



Lord Bassam of Brighton
House of Lords
SW1A 0PW

30 June 2020

Dear Lord Bassam,

HL 5452: Her Majesty's Government what safeguards they have in place to ensure that predicted grades replacing A-level exams this year are awarded fairly; and whether they plan to introduce an appeals system.

Since the Secretary of State for Education announced that the 2020 exam series in England would be cancelled to help fight the spread of Coronavirus (COVID-19)¹, we have worked at speed to develop a new process for more than a million students this summer which fairly recognises students' work and makes sure they get their grades in time to progress.

On 3 April, we published our Guidance for GCSEs, AS and A level awarding: summer 2020.² This information is relevant to all students and exam centres in England using GCSE, AS and A levels, Extended Project Qualifications (EPQ) and Advanced Extension Awards (AEA) in maths regulated by Ofqual and offered by AQA, OCR, Pearson, WJEC Eduqas, ASDAN and City & Guilds.

Between 15 and 29 April, we formally consulted³ on several aspects of the exceptional arrangements we planned to put in place for issuing grades in summer 2020. A summary of the responses and the decisions are

¹ <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Lords/2020-03-23/HLWS170/>

² <https://www.gov.uk/government/publications/awarding-qualifications-in-summer-2020>

³ <https://www.gov.uk/government/consultations/exceptional-arrangements-for-exam-grading-and-assessment-in-2020>

published separately⁴ and we have updated our information for Centres document⁵.

We asked schools and colleges to use their professional experience to make a fair and objective judgement of the grade they believe a student would have achieved had they sat their exams this year. We highlighted within our guidance the importance that schools and colleges take into account the full range of available evidence when they grade students - including non-exam assessment; the results of any homework assignments or mock exams; and any other records of student performance over the course of study. We also asked schools and colleges to provide a rank order of students within each grade in a subject.

The Head of Centre has been required to sign a declaration confirming that the centre assessment grades and the rank order of students are a true representation of student performance, having reviewed the processes and data used to generate these grades and rank orders.

We have also provided additional guidance for Heads of Centre, Heads of Department and teachers on objectivity in grading and ranking⁶ to help schools and colleges play their role in ensuring this year's grading is as fair as possible. The guidance provided is based on existing research and analysis about how centre-based assessments can be carried out as objectively as possible.

As these arrangements have had to be put in place very quickly due to the Coronavirus (COVID-19) pandemic, it has not been possible to provide national training to school and college staff to standardise these judgements. Therefore, to make sure grades are as fair as possible, exam boards will standardise centre assessment grades using a statistical model which will include the expected national outcomes for this year's students, the prior attainment of students at each school and college (at cohort, not individual level), and previous results of the school or college. As such, it is highly likely that all centres will see some adjustment, in at least one subject, to their centre assessment grades. Such adjustments are in the interests of fairness to all students because it is likely that some centres will have been too severe and some too generous in comparison with other centres.

We are committed to doing all that we can to make sure students are not disadvantaged by these unprecedented circumstances, including allowing for an appeal where appropriate. 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. Therefore, following our consultation on arrangements for awarding in

⁴ <https://www.gov.uk/government/consultations/exceptional-arrangements-for-exam-grading-and-assessment-in-2020>

⁵ <https://www.gov.uk/government/publications/awarding-qualifications-in-summer-2020>

⁶ <https://www.gov.uk/government/publications/awarding-qualifications-in-summer-2020#history>

summer 2020⁷ and in accordance with government policy, we have confirmed that a centre can appeal to an exam board on the grounds that:

- the exam board used the wrong data when calculating the grade of all, some or just one of a centre's students, including because the centre erroneously submitted the wrong data; and/or
- the calculated grades generated by the model were incorrectly allocated or communicated to all, some or just one of a centre's students.

Ninety per cent of respondents to this proposal in our consultation agreed or strongly agreed with this approach.

We also continue to look at ways in which centres can also appeal if there are a range of truly exceptional circumstances which had not been foreseen and which meant that operation of the statistical model was less reliable than it could have been and, taking into account new information, would give more reliable results.

There may be rare cases where a student considers that centre assessment grades or rank order information was demonstrably affected by bias. If there was evidence of bias, which the student could provide, then this could be investigated. Evidence of bias could, regardless of any appeal facility, be raised by a student with their centre as a complaint that would need to be investigated. Similarly, evidence of bias could be presented to the exam board who would then investigate the matter as alleged malpractice.

We will publish before results are issued information for students, their parents and carers on how the appeal arrangements will work.

I do hope this information is useful.

Yours sincerely,

A handwritten signature in black ink that reads "S Collier". The signature is written in a cursive style with a long horizontal stroke underneath.

Sally Collier
Chief Regulator

⁷ <https://www.gov.uk/government/consultations/exceptional-arrangements-for-exam-grading-and-assessment-in-2020>