FAO Richard Garrett Director of Policy and Strategic Relationships, Ofqual

Baker Dearing response to Ofqual consultation on proposed changes to the assessment of GCSEs, AS and A Levels in 2021.

Richard
The submission below complements the Baker Dearing online response to the above open consultation. Its intention is to provide the coherent narrative and contextual detail which is difficult to convey within the online format.

Key points

1. Baker Dearing is **supportive** of the proposal to delay the start of both GCSE and A level examinations to the beginning of June 2020.

2. We consider that the aggregated adjustments to subject examinations **do not** release time sufficient to address the general learning 'deficit' as a consequence of school closures.

   Appendix 1 illustrates the aggregated impact of the proposed subject changes on teaching time and the learner's study time for a typical timetable. The aggregated time released to the pupil in the example is approximately **1.5 weeks**. UTCs have in general been highly effective in providing home learning throughout the school closure period. Most have provided live lessons and secured high levels of engagement. One Ofsted Outstanding UTC reports 85-90% engagement of Year 10 pupils across an extended 35 hour week. However, despite this level of support, the great majority of their pupils are assessed as one full grade behind their expected position for this time in the course. The Principal estimates that this corresponds to at least two months of study. In addition some pupils are even further behind, including disproportionate number of disadvantaged pupils.

3. Baker Dearing considers the proposed adjustments are **not appropriate** as they consistently remove assessment of practical elements and skills. As well as devaluing these elements, such policy risks disadvantaging those pupils who respond to active and experiential learning styles. In technical qualifications these skills are critical to progression to Level 3 courses or apprenticeships. **Appendix 2** presents evidence of the value placed by Awarding Bodies on these practical elements.

4. Baker Dearing considers Ofqual should pursue an **alternative approach** which:
   - identifies demands on pupils which are manageable in the reduced timeframe and recognises their range of learning need
   - protects the development and application of practical skills
   - enables schools to build resilience and flexibility for further national/local lockdown.

To this end we recommend that for all GCSE subjects other than maths and English Language, the **optional questions approach** should be taken. These examination papers should be structured to reduce the knowledge requirement by a potential 15-20%, whilst maintaining their depth and level of challenge. To facilitate this approach, the syllabus

content should be allocated to question or section and published to schools as soon as possible. For example: *Section A 40% mandatory core, Section B answer 3 from 4 sub-sections.* A sub-section may be a single question or set of questions from the prescribed syllabus area. This example has the potential to reduce content coverage by a notional 16-17%. Such crudely translates to 10-12 weeks of study.

The evidence presented against the use of papers with optional questions in the consultation (Consultation Annex D - Research Evidence on optional exam questions) appears unconvincing in the context of the significant challenge we are seeking to address. Much of the research is evaluating the potential for an optional question structure to assist the less able learner. This is not the intention in the current context. However:

i) the precedent of optional questions as a valid and reliable assessment model is confirmed by its adoption for **GCSE history**
ii) the evidence presented in Annex D, asserts that 'students who were weaker in the subject were also less likely to choose the easier question'. In response we would note that the awarding body is in a position to ensure comparable level of difficulty across optional questions. Furthermore, the recognition that more able students in the subject were better equipped to identify the 'easier' questions is therefore unlikely to challenge the validity of the rank order generated by the assessment. Any resulting distortion in terms of spread of outcomes can then be addressed fairly through appropriate adjustment to grade boundaries.

5. In recognising the potential for further covid-19 related disruption in schools, whether at local or national level, a decision **to not publish school performance tables following the summer 2021 examinations** should be taken in advance of the September 2020 start to the school year. Such will provide schools with the confidence to plan effective programmes of study which meet the educational needs of all pupils whilst protecting their mental health and well-being. Those educational needs include preparation for both examinations and progression.

6. Equality Impact Assessment
The policy of protecting content over skills risks disadvantaging those pupils who respond to active/experiential learning styles. Research identifies that boys are disproportionately represented in that group. Hence, we would recommend an equality impact assessment of the proposals in regard to gender.
In mitigating such risk Baker Dearing advocates replacing the proposals removing assessment of practical elements (such as in GCSE science, geography, engineering, computer science) with the optional question solution presented in bullet 4 above.

K Cornforth
Director of Education
Baker Dearing Educational Trust

Appendix 1
Analysis of impact of the aggregated proposals on a pupil in Year 11 2020-21
Example pupil's entry: Nine GCSEs with full EBacc coverage

Qualification All GCSE	**Adjustment**	**Saved teacher time**	**Saved Y11 pupil time**	**Potential learning impact**
Maths	Nil	Nil	Nil	
English Language	Speaking doesn't require recorded presentation.	10 hours across all groups	2 hours	Devalued and under-developed speaking and presentational skills. Audience one teacher.
English Literature	Nil	Nil	Nil	
Science	8 practicals watched	6 hours	6 hours	Assume 2 practicals early Yr10. Devalued and under-developed practical and research skills.*
Science	8 practicals watched	6 hours	6 hours	As above
Computer Sci (2019 <13% of pupils at end KS4)	Programming project outside timetable	20 hours	0 hours net unless not completed	Additional 20h pupil homework time. Otherwise under-developed programming skills**
Geography	2 x Field Study removed	2 hours from Y11 t-t	10 hours across t-t	Devalued and under developed practical skills***
Design Technology (2019<15% of pupils at end KS4)	Don't have to make prototype or use machinery.	Estimate 15 hours	Estimate 15 hours	Devalued and under developed practical skills****
Spanish	100% reading, listening and writing only. Speaking an endorsement.	Nil	Nil	Devalued and under-developed speaking skills. Pupil can secure A* Grade without speaking the language.
			Total saving 1.5 week.	**Practical and application skills devalued and under-developed for progression. Risk of disadvantage to pupils who respond to active learning styles.**

Note: the vast majority of pupils in KS4 in UTCs study approved Technical Awards alongside core GCSEs. The adjustments to these courses, with a high technical and practical skills element is yet to be determined and outside the scope of this particular consultation.
* see Appendix 2

Appendix 2
Evidence of the value placed by Awarding Bodies on practical elements.

1. AQA GCSE Chemistry *

There's **no better way** to learn about science than through purposeful practical activities as part of day-to-day teaching and learning.

Practical work is **at the heart of** chemistry, so we have placed it at the heart of this specification. There are three interconnected, but separate reasons for doing practical work in schools. They are:
1. To support and consolidate scientific concepts (knowledge and understanding).
This is done by applying and developing what is known and understood of abstract ideas and models. Through practical work we are able to make sense of new information and observations, and provide insights into the development of scientific thinking.
2. To develop investigative skills. These transferable skills include:
• devising and investigating testable questions
• identifying and controlling variables
• analysing, interpreting and evaluating data.
3. To build and master practical skills such as:
• using specialist equipment to take measurements
• handling and manipulating equipment with confidence and fluency
• recognising hazards and planning how to minimise risk.
By focusing on the reasons for carrying out a particular practical, teachers will help their students understand the subject better, to develop the skills of a scientist and to master the manipulative skills required for further study or jobs in STEM subjects.

2. EdExcel GCSE Computer Science **
The purpose of the (programming) project is to enable students **to develop skills in**:

- analysing the requirements of a problem
- designing and then implementing a programme solution
- testing, refining and evaluating their solution

3. AQA GCSE Geography ***
Fieldwork is an **essential** aspect of geography. It ensures that students are given the opportunity to consolidate and extend their geographical understanding by relating learning to real experiences of the world.
Our resources include _ _ _ a fieldwork toolkit to support your delivery of this **key** element of the specification.

4. OCR GCSE Design Technology ****
OCR's GCSE (9–1) in Design and Technology enables learners to progress from their learning in Key Stage 3, developing critical thinking and **practical skills** that will serve them well in their futures, with A Levels, Further Education, Higher Education or in the workplace.

End of submission.