption that exam cohorts have faced, the Union agrees that it will be important for candidates to benefit from as much teaching as possible during normal term time, not only to allow them to access their curricular entitlements to the fullest possible extent but also in order to ensure that there is a sufficient evidence base for effective assessment.

For this reason, the Government must now consider the merits of prioritising exam cohorts as part of any staggered relaxation of the current partial school closures. Teachers have little viable time available for face to face teaching with these students or to undertake and complete any assessments leading to awards this summer. Further disruption for these students will render unviable any move to effective and robust teacher-led assessment arrangements in place of examinations.

It will, therefore, be essential to ensure that plans for awarding take into account the potential for disruption to on-site provision to continue beyond the time period currently anticipated. In such circumstances, it may be the case that centres would not have sufficient evidence on which to assess candidates on the basis envisaged in the consultation document. It will, therefore, be important for the DfE and Ofqual to work with the NASUWT and other legitimate stakeholders to develop contingency options if this situation were to arise. Clearly, regard for the wellbeing of young

people and staff would prevent attempts to resolve this situation through extending taught time into holiday periods or lengthening the school day so it will be necessary to identify alternative approaches to addressing the implications of any further extension of current restrictions on the operation of schools and colleges.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Roach', written in a cursive style.

Dr Patrick Roach  
**General Secretary**