



Lord Kennedy of Southwark  
House of Lords  
SW1A 0PW

1 July 2020

Dear Lord Kennedy,

**HL5600: To ask Her Majesty's Government what action they have taken to ensure the calculated grades given to students due to sit A Level exams this summer are fair.**

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)<sup>1</sup>, we have worked at speed to develop a process 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.<sup>2</sup> 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 consulted<sup>3</sup> 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 published separately<sup>4</sup> and we have updated our information for Centres<sup>5</sup>.

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

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

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

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

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

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 took into account the full range of available evidence when they graded 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 to confirm 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 order.

We also provided additional guidance for Heads of Centre, Heads of Department and teachers on objectivity in grading and ranking<sup>6</sup> 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, however carefully they have made their judgements. Such adjustments are in the interests of fairness to all students because they will ensure, as far as possible, that individual centres have not been too severe or 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 summer 2020<sup>7</sup> and in accordance with government policy, we have confirmed that a centre can appeal to an exam board on the grounds that:

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

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

- 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.

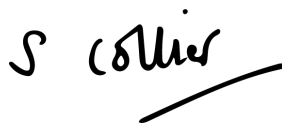
When we published our consultation decisions last month, we committed to carrying out further work to consider whether to allow an appeal where a centre could evidence significant demographical changes in its cohort to justify changes in how the standardisation process was applied to its students. As a result of this work<sup>8</sup>, we have decided this would amount to using the wrong data for the purposes of standardisation – centres can already appeal on these grounds. Our analysis indicates such cases would be exceptional, however, because the magnitude of change that would be required to affect calculation of results would need to be great.

If students or others have concerns about bias, discrimination or any other factor that suggests that a centre did not behave with care or integrity when determining the centre assessment grade and/or rank order information they should normally raise these concerns with their centre, in the first instance. In some cases, where there is evidence of serious malpractice on the part of the centre, it may be appropriate to bring those concerns directly to the exam board in the first instance. Where there is evidence, we require exam boards to investigate allegations as potential malpractice or maladministration. We expect such allegations to be rare, but this is an important safeguard for students and their overall confidence in this year's grading arrangements.

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,



**Sally Collier**  
Chief Regulator

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<sup>8</sup> <https://www.gov.uk/government/consultations/consultation-on-statutory-guidance-in-relation-to-the-ggcovid-regulatory-framework>