

Cookies on GOV.UK

We use some essential cookies to make this website work.

We'd like to set additional cookies to understand how you use GOV.UK, remember your settings and improve government services.

We also use cookies set by other sites to help us deliver content from their services.

[Accept additional cookies](#)

[Reject additional cookies](#)

[View cookies](#)

GOV.UK

▼ Menu

[Home](#) > [Education, training and skills](#) > [School curriculum](#) > [Exam regulation and administration](#)
> [Ensuring the resilience of the qualifications system in 2023: GCSE, AS, A level, Project and AEA](#)

[Department](#)
[for Education](#)

[Ofqual](#)

Consultation outcome

Analysis of responses: Ensuring the resilience of the qualifications system in 2023

Updated 30 November 2022

[Contents](#)

Background

[Background](#)

[Approach to analysis](#)

[Who responded?](#)

[Overarching themes](#)

[Detailed analysis](#)

[Annex A: analytical tables of the responses to the quantitative questions aggregated over all respondent types](#)

[Annex B: List of organisational respondents](#)

 [Print this page](#)

The Department for Education (DfE) and Ofqual welcomed the return of exams and other formal assessments in summer 2022, for the first time since 2019. Exams and other formal assessments are the best and fairest way of assessing what students know and can do. That's why it was so important that students were able to take exams in 2022 and can continue to take them in 2023 and in the future.

The national cancellation of exams – and the need for alternative assessment arrangements – is now very unlikely. The government does not expect to ever be in the situation again where exams do not go ahead, but good public policy means having contingency, even for extremely unlikely scenarios.

A consultation, prepared jointly by the DfE and Ofqual, invited views on guidance to schools and colleges about gathering assessment evidence to support resilience in the exams system in the unlikely event it is necessary to use that evidence to inform Teacher Assessed Grades (TAGs). The proposed guidance was designed to allow schools and colleges to decide how to gather evidence of student performance in assessments in ways that align with their normal arrangements for preparing students for exams. The consultation asked for the views of relevant people and institutions, such as students, teachers, exam boards, schools and colleges and their representatives on the proposed guidance. In particular, it sought their views on whether it supported the gathering of evidence to build resilience in the system whilst minimising any additional burden on teachers and students.

Responses to the consultation have informed the arrangements for gathering assessment evidence to support resilience in the exams system in 2023 that we have now put in place. The decisions taken on the final form of the guidance are set out in a decisions document, and the final guidance itself can be found here . The consultation was available online for 21 days and received 213 responses.

Approach to analysis

The consultation was available to be completed through an online form from 29 September 2022 until 20 October 2022. The consultation included 13 questions on proposed arrangements to build resilience in the exam system in 2023. The questions were:

- quantitative, having a format of either a 5-point scale (Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree) or 2-option questions (Yes or No)
- qualitative, open-ended questions where respondents could provide comments on the proposals

Respondents were invited to self-identify the group to which they belonged. For the main analysis of the responses to the quantitative questions, we grouped the original unverified respondent types into 6 categories:

- education or training providers (including academy chains, private training providers as well as schools and colleges)
- exam boards or awarding organisations
- parents or carers
- school and college staff (including exams officers or managers, senior leadership team members and teachers)
- students (including private candidates)
- other (including awarding organisation employees responding in a personal capacity, employers, consultants, local authorities, other representative or interest groups, governors, examiners, universities, higher education institutions, or other respondents)

The 4 organisations recognised by Ofqual to offer GCSE, AS and A level qualifications are referred to as exam boards: AQA, WJEC, Pearson Edexcel and OCR. However, there are many more awarding bodies offering other qualifications.

Throughout the analyses presented in this report, the answers to quantitative questions are summarised in bar charts, presenting frequencies of responses broken down by respondent groups as listed above. Annex A includes tables of the responses to the quantitative questions aggregated over all respondent types.

All responses to the qualitative questions have been read in full. For qualitative questions, we have presented the key themes that emerged from respondents' answers. A selection of comments from respondents have been included which represent the range of views expressed. Some of the comments have been edited to correct spelling or grammatical errors and to keep respondents' identities anonymous. In editing, though, care has been taken to ensure any such changes do not alter the meaning of the comments.

Respondents could submit their final response without having replied to all questions. Many respondents skipped the qualitative questions or replied with "N/A" or "nil". These answers are included in the total number of responses presented in the document.

The report is organised into the following sections:

- Guidance on collecting evidence of student performance in academic year 2022 to 2023
- Longer-term perspectives
- Arrangements for private candidates
- Equalities impact assessment
- Regulatory impact assessment

The questions are presented in the same order as in the consultation document.

Where we refer to schools and colleges, this includes schools, colleges and other exams centres.

Who responded?

In the following table, we present the number of respondents by respondent type.

Respondent type	Number of respondents
------------------------	------------------------------

Education or training provider	30
Awarding body or exam board	4
Parent or carer	17
School and college staff	94
Student	49
Other	19
Total number of respondents	213

Overarching themes

Overall, respondents agreed that the guidance was helpful in guiding schools and colleges to collect and retain evidence to help determine TAGs in the unlikely event exams do not go ahead as planned. Respondents also generally agreed that this would not add significant burden to students, schools and colleges, beyond their existing assessment arrangements. Some respondents, however, held different views and there were also some themes in responses across multiple questions.

First, a small number of respondents questioned the need for such arrangements given the low likelihood of exams and assessments not going ahead as planned in 2023. This was particularly in the context of the country entering the post-pandemic period and the reducing risk of disruption due to coronavirus (COVID-19). Some respondents believed that the time needed for contingency planning would reduce available teaching time that had already been disrupted by COVID-19. In general, these respondents thought that any process for gathering evidence should only be put in place when it is clear that exams are unable to go ahead.

Secondly, some respondents highlighted that guidance would place some additional burden on schools and colleges. Respondents focused on the impact on teacher workload from setting and marking assessments, and on

retention, as well as a potential increase in costs (for example, printing copies of assessments for students).

Thirdly, concerns were expressed by a small number of respondents that the guidance would change the nature of formative assessments if those assessments were also used to produce evidence that could be used to determine a TAG in the unlikely event that exams cannot go ahead as planned. Some respondents suggested it would change the purpose of these assessments from formative to summative and emphasised the potential impact on student mental health.

Detailed analysis

Guidance on collecting evidence of student performance in academic year 2022 to 2023

This section of the consultation focused on the draft guidance proposed for how teachers should assess students to generate evidence to be used to determine TAGs in the unlikely event they are needed in 2023.

The draft guidance was designed to minimise the impact for schools, colleges, teachers and students, with arrangements that were scaled back from those in place in 2022 and 2021 in light of the experience of schools and colleges. It was designed to enable teachers to gather evidence in line with their existing formative assessment processes and to best support students preparing to take their exams.

Question 1

Do you agree that this proposed guidance is helpful in guiding schools and colleges to collect and retain evidence in a proportionate way in line

with their existing arrangements to help determine TAGs in the unlikely event exams do not go ahead as planned?

Response	Number of responses
Yes	158
No	55

Respondents were required to answer this question, so we received a response from everyone who completed the survey. Overall, nearly three-quarters (158) of the 213 responses agreed that the guidance is helpful. Virtually every respondent group showed more respondents agreeing that the guidance was helpful. The only exceptions were ‘employer’, where the single respondent in this category answered ‘no’, and ‘organisational – other’ where 2 of the 3 respondents answered ‘no’.

The 3 main groups of respondents representing schools and colleges (organisational responses from a school or college and personal responses from teachers or members of a senior leadership team) were all more balanced. Nevertheless, 62% of respondents in these groups agreed that the guidance is helpful.

We received 95 comments about this question. Many respondents who agreed that the guidance is helpful did not provide further comments, whereas the majority of those who did not agree provided comments. This means that the comments are not representative of the full range of views and focus on issues where respondents disagreed with the proposals. Many of the comments also pre-empted subsequent questions so many of the themes raised were repeated in response to subsequent questions.

In particular, approximately half of the comments on this question referred to the impact on school or college staff workload, or increased stress and anxiety for students. Some of these comments, however, assumed a need to engage in more formal assessment than would normally take place in schools and colleges, which is not in line with the proposed guidance. Examples of these concerns are set out below.

“ This continues to put undue pressure on students and teachers.”

(Senior leadership team)

“ We understand the need for consistency and clarity to have a fair system for all, but are concerned that this proposal represents a duplication of work, and distraction from teaching. It is effectively asking for much more formal assessment than would normally be taking place and adding significantly to the extended pressure being placed on students over the course.”

(School or college)

Many respondents highlighted a specific concern about the guidance requiring the retention of evidence, indicating that this was resource intensive and time consuming.

“ The workload that was imposed on schools’ infrastructures to retain the evidence adequately was disproportionate and extremely time consuming. Both scanning and saving paper copies of all papers sat (usually more than one round of papers) placed a huge burden on teachers who were already taking on the additional burden of marking and moderating.”

(Senior leadership team)

“ The retention of this evidence puts huge demands on schools and also means the work is not returned to students where it would be most useful. Copying all assessments for all subjects for 350 students is not feasible.”

(Academy chain)

A number of respondents commented that mock exams should be a useful activity for students. Comments highlighted concerns about raising the stakes of mock exams, even if only with a small possibility that the results might be used to inform TAGs. They suggested that, in doing so, the nature of the assessments would be changed so much that they would not be as useful for teaching and learning as they might otherwise have been.

“ By making every ‘mock’ high stakes, or potentially high stakes, these

exams cease to be productive. Indeed, it becomes in the best interest of all students to make sure they pass – by any means necessary – even if this is at the expense of good learning.”

(Teacher)

Many respondents agreed that the guidance was helpful, but some went on to add a caveat of some sort – for example referring to pressure on students or difficulties for schools and colleges.

“ The general premise of why and what would happen in the event exams do not go ahead is good however I am concerned that students would potentially feel under pressure for 2 years that all pieces of work could potentially be used to help inform their grade. Instead of enjoying their studies and having the freedom to learn and make mistakes. The chances of needing this again is hopefully very slim so to put in place this guidance is well intentioned but could (if actioned by all) take lots of the joy out of education for years 10–13.”

(School or college)

A number of respondents commented about the number of assessments a school or college might need to provide, expressing concern that additional opportunities would need to be scheduled.

“ We would only ever run one full, formal mock series per year, for exam year groups. All other assessment is done in classrooms (controlled conditions, but not simultaneous for the whole cohort). Your guidance refers to assessments in the plural, implying we would need to run additional assessment cycles as our existing ones don't adhere to all of your criteria. Thus, we will have over- assess students in order to comply with the above contingency requirements.”

(Senior leadership team)

A small number of respondents commented on a range of practical issues around the marking process. These included comments that guidance needs to be clearer, that there would be limited consistency between or within schools and colleges, and that more information should be available about how exam boards would quality assure TAGs.

“ However, I would add that in addition to this guidance on how to collect evidence, more clarity is required as in how the exam boards would use the data and evidence submitted by schools.”

(School or college)

“ It is however only useful where members of the school staff have training from exam boards. For example, in my school there is significant variation in how marks are awarded on more complex questions leading to papers marked by certain staff, including senior members of the school staff who had received marking training from exam boards in the past, doing far better than other staff.”

(Teacher)

One comment noted that the approach suggested in the guidance might be more difficult for certain centres such as special schools.

“ This model is a very mainstream model that would not work in alternative provisions. Pupils often arrive very late in the year 11 having already established a history of not engaging in formal assessments. These pupils bring with them knowledge but an inability to engage in the traditional methods of teaching...”

(School or college)

Question 2

To what extent do you agree or disagree that the guidance set out minimises any additional burden on students beyond the existing assessment arrangements, such as mock exams, in place in centres?

Response	Number of responses
Strongly agree	36

Agree	75
Neither agree nor disagree	29
Disagree	33
Strongly disagree	39

We received 212 responses to this question. Overall, just over half of respondents agreed or strongly agreed that the guidance would minimise burden on students. A little over 30% of respondents disagreed or strongly disagreed, and the remainder indicated that they neither agreed nor disagreed.

Responses did vary among different groups, however. These included schools and colleges (42% agreement, 46% disagreement) and members of senior leadership teams (43% and 49%). Teachers, on the other hand, tended to agree (59% and 37%).

In total, we received 84 comments about this question.

The most frequent issue raised by those that disagreed that the guidance was helpful was that having this guidance in place would increase pressure on students.

“ Obviously it is stressful for students to be told that mock assessments, which should be opportunities for them to develop exam technique, and identify areas that they need to practice further, may be used as part of final assessments of their grades.”

(Parent or carer)

A small number of comments, on the other hand, indicated that burden would not significantly increase.

“ It gives schools lots of guidance and information as to what they should do in an unlikely situation. Schools will feel that they are doing everything to ensure students are not disadvantaged in the end, regardless of what might happen and it takes some burden away from the students by giving them clear information over what they should expect.”

(Student)

“ We are already doing 2 sets of year 11 mock exams and in class assessments, so would have enough evidence to TAG if the worst came to the worst. It should therefore, not add any further burden to our students.”

(Exams officer or manager)

A number of respondents raised the issue of the guidance potentially distorting the purpose of mock or practice assessments.

“ Although it may be possible to administer the proposed arrangements without adding many more additional assessment-points/tasks to the student year, the effect of the guidance is to transform previously valuable formative assessment experiences into magnified high-stakes summative assessments. Burden should not solely be measured in terms of task to be undertaken but also the emotional toll on the students, the impact on their motivation for learning and the corrosive deterioration of their love for learning.”

(School or college)

“ The potential impact is that some students may focus on responding to assessments rather than focus on learning opportunities, including considering how they might respond to assessment tasks in an innovative way. Students may decide to be conservative in their responses so as not to risk receiving a lower mark which may negatively impact their qualification grade.”

(Awarding body or exam board)

Like comments made in response to the previous question, some respondents raised the possibility of additional assessment opportunities being required and suggested that this would increase the burden on students.

“ Unless schools do more than one series of mock exams, it is extremely challenging to meet this guidance. Sitting more than one series of mock exams causes disruption to the curriculum, extra workload for teachers

and extra upheaval and stress for students and families.”

(Senior leadership team)

Other comments in response to this question concerned issues considered elsewhere in this analysis, including the effect on teacher workload and problems with the retention of scripts.

Question 3

To what extent do you agree or disagree that the guidance set out above would minimise any additional teacher workload beyond existing assessment arrangements, such as mock exams, in place in centres?

Response	Number of responses
Strongly agree	25
Agree	62
Neither agree nor disagree	35
Disagree	38
Strongly disagree	49

209 responses were received to this question. Overall, opinion was exactly split: 87 respondents agreed or strongly agreed, and 87 respondents disagreed or strongly disagreed. Strength of feeling was stronger among those who disagreed, with 23% indicating they ‘strongly disagreed’ compared to 12% saying they ‘strongly agreed’. The remaining 35 respondents neither agreed nor disagreed.

Looking at the responses from different groups, disagreement was highest for teachers (50%), senior leaders (54%) and schools and colleges (58%). Only about 20% of students either disagreed or strongly disagreed.

80 comments were received about this question. Over half of these described different ways in which respondents felt burden would be increased (only 2 of these comments came from respondents who agreed with our proposal). Chief among these were the possibility of additional assessments, the requirement to retain scripts, the time necessary to mark and quality assure assessments, and general comments about the work that goes into creating a rigorous assessment opportunity.

“ There is no question that this system adds to teacher workload. Marking and moderating 2 sets of exams instead of just one set of mock exams doubles the workload. As above, it is not useful to the students to sit truncated tests, so the suggestion of not creating cumulatively more than one set of exams to mark does not stand.”

(Senior leadership team)

“ The requirement to retain original scripts or copies is significant. Either pupils cannot keep their scripts, in which case the assessments lose some formative value, or all scripts must be copied which has significant storage, cost and time consequences.”

(Teacher)

A handful of comments suggested that there would not be additional burden. This reflected the fact that only 9 comments were from respondents who agreed or strongly agreed that the guidance would minimise additional teacher burden.

“ We are already doing 2 sets of year 11 mock exams and in class assessments, so would have enough evidence to TAG if the worst came to the worst. It should therefore, not add any further burden to our teaching staff.”

(Exams officer or manager)

“ This guidance essentially helps teachers to feel more prepared and know what they should expect in the future so there is no surprises at the end. Teachers can plan ahead and organise with this guidance so that there isn't a lot of workload.”

(Student)

A few respondents suggested that a lack of resources from exam boards was a contributing factor to additional burden.

“ It is crucial that the awarding organisations provide sufficient assessment resources to address a wide range of topic requirements in the form of exam-style question papers and provide the mark scheme and, preferably, exemplar material in order to support teachers and to support consistency nationwide in the quality of assessments and marking.”

(Other representative or interest group)

A small number of respondents noted that the higher the stakes of an assessment, the more pressure teachers would be under.

“ Creating reliable assessments is an extremely difficult task. The higher the stakes of the assessments, the more carefully these assessments need to be designed. As soon as it is known that any ‘mock’ examinations might be counted towards final GCSE and A level grades, there will be more pressure on teachers to create appropriate assessments ... To expect teachers to create their own assessments using similar style questions to the examination boards would add enormously to their workload and as teachers are not trained examiners, the chances are that the questions would be of lower quality and not support students in their preparation for the terminal examinations.”

(Senior leadership team)



Question 4



Are there any parts of the guidance which you think could be improved?

We received 107 comments from respondents to this question. Comments covered a wide range of topics, not all of which were related to the guidance in question. For example, the single biggest group of comments was about

arrangements for exams in 2023. In particular, students and parents, as well as some other types of respondents, called here for advance information and other adaptations. Arrangements for exams in summer 2023 were not in scope this consultation, so we have not considered those comments here

Other comments reiterated points already made in response to other questions. These included comments stating that the retention of scripts would be a burden which should not be imposed, and raising concerns about increased stress for students.

Another significant group of comments suggested that there should be no guidance for resilience. These comments were largely from teachers and schools and colleges. Some focused on a sense of 'getting back to normal' after the pandemic.

“ The guidance should be scrapped completely. Teachers should not be expected to gather evidence during the year whilst final exams remain in place.”

(School or college)

“ I think you should stop giving guidance and let things get back to normal, the pandemic is over and the sooner we get back to normal the better for students and teachers.”

(Teacher)

The third most frequent type of comment was to suggest that exam boards provide more assistance, usually in the form of assessment materials, but also covering the quality assurance process.

“ It would be helpful if awarding bodies could produce a range of questions which teachers could use to conduct assessments which have not been published on their website, which would allow teachers to know that students were answering 'fresh' questions rather than ones previously attempted.”

(Exams officer or manager)

Several respondents requested additional guidance on when assessments should take place.

“ Schools should ideally be given guidance about the time of year to carry out mock assessments, if possible and practical to do so. This could help to minimise the chance that in the event of an emergency, some, but not all students have already completed their mocks, allowing for consistency of approach across the country.”

(Other)

A small number of other comments requested additional clarification on the conditions under which mock assessments should be sat. Others asked about how to manage assessments for large numbers of students and what to do if some students miss an assessment opportunity.

“ Under the section ‘The conditions under which students should be assessed’ the guidance says, ‘given that this reflects the conditions under which formal exams would be taken’. This could lead to the misinterpretation that assessments must be fully compliant with JCQ regulations which [we] understand is not the requirement. It would be helpful, therefore, to make this clear, perhaps the addition of word ‘broadly’ would be sufficient: ‘given that this broadly reflects the conditions under which formal exams would be taken’.”

(Other)

Longer-term perspectives

This section of the consultation sought to gather initial views on whether the proposed guidance should be in place beyond 2023. We were clear that the question was to gather initial views, and that we would consult in the summer term of 2023 should we wish to make proposals for the longer term.



Question 5a



Should guidance remain in place beyond 2023 to support the award of grades should exams not be able to go ahead as planned for any reason in future years?

Response	Number of responses
Yes	138
No	71
Not answered	4

Two-thirds of respondents supported guidance remaining in place beyond 2023. Across respondent types, students had the highest proportion of respondents in support of the guidance (84%), followed by teachers (62%).

Question 5b

Please add any comments you have on the use of guidance to build resilience in the exam system beyond 2023.

There were 87 responses to this question. As with other questions, some of the issues raised were covered under the section above on overarching themes, including the additional burden, workload and costs for schools and colleges. The main theme, which was raised by all respondent groups, was support for national guidance which would provide useful and reassuring consistency to schools and colleges.

“ It is always better to have a contingency plan in place, that has been used before, and that has been successful, rather than have to develop another one from scratch, should the circumstances warrant such an approach to exams.”

(Exams officer or manager)

“ The proposed assessment arrangements are actually helpful to youngsters in preparing for their summer exams: if they complete mocks under exam conditions, they become more practiced, so the ‘real thing’ seems less scary, and for those who struggle with the discipline of revising, it provides a framework to help them tackle it in more manageable chunks.”

(Parent or carer)

One-third of respondents overall (33%) did not support the proposal for guidance to remain in place beyond 2023, stating that the workload and burden on schools and colleges would outweigh its need.

“ What is being proposed in this guidance would significantly increase the workload and stress levels of students, as well as the workload of staff. To have it as a permanent feature of the education system is a time-consuming defence measure against a threat that is unlikely to come again, and the cost/benefit analysis on it is almost entirely unfavourable.”

(SLT)

“ Guidance should only stay in place if it is fit for purpose. This arrangement shifts a disproportionate amount of teaching and learning focus to testing for a contingency arrangement that is unlikely to benefit the students in any way if exams run as normal.”

(Centre)

Several respondents, including those who agreed and disagreed with the proposal, noted that the resilience of qualifications and the assessment system beyond 2023 should be addressed.

“ A more productive approach to system resiliency should be considered. Having more than one assessment window so that not all assessment is necessarily linear and having multiple modes of assessment in as many subjects as possible are both approaches which would spread assessment risk and build resiliency into the system.”

(Organisation)

Arrangements for private candidates

This section of the consultation focuses on the proposed arrangements for private candidates in the event of exams not going ahead for any reason. The proposed guidance stated that some private candidates may want centres to assess them during the academic year, alongside the centre's students, in line with the guidance. Alternatively, that private candidates could be assessed only in the unlikely event it is confirmed that exams will not take place as intended, in which case they would be assessed in a compressed period.

Question 6

To what extent do you agree or disagree that this would be the best approach for private candidates?

Response	Number of responses
Strongly agree	35
Agree	63
Neither agree nor disagree	79
Disagree	18
Strongly disagree	12

A significant number of respondents strongly agreed or agreed that the guidance would be the best approach for private candidates, with 46% strongly agreeing or agreeing. This was followed by 37% of respondents neither agreeing or disagreeing and only 14% disagreeing or strongly disagreeing.

Question 6b

Please add any comments you have on the proposed approach, and/or any views you have on alternative approaches.

There were 42 responses to this question. As with other questions, a number of issues raised have been covered under the section above on overarching themes, including the additional burden, costs and time for centres. Other than these issues, 37%) of responses in relation to this question related to fairness, with concerns raised about potential unfairness both in favour of and against private candidates.

“ This is a charter for private candidates to shop around to find the centre most willing to give them a good grade.”

(SLT)

“ Private candidates would be likely to approach centres in this regard well after the school’s own candidates had already completed mock exams earlier in the year. The evidence base for private candidates would be incomplete and it would be inappropriate for a school to award a grade for them.”

(SLT)

Twenty per cent of responses, from a range of respondent types, related to the various difficulties centres would have in supporting private candidates.

“ This idea is good in principle. I am not sure how it would work in practice. It would depend on what the reason for examinations being cancelled, and what the time frame of their cancellation is in respect to the expected examination window.”

(SLT)

“ It may be that there is no other option, but it does seem vastly more

stressful and expensive for this group than for other candidates, and we also have reservations about whether centres which agreed for candidates to sit exams in person would necessarily be able to deliver on the contingency arrangements.”

(Organisation)

Of the responses in support of the proposal, the most frequent recommendation was that there should be clear guidance for centres to ensure a consistent approach to support private candidates.

“ This area needs very clear guidance and centres may need to be provided with a template policy outline to ensure that there is a common approach to supporting these candidates.”

(Personal)

Around a quarter of the comments called for support for private candidates in terms of accessing centres. The majority of those asking for this were students or private candidates (70%) and parents or carers (30%).

“ There is a severe lack of availability of exam centres or schools which will support private candidates in taking their exams. The few schools or exam centres which will offer support to private candidates are often expensive, and often require long journeys. Private candidates and their families also have to then try their best to be amenable to the exam centre, perhaps not pursuing the access arrangements available to them, in case the exam centre/school withdraws all private candidate support entirely... In order to alter the incredibly precarious assessments we currently have, the government will need to give private candidates cast-iron guarantees that they will be supported with actually workable solutions.”

(Private candidate)

A related suggestion (particularly from students and senior leaders in schools and colleges) was that this could alternatively be a service provided by a separate exam board or specific centre designed to support private candidates.

There will always be candidates who cannot identify with a centre

“

therefore AOs should have the legal permission to set up a centre in order to allow external candidates to access assessments which would be marked by a member of the senior examining team for that subject”

(Student)

Equalities impact assessment

In developing the proposals included in the consultation, there was consideration of the impact that the proposals might have on students because of their protected characteristics. In this section of the consultation, respondents were asked:

- if they agreed with the impacts identified by DfE and Ofqual
- whether there were other impacts not identified
- whether there were additional ways to mitigate these impacts

Question 7

Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of students because of their protected characteristics?

Response	Number of responses
Yes	103
No	88
Not answered	2

More respondents agreed than disagreed that the proposed arrangements

would have a positive impact on particular groups of students because of their protected characteristics. 48.3% answered “yes”, 41.3% answered “no” and 10.3% did not answer. Across respondent types, the groups where the majority of respondents answered “yes” were exams officers (90% of respondents), students (69%) and parents (53%). Senior leadership team members were most likely to answer “no” (70% of respondents), followed by schools or colleges (54%) and teachers (53%).

Question 8

Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of students because of their protected characteristics?

Response	Number of responses
Yes	62
No	135
Not answered	16

Most respondents said that the proposed arrangements would not have a negative impact on particular groups of students because of their protected characteristics. 29% of respondents answered “yes”, 63% answered “no” and 8% did not answer.

Across the respondent types, senior leadership team members were the most likely to answer “no” (73% of respondents), followed by students (65%) and teachers (61%). The only group where the majority of respondents answered “yes” were other representative or interest group organisations (63% of respondents).

Question 9

Do you have any comments on the impact of the arrangements on particular groups of students because of their protected characteristics?

There were 53 responses to this question. A few respondents raised issues outside of the question and asked about adaptations to the 2023 exams or changes to the assessment system. These are outside the scope of this consultation and are, therefore, not included in this analysis.

Several respondents noted that the proposals may have a negative impact on the mental health and wellbeing of students, particularly for those with protected characteristics.

“ Those with SEND issues relating to anxiety and timing issues will be forced through multiple rounds of high-stakes assessment.”

(SLT)

Other respondents raised potential concerns that unconscious bias would affect students with protected characteristics if they were to be given a teacher assessed grade. One comment noted that unconscious bias could be reduced through centre training and double-blind marking.

“ Unconscious bias is probably the biggest issue with TAGs/CAGs and centres need better training, and better policy to eliminate this as much as possible. Double blind marking, additional scrutiny and a review of protected characteristics should be ingrained in Centre policy.”

(Teacher)

Some respondents highlighted the need for reasonable adjustments to be applied to mock assessments, as already included in the proposed guidance.

“ Schools should continue to make reasonable adjustments to assessments, regardless of whether the assessments being completed were internal mock exams, or external exams...”

(SLT)

However, a small number of respondents commented that reasonable adjustments in place for students taking formative assessments may not be the same as adjustments in place for summative assessments.

“ Students who are entitled to a range of access arrangements often use mock examinations throughout their courses as a way of testing out which arrangements work best for them in which subjects, and perhaps trialling not using some arrangements to see how that impacts on them. Having assessments as potentially counting may prevent students from doing this as they are concerned about the impact.”

(Exams officer or manager)

A small number of respondents commented that there may be an issue with gathering evidence from learners who have poor attendance or who have just joined a centre, as mentioned in the proposals.

“ ...Some students may have a negative impact where they have not attended an educational setting for varying reasons. They may not have enough of the required ‘evidence’ to submit for an overall grade.”

(Awarding body or exam board)

A few respondents commented on how the arrangements would affect specific groups of learners.

“ This approach would be a detriment to boys who, more often on average than girls, leave their revision later on and do less well in mocks relative to their summer exam performance.”

(School or college)

Some respondents recommended ways in which they thought the guidance could be amended to benefit specific groups of learners. The recommendations included adding further detail on the types of evidence that would be acceptable in relation to learners with alternative education arrangements, and ensuring any assessments undertaken are fair and accessible for students for whom English is an additional language.

Some respondents raised similar issues to those covered in an earlier question on private candidates. A few respondents also suggested that private candidates are more likely to have special educational needs and disabilities (SEND). This would further increase the burden on centres when accepting private candidates as centres would have to provide reasonable adjustments for formative assessments used to gather evidence.

“ ...These problems around home-educated children with SEND often arise around exam centre access, as access arrangements and additional support is often needed for these children. This is often costly, and schools are not equipped with sufficient funds to assess or provide the necessary access arrangements for private candidates.”

(Student – private candidate and/or home educated)

One respondent suggested that the arrangements would take time away from teaching and learning and would impact particular groups of students with protected characteristics who had been impacted by the pandemic due to lessened teaching time.

“ ...The existence of this guidance encourages further time to be taken away from teaching and learning, in order to gather evidence. Therefore, an impact of the arrangements on particular groups of students with certain protected characteristics is less time to reduce the unequal impacts of the pandemic on these students...”

(Union)

Regulatory impact assessment

This section of the consultation asked respondents if there were:

- additional activities associated with delivering the proposed contingency arrangements that had not been identified in the consultation
- additional costs incurred by the proposed contingency arrangements
- alternative approaches to reduce burden and costs



Question 11

Are there additional burdens associated with the delivery of the proposed arrangements on which we are consulting that we have not identified above? If yes, what are they?

There were 186 responses to this question. Most respondents said that there are no additional burdens not identified within the consultation. Local authorities, employers and awarding bodies or exam boards were more likely to suggest that there are burdens not identified in the guidance. Of those that thought this, the most prevalent response across all types of respondents was an increase in staff workload, with various respondents noting that teachers are already under a high level of pressure.

“ Absent students for mock exams would require a different mock which would not be practical for teachers/Exams officers to create/ administer and mark – some absent students are then absent for multiple catch ups and so would potentially need 4 or 5 different exam papers for the same exam.”

(Exams officer or manager)

Some respondents raised concerns as to the impact on staff mental health.

“ Massive increase in workload and significant impact on mental health of staff and students. Much greater burden on school leaders.”

(School or college)

Logistical issues, such as secure storage space, were also identified as an additional burden.

“ Secure storage of large numbers of mock papers takes space.”

(Organisational – School or college)

Question 12

What additional costs do you expect you would incur through implementing the proposed arrangements on which we are consulting?
What costs would you save?

There were 56 responses to this question that identified additional costs. Respondents identified a variety of additional costs, with the predominant themes being staffing costs due to the additional workload of preparing, marking and storing mocks in a more rigorous way, and the additional staff needed for invigilating and organise mocks.

“ The proposals are unlikely to save any costs for schools and colleges. As acknowledged in your regulatory impact assessment, there are likely to be increased costs due to marking, quality assurance, storing of materials, and responding to student and parent queries.”

(Organisational – Other representative or interest group)

There were additional themes identified, but to a lesser extent. These were material costs arising from having to prepare and copy more mocks, and facility costs of having to move classes. Some respondents also commented on the provision for students that need access arrangements, storage facilities for assessments, electricity, and heating.

“ Storage, enhanced invigilation requirements, shredding costs, further time for staff CPD on marking exam board materials for their specification.”

(Teacher)

There were 32 responses to the question asking if there would be any costs saved. Most respondents to this question stated that there would be no cost savings from this proposal. One respondent identified a possible cost saving for schools and colleges in contingency planning.

“ Cost savings in contingency planning would reduce the number of staff committed to answering queries and providing reassurance.”

(Student)

Most respondents identified savings that would only be realised if the contingencies were implemented. These covered savings on invigilation staff and potential exam board savings

“ We do not anticipate cost savings outside of exam board fees.”

(Organisational – Academy chain)

Question 13

Do you have any views on how we could reduce burden and costs while achieving the same aims?

There were 29 responses to this question. Most focused on exam boards providing additional support by providing additional exam questions or revision material if exams do not go ahead.

“ Expect Exam boards to publish material to be used as in school examination material if the summer series do not go ahead.”

(Exams officer or manager)

The second most common type of comment, mainly expressed by members of senior leadership teams, was about the removal of the requirement to collect evidence or remove the resilience plan entirely.

“ Only requiring centres to keep a sample of the original work.”

(Senior leadership team)

Some responses asked for additional funding to assist schools and colleges implementing these arrangements. Students made the most comments in this category.

“ ... the government could provide financial support to schools so that these aims could be achieved.”

(Student)

Annex A: analytical tables of the responses to the quantitative questions aggregated over all respondent types

Response	Number of responses
Personal – Student	49
Personal – Teacher (responding in a personal capacity)	47
Personal – SLT (senior leadership team)	37
Organisational – School or college	26
Personal – Parent or carer	17
Personal – Exams officer or manager	10
Organisational – Other representative or interest group	8
Organisational – Academy chain	4
Organisational – Awarding body or exam board	4
Organisational – Other	3
Personal – Examiner	2
Personal – Student – private candidate and/or home-educated	2

Personal – Other	2
Organisational – Employer	1
Organisational – Local authority	1
Total	213

Breakdown of responses for each question

Do you agree that this proposed guidance is helpful in guiding schools and colleges to collect and retain evidence in a proportionate way in line with their existing arrangements to help determine TAGs in the unlikely event exams do not go ahead as planned?

Response	Number of responses
Yes	157
No	56
Total	213

To what extent do you agree or disagree that the guidance set out minimises any additional burden on students beyond the existing assessment arrangements, such as mock exams, in place in centres?

Response	Number of responses
Strongly Agree	36
Agree	74
Neither agree nor disagree	29
Disagree	34

Strongly Disagree	39
Not answered	1
Total	213

To what extent do you agree or disagree that the guidance set out above would minimise any additional teacher workload beyond existing assessment arrangements, such as mock exams, in place in centres?

Response	Number of responses
Strongly Agree	26
Agree	61
Neither agree nor disagree	35
Disagree	38
Strongly Disagree	49
Not answered	4
Total	213

Should guidance remain in place beyond 2023 to support the award of grades should exams not be able to go ahead as planned for any reason in future years?

Response	Number of responses
Yes	139
No	71
Not answered	3

Total 213

To what extent do you agree or disagree that this would be the best approach for private candidates?

Response	Number of responses
Strongly Agree	35
Agree	62
Neither agree nor disagree	79
Disagree	18
Strongly Disagree	13
Not answered	6
Total	213

Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of students because of their protected characteristics?

Response	Number of responses
Yes	103
No	88
Not answered	22
Total	213

Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of students because of their protected

characteristics?

Response	Number of responses
Yes	62
No	135
Not answered	16
Total	213

Are there additional burdens associated with the delivery of the proposed arrangements on which we are consulting that we have not identified above?

Response	Number of responses
Yes	60
No	126
Not answered	27
Total	213

Annex B: List of organisational respondents

When completing the consultation questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation. These are the organisations that submitted a non-confidential response:

- Academies Enterprise Trust
- AQA

- Ashton Sixth Form College
- Association of School and College Leaders (ASCL)
- Bedford Modern School
- Caterham School
- CBC
- Confederation of School Trusts (CST)
- Cressex Community School
- Edyourself
- Godolphin and Latymer School
- Haberdashers' Aske's School for Girls
- Home Education Advisory Service
- Independent Society of Musicians (ISM)
- Latymer Upper School
- Marlborough College
- NAHT
- National Association of Schoolmasters and Union of Women Teachers (NASUWT)
- National Education Union
- National Governance Association (NGA)
- Northgate High School
- Nottingham High School
- OCR
- Parentkind
- Pearson
- Ruislip High School
- South Hampstead High School
- Southend High School for Boys
- St. John's, Marlborough
- Sutton Trust
- The Bell Foundation
- The King's School, Chester
- The Manchester Grammar School

Tonbridge School

- Upper Wharfedale School
- VOICE
- Westminster School
- WJEC-CBAC
- Yarm School

[Back to top](#)

Is this page useful?

Yes

No

[Report a problem with this page](#)

Topics

[Benefits](#)

[Births, death, marriages and care](#)

[Business and self-employed](#)

[Childcare and parenting](#)

[Citizenship and living in the UK](#)

[Cost of living support](#)

[Crime, justice and the law](#)

[Disabled people](#)

[Driving and transport](#)

[Education and learning](#)

[Employing people](#)

[Environment and countryside](#)

[Housing and local services](#)

[Money and tax](#)

[Passports, travel and living abroad](#)

[Visas and immigration](#)

[Working, jobs and pensions](#)

Government activity

[Departments](#)

[News](#)

[Guidance and regulation](#)

[Research and statistics](#)

[Policy papers and consultations](#)

[Transparency](#)

[How government works](#)

[Get involved](#)

[Help](#) [Privacy](#) [Cookies](#) [Accessibility statement](#) [Contact](#) [Terms and conditions](#)
[Rhestr o Wasanaethau Cymraeg](#) [Government Digital Service](#)

All content is available under the [Open Government Licence v3.0](#), except where otherwise stated



© [Crown copyright](#)