



Response to the DfE consultation *Post-qualifications admissions (PQA) in higher education: proposed changes*

Key points

The **Joint Council for Qualifications (JCQ)** fully supports the need to ensure that admissions to university are a level playing field based purely on attainment and ability. Exams and assessments, whether in general qualifications (GQ) or vocational and technical qualifications (VTQ) play a critical role in allowing objective assessment of a student's knowledge and capabilities.

We believe that consideration should be given as to whether PQA is the solution for ensuring a level playing field for progression into higher education. An alternative approach would be to have an application and acceptance system that is anonymised with unconditional offers banned.

Furthermore, a full impact study taking in students, schools and colleges, the exams and assessment system and HEIs should be published before the final outcomes are decided to inform decision-making.

In summary:

- If PQA is to be implemented, then every stakeholder involved needs to provide some flexibility to accommodate the timelines, to minimise risks to delivery and take into account student health and well-being.
 - Changes in the 'usual' exam and awarding timetables for Level 3 and Level 2 qualifications **must not** be predicated on experiences during the 2019-20 and 2020-21 academic year where exams were cancelled: while a compressed and delayed timetable was scheduled for 2021, this was never delivered and JCQ and the awarding organisations (AOs) raised concern to government officials and regulators that this entailed increased risk to delivery and could adversely affect student mental health and well-being.
- The operational challenges associated with a delay, most notably an expansion of the examiner workforce, is not sustainable long term. 2021 (as envisaged prior to the cancellation of exams) would have seen a lot of inexperienced and untested assessors being brought into the system.
- JCQ believes results days for Level 3 and Level 2 qualifications could be moved by some days, dependent on a sufficient lead-in period and maintaining the existing exam window – this would add additional time for PQA with the start of the higher education term being set back.
 - We strongly recommend that AS/A-Levels and GCSE results days, and their equivalent VTQs, are not within the same week – this creates significant amount of pressure on centres and reduces the time they have to provide support for students to facilitate their progression.
- Any compression of the timetable is likely to: adversely impact the mental health and well-being of students; increase both the number of students having to take multiple exams in a single day and increase the number of exam clashes; and reduce the time for marking and quality assurance

processes, which would be compounded by the bringing forward of results days. In particular we are concerned about disproportionate impact on impact on students with protected characteristics where extra time is required for examinations – this is compounded where clashes occur increase.

- It is essential there is an equalities impact assessment of any proposals to compress the timetable before decisions are made.
- There have already been many efficiency gains in marking time through the introduction of new technology, without compromising the need for human intervention and oversight in the process at appropriate times.

Introduction

The JCQ is a membership organisation comprising the eight largest providers of qualifications in the UK. The AOs that make up the membership provide all A-Levels (England, Wales, Northern Ireland) and Scottish Highers (Scotland) as well Level 3 vocational and VTQs that also provide access to higher education.

The JCQ provides a single voice for its members on issues of examination administration and, when appropriate, qualification and wider education policy.

Our main objective is the advancement of public education by enabling our members to act together in providing, wherever possible, common administrative arrangements for examinations; providing a forum for strategic debate, information exchange and expression of common interest; providing a channel for collective discussion with key stakeholders; communicating with a single voice to the media and other interested parties.

The AOs design and administer qualifications including exam and non-exam assessments; this includes the processing and marking of exam scripts and the post-results reviews and appeals process. JCQ also sets the common A-Level timetable. We have sought to limit our consultation response to these core JCQ awarding organisation activities.

Post Qualifications Admissions

JCQ AOs share some key concerns regarding Government proposals for a post-qualifications admissions system but we are supportive of reform. We understand the compelling arguments made in favour of reforms and the importance of levelling the playing field of higher education admissions for students from disadvantaged backgrounds.

Our primary concern is that the proposals would include either compression of the examination timetable or of the marking process. The former, we believe, would have an adverse impact on student wellbeing, the latter would jeopardise quality assurance and public confidence. We believe that incremental moves should instead be made at every stage of the process and by all key stakeholders with the focus being as smooth and stress-free an experience as possible for students at such an important time in their lives.

We would also like to emphasize the importance of ensuring that any new HE admissions model not disadvantage VTQ and combination students who do not always receive results at the same time or in the same way as A-Level only students.

Compression of the marking period

Current proposals would require earlier Level 3 results days, possibly achieved by compressing the marking period, while AOs understand the need for this and are prepared to facilitate a small move, we don't believe it is possible to substantially compress the marking period without affecting quality assurance and public confidence.

Student wellbeing is also at risk from public perception of diminished quality assurance which is likely to push up the number of appeals. There would also be an impact on teachers required to support students at a time when they would normally be on holiday. We are further concerned with teacher workload as the majority of assessors are active teachers and would be required to fit more marking into less time. Successful delivery of marking in a normal year is predicated on the ability to recruit sufficient assessors, and especially sufficient experienced assessors, with a full life cycle of recruitment and training starting each September. There are existing recruitment and capacity issues that have been greatly exacerbated by Covid-19. Assessors feel let down by the repeated cancellation of exams, of those willing to return to marking many will need re-training after two years not marking.

For ease of reference, we have given an overview, below, of the volume and complexity of work done during the marking period:

A quarter of a million students in England, Northern Ireland and Wales sit A-levels each year. After candidates sit the exam, the papers, completed scripts and any blank scripts are collected by exams office staff and put back into secure storage to wait for pickup couriers who transport over 15 million completed scripts (GCE and GCSE combined) to the awarding organisation for marking in just under 3 months.

Scripts to be marked online are scanned and kept in secure storage by the awarding organisation, the scanning of millions of scripts takes a considerable time as very few businesses can provide the service. Scripts to be marked in hard copy are sent to individual assessors.

Scripts are marked with rigorous checks performed by senior examiners to ensure marking is consistent with the awarding organisation mark scheme; that conversions from raw marks to UMS scores have been calculated accurately and the application of grade boundaries is correct.

Results are issued to centres by the awarding organisations; after centres give results to candidates, the exams officers process any reviews of results (Reviews of Marking and Reviews of Moderation).

If a re-mark is requested, an awarding organisation examiner will go through the script to check the original marking was consistent with the mark scheme and that all the marks were added together correctly to give the right grade. Any changes to marks or grades will be communicated to the centre. Time for appeals has to be factored into any new admissions model.

In order to meet an earlier A-Level results date there would have to be agreement with Ofqual and the Department that AOs can delay the Access to Scripts and Review of Results timeline for GCSEs, enabling priority processing for A Level. This would require regulatory changes.

Timetable compression

In Autumn 2020 when Government policy was that 2021 exams would be taking place, JCQ was asked to put together a compressed timetable in order to allow for as much teaching and learning time as possible following school closures and associated disruption. At the time we wrote to ministers and regulators to make clear that, while endeavouring to deliver during this exceptionally challenging circumstance there were a number of points to consider:

- first, we warned of increased risk of partial or non-delivery because of time pressures, especially the difficulty in recruiting the additional, experienced examiners required because of the shorter marking time; and
- a real concern on the impact of student health and well-being, with increased potential for multiple exams on the same and/or consecutive days for candidates, increased clashes and reduced time between exams.

Our concern for student wellbeing would make it impossible to replicate in following years. Now more than ever we believe that student mental health is paramount and we cannot support the compression of the A Level timetable in order to bring results days into July.

Any change to the timetable should be subject to a stand-alone consultation with stakeholders including schools, colleges, learners and parents to gauge centres' ability to deliver and the impact on students, especially those who require access arrangements including extra time. It will inevitably increase the number of students who have exam clashes and will require bespoke and resource-heavy arrangements to be made. In a non-compressed series AOs have feedback from centres needing to utilise weekends because of clashes. Those learners most acutely affected would be those with 100% extra time. It would be exhausting for them and difficult for the centres to manage.

An increase in the number of exam clashes also increases the risk of exam paper security breaches as some candidates will be sitting an exam before others. Security breaches can have an adverse effect on candidates and a negative impact on the integrity of the exams system. The potential for exam security breaches also falls under a regulatory principle that additional resourcing requirements may have to be put in place to mitigate such a breach taking place. A compressed timescale could lead to rushed processes or mistakes being made that would not normally happen under the present system.

A compressed timetable would also have an impact on the marking of exam papers by increasing the overlap of subjects to be marked (many assessors mark multiple subjects).

Final Comments

Although it is not a core part of the JCQ process, we are concerned about how students will be supported to make their applications. Requiring students to make their applications with less support risks undermining the principal case in favour of a PQA Model which is to reduce unfairness in the system for more disadvantaged students.

The post qualification offers model, where applications would still take place before exams, fails to address a key issue highlighted in the consultation which is the lower aspirations of high achieving students from disadvantaged backgrounds who will still be less likely to apply to top universities.

Furthermore, the risk of disadvantaging the most disadvantaged is heightened by the lack of attention given to the place of VTQs in the proposed models. New research by Pearson/ NEON shows that the proportion of students accessing HE with either VTQs or a combination of A Levels and VTQs is higher in more disadvantaged areas.

Finally, we believe that the impact on students with SEND should be the subject of further investigation to ensure that all parties are able to meet their duties under the Equalities Act.