



By email

Kirsty Williams
Minister for Education

16 October 2020

Dear Minister

Thank you for your letter of 30 September requesting that Qualifications Wales provide further advice on the best options that we now consider to be available for learners due to complete their qualifications next summer. This advice was agreed by the Qualifications Wales Board when it met on 8 October 2020 and has been tested with stakeholders in subsequent meetings. You particularly asked that our advice consider your overriding priority for any approach, which is to promote and enable learning and learner well-being, so that learners have the knowledge, skills and confidence to progress into further education, higher education or employment.

You also asked that any approach meets the following objectives:

- Delivers fair and equitable arrangements that provide consistency across Wales and parity of treatment, ensuring equality for all learners - particularly those most disadvantaged
- Presents the lowest risk to learners in terms of their future progression
- Is deliverable within the timescales available, both in terms of the actions that you and WJEC must undertake, as well as the wider responsibilities of the education sector required to deliver a viable approach
- Provides a credible approach that promotes confidence in the qualifications system in Wales.

In these extraordinary times learners, teachers and centres are facing significant challenges, which are likely to continue for the foreseeable future. It's important, however, to acknowledge from the start that there are limits to how changes to qualifications can help to address these challenges. A qualification gives a measure of the knowledge, skills and understanding that a learner has at the end of a programme of study; it cannot in itself address inequalities in teaching and learning. Changes to the way qualifications are assessed are not a panacea that will address the underlying issue of lost learning.

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Qualification results are used principally for selection purposes in continuing education and employment. To ensure a fair and level playing field for all, it is important that results are consistent within and across cohorts, and that assessments treat all learners equally, without advantaging or disadvantaging one group of learners over another.

Our advice focuses on the full range of qualifications and makes specific proposals for GCSEs, AS and A levels approved for Wales. We have considered the views of a wide range of stakeholders and acknowledge that there is no strong consensus on the best way forward – opinions are diverse and vary considerably.

We have based this advice on our two Principal Aims as defined in the Qualifications Wales Act (2015):

- to ensure that qualifications are effective for meeting the reasonable needs of learners in Wales, and
- to promote public confidence in qualifications and the qualifications system in Wales.

When we met with you in June, we agreed that the normal assessment arrangements for qualifications provide the fairest and most accurate measure of a learner's performance. However, the current public health crisis means that we cannot be confident that timetabled examinations will be able to take place as usual next year.

We are, therefore, proposing different assessment arrangements that provide greater flexibility, without the need for significant additional contingency measures. For the most part, our proposals move away from reliance upon timetabled exams and all of them include the 'banking' of some assessment evidence prior to the summer that could be used to generate results if schools were closed.

Our proposals make use of question types already included in specifications, so will be familiar to learners and teachers. Given that arrangements would stem from familiar assessments, our proposals provide as much certainty as possible to learners and teachers at the earliest opportunity. The provision of common assessments designed by WJEC would avoid increasing the assessment burden for teaching staff allowing them to maximise teaching and learning time.

Proposals for GCSEs, AS and A Level qualifications

We propose different combinations of four assessment types for GCSEs, AS and A levels:

1. **Unit exams** externally set and marked by WJEC and sat under usual timetabled exam conditions
2. **Unit assessments** similar in structure to a unit exam - externally set and marked by WJEC, but not timetabled. This would give centres more flexibility in when and where to deliver these assessments
3. **Sub-unit assessments** externally designed small tests developed by WJEC to be delivered during normal timetable periods. These could be externally or internally marked – this could be determined by us through consultation.
4. **Non-exam assessments (NEA)** as set out in the qualification specifications and already adapted by WJEC for the current circumstances.

We have used a three-unit qualification structure to exemplify our proposals - one NEA and two exams. Different qualifications have different unit structures, but the principles can be applied to a range of different qualification structures.

For GCSEs and AS levels we propose:

- the adapted **NEA** units proceed as intended
- one exam unit is replaced by a **unit assessment** that is not timetabled and can be delivered within a window at the end of the summer term
- one exam unit is replaced by **sub-unit assessments** that could be delivered earlier, for example in the spring term.

For A level we propose:

- the adapted **NEA** units proceed as intended
- one exam unit continues to be delivered as an **exam** (the exam timetable for Wales could be adapted to allow two comparable opportunities for the unit to be sat)
- one exam unit is replaced by **sub-unit assessments** that could be delivered earlier, for example in the spring term.

As results for AS level in summer 2020 were at a grade level only and there are no marks to include in the awarding process, the only way of awarding A level is to base it solely on A2 units. We know that this has been a cause for concern amongst learners and parents, but see no alternative solution that would ensure fairness for all learners.

The proposals move away from the normal position of exams delivered under secure conditions. While we accept that this presents some risk to public confidence, it is a reasonable compromise that a) allows greater flexibility to meet centres' different circumstances, b) preserves external assessment and c) improves on the fairness of the assessment for learners relative to centre-assessment grades.

In light of recent announcements in England, NI and Scotland that exams will go ahead for A levels and Highers, retaining a timetabled exam for A levels reduces the risk that these qualifications are perceived as less robust than their equivalents elsewhere. Keeping in place a timetabled exam element for A levels would satisfy our legal responsibility¹ to consider whether Welsh qualifications indicate a consistent level of attainment with that of comparable qualifications elsewhere.

In the annex to this advice we set out the significant risks associated with awarding qualifications in 2021 on the basis of moderated centre-assessment grades (CAGs). We do not believe that a sufficiently fair and equitable mechanism for moderating CAGs can be established in the timescale available. We are also concerned that any such arrangements would place a significant burden on centres and teachers, and significantly reduce time for teaching and learning.

Many concerns were raised by learners in our consultation² on arrangements for summer 2020 about equalities issues, and in particular the effects of conscious and unconscious bias. As our proposals for 2021 are based upon external assessments this goes some way to addressing these concerns. This is supported by the evidence that we have already published in our results overviews about differences in results by protected characteristics.

Our proposals address your objectives as follows:

- Externally set and marked assessments deliver fairer and more equitable arrangements for learners across Wales.
- We have proposed an examined unit for A level to promote comparability with arrangements for qualifications used for entry to higher education across the UK. For GCSE the next stage in education is usually local and, therefore, we do not need to consider immediate cross-border progression. While GCSE outcomes are sometimes used for selection purposes in Higher Education and by some employers, on balance we believe that the risk to progression for these learners is lower. Similarly, as most AS level learners progress to A level within the same institution, we do not see a risk to their immediate progression.
- We have tested our proposals with WJEC who has indicated that they are deliverable within the available timescale. While the assessments we have proposed represent significant adaptations to existing arrangements, they provide some familiarity and would require less extensive change management than other options.

¹ This is one of the eight matters listed in S2(f) of the Qualifications Wales Act that we must have regard to when considering what is appropriate for the purpose of achieving our Principal Aims.

² <https://www.qualificationswales.org/media/5902/consultation-arrangements-for-summer-2020.pdf>

- The middle ground we have proposed between exams on one hand and centre assessment grades on the other provides a credible approach that helps to promote confidence in the qualifications system in Wales. It provides clarity and certainty, with contingency built in from the start by minimising the dependency on timetabled exams and providing greater flexibility to schools and colleges.
- Our proposals provide greater flexibility to schools and allow teaching staff to administer assessments at times that are appropriate for their learners.

In summary, our proposals give greater control to centres without over-burdening them at a time that is already difficult, allowing them to focus on your priority to promote and enable learning and teaching.

Vocational qualifications

Vocational qualifications taken at key stage 4 in schools in Wales are Designated qualifications (not Approved Wales only qualifications). There is a variety of vocational qualifications taken post-16. Apart from the Approved suite of Health and Social Care and Childcare and Essential Skills Wales qualifications, these qualifications are also available to learners in other jurisdictions.

Most of the vocational qualifications we regulate are also regulated by Ofqual (England) and CCEA Regulation (Northern Ireland). These qualifications are awarded by the same awarding bodies and follow the same assessment arrangements across jurisdictions. We have worked closely with other regulators to ensure that a consistent approach is taken across the UK and we have all published an Extended Extraordinary Regulatory Framework (EERF) for Vocational Qualifications. The framework sets out the principles that awarding bodies must apply when making adaptations in response to the impact of Covid-19.

Adaptations for Wales only Approved qualifications have already been communicated to centres, while adaptations for others will be communicated to centres by 23 October 2020.

The structure of most vocational qualifications allows learners to bank units during their course, with less reliance on the end of course examination. Many qualifications which include a summer examination also include a January or March examination series, and many learners tend to take the examination earlier in the course than in the final summer opportunity. Awarding bodies are encouraging centres to bank units during this year to mitigate the potential for disruption later in the academic year.

We are further reviewing the range of adaptations being implemented by awarding bodies and will continue to do so as the public health situation develops. We are working with stakeholders to identify any qualifications where we consider there to be a risk that learners will be unable to complete sufficient assessments to award the qualification, we will consider what further mitigations are possible.

Our advice is to allow centres to continue with the adapted assessment arrangements for vocational qualifications that awarding bodies are implementing in response to our EERF. This means that timetabled examinations for vocational qualifications for the summer 2021 series will continue and maintain the consistent approach across Wales, England and Northern Ireland. We will keep this position under review and work closely with our fellow qualifications regulators in doing so.

Conclusion

We believe that our proposals for GCSEs, AS and A levels offer the best approach in the circumstances and we would welcome the opportunity to discuss them with you.

If our proposals are accepted, there are other significant issues that we will need to consider and would welcome discussion on. These include whether outcomes should be consistent with those seen in 2019 or 2020, or somewhere in between. This is something that should be considered on a UK basis so that there is comparability and fairness for all learners taking the GCSEs and A levels across jurisdictions.

We trust that you are content with our approach to vocational qualifications.

We recognise that there are there are no easy solutions. Whatever you decide, we will work with your officials and other key stakeholders in the interest of learners in Wales to develop and implement the detailed arrangements, consulting where appropriate.

Yours sincerely,



David B Jones OBE DL
Chair



Philip Blaker
Chief Executive

Annex A – Summary of considerations in the formulation of advice

Analysis of summer 2020 results

On 12 October we published further analysis of the results awarded to learners in Wales. This shows evidence of inconsistencies that suggests some possible unfairness in the way grades were awarded this summer:

- Atypical variation in results for A level, AS, and GCSE over time. There is also evidence that the impact of the increases in results is different at different points in the grade scale, with more marked changes in the middle of the cumulative grade thresholds.
- Inconsistent variation in results by subject for A level, AS, and GCSEs.
- Inconsistent variation in results across centres, centre types, local authorities, and regional consortia for A level, AS, and GCSEs.

We want any new approach to assessment in 2021 to address, as far as possible, these inconsistencies so that results are as fair as they can be in the circumstances.

We will publish further analysis of summer 2020 results at the end of October. This will look in more detail at the attainment gaps relative to protected characteristics. The initial, more limited, equalities impact assessment included in our results overviews, showed changes in attainment gaps at key grade points that were atypical.

Centre Assessment Grades with a robust model of moderation

In 2020, GCSE, AS and A level qualifications were awarded based primarily on Centre Assessment Grades (CAGs). Centres were asked to determine, based on the available evidence, the grade that a learner was most likely to have achieved in each of their qualifications if exams had gone ahead.

For 2021, some stakeholders have called for a similar approach to be taken but with the addition of arrangements to help moderate decisions across centres to ensure consistency. We have discussed this possibility with our 2021 stakeholder group, but these discussions did not identify what additional moderation arrangements could look like in practice. Therefore, to consider this option we have made assumptions.

1. Schools would present outcomes at grade-level – as there are no common assessments against which mark schemes could be reliably developed to allow marks to be submitted. This means that any adjustment made through moderation would be to change grades.

2. Grade description criteria would need to be developed – qualifications do not currently have sufficiently robust and transparent grade descriptions for use by teachers. This would require input from stakeholders and take considerable time to agree. Given the uneven disruption to learning across centres, it may be particularly difficult to gain agreement on fair and consistent descriptors.
3. Centres would need to be trained on the evidence requirements and the application of any marking/grading requirements – this is likely to impact on teaching time and present significant additional burden if arrangements are to be robust.
4. Local moderation could not provide the level of consistency required in national qualifications. There would need to be a national model of moderation to maintain consistency and fairness in high-stakes national qualifications.
5. Any moderation process would have to involve more than one stage, including the up-front agreement on a centre's approach and then checking that the national standard has been applied consistently. This would add burden to schools and colleges.
6. An effective moderation process would lead to some changes in the grades initially proposed by schools and colleges. This would need to be accepted by all stakeholders and not seen negatively as 'downgrading', as interventions were perceived in summer 2020.
7. Learners would need to be able to appeal directly against judgements made by schools and colleges. Appeals would need to be considered by the school or college rather than WJEC. The current appeals process that schools and colleges run for NEA (prior to submitting marks to WJEC) would need to be developed to accommodate the right of appeal for learners against school or college judgements. WJEC would only be able to consider appeals made by the school or college where decisions to alter proposed grades had been made through its moderation process. It is not realistic or reasonable to expect WJEC to adjudicate school and colleges' decisions.

Other countries that have made a shift to greater teacher assessment have done so over a long period of time, over many years and supported by substantial training. Whilst there are merits in developing approaches that could involve teachers more in the awarding process, we are concerned that it would be difficult to implement a sufficiently robust process in the short time available and in the context within which we are all currently working.

The key impacts associated with an approach based on CAGs include:

1. Constant performance pressure on learners that may have a negative impact on their wellbeing.

2. Significant increase in workload for centres to design, administer, mark, internally standardise assessments, agree and moderate grade outcomes, and administer an appeals process.
3. Significant additional pressure on teaching staff if they are making grading decisions that are high stakes for learners.
4. There could be an increased risk of legal challenge against schools and colleges in relation to their internal appeals process.
5. There could be an increased risk of legal challenge against schools and colleges in relation to equalities. Many stakeholders raised significant concerns about equalities issues in our consultation on arrangements for summer 2020. Whilst it is possible for training to be provided to teachers on conscious and unconscious bias, this would be an additional training requirement and there would still need to be reliance upon the Public Sector Equalities Duty held by schools and colleges.
6. Adverse public reaction to any changes made by the moderation process.

In summary, we cannot see that there is a sufficiently robust mechanism of moderation that can be put in place effectively for next summer. Should you decide to take this path, then we and WJEC will work to implement as robust a solution as possible in the circumstances, but cannot guarantee that it will address the inconsistencies and inherent unfairness experienced in summer 2020.

Options considered

We have considered several options that include different combinations of the following four different types of assessment:

1. **Unit exams** externally set and marked by WJEC and sat under usual timetabled exam conditions

Key benefits

- Objective externally set and externally marked assessment for qualifications.
- Consistent approach for learners.
- Maintains the integrity and credibility of qualifications.
- Exams are sat under secure conditions maintaining high levels of reliability.
- Consistent approach between approved and designated qualifications for learners in Wales (designated GCSEs and A levels being regulated by Ofqual according to policy set in England).
- Consistent approach to those announced in England, Northern Ireland and Scotland for Highers and Advanced Highers.
- Awarding would follow usual procedures.
- Assessment materials would be familiar to teachers and learners.

- No additional burden placed on centres to devise their own assessments.
- Some limited scope for further adaptations.

Key risks and issues

- Learners may not be able to take the exams due to local or national restrictions, or self-isolation.
- Fairness concerns due to variability in coverage of the content, due to differences in teaching time for individual learners,
- Significant delivery risks for awarding bodies associated with the potential timetable changes.
- Manageability issues for centres delivering a full exam series within a condensed period.
- Difficulty in running socially distanced exams for large cohorts.

2. **Unit assessments** similar in structure to a unit exam - externally set and marked by WJEC, but not timetabled. Topics could be shared with centres so they can focus their teaching to ensure learners are prepared

Key benefits

- Objective externally set and externally marked assessment for qualifications.
- Consistent approach for learners.
- Gives centres more flexibility in when and where to deliver these assessments
- Assessments are separated by more time than they would be in the exam timetable to allow more learning time between the assessments
- Externally set and marked assessments reduce teacher burden.
- Common assessments allow for comparable judgements of performance across schools.
- Style of assessment would be familiar as they would be based on the current format of exams.
- No additional burden placed on centres to devise their own assessments.
- Awarding would follow usual procedures.

Key risks and issues

- Non-timetabled assessments may be shared and therefore would not be delivered under secure conditions.
- Reputational risk if units are widely shared on social media before some have taken the assessment.
- Would require system and process modifications for WJEC to ensure safe delivery of the new qualifications structure. Fairness concerns due to variability in coverage of the content, due to differences in teaching time for individual learners.

3. **Sub-unit assessments** externally designed small tests developed by WJEC to be delivered during normal timetable periods. These could be externally or internally marked – this could be determined through consultation.

Key benefits

- Sub-unit level assessments allow flexibility for centres to deliver small scale assessments in a modular fashion within a window.
- Consistent approach for learners.
- Assessments are separated by more time than they would be in the exam timetable to allow more learning time between the assessments
- Common assessments allow for comparable judgements of performance across schools.
- Question type would be familiar as they would be similar to exam questions.
- No additional burden placed on centres to devise their own assessments.

Key risks and issues

- Sub-unit level assessments may be shared and therefore would not be delivered under secure conditions.
- Would require system and process modifications for WJEC to ensure safe delivery of the new qualifications structure.
- Fairness concerns due to variability in coverage of the content, due to differences in teaching time for individual learners,
- Processes for appeal at centre level could be burdensome if assessments marked internally.
- Additional burden placed on centres if assessments marked internally, including the standardisation and moderation of marking.

4. **Learner portfolio** internally designed and marked – would need moderation or verification

Key benefits

- The learner portfolio allows flexibility for centres to make use of their own assessments (including use of WJEC past papers)

Key risks and issues

- Excessive assessment of learners to produce a portfolio may have a negative impact on their wellbeing and reduce the time available for learning.
- Burden on schools and colleges in the design and production of portfolios, marking of work, local standardisation of marking and submission of samples for moderation.
- The production of broad marking descriptors that enable consistent judgements on a wide range of assessments is challenging.

- The training that would likely be required by teaching staff to help them devise portfolios would detract from teaching time and add additional burden on teachers. And may be challenging to deliver in the current context.
- A national moderation or verification system would need to be implemented for the learner portfolio and would take considerable time to design and establish.
- Any moderation or verification process would lead to changes in the marks initially proposed by schools and colleges. This may be perceived negatively as 'downgrading'.
- There is a risk of increasing inequalities (e.g. on families without digital access or access to other resources), where learners are creating portfolios - particularly if they can't access centre facilities and are working from home.
- Would require system and process modifications for WJEC to ensure safe delivery of the new qualifications structure.
- Processes for appeal of teacher marked portfolios at centre level could be burdensome and place the primary responsibility for appeals with the centre.

We considered the following combinations of assessment. These are based on a three-unit qualification structure*, where one unit is non-exam assessment (NEA), which would continue as already adapted within the specification, and two exam units, which would be adapted as follows:

*These options could be adapted to fit other qualification structures.

Option	NEA	Unit exam	Unit assessment	Sub-unit assessment	Learner portfolio	Moderated CAG
1	✓	✓ ✓				
2	✓	✓	✓			
3	✓	✓			✓	
4	✓		✓		✓	
5	✓	✓		✓		
6	✓		✓	✓		
7	✓			✓	✓	
8						✓

Overarching considerations

No solution is risk free and it is important that assessment arrangements are 'owned' by all in the system. In developing our advice, we have recognised the following:

- There is no perfect option that will satisfy everyone – communications will need to emphasise the importance of everyone working together to deliver a solution.
- All options involve some degree of compromise.
- All options are likely to impact on the 2022 exam series.
- The current approach in other jurisdictions is to continue with exams to varying degrees.
- The principal concern for stakeholders is the differential impact of disruption to teaching and learning, which changes to qualifications cannot fully address.
- It is important that WJEC are content with the agreed way forward as they will have to deliver and award the qualifications.