



Ein cyf/Our ref: MA.KW.4343.20

David Jones OBE, DL
Chair of Qualifications Wales
&
Philip Blaker,
Chief Executive Officer, Qualifications Wales
Q2 Building, Pencarn Lane,
Newport
NP10 8UH

14 December 2020

Dear Philip and David

I am writing further to my letter of direction of 17 November, where I indicated that I would provide further policy direction once I had received and considered the policy proposals developed by the Design and Delivery Advisory Group. This is provided as an annex to this letter.

I am grateful for the expert advice provided to the Design and Delivery Advisory Group as it has considered possible options for alternative assessment arrangements for general qualifications in 2021. I also welcome the detailed considerations made by the Qualifications Wales board to ensure the validity and equity of different options – your letters of the 24 November and 1 December were particularly helpful in this regard.

I recognise the exceptional and extremely challenging circumstances that the education system faces this year with the significant and variable disruption that learners have faced, the diversity of teaching and learning experiences and the uncertainty of the public health situation we will face in the coming months. I also fully acknowledged that these are challenges that the qualification system can only go so far in helping to address.

Against this context, I believe that the policy proposals recommended to me by the Design and Delivery Advisory Group represent the best balance between meeting the needs of learners with regards to their well-being and supporting their onward progression, manageability for the profession without adversely impacting on teaching and learning time available and sufficient transparency, consistency and rigour to provide confidence in learners' abilities and support their onward progression – particularly into higher education. As such, it is my intention to adopt these policy proposals as my policy direction for the approach that should be taken to general qualifications taken by learners in Wales in summer 2021. However, I recognise that the final decision regarding arrangements for the

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Gohebiaeth.Kirsty.Williams@llyw.cymru
Correspondence.Kirsty.Williams@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

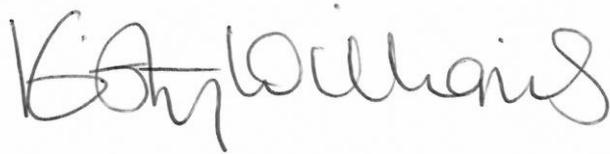
summer examination and any alternative assessment arrangements will be for Qualifications Wales to make and implement.

I have been clear that the best solution is one that is developed in conjunction with the education profession and I recognise there remain key delivery elements to be discussed and developed as arrangements are operationalised. It will also be crucial to be responsive to the needs and experiences of learners and practitioners as the academic year unfolds, as such it is my intention to retain the Design and Delivery Advisory Group. I would welcome your continued expert advice in supporting the group's considerations.

Finally I will reiterate my commitment to learners' wellbeing, fairness and progression for 2021 and my confidence that by working collaboratively as an education sector we can meet the challenges of the coming months and ensure our learners are best supported.

I remain extremely grateful for your continued support and advice and the hard work and dedication of your officials

Yours sincerely

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

Kirsty Williams AS/MS
Y Gweinidog Addysg
Minister for Education

DIRECTION UNDER SECTION 53 OF QUALIFICATIONS (WALES) ACT 2015

Under section 53 of the Qualifications Wales Act 2015, Qualifications Wales must have regard to such aspects of government policy as the Welsh Ministers may direct.

A Direction by the Minister for Education, one of the Welsh Ministers, was issued to Qualifications Wales on 17 November regarding the Welsh Government policy statement regarding the summer 2021 examinations and the development of alternative assessment arrangements for learners in Wales who were due to take Qualifications Wales approved GCSE, AS and A-level this summer to support their future progression.

That Direction detailed the Welsh Government policy that proposals for centre-based outcome, are co-constructed with the education sector via the Design and Delivery Advisory Group.

Those proposals have now been developed and agreed by the Design and Delivery Advisory Group and submitted to the Minister for Education for consideration. A copy is enclosed for your information.

The Minister for Education, one of the Welsh Ministers, directs Qualifications Wales to have regard to the following matters:

- The Welsh Government policy to adopt the proposals as set out in the consensus document developed by the Design and Delivery Advisory Group for GCSE, AS, and A-level learners in Wales taking Qualifications Wales approved qualifications in summer 2021. These policy proposals can be summarised as:
 - The principle of a three pillared approach to general qualifications which incorporates non exam assessment, internal assessment and external assessment, recognising this needs to be considered on a subject specific basis taking individual qualification structures into account;
 - Non exam assessment, as adapted by WJEC, should continue as planned;
 - Internal assessment should be internally managed and marked, but should utilise external assessment material provided by WJEC based upon adapted past papers to reduce administrative burden and ensure equity of assessment experience. Practitioners should be able to exercise professional judgement as to how and when these assessments are delivered within an assessment window, so that they can be embedded in teaching and learning plans and learners' preparation can be supported;
 - External assessment should be externally set and marked, although advance notification of topics should be provided to support learning. These will be classroom based assessments and flexibility should be provided as to how and when the assessments are taken within an assessment window to support learners;
 - These components should be mark based and should be used by the WJEC to determine the grades that learners are awarded;
 - This approach should include necessary arrangements to ensure equity and fairness for learners including reasonable adjustments, processes for appeals, access to private candidates and special consideration procedures. Given the variability that there has been in teaching and learning consideration should be given as to how the special consideration process may be adapted to support those learners who have been the most adversely affected.
 - Overall grade outcomes in summer 2021 should reflect a level of generosity that is similar to those awarded in summer 2020.

DESIGN AND DELIVERY GROUP

REFLECTIONS AND AREAS OF CONSENSUS November 2020

1. The Group have been clear throughout that their role is advisory, and focused on policy proposals. They have been supported by Qualifications Wales, and WJEC to understand and explore the implications for operational and regulatory issues. The note below reflects their understanding and discussions to date, but recognises that the actual decisions on the assessment of qualifications and the operationalisation of this will be taken by QW and WJEC respectively in due course.
2. Discussions have been wide ranging, including topics such as non-examination assessments (NEA), the January exam series, and the priorities for and design of a system approach to general qualifications in summer 2021. The themes emerging have included:
 - a. The importance of fairness for learners: in particular equity of treatment and experience of assessment
 - b. The need to maximise opportunities for teaching and learning: any solution needs to be embedded in the school/college's planning and linked to this the desire to retain familiarity for teachers/ lecturers and learners with the assessment materials used
 - c. Minimising the burden on teachers/lecturers to enable them to maximise teaching
 - d. Learner wellbeing and the impact of preparation for exams as well as enabling them to have a break from learning before progressing to their next steps
 - e. The integrity of the qualifications system to support learners in Wales
 - f. The continued variation of views and perspectives of different schools/colleges and learners;
 - g. Recognition of the significant and ongoing disruption experienced by some schools/colleges reemphasising the need to keep arrangements as flexible as possible
 - h. The critical role of discretion and flexibility in teacher judgement: that teachers/lecturers are best placed to support their learners through this year

The Group has reached consensus on a number of areas:

3. General Qualifications in summer 2021 should be predicated on a three pillared approach to provide the evidence for qualifications (recognising the difference in qualification structures and adaptations already made means individual qualifications will need to be considered on a case by case basis):
 - a. NEA (where already part of existing adapted qualifications, to ensure consistency of expectation and equity for those who have already

completed/are yet to complete these), this should follow the NEA timescales applicable in normal years

- b. Internally managed assessment (see para 6)
 - c. Externally set and marked assessment (see para 7)
4. A one size fits all (schools/colleges as well as qualifications) will not work, and the Group would welcome an approach which provided for some teacher/lecturer judgement, discretion and flexibility in order to support learners. The Group would lean towards a model, which supports learner performance in the current unique circumstances.
 5. Not all courses have an NEA element. However, as a general principle (and recognising different qualifications structures), the Group's preference was that the combination of internally managed assessment and NEA (where relevant) should contribute a greater proportion to the individual's ultimate grade than the externally set and marked assessment (recognising that this might not be possible/ desirable for all qualifications without disadvantaging learners– this was discussed at a DDAG sub-group as part of WJEC exemplification work with GCSE Maths and GCSE separate sciences particular examples considered).
 6. The **internal assessment** discussion set out a number of issues:
 - a. All schools/ colleges already undertake internal assessment that is teacher managed as a matter of course as part of their teaching and learning, though this may be different between schools/colleges in approach, content and timing. **Schools/colleges should seek to embed the internal assessment element within their teaching and learning plans in order to reduce additional burdens on the profession.** Clarity on this would provide the opportunity to reduce or stop current in-class assessment and replace it with these options, seeking to minimise the amount of *additional* assessment being undertaken in the year;
 - b. In principle the internal assessment element (including NEA) should make the biggest contribution to a learner's grade outcome. To provide equity of experience for learners, the Group have cohered around the **assessment activities being provided nationally around clearly defined parts of the syllabus.** Standardised materials would provide a consistent experience for learners and guard against differential amount and stretch of assessment within and across different schools/ colleges. Options for securing this include using past papers to ensure all learners are offered opportunities to be assessed using tested, impact-assessed materials, or the development of templates for practitioners to support them in developing their own assessments. It was acknowledged that in the latter option, even with clear guidance and parameters informing their development, a quality assurance process would be needed and, ultimately, there would be a greater burden on teachers and the risk of inequity in learner experience. This could then open up a new route for appeals, and/or require a level of moderation, which could take teachers away from teaching and learning. WJEC assessments are

already impact assessed for equalities and accessibility for learners, teachers/lecturers and learners are familiar with them. Using WJEC materials would ensure that the education system is drawing on the resources that are already available rather than trying to create a new system in the limited time available;

- c. **Teacher/lecturer judgement should be used to make decisions on when, how and where to use this assessment** (options include having a choice of past papers; using them at times which fit in with the teaching plan during the agreed window; splitting them up to fit with planned teaching schedule; supporting wellbeing through more flexible assessment conditions in class). This flexibility and discretion better reflects the different approaches to teaching and learning, as well as subject content throughout the academic year in different settings. WJEC will provide early notice as to the choice of assessments so that they can be coordinated with teaching plans;
 - d. **The time window for these assessments should be from spring 2021** to enable teachers/lecturers to decide when it is best to use these for their learners, given teaching time available, any disruption, and judging when their learners would be best placed to do this. Longer windows for undertaking internal assessments (and to a degree the external assessments) would allow for the management of individual or group instances of self-isolation or disruption to learning. This window would ensure this process does not overlap with the externally set element. There should be a sufficient length of time between internal assessments ending and external assessment starting in order to provide a break and to better support the delivery of teaching and learning. The group discussed the exemplification timeline provided by WJEC and agreed an assessment window from 22 February to 23 April would be appropriate, although this will be for WJEC to confirm.
 - e. The teacher/lecturer and school/college would manage the marking and relevant in-centre moderation, and WJEC would provide a mark scheme to support this. WJEC would undertake a process of checking marking and would refer back to school/college if there is a notable level of inconsistency.
 - f. The proposal around the use of standardised materials and marking which have already been tested for equalities and accessibility considerations was an important consideration for the Group. The Group felt that teachers and lecturers would be familiar with past papers, and this may make the assessment process easier to handle for them.
7. The **external assessment** discussion set out a number of expectations:
- a. The assessments would be externally set and marked by WJEC. Teachers/lecturers would exercise their professional judgement as to when and how the assessments would be taken (eg the timing and more flexibility around the conditions under which they are taken; the possibility of splitting the assessments into different parts to enable them to be taken within a lesson if preferred).

- b. The general principle was that, with the exception of core subjects which are crucial to progression and a small number of exceptions where reducing duration would increase difficulty of assessment, the external assessment for GCSEs should be no more than 1 ½ hours, recognising the number of GCSEs taken by a learner and the preference to prevent a sense of being assessed all the time. GCSE core subjects being greater than this was felt manageable as greater teaching and learning time is allocated in school/college timetables to these subjects. For AS / A level there will be no timing constraints as there are fewer subjects. The external assessment window could be open for longer to provide flexibility around experiences of disruption, noting the need to ensure marking and quality assurance can be completed in line with the timeline for results days. The group agreed that the window of 17 May to 29 June as set out in the exemplification timeline presented by WJEC for discussion would be appropriate, this will be for WJEC to confirm.
- c. Further, the window could be split into 3 sub-windows whereby subjects will be grouped and schools/colleges will have advance notice of in which window specific subject assessments will take place. This will retain flexibility in the model while providing a supported, structured scaffolding to assist the planning of teaching and learning, and help ensure that learners are not over assessed. Finally, this approach will also give dedicated space in the school/college timetable for core and non-core subjects so they do not have to compete for space with one another
- d. Potential employment issues in FE institutions were acknowledged as possibly preventing assessment windows running beyond the point at which the traditional summer exam series would normally run.
- e. As with the internal assessments, WJEC would provide guidance in good time on high level themes for these assessments to enable schools and colleges to prepare their teaching plans and timing appropriately.
- f. Examinations are sat in exam halls with invigilators, under strict exam conditions, with everyone sitting the same unseen paper on a nationally set date and time. External assessments would be different from exams in providing flexibility in how the assessment is delivered, the flexibility of timing in relation to teacher/lecturer and learner preferences, and the level of control under which they are being experienced. Schools and colleges will also have some guidance in advance on some of the key areas to be assessed, in order to enable them to plan teaching and learning. As such, they engage teacher judgement but not to the same extent as the internal assessments. In particular, teacher judgement would be exercised, within certain parameters to ensure consistency and fairness, in relation to the level of control of the conditions under which both externally-set and internal assessments would be taken: the Group were mindful of the need to ensure security of assessments, to provide a consistent experience of assessments for learners across Wales, and the importance of balancing that with wellbeing – in light of this a sub-group will explore development of advice to secure a shared understanding of and consistency in the appropriate level of control .

The Group made a number of **assumptions** in coming to this view:

8. The existing adaptations published by WJEC will continue and as such any assessment should not go wider than these [although a matter for WJEC, this was an assumption which underpinned the discussion].
9. The assessment model will be mark based to allow WJEC to award grade outcomes. Schools and colleges would provide marks to WJEC who would deliver a set of grades on results days as a 'normal' year. The grade outcomes would be expected to provide more support for learners in 2021 compared to 'normal' times (pre-Covid) and would overall reflect 2020 outcomes, to recognise the loss of teaching and learning time and the overall disruption [although a matter for Qualifications Wales, this was an additional element of support for learners that was noted in this context]
10. Syllabi could, where relevant, be split up across teacher and external assessments but this would require some further work to ensure they remained fit for purpose and that the balance of assessment did not disadvantage learners. In any case, the internal assessment where relevant would cover distinct areas from the external assessment – it was important to the Group that learners would not be over-assessed. The WJEC would provide details of the units subject to internal assessment and those subject to external assessment, so teachers/ lecturers are clear about the topics covered by each type of assessment.
11. Currently expected results days should stand (in alignment with England and Northern Ireland). This was to ensure that learners in Wales would not be disadvantaged relative to their peers in other nations.
12. Appeals would need to be directed to where the decision on marking/awarding had taken place. The Group preferred a model which minimised the role of centres in managing appeals. The model being developed by the Group would mean that there would need to be an appeal route to centres based on the mark provided for those elements assessed by teachers/ lecturers. The appeal route for the external assessment would be to WJEC. The Group noted the need to develop understanding about the process needed if WJEC identified notable inconsistency in marking of internal assessments, and the implications of that for appeals, deliverability of consistency across centres, and fairness to learners. This would be a priority issue for the DDAG to understand in early 2021.
13. The Group noted the clear comments in summer 2020 that the AS centre assessed grades would not contribute to 2021 A level results, and noted both the technical and equalities reasons for this. There was broad consensus with this position, particularly that it was clear and there was no fair alternative. The [sub] Group were of the view that, as 2021 was offering an evidence-based, consistent and robust approach, then AS levels awarded in 2021 *should* be expected to contribute to A levels in 2022.
14. There would remain some inconsistency with the approach for those taking vocational qualifications and for those learners also taking qualifications provided by English exam boards, some of whom may be doing exams. This is outside the scope of the Group's discussion but a point to note.
15. The Group reflected that this scheduled assessment approach would provide a fairer approach for private candidates than last year's approach, though there

would need to be some work to ensure that private candidates knew how and when they could participate in internal and externally set assessments and access information about these assessments in line with the support being provided to other learners, and any operational issues in relation to Covid risk in particular. This would need further thought with schools and there may be a role for local authorities.

16. WJEC could consider a process that draws on elements of the current special considerations process, to reflect the challenging circumstances we are experiencing this year. There would also be some work done at Welsh Government level to set out which schools and year groups had been most affected by periods of self-isolation.
17. The Group valued the opportunity of support from WJEC to help teachers and lecturers in the marking process. They recognised the potential benefits of further professional learning in assessment (including towards qualifications) and thought this would be helpful, but might this year represent too significant a burden given the priority the Group attach to providing time for teaching and learning.
- 18.

Next steps

19. The Group recognised the need for all parties (Welsh Government, WJEC, and Qualifications Wales) to ensure early communications on all aspects of the approach and throughout its implementation in order to support teachers/lecturers and learners with their planning.
20. The Group recognised a set of issues for next steps discussion in January, including:
 - a. Understanding the process of checking (process tbc) internal assessment marks between schools and colleges and WJEC and the relationship with fairness, deliverability, consistency, appeals;
 - b. Arrangements to support private candidates, ensuring all have equal opportunity to gain their qualifications in 2021
 - c. An additional process, similar to the special considerations process, for 2021 to consider exceptional Covid-19 circumstances;
 - d. How to support schools and colleges in understanding the 2021 process (such as WJEC webinars), and ensure understanding of key issues in schools and colleges, including the experiences of learners (for wider reflection within group);
 - e. Guidance on administration of assessments for teachers and lecturers to ensure learners are supported;