

Consultation on exceptional arrangements for exam grading and assessment in 2020

Your data and rights

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Do you wish any part of your response to remain confidential?
No

Consultation questions

To what extent do you agree or disagree that we should incorporate the requirement for exam boards to collect information from centres on centre assessment grades and their student rank order, in line with our published information document, into our exceptional regulatory requirements for this year?
Strongly agree
To what extent do you agree or disagree that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity?
Strongly agree
To what extent do you agree or disagree that Heads of Centre should not need to make a specific declaration in relation to Equalities Law?
Strongly disagree

To what extent do you agree or disagree that students in year 10 and below who had been entered to complete exams this summer should be issued results on the same basis as students in year 11 and above?

Strongly agree

To what extent do you agree or disagree that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by exam boards as potential malpractice?

Agree

Do you have any comments about our proposals for centre assessment grades?

As the Equality Impact Assessment makes clear, it is uncertain what the exact likelihood of underestimation (or indeed overestimation) of the likely achievement by deaf candidates in examinations would be. This is particularly true in view of the fact that deaf candidates would be in receipt of suitable reasonable adjustments such as a language modifier, a communication professional and extra time which allow the candidates to show what they know and can do. Judgements about suitable access arrangements are usually made by the SENCo with the advice of the specialist QToD and this should equally apply in the deliberations around grade allocation and ranking. It is crucial to include the professional specialist input which the pupils will be receiving throughout their school career at this very important time. It is incumbent on centres and support services to ensure that such specialist advice is taken into account in the decision-making. This will require liaison between specialist support services and the centres which is usually already well established through the support being offered. This will require both centres and services to take the initiative in making contact. BATOD is encouraging all relevant specialist services to make the necessary contact. BATOD feels that the declaration of accuracy and integrity made by the head of centre should indeed include a specific reference to Equality law which would imply consultation with appropriate specialist professionals in the case of deaf and other candidates.

According to the 2019 report from CRIDE (Consortium for Research in Deaf Education: <https://www.batod.org.uk/wp-content/uploads/2018/02/CRIDEE2019v2.pdf>) 6% of deaf pupils are in mainstream schools with resource bases and 3% in schools for the deaf where Teachers of the Deaf will be on site to contribute to the decision-making. 78% of school-aged deaf pupils in England are in mainstream schools without on-site specialist support and require the involvement of specialist support services. 12% are in special schools which are not for deaf children specifically but for children with a range of SEND some of whom will also require the input of specialist support services.

To what extent do you agree or disagree that we should incorporate into the regulatory framework a requirement for all exam boards to issue results in the same way this summer, in accordance with the approach we will finalise after this consultation, and not by any other means?

Agree

Do you have any comments about our proposal for the issuing of results?

Nothing to add

To what extent do you agree or disagree that we should only allow exam boards to issue results for private candidates for whom a Head of Centre considers that centre assessment grades and a place in a rank order can properly be submitted?

Agree

To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to students in the rest of the UK?

Strongly agree

To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to all students, wherever they are taking the qualifications?

Strongly agree

Do you have any comments about the impact of our proposals on any particular groups of students?

A sensible decision for the reasons you have put forward

To what extent do you agree or disagree with the aims outlined above?

Strongly agree

To what extent do you agree or disagree that using an approach to statistical standardisation which emphasises historical evidence of centre performance given the prior attainment of students is likely to be fairest for all students?

Neither agree nor disagree

To what extent do you agree or disagree that the trajectory of centres' results should NOT be included in the statistical standardisation process?

Neither agree nor disagree

To what extent do you agree or disagree that the individual rank orders provided by centres should NOT be modified to account for bias regarding different students according to their particular protected characteristics or their socio-economic backgrounds?

Neither agree nor disagree

To what extent do you agree or disagree that we should incorporate the standardisation approach into our regulatory framework?

Agree

Do you have any comments about our proposals for the statistical standardisation of centre assessment grades?

It is important to note that deafness is a low incidence disability so the candidates, who will be very few in each centre if there are any at all, will be quite different one from another from year to year. Whilst it makes sense in general to adopt this approach to statistical standardisation this would not necessarily be relevant or useful for deaf candidates and underlines why it is essential to ensure that the special needs of the deaf candidates are taken into account and the head of centre declares that this has occurred.

To what extent do you agree or disagree that we should not provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre's assessment grades are determined?

Agree

To what extent do you agree or disagree that we should not provide for a student to challenge their position in a centre's rank order?

Neither agree nor disagree

To what extent do you agree or disagree that we should not provide for an appeal in respect of the process or procedure used by a centre?

Strongly disagree

To what extent do you agree or disagree that we should provide for a centre to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated?

Agree

To what extent do you agree or disagree that for results issued this summer, exam boards should only consider appeals submitted by centres and not those submitted by individual students?

Agree

To what extent do you agree or disagree that we should not require an exam board to ensure consent has been obtained from all students who might be affected by the outcome of an appeal before that appeal is considered?

Agree

To what extent do you agree or disagree that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student?

Agree

To what extent do you agree or disagree that exam boards should be permitted to ask persons who were involved in the calculation of results to be involved in the evaluation of appeals in relation to those results?

Neither agree nor disagree

To what extent do you agree or disagree that exam boards should be able to run a simplified appeals process?

Agree

To what extent do you agree or disagree with our proposal to make the Exam Procedures Review Service (EPRS) available to centres for results issued this summer?

Agree

Do you have any comments about our proposals for appealing results?

If it is clear that a centre has not taken into account the specific specialist needs of deaf candidates in their decision-making then an appeal should be possible. This would be obviated by ensuring that the head of centre makes a specific declaration when submitting the grades and ranking stating that this had been taken into account.

To what extent do you agree or disagree that entries to the autumn series should be limited to those who were entered for the summer series, or those who the exam board believes have made a compelling case about their intention to have entered for the summer series (as well as to students who would normally be permitted to take GCSEs in English language and mathematics in November)?

Agree

To what extent do you agree or disagree that we should apply the same provisions as GCSE, AS and A level qualifications to all Extended Project Qualifications and to the Advanced Extension Award qualification?

Agree

Do you have any comments about the qualifications to which the exceptional regulatory measures will apply?

Nothing to add

To what extent do you agree or disagree that we should confirm that exam boards will not be permitted to offer opportunities for students to take exams in May and June 2020?

Strongly agree

To what extent do you agree or disagree with our proposals that exam boards will not be permitted to offer exams for the AEA qualification or to moderate Extended Project Qualifications this summer?

Strongly agree

Do you have any comments about our proposals for building our arrangements into our regulatory framework?

Nothing to add

Are there other potential equality impacts that we have not explored? What are they?

Assessment above is not spelled correctly. It is reasonable to assume that the specific needs and potential equality impacts for deaf candidates will be taken into account in the decision-making if there is input from specialist services. Therefore the declaration of accuracy and integrity made by heads of centre should specifically state that specialist input had been taken into account when deciding on grades and rankings.

We would welcome your views on how any potential negative impacts on particular groups of students could be mitigated:

The declaration of accuracy and integrity made by heads of centre should specifically state that specialist input had been taken into account when deciding on grades and rankings.

Are there additional activities associated with the delivery of the revised approach that we have not identified above? What are they?

Nothing to suggest

What additional costs do you expect you will incur through implementing this approach?

None

What costs will you save?

None

We would welcome your views on any suggestions for alternative approaches that could reduce burden:

Nothing to suggest

Your details

Which nation or country are you based in?

England

How did you find out about this consultation?

Ofqual's website

Is this the official response from your organisation or your own, personal response?

This is the official response from my organisation

Your details (official response)

Which of these options best describes your organisation?

Teacher representative group or union