

Preparing to award teacher assessed grades

Schools will now be tasked with reading a vast amount of information to get themselves ready to provide teacher-assessed grades (TAGs) for students following the recent publication of the suite of Joint Council Qualifications (JCQ).

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Please note: the information contained in this legal update is correct as of the original date of publication.

Following the recent publication of the suite of Joint Council Qualifications (JCQ) documents, schools will now be tasked with reading a vast amount of information to get themselves ready to provide teacher-assessed grades (TAGs) for students, and to develop internal quality assurance and appeals processes. The timelines are tight and various issues could arise both before and after grade decisions. If schools aren't prepared well in advance, it could lead to time and resource being unnecessarily diverted to deal with complaints, appeals and other challenges.

So, what should schools be thinking about now when making their plans? How can schools prepare to minimise the time spent in dealing with any fall-out from TAGs? We have set out our thoughts below on what schools should proactively focus on and have developed detailed FAQs on various issues which you can find [here](#).

- Note the deadlines** – Grades must be submitted to the exam boards by 18 June 2021 with results published the week commencing 9 August. The grades submission window falls between 26 May and 18 June, with quality assurance processes taking place between 18 June and 16 July. Clearly, these deadlines do not leave a lot of time for schools to get the policy and processes in place. Communication with students, parents and private candidates at an early stage is key to ensure that they have sufficient information about how the final calculated result will be determined.
- Policy development** – Schools will need to have adopted a Centre Policy by 30 April 2021. They can adopt or amend the JCQ's template, which sets out how grades will be determined, what evidence will be used and what pupils (and parents if appealing on their behalf) can do if they are not happy with the outcome. As the Centre Policy will be a central piece of evidence in appeals and challenges, schools need to think carefully about how they can evidence compliance with the statements within the policy. Other policies may also need tweaking; e.g. complaints policies should be amended to make clear that any complaints about TAGs will be dealt with under the specific appeals process (which looks at any allegations of "administrative or procedural" errors in awarding TAGs).
- Equality issues** - Schools will be used to putting in place reasonable adjustments for disabled pupils – a task that is particularly important this year, given the exacerbation of many issues caused by the pandemic. It may not have been possible for access arrangements to be put in place whilst students were working at home, and this may have had an impact on the work submitted. Whatever decision is made about access arrangements should be recorded together with the reasoning as to why that decision has been made. If reasonable adjustments were not in place when a student completed an assessment that is being used as evidence, teachers should take that into account when determining the grade or use other evidence instead. In addition, this year Ramadan runs from April to May, which is the prime window for carrying out assessments for TAGs. Schools will also need to think about the implications of this and whether any other adjustments need to be made.
- Mitigating circumstances** - Schools should ensure that students are given the opportunity to raise mitigating circumstances before grades are submitted and need to make students aware of doing this at an early stage. This could help avoid any claim that a student

did not know they needed to inform the school of an issue by a certain time. Students should be able to raise concerns about specific evidence being used to determine their grade; for example, if the evidence was affected by personal circumstances such as illness.

5. **Mental health** - It may be that mental health issues, either undiagnosed and/or caused by/exacerbated by the pandemic, have impacted on a pupil's studies, work done and their likely outcomes. Bereavement, isolation, anxiety and social difficulties may arise for students who, prior to the pandemic, had no known issues. Reasonable adjustments may need to be made, and the quality of the evidence of the mitigating circumstance will be key. In most cases, it is hoped that there will be enough content on which to base a grade (given that grades will be based on a range of evidence relating to the subject content gathered throughout a course, rather than hinging on a single exam). For example, it may be that assessment of fewer pieces of work is used to give an equivalence to a full set of work by a pupil who has suffered with mental health issues.
6. **Preparing for and managing requests for data** - Grade judgements are required to be based on records and evidence that demonstrate a student's performance in relation to the subject content they have been taught. Whilst TAGs will not initially be shared with students in advance, schools will need to retain the information and record what they have based these on, in the event that grades are challenged and to evidence the approach taken by the school. As experienced by some schools last year, students may request their personal data in the form of Subject Access Requests or more specific requests for their personal data relating to the grades awarded by staff. Given the number of children receiving awards, this could be timely to respond to. If a request is made before results day, schools will need to wait to share the information until after results day. Schools may want to have the information ready for each student on results day in the form of a letter, explaining what was taken into account, how the centre arrived at the grade, and to share it with those who request the same.

Last year, a few schools also received freedom of information requests from pupils, parents and the press, concerning results and grading statistics and the manner in which grades were awarded to students. As a public authority, schools are required to respond to such requests and should have a mechanism in place to simplify the process internally. A proactive approach could be more beneficial than reacting to requests after results day.

Caution should be taken not to share out the personal data of identifiable individuals who have not consented to the sharing of their data. Staff should be advised how to identify such requests for information and what to do when they are received. If you require any further support, in respect of template letters or advice about any requests received, please do not hesitate to contact us.

If you require any assistance or advice please do not hesitate to [get in touch](#).

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