BCS
The Chartered Institute for IT

3 Newbridge Square,
Swindon,
SN1 1BY

T +44 (0) 1793 417 417
F +44 (0) 1793 417 444
E bcshq@bcs.uk
bcs.org

By attachment to email

Sarah Old
Senior Manager - Standards, Ofqual
Earlsdon Park
53-55 Butts Road
Coventry
CV1 3BH

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Dear Sarah

BCS School Curriculum and Assessment Committee Response to Ofqual/DfE consultation on how GCSE, AS and A level grades should be awarded in summer 2021

Once again, many thanks for the opportunity to respond to Ofqual's consultation on the summer 2020 GCSEs and A-levels. The BCS School Curriculum and Assessment Committee has responded to the online consultation. Through this letter we wish to draw Ofqual's attention to responses we made through our online submission and to share the committee's views on wider points not explicitly addressed in the consultation questionnaire. We approach this from the consideration of the specific issues as they affect Computer Science but believe some of the points we make have more general application.

Given the general level of uncertainty we believe that overarching principles should inform Ofqual's approach:

Trust the teachers. Everything Ofqual does should express trust in the professional judgement of teachers, and should seek to inform and support that judgement, not to constrain or limit it. Following the events of last summer and the unsatisfactory beginning to this term, teachers', and public confidence that the education system has a 'grip' on things is low. Any realistic approach will depend on the good will and efforts of our teachers; we will fail again if we do not explicitly trust them. Our collective top priority over the next few months is to build confidence that the proposed approach will materialise and deliver fair results under circumstances that are exceptionally unfair.

Of course, the judgement of teachers may not be perfect; but this year we are forced to rely on it, and we should do so wholeheartedly, in a way that supports them, and not in a way that undermines them or questions their judgement.

Flexibility. The next few months will be unpredictable, and schools and young people's experiences will continue to be different over the next few months. Building in flexibility at the outset heads off the 'but what if …..' questions that teachers and parents will inevitably ask because of their concerns over unanticipated events affecting individual schools, teachers or candidates. Schools will need the freedom to consider as many ways as

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possible to assess student achievement and choose the ones that work for them. Any reduction in flexibility for teachers and candidates increases the likelihood of the process being derailed.

Transparency. Every aspect of the process must be visible at every stage to reassure teachers that things are on track and there have been no last-minute changes. This means, for example, that papers should be sent to schools well in advance (minimum of two weeks). There is a risk that some may leak, but teachers know their students, and will have other evidence to draw on. Transparency is equally important for young people and their parents; we saw last summer how they will react if there is another perception of unfairness.

Fairness. Teachers', parents', and candidates' perception of fairness will also depend on the overall profile of the grades achieved nationally, and how these are distributed between individuals and centres. We welcome that Ofqual is not proposing to use historical data to 'ration' grades at an individual centre level.

For Computer Science GCSE in particular, it is imperative that the profile of the GCSE grades awarded aligns with the 2020 profile rather than that of earlier years. We have presented evidence to Ofqual on the extent to which GCSE Computer Science Grades are out of step with other subjects and believe the grades awarded in 2020 better reflect candidates' achievement in the subject.

While the impact on young people's mental health lies outside the scope of the committee, we believe prioritising flexibility, transparency and fairness will go some way to alleviate the devastating impact of the pandemic on this year's examinations cohorts. We assume that Ofqual will take specialist advice on the psychological impact of the proposals and any further fall out from any further changes.

Considering these four principles, the committee recommends that:

1. While the approach to assessment should encourage candidates' continued engagement, it should not disadvantage students where this has not been achievable. We must recognise that the fragmented experiences of many young people will mean that teachers may need to make a balanced judgement based on evidence from across the whole two years of the course.

2. Unless we are prepared to disadvantage young people because of their postcode or their school's ability to manage remote teaching, the evidence that teachers use to make judgements should be recommended but not mandated. While this may lead to some variation in awarding, we believe this will be minimal and can be managed.

3. A breadth of evidence should be allowed, as teachers will need to draw flexibly across the widest range of evidence to which they have access. Since there is no way of determining an arithmetical weighting, teachers should be free to draw on evidence as best suits a candidate's circumstances.

4. Assessment judgements should take place as late as possible, subject to the need to provide results to third parties such as employers or other education institutions.

5. Optional papers produced by the awarding bodies will provide helpful support for standardisation. However, they should be used only to help teachers make decisions (i.e. as part of the teacher's judgement process). How they are used should not be mandated, as they might provide limited useful evidence given the unusual circumstances under which they may have been taken, and they must not 'trump' teacher judgement, otherwise we will see a huge number of appeals.

6. As students may not be sitting a full paper, results will need interpretation by the teacher, so the results from these papers should not be submitted to the exam board. The teachers who choose to use the papers will use it to inform their own professional judgement, but this professional judgement needs to be trusted.

7. Where disadvantaged young people are forced to take the assessment at home, connectivity issues may severely impact on any online assessments, and logistical challenges prevent papers being posted and returned by post. Putting all aspects of the assessment process under the teacher's control mitigates the risk of disadvantaging such candidates.

8. Teachers will need sufficient information to make decisions about the use of any optional papers. A simple description will not be enough as the Computer Science specifications have not been designed with sufficient 'granularity'. If sample material cannot be provided for each paper, teachers will need advanced sight of the papers.

9. The awarding bodies should produce guidance on a subject-by-subject basis on the types of evidence to use. We also recommend that the awarding bodies are equally clear about the evidence that should not be used (e.g. attendance data which might be discriminatory). We also recommend that the school should develop appropriate approaches for each subject, including considering ranking candidates. These should be signed off by the school's SLT.

10. Awarding organisations should set out possible resources that teachers could use to gather evidence. For example, for Computer Science, there are banks of high quality, online quizzes available, explicitly linked to curriculum content, which have been developed jointly by Computing At School, The Centre for Evaluation and Monitoring (CEM), Cambridge Assessment and the Diagnostic Questions team.

11. Practical work is an excellent source of evidence in Computer Science. While there is a risk of plagiarism, the impact of any malpractice can be mitigated by a requirement for a breadth of evidence. Ofqual should actively encourage computing teachers to use practical work as a source of evidence, but, in line with the rest of our response, we do not want Ofqual to mandate a practical work component.

12. Computer Science departments are small and will not be able to carry out the level of internal moderation available in mathematics or English. Consideration should be given to cross moderation between schools.

13. Schools should perform the appeals process; however, this will lead to a significantly increased workload for schools and a risk of legal challenge from affluent parents, leading to inequality. Where parents or candidates do not accept the result of an appeal, this should be escalated to the AO if parents/candidates do not accept the result of an appeal.

Finally, teacher assessments will impose significant extra costs on schools and teachers, at a time at which they are already highly stressed. Gathering evidence, reviewing and evaluating it, and developing defensible judgements about a student's outcome, are time consuming and sometimes emotionally demanding activities. Ofqual should explicitly recognise and acknowledge these burdens, and explicitly articulate an attitude of trust in the professional judgement of the teachers. In addition, consideration should be given to closing secondary schools or year groups for a week to give teachers time to finalise assessment judgements.

The committee would be delighted to expand on any of the recommendations it makes, though we recognise the huge pressures on Ofqual at the moment.

Yours sincerely
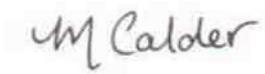
Professor Dame Muffy Calder DBE OBE FREng FRSE
Chair, BCS School Curriculum & Assessment Committee
Vice-Principal and Head of College of Science and Engineering, University of Glasgow