

20<sup>th</sup> October 2020

Dame Glenys Stacey  
Acting Chief Regulator  
Ofqual

Dear Dame Glenys

We feel compelled to write to you as providers of our existing exams and also Ofqual as the regulator of all the awarding bodies. Last year our centre had nearly 4,000 entries at GCSE and A Level, and you therefore play an important role in the education of our students.

The objective of this letter is to highlight that the arrangements for next summer's exams, unless significant adaptations are made, will severely disadvantage students at Whitley Bay High School and many other students across the country. The arrangements appear to contradict the stated obligations of the awarding bodies to:

- have a clear rationale for any optional routes through a qualification, combinations or pathways and can explain how, as far as is possible, these are comparable in terms of the Level of demand and the amount of subject content required to be taught and on which learners will be assessed
- keep its assessments under review, amending them where necessary, to ensure they remain fit for purpose, for example by reflecting new requirements, good practice or legislation.

As a School in the North East of England we were one of the first areas in the country to be placed in a local lockdown and have since been moved to a Tier 2 Restriction Area. To put this in context, since September, we have had 22 cases of COVID-19 within our student population. This has led to 532 of our students having to self-isolate for at least 2 weeks. 21 of our students have now entered a second period of self-isolation so will have missed 4 weeks of an 8 week half-term.

This is a problem for all year groups, but a particular issue for Year 11 and Year 13 students who will be sitting their exams this summer. 256 out of our 370 Year 11 students have had at least one period of self-isolation this half term. Another Year 11 case this morning, will lead to further self-isolation periods for more students. 70 out of our 270 Year 13 students have also had at least one period of self-isolation this half term. We can only see this situation getting worse as winter approaches and we will have more and more students having to self-isolate. This means students at Whitley Bay High School and many other schools will be at a distinct disadvantage compared to other schools around the country, where no or few positive cases have been identified and small numbers of students have had to self-isolate.

Therefore, to suggest exams, as they are currently planned, will be a level playing field for all students, is simply not correct. They are not fit for purpose for large number of students and we would suggest the exam arrangements will be discriminatory for many students, unless significant adaptations are made.

The statement that, delaying the exams for 3 weeks will compensate students in some way for the four months of school they have missed and, for many of our students, the further 2 or 4 weeks they have missed subsequently, fails to grasp the significance of this period of absence. It also severely belittles the teaching

profession to suggest, that a reduction of at least 20% of direct teaching time across the two years of the GCSE and A Level courses, will have little or no effect on the extent and quality of learning by students.

We believe there are some straightforward solutions to this issue which we propose are considered by Ofqual and the exam boards:

- In most subjects the amount of content has not been reduced by any significant degree, which is a mistake. The learning outcomes and specification can still be covered in sufficient depth with restricted breadth of curriculum. However, to achieve this, exam boards should provide more choice on the exam papers, to give students a greater chance, that there is a question(s,) which reflect what they have covered, while in school. This could be as simple as asking students to select 2 out of 4 questions rather than 3 out of 4 or worse still 4 out of 4. We accept this means students will be assessed on less content but it would provide a more level playing field for students who have experienced further significant disruption to their education.
- There needs to a mechanism in place, that provides special exam consideration, for the amount of time students miss this academic year due to self-isolation as a consequence of COVID-19. This can be verified through the attendance and absence data which is a statutory requirement for schools.
- There also needs to be a clear and well communicated alternative for students who are unable to sit exams because they either have COVID-19 or are self-isolating due to close contact with someone who has tested positive.

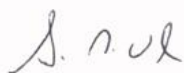
Moving forward, there will continue to be huge regional variations in the amount of learning students are able to complete because of COVID-19 and this needs to be reflected in any future planning regarding the summer exams. We already have the situation where students have returned to school from one period of isolation only to enter a second period – this will undoubtedly continue and must be addressed as a factor impacting on performance.

As a school, we have been proactive in providing high quality on-line and remote learning but, as the Secretary of State for Education has said, this is not the same as the face-to-face learning that takes place within the classroom. Therefore, the exams and assessment processes needs to adapt to recognise that all learning is not equal at the current time.

There is a need for the exam boards and Ofqual to communicate how and why they are making and implementing the decisions relating to 2021 exams and why they have rejected alternatives. Our current belief is that, with some proactive interventions by the exam boards, with the endorsement of the regulator, it is possible to be more agile and responsive to change and have an examination and assessment process which has credibility and standing with all participants in the process.

We look forward to your considered response.

Yours sincerely



STEVE WILSON  
Headteacher/National Leader in Education