



The Lord Watson of Invergowrie  
House of Lords  
London  
SW1A 0PW

20 July 2020

Dear Lord Watson,

**HL6186: To ask Her Majesty's Government what arrangements they have put in place to facilitate permanently home-schooled children being awarded the grades required to allow the take up of college and university places in the 2020/21 academic year.**

Baroness Berridge 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.

On 18 March the Secretary of State for Education told Parliament that, in response to the Coronavirus (COVID-19) pandemic, schools and colleges in England would shut to all but the children of critical workers and vulnerable children after 20 March until further notice, and that exams scheduled for the summer would not take place. The Secretary of State said that the government would work with the education sector and with Ofqual (the regulator of qualifications, examinations and assessments in England) to make sure students who were preparing to take GCSEs, AS and A level exams in the summer would not be unfairly penalised.

On 31 March the [Secretary of State directed us](#) to have regard to this policy in respect of GCSE, AS and A level qualifications. His letter set out the government's policy that this year's cohort of students should be issued a set of results this summer in order to allow them to progress to further study or employment.

The Secretary of State acknowledged that the policy position is different for vocational and technical qualifications, given both the nature of those qualifications and the complexity of the sector. His letter signalled that there would be a further policy direction in relation to vocational and technical qualifications and other general qualifications not covered by the earlier direction. This was provided to us [on 9 April](#). In it, the Secretary of State set out that students and other learners who are taking vocational

and technical qualifications that are used for progression to and through employment, further or higher education should be issued a set of results this summer in order to allow them to progress to the next stage of their lives.

### **GCSE, AS and A levels**

On 23 March, in a written statement to the House of Commons, the Secretary of State confirmed the government's priority was that students could move to the next stage of their lives and that GCSE, AS and A level students would receive a grade that reflected their work. The statement explained the government's intention that "a grade will be awarded this summer based on the best available evidence, including any non-exam assessment that students have already completed. There will also be an option, for students who do not feel this grade reflects their performance, to sit an exam at the earliest reasonable opportunity once schools are open again."

The statement explained that Ofqual would "develop and set out a process that will provide a calculated grade to each student which reflects their performance as fairly as possible, and will work with the exam boards to ensure this is consistently applied for all students."

In April we ran a [consultation](#) seeking views on our proposals for the key aspects of this process. We outlined that students' grades this summer will be based on evidence of their likely performance in the exams, had they gone ahead. Schools and colleges (centres) would 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 (the "centre assessment grade");
- the rank order of each student at each grade in each subject in that centre.

We said that these should be holistic judgements informed by evidence of students' performance during their courses of study, such as homework, mock exams and non-exam assessments.

We acknowledged that some students who were expecting to take exams this summer will have been private candidates (i.e. will not have been studying in a centre) – including home learners, some students retaking a qualification to improve their grades, and some adult learners. We said that our arrangements would allow any such students for whom a Head of Centre could, with confidence, provide a centre assessment grade and include them in the centre's rank order to receive a grade in line with other students this summer.

We carefully considered whether results might be issued for private candidates on whose behalf a centre could not submit a centre assessment grade and rank order. We considered whether to require exam boards to secure relevant information, similar to centre assessment grades, from private tutors or parents who have taken responsibility for preparing candidates for exams. However, we concluded that, unlike centres, there is no pre-existing arrangement between private tutors or

parents and an exam board that could have been used to secure the necessary information, and no mechanism by which an exam board might require and enforce the necessary declaration.

More significantly, we felt that the professional judgements made by centres to inform centre assessment grades would be informed by their experience of each student in comparison with a broad range of their peers, in the current cohort and previous cohorts. Private tutors and parents would not have this context, which we considered would inevitably affect the reliability of any judgements they might have made as to the grade the students might have secured.

We also felt that that it would be unlikely that a private tutor could submit rank order information for a student, and perhaps inconceivable that a parent could do so. In any event, there would have been no Head of Centre of an approved exam centre who could have made the required declaration to the exam board.

We therefore decided that we should only allow an exam board to issue results for private candidates for whom a Head of Centre considered that centre assessment grades and a place in a rank order could properly be submitted. However, we were aware of the difficulties this could cause for some private candidates and we worked with the exam boards to find a solution.

On 30 April exam boards published further guidance to support Heads of Centre making judgements about private candidates, and we published an [update to our own information](#). The exam boards' guidance set out alternative sources of evidence a centre might consider where it did not have sufficient evidence about a student's attainment to submit a centre assessment grade and rank order information. It also allowed for some private candidates to transfer to another centre ahead of the grading process if the centre where they had registered decided it could not submit a centre assessment grade on their behalf.

We welcomed the exam boards' additional guidance, and stressed that it was vital that all grades are determined using a robust and consistent process so that everyone can have confidence in them. We now know that many thousands of private candidates will receive grades this summer, however we acknowledge that it may be necessary for some students who have not been studying with a centre to take exams in the additional autumn series instead.

The Department for Education announced that there will be an opportunity for students to sit exams in the autumn. These exams will act as a backstop to the summer arrangements: students will be able to sit them if they feel they could have demonstrated improved performance in an exam, if they need an improved result to progress onto the next stage of their education, or if there is not enough evidence for a calculated grade to be derived in the summer. In cases where students wish to sit exams, the Department for Education has issued [guidance](#) which makes clear that it expects the exam centre that entered them for the summer series to enter them in the autumn series and take overall responsibility for ensuring that they have somewhere appropriate to sit their exams. Centres are expected

to extend these arrangements to students who were private candidates in the summer, as well as for students who were on their roll.

## **Vocational and technical qualifications**

On 9 April the Secretary of State provided us with a [policy direction](#) relating to vocational and technical qualifications and other general qualifications not covered by the earlier direction. In summary, this direction sets out that learners taking these qualifications this summer should be issued results wherever possible, and all reasonable measures should be taken to ensure these results are safe, valid and maintain the same broad levels of comparability with previous years. The Secretary of State acknowledged that there would be some learners who could not be provided with a result this summer because there is no way in which a valid result can be calculated, or an assessment adapted, while still remaining fit for purpose.

We sought views from groups that represent learners and drew on the advice of assessment experts on technical issues as we carefully considered the aims of the direction. We also consulted with groups representing education and training providers and those representing employers, professional bodies and awarding organisations. Between 24 April and 8 May, we publicly [consulted](#) on a series of exceptional arrangements. These arrangements included:

- the provision of an extraordinary regulatory framework that sets out how an awarding organisation should calculate results, or adapt or delay assessments, depending on a qualification's purpose;
- allowing awarding organisations to make clear which learners should receive a calculated result (and how it will be awarded), or be required to complete an assessment.

We received high levels of support for our proposals and on 22 May we published our [decision](#) to adopt the proposed policy approach, with additional guidance and strengthened requirements. This reflected the significant contribution our stakeholders made in informing these exceptional arrangements.

The qualifications in scope of the direction fall into three categories: qualifications used for progression to further or higher education, qualifications serving a mixed purpose, and qualifications signalling occupational competence. We provided advice to the Secretary of State on which qualifications fall within each category. The Secretary of State, on the basis of this advice, determined the qualifications to which our extraordinary regulatory framework applied.

We know some private candidates such as home-educated children take vocational and technical qualifications alongside or in place of GCSEs, AS and A levels. For the majority of these qualifications, learners may expect to receive calculated results or to be offered an adapted assessment. Where private candidates have already completed some assessments through a centre, that centre may consider this and other evidence of the candidate's achievement sufficient to make an objective judgement about their likely performance. This enables the awarding organisation to provide

a calculated result. Where awarding organisations adapted their assessments, we asked them to consider how these could be offered to private candidates in as similar a way as possible to other learners.

For private candidates who did not have an existing relationship with a centre, and who were unable to secure a new relationship in time for centre assessed grades to be submitted to awarding organisations, it may be necessary to take assessments at the next available opportunity. Unlike GCSEs, AS and A levels, many vocational and technical qualifications have a number of assessment opportunities throughout the year, including in the autumn and in January. Where an autumn assessment opportunity is normally provided, awarding organisations must take all reasonable steps to continue to do so.

Where awarding organisations do not normally offer an additional assessment opportunity, they should do so where there are enough learners who need to take an assessment at this time or where it would be unfair for the opportunity not to be offered. We have safeguards in place for us to intervene if we decide there is a particular need for an assessment that awarding organisations have not met.

We expect awarding organisations to work with centres and to take decisions in the best interests of learners.

For all qualifications, we have asked organisations that represent higher and further education providers to consider how they might be flexible in admissions decisions, considering delays to entry to courses, for any students choosing to take an exam this autumn. We are reassured to hear that they believe that institutions will be flexible wherever possible, though we recognise this might only be possible in a minority of cases.

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