

Issues to raise from AP/SEND CEO Network, PRUsAP and National Association for Hospital Education regarding Ofqual's Guidance on the allocation of grades:

Leaders across the SEND/AP sector recognise the unique and complex challenges that the current COVID-19 crisis is placing on all aspects of the current education system. These challenges included the need for Ofqual and the DfE to act swiftly to start to deal with the need to cancel all external assessments this year. Whilst we applaud the swift response by issuing guidance so promptly, we wish to make the following points on behalf of the sector. We anticipate that these views will form part of an ongoing dialogue with Ofqual and the DfE over the coming weeks and months through the recently convened AP/SEND Stakeholder Engagement Working Group and related discussions which include a planned discussion with Ofqual in the coming weeks.

1) *"We propose that grades will not be issued for students in year 10 or below, and that centres should withdraw any entries for them, but we will shortly consult on this proposal."*

Most pupils who attend PRUs and other forms of AP/SEND provisions often attend at various points in their school careers. Some of these pupils have been excluded from their mainstream schools, others to prevent exclusion and others who have a wide range of medical needs. Often entry into exams in Year 10 has been essential to improve outcomes for these pupils over time as it can allow a broadening of their curriculum offer and accreditation. While the guidance states that Year 10 students would have the opportunity to sit these exams at a later point, we need to be mindful that they will be taught a full curriculum during Year 11 next year and will be suffering the consequences of the current period of missed education. To ask these pupils to revise for and sit these additional exams during their Year 11 will further disadvantage a cohort who have already struggled within the education system. This may also provide an additional barrier to re-entry for many pupils within an AP setting for whom re-integration in Year 11 is unlikely.

2) *Judgements to be made on the evidence that is available*

As most pupils have only been in their AP/SEND provision for up to one year and have missed almost all of their year 10 education: this means that the sector is often trying to deliver GCSE courses in one year so there is often an emphasis on content delivery. Therefore, provisions do not always have the range and depth of information that you would find in mainstream schools available. Due to the complexity of student needs and the impact of their medical/mental health issues means that evidence is patchy and inconsistent. Our networks are currently exploring cross network partnerships to moderate the teacher assessments to provide additional rigour and challenge across all possible areas.

Will our knowledge and professionalism be recognised as we know our pupils best so even though we may not have traditional evidence we would know what grades to assign?

Could we use our teacher assessment information over the last 3 years vs actual grades as evidence of the accuracy of grade assigning?

Mock examinations are routinely used across the sector to prepare pupils for the rigor of external examinations. However, a significant number of pupils can be too anxious or unwell for the mocks to be used to assess knowledge taught so far as aspects of the syllabi may not have been taught yet.

Record of student performance over the course of study - For most AP/SEND provisions this information will not be available. Most students are placed in AP/SEND because they have had a challenging time at school so will not have perhaps performed to the best of their ability previously.

Progress review data – The short stays of the majority of pupils in AP/SEND means that they will probably have missed significant amounts of previous schooling so there may be little or no evidence available to be used.

Previous results in the centre in the subject – There may be a significant challenge if the subjects being taken by some pupils have not been offered previously. This can often be the case with the need for provisions to be as personalise as possible in their offer to pupils.

Is it plausible to apply a multiplier effect to ensure pupils that have only recently been in AP/SEND provisions to not be further disadvantaged by not having evidence of performance from a 3-year time period?

Can this process also account for pupils that re recently in some sort of crisis and therefore use the most 'appropriate' teacher-based evidence available to inform grades?

3) Statistical standardisation will include "results in previous years at individual centre level"

As cohorts of pupils in AP/SEND can vary widely year on year, it is likely that the different profile of pupils means that results are likely to differ significantly. There can be a wide range of factors influencing this including;

- the length of time pupils have been accessing education within the SEND/AP setting
- their prior attainment
- nature and prognosis of medical need

- the impact of which schools they have been excluded from.

As a result, standardisation risks disadvantaging the current cohort on the basis of the nature of the previous years. This is potentially exacerbated by the fact that some AP/SEND provisions report having an ongoing year-on-year trend for better results due to ongoing school improvement.

In other provisions certain GCSE courses may not have been taught in previous years which could have a substantial impact on the current cohort's predication of grades.

Many AP/SEND provisions operate across sites, the practicalities of ranking within a grade could substantially disadvantage individual pupils due to the lower number of students which can be as low as 1 or 2 pupils sitting a subject. There may also be difficulties in our sector with often only one teacher delivering a subject. ***Can a Head of Centre sign off instead of at least 2 teachers as stated in the guidance after moderation with another AP/SEND setting (Cross-network moderation)***

Suggested areas for using standardisation

Expected national outcomes for this year's cohort - Is this for AP/SEND provisions or for mainstream settings? How will this be judged? What about dual registered pupils? (Very common in our sector)

Results of the setting in previous years - in AP/SEND, the cohorts can vary significantly every year, with no control over prior schooling or attainment so the results in GCSEs can give an unrepresentative pattern over the years.

The often-low numbers of student entries mean that there can often be significant changes in percentage pass rates year on year - One student can make a huge difference. ***What weighting will be given to this area? Is this as relevant in AP?***

Will pupils in AP/SEND be standardised against other AP settings or against mainstream?

Other issues to consider

Dual registered pupils (particularly for pupils in medical AP) - Some pupils will be entered by their home schools for exams. These pupils may have only attended those schools for a short period of Key Stage 4 and that would mean they would be submitting the grades and ranking.

We will be able to submit information to the home school, but will schools be encouraged to liaise closely for those pupils and engage in discussions about how secure those grades would be and support the ranking process?

For some medical APs this would mean close liaison with over 30 different schools – We are unsure that the proposed time scales will be sufficient for this to be completed effectively and fairly.

Students resident in CAMHS Tier 4 inpatient units – Pupils who have been resident in tier 4 units would most likely to not be performing at a level that reflects their progress over the GCSE.

Can schools use the assessment information that they have about the student prior to their illness to assign the grades?

Students who have been inpatients over a longer period of time will not have any meaningful data from home schools. They would then be required to make a judgment based on what they have seen and what evidence they hold. However, the impact of their illness will need to be considered e.g. poor attendance at education because they are too unwell, inconsistent engagement in study.

Would evidence from the tier 4 units be considered in the absence of homeschool assessment information?

Students in General Hospitals - Teaching colleagues will need to liaise closely with the students' home schools and bring them up to speed as to what work they did whilst in hospital supported by staff and independently. This could be a mammoth task for some of the larger hospital schools like GOSH, Manchester or Newcastle. ***Will there be any additional allowances for this?***

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