**National Society for Education in Art & Design**

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**NSEAD response to Ofqual consultation**

NSEAD has consulted with members of our Special Interest Group for Examinations, who have informed the response to this consultation.

We agree that it is important that students completing their studies in 2021 receive a valid qualification that clearly reflects what a student knows, understands and can do, and they must be widely understood and respected. We agree that the results they receive through the alternative approach must be credible and meaningful.

We welcome recognition by Ofqual that the impact of the pandemic varies between regions, between schools and colleges within a region, and from student to student according to their personal circumstances.

We also believe that alternative arrangements for assessment must as far as possible make sure grades are valid and consistent.

We are extremely concerned that students completing assessments this year will be awarded grades to indicate their demonstrated knowledge, understanding and skills. with grades that will be indistinguishable from grades issued by exam boards in other years. We do not believe that this is achievable in our subject, which requires students to acquire an increasing depth and proficiency through practice. For the majority of students access to the necessary specialist resources has been severely limited and uneven. We do not see how it is possible to claim that grades achieved this year will be comparable with those awarded in other years.

We set out our detailed position and suggestions in response to the consultation questions below.

**Question 1**: To what extent do you agree or disagree that the grades awarded to students in 2021 should reflect the standard at which they are performing?

***Practical, studio-based qualifications are disproportionately affected - as a result of national restrictions and school closures, at best students will have had 44% less studio time than across a normal cohort. Many will have had even less time than that, where they have been subject to localised school closures and required to self-isolate - disproportionately affecting students from some areas of the country, some sections of the community and those in areas of high deprivation. The fact is that there will be an inbuilt regional and socio-economic bias in any assessment that does not take account of these factors***

***The danger is that the stronger and more advanced students (i.e. those with stronger cultural capital and early developed technical/creative skills and understanding of how to apply this or those whose home has resources, guidance and technology) will easily do not just better but substantially better. The consequence of lockdown and very variable access to quality online learning and digital facilities at home, as well as quality art materials, will inevitably broaden the span of standards this year. For many, but not all students we would expect to see:***

* ***A more limited range of materials used.***
* ***The depth and breadth of conceptual ideas, and development from starting points will be less than if the teacher had been there to guide them.***
* ***Contextual sources and the way in which these inform practice will likely be diminished.***
* ***The quantity of work submitted will be far less than usual, and it’s overall quality lower.***

***We appreciate that it wil not be possible at this stage to modify the GCSE and A level criteria, as these are set and agreed. But, we ask that interpretation and the marks allocated against criteria and modified this year, need to take account of the following:***

* ***An acceptance in the marking of those students who have not had access to high quality materials for work created at home under restrictions (teachers may need to identify where this is so)***
* ***Evidence of creativity used to qualify higher GCSE marks, should be redefined into broader grade boundaries to take account of the lack of one-to-one teaching through the latter part of the course and last year’s restrictions.***
* ***Marking should be sensitive to the evidence of cultural capital informing the development of critical and contextual development and the use of artists/designers etc. Teachers marking to inform ranking and standards achieved, has to be contextualised by the background and history of the students, honestly determining the effectiveness with which each student has used teacher input to the best of their opportunity, intention and creative aspiration.***

**Question 2**: To what extent do you agree or disagree that the alternative approach to awarding grades in summer 2021 should seek to encourage students to continue to engage with their education for the remainder of the academic year?

***We believe that this is a positive move, and that the timescale for submitting grades for art and design should be the same as all other subjects, not earlier as we usually have to during normal circumstances,  given that moderation if not proposed this year. Students need as much opportunity to work in school, hopefully accessing specialist facilities of the art department as possible.***

**Question 3**: When would you prefer that teachers make their final assessment of their students’ performance?

***If student portfolios are not going to be externally moderated (which takes time to prepare) we agree that final assessments should be delayed until the end of May, with time allowed for the internal standardisation before submission of grades to the exam boards.***

**Question 4**: To what extent do you agree or disagree that teachers should be able to use evidence of the standard of a student’s performance from throughout their course?

***Students should be given all opportunity to provide evidence from any valid source that enables teachers to make the most accurate, fair and generous assessment.***

**Question 5**: Should there be any limit on the period from which previous work could be drawn?

***No***

**Question 7**: Do you have any comments on when students should be assessed?

**Question 15**: To what extent do you agree or disagree that teachers should take account of a student’s performance in any non-exam assessment where that has been completed in full for a subject?

***Students should be given all opportunity to provide evidence from any valid source that enables teachers to make the most accurate, fair and generous assessment.***

**Question 16**: To what extent do you agree or disagree that teachers should take account of a student’s performance in any non-exam assessment where that has been completed in part for a subject?

***We agree with the proposal that the student’s portfolio – whether or not it is complete at the time of the assessment – should be the sole evidence teachers use to decide on the grade the student should be awarded. As with other subjects, we believe that students should not be penalised if, for reasons beyond their control, they have been unable to complete their portfolio. However, we note again that attainment in our subject is not just an issue of quantity but breadth, depth and range of experience that informs the work.***

**Question 17**: To what extent do you agree or disagree that teachers should mark their students’ non-exam assessments?

***We agree that teachers are best placed to make these assessments, as has always been the case in our subject.***

**Question 18**: To what extent do you agree or disagree that the marking of non-exam assessments should not be moderated by the exam boards this year?

***We accept that external moderation may not be possible this year, however we note that this proposal for Art and Design would seem to be at odds with general proposals requiring the exam boards to sample assessments. Art and Design should not be held to a lesser standard of quality assurance than other subjects.***

**Question 19**: Do you have any comments on the use of non-exam assessment and separately reported results and grades?

***Where other sources of performance evidence are used in addition to the non –exam assessment portfolio, those sources of evidence should be subject to the same level of scrutiny, including assurance that has been completed without support/external support.***

**Question 20**: To what extent do you agree or disagree that a breadth of evidence should inform teachers’ judgements?

***Teachers and internal moderation should seek to contextualise the ranking based on knowledge of student’s effort, commitment, opportunity and means within their home environment to realise intentions. This means that carefully redefined criteria are required to guide the marking. It is not just as simple as only marking one component. What we expect within that component needs to be redefined.***

**Question 21**: To what extent do you agree or disagree that the provision of training and guidance from exam boards should support teachers to reach their assessment of a student’s deserved grade?

***We note that the Scottish Qualifications Authority have produced guidance on how students can achieve grades with less evidence – using existing exemplars to show how the same grade could have been achieved even with elements of the evidence removed. We would hope that similar ‘Understanding Standards’ resources will be provided as a matter of urgency.***

**Question 22**: To what extent do you agree or disagree that teachers should be able to take into account other performance evidence for a student before submitting a grade?

***Students should be given all opportunity to provide evidence from any valid source that enables teachers to make the most accurate, fair and generous assessment.***

**Question 23**: To what extent do you agree or disagree that performance evidence from closer to the time of the final assessment, should carry more weight in determining a student’s final grade?

***We agree that work produced when students have had more access to teaching and specialist facilities should carry more weight within the assessment grade decision***

**Question 24**: Do you have any comments on the use of other performance evidence?

**Question 28**: To what extent do you agree or disagree that the assessments should, if possible, be taken within the student’s school or college?

***The asessed portfolio should as far as possible be work be completed on site. In reality this will vary enormously, given the wide variation in local restrictions and individual circumstances.***

**Question 29**: To what extent do you agree or disagree that if the pandemic makes it necessary a student should be able to take their assessments at an alternative venue, including at home?

***We agree that if any evidence used to determine a final assessment was not completed under the supervision of a teacher (either directly or remotely), the student (and anyone supervising them) would be required to make an appropriate declaration that they had not received.***

**Question 31:** To what extent do you agree or disagree that the exam boards should provide support and information to schools and colleges to help them meet the assessment requirements?

***We believe that this is of highest importance. Guidance in our subject is frequently not well understood by school and college leaders at the best of times, leaving teachers and students vulnerable to misinterpretation. It is particularly important that expectations are clear this year, and that the exam boards are stringent in their support for school and college senior leaders and their teachers and that they have put in place appropriate arrangements to support their teachers to fulfil their role.***

**Question 32**: To what extent do you agree or disagree that the exam boards should set requirements for school and college internal quality assurance arrangements and should provide guidance on these requirements to support centres?

***This is of critical importance if teachers are to be supported to make consistent judgments within and across centres.***

**Question 33**: To what extent do you agree or disagree that the head of a school or college should make a declaration to the exam board confirming its requirements had been followed and teachers had regard to the guidance and support materials provided?

***This should be a requirement.***

**Question 34**: Do you have any comments about internal quality assurance?

***Removal of external moderation means that teachers marks are internally moderated and entered using what we assume will be a very structured marking and criteria driven ranking system. Whilst this is far from perfect, we believe that it is more manageable than the alternatives. Questions remain about the management and accuracy of ranking? In addition,  we are concerned that schools may be judged as having some form of ‘accuracy’ rating, based on previous track record.  Where exam boards apply historic patterns of national moderation to categorise schools assumptions may be made which may or may not be true, ignoring staff changes, intake changes and rising or falling standards within the school.  This approach would lead to a repeat the mistakes of last year, which assumes Independent schools and schools serving affluent areas are better, more consistent and therefore ‘reliable’. There is a danger that students in schools serving areas of poverty or disadvantaged communities would not be well served.***

***Exam boards should also sample, at subject level, the evidence on which the submitted grades were based.***

**Question 35**: To what extent do you agree or disagree that the exam boards should quality assure how schools and colleges are determining grades?

***Strongly agree***

**Question 36**: To what extent do you agree or disagree that the exam boards should quality assure the overall approach for all schools and colleges?

***Transparent and consistent quality assurance applied to all subjects is essential.***

**Question 37**: To what extent do you agree or disagree that the exam boards should sample, at subject level, the evidence on which the submitted grades were based?

***This contradicts the proposal that while teachers should mark Art and Design non-exam assessments, the exam boards should not be required to moderate their marking this year.***

**Question 38**: To what extent do you agree or disagree that the exam boards should target their more in-depth quality assurance activities?

**Question 39**: To what extent do you agree or disagree that exam boards could only change a student’s grade after a review of the evidence and discussion with the school or college?

***We agree with this proposal***

**Question 40**: Do you have any comments about external quality assurance?

***We would like to see a consistent approach across all subjects***

**Question 41**: To what extent do you agree or disagree that students should not be told the grade their teacher has submitted before results day?

***We agree with this proposal***

**Question 42**: To what extent do you agree or disagree that students should be able to appeal their grade on the grounds that their teacher made an error when assessing the student’s performance?

***We agree with this proposal***

**Question 43**: To what extent do you agree or disagree that the school or college should consider the appeal?

***We are concerned that there must be clear guidance and that schools must be held accountable for following due process in any appeals system. Ultimately appeals must be moderated by the exam boards, schools and colleges cannot be self-regulating.***

**Question 44**: To what extent do you agree or disagree that the appeal should normally be considered by a competent person within the student’s school or college who was not involved with the original assessment?

***Subject to clear guidance and accountability we agree with this proposal***

**Question 45**: To what extent do you agree or disagree that a school or college should be able to appoint a competent person from outside of the school or college to consider the appeal?

***Subject to clear guidance and accountability we agree with this proposal***

**Question 46**: To what extent do you agree or disagree that a grade should only be changed if it is found not to represent a legitimate exercise of academic judgement?

***Subject to clear guidance and accountability we agree with this proposal***

**Question 47**: To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not follow the exam board’s requirements when it assessed the student’s performance?

***Subject to clear guidance and accountability we agree with this proposal***

**Question 48**: To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not properly consider the student’s appeal?

***Subject to clear guidance and accountability we agree with this proposal***

**Question 49**: To what extent do you agree or disagree that we should seek to bring forward results day(s), in order for appeals to begin earlier?

***We agree that this would be desirable, but not if it means bringing forward the final dates for assessments.***

**Question 50**: To what extent do you agree or disagree that if results day(s) are brought forward, we should seek to decouple when a student is informed of their results, and universities are informed of their formal result for the purpose of admissions decisions?

***We strongly agree with this proposal. Students should not be disadvantaged in securing their choice of university because they choose to appeal their result. This was a cause of real injustice and detriment to students last year.***

**Question 51**: To what extent do you agree or disagree that the exam boards should provide information for schools and colleges on how they should handle appeals?

***This is essential***

**Question 52**: Do you have any comments on the proposed appeal arrangements?

**Question 53**: To what extent do you agree or disagree that private candidates should be able to complete the papers set by exam boards, with them marked by the exam boards?

***We agree with this proposal, subject to those candidates being marked according to the same criteria and process as those in schools and colleges. It should be noted that where a wider range of performance evidence is considered, private candidates are likely to be disadvantaged.***

**Question 54**: To what extent do you agree or disagree that private candidates should be able to work with a school or college to produce the same type of evidence as the school or college’s other students?

***We agree with this proposal***

**Question 55**: To what extent do you agree or disagree that exam boards should run normal exams for private candidates in summer 2021?

***We disagree with this proposal***

**Question 56**: To what extent do you agree or disagree that exam boards should run normal exams for private candidates in autumn 2021

***We disagree with this proposal***

**Question 59**: Should the exam boards be prohibited from offering GCSE, AS and A level exams in any country in 2021?

***Yes, GCSE, AS and A level assessment should be consistent across the UK and internationally in 2021***

**Question 61**: Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of students because of their protected characteristics?

***Removing the requirement to complete both components will help all students, as will extending the period available to complete work for assessment. If wider sources of evidence of performance are allowed, this will also benefit those who may have missed more direct teaching and access to specialist facilities.***

**Question 63**: Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of students because of their protected characteristics?

***Yes, any student who has been disproportionately affected by school closures due to local infection rates or personal circumstances (which may well be linked to their protected characteristics) may be disadvantaged and receive a lower grade than other students.***