



Daisy Cooper MP
House of Commons
London
SW1A 0AA

1 May 2020

Dear Ms Cooper,

PQ 39785: To ask the Secretary of State for Education, if he will take steps to allow schools to challenge examination boards and Ofqual where student grades are adjusted on the basis of statistical modelling.

The Rt Hon Nick Gibb MP has asked Ofqual to respond to you directly regarding your recent parliamentary question. A copy of this response will be placed in the Libraries of both Houses.

Ofqual is the independent regulator of qualifications, examinations and assessments in England. We have a statutory objective to secure qualification standards as part of the Apprenticeships, Skills, Children and Learning Act 2009.

As exams will not take place this summer, students' grades will instead be based on evidence of their likely performance in the exams had they gone ahead.¹ Schools and colleges (centres) will submit to exam boards, for each student and for each subject for which they were entered, judgements on the grade the student would most likely have received had the exams taken place, and the rank order of each student at each grade in each subject in that centre.

We have only a short amount of time to implement the exceptional arrangements needed to deliver summer 2020 results. Public health restrictions have closed schools and colleges for normal teaching and stopped all but essential travel. Inevitably, some teachers will have been directly affected by the virus. For all of these reasons, it will not be possible to standardise the process by which centres make the necessary judgements before they are submitted to the exam boards. While teachers are well equipped to rank order their students, some centres will inevitably be slightly more generous and others slightly more severe than the

¹ <https://www.gov.uk/government/publications/awarding-qualifications-in-summer-2020>

average when they are determining centre assessment grades. As far as possible, such inconsistencies will be corrected by the exam boards when they standardise all centre assessment grades.

The Secretary of State said in his direction to Ofqual that students should have access to a right of appeal if they believe the process was not followed correctly in their case. We propose that appeals should be made to exam boards by centres, on behalf of one or more of their students, on the grounds that the wrong information was used to generate calculated grades or that a mistake was made when the exam board standardised the grade or communicated the grades to the centre.

We have considered whether centres should have the opportunity to appeal in respect of the outcome of the statistical standardisation model in circumstances where there has been no error in the process followed by the exam board but the results issued are significantly out of line with the centre's expectations. We do not propose to allow appeals on this basis, though we have publicly consulted on this issue and as such this proposal remains at the formative stage. The basis of our proposal is that consistent application of the statistical standardisation process is central to the maintenance of standards in these qualifications this year. To vary the application of the statistical standardisation model for one student or for a centre's cohort of students, as a result of an appeal, would be unfair to other students and would undermine standards.

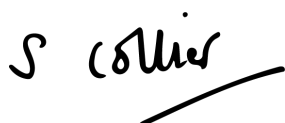
In the exceptional circumstances of this summer, we consider the statistical standardisation model to be analogous to the exam boards setting grade boundaries in normal years. In a normal year, appeals are not permitted on the basis that grade boundaries (specified levels of attainment) were incorrect and we propose to replicate that prohibition for appeals in respect of the statistical standardisation model.

As stated, we consulted on this proposal as part of our public consultation². The consultation ran from 15 April to 29 April. We have taken no decision on the proposals we have set out, which remain at a formative stage. We will carefully consider all responses received, and reflect them as appropriate, before making any decision.

Students who feel that the grade does not reflect their ability will be able to take exams in the additional exams series which will be scheduled for this autumn or, if they prefer, next summer.

I do hope this information is useful.

Yours sincerely,



Sally Collier
Chief Regulator

²<https://www.gov.uk/government/consultations/exceptional-arrangements-for-exam-grading-and-assessment-in-2020>