



Rt Hon Robert Halfon MP
Chair, Education Select Committee
House of Commons
London
SW1A 0AA

8 September 2020

Dear Mr Halfon,

Thank you for the opportunity last week for Ofqual representatives to appear before your Committee, and for accepting and publishing promptly our chair's [written statement](#) to the Committee. We are now writing to ensure you have all the information you need to complete your inquiry.

During the hearing, we committed to providing you with more information on a number of points and your clerk has since written to us with some further questions. I am writing to answer those questions and to provide the information we promised, as well as to clarify two points we made during the hearing.

Exclusion of data from independent and selective schools

You asked us about the statement in our [interim technical report](#) that refers to excluding data from independent and selective schools from our statistical predictions. We assume you are referring to the section on page 25 which explains that these were not included in the national predictions generated this year.

Excluding this data is routine practice. It is the approach adopted every year by exam boards, for good reason. The statistical predictions are generated at cohort level for a specific group of students, typically those that would be expected to certificate in that qualification – 18-year-olds for A level and the Extended Project Qualification, 17-year-olds for AS, and 16-year-olds for GCSE. The predictions include all students (of the appropriate age) that are matched to their prior attainment, except for GCSE where students from independent and selective schools are excluded.

This exclusion is because evidence suggests that students from independent and selective schools perform differently to the overall cohort. Most significantly, they have a different relationship between prior attainment and outcomes. As such, if the proportion of students from these

centres changed over time or within a particular exam board, then the predictions may under- or over-predict outcomes. We and exam boards have never considered this to be fair to the overall cohort, so these students are routinely excluded from the predictions.

Using the time between 12 June (submission of centre assessment grades [CAGs]) and 13 August (A level results) to check the algorithm

The deadline for schools and colleges to submit CAGs was 12 June. The suggestion you and your colleagues raised was that between that date and A level results being issued, we should have run a 'mock exam' on the statistical model, which would have exposed any anomalies.

We and exam boards started work as soon as the 12 June deadline had passed. We received data from the exam boards, but it was not complete, in that not all schools and colleges had been able to meet the deadline. We expected this to be the case, given the challenging circumstances in which they were working, so exam boards did what they could to be flexible on the deadline.

Exam boards ran the model for every school and college for every subject, and we did the same as a quality assurance check. This process needed to deal with additional complexity, such as where a school or college had split their entries for a subject across more than one exam board. This was a substantial task that took several weeks. Exam boards then took the outputs from the model and transferred the data into their usual results processing systems to allow them to issue results.

It was important that there was consistency between different exam boards, and so we carried out a live test of the model as an additional level of quality assurance. In this respect, the testing and quality assurance that we carried out in parallel was a 'live mock'. As we have said, we were aware that there were some students whose results appeared to be anomalous. However, there was no single, objective way to distinguish those students from others where the CAGs given were perhaps over-generous.

We were aware of the limitations of the model, and we discussed with exam board technical colleagues and the Responsible Officers in exam boards possible ways to address, ahead of results, the issue of anomalous results. However, since it was not possible to be confident about which students would receive anomalous results, it was not possible to address this ahead of results. We believe that only schools and colleges themselves would be able to make that judgement in all cases.

As we noted in our statement, statistical standardisation will inevitably result in a very small proportion of quite anomalous results that would need to be corrected by applying human judgement, through an appeals process.

Grounds for appeal

You enquired about potential grounds for appeal where schools and colleges had moderated their teachers' judgements before submitting centre assessment grades to the exam boards. Their moderation reflected the achievements of students in previous years.

The guidance for centres on how they were asked to determine centre assessment grades and the rank order position for each student is published [here on our website](#)

As you will see from the guidance schools and colleges were asked to come to an objective, holistic judgement on the grade a student would most likely have received had the exams taken place, taking into account evidence of their performance in class work, homework, mock exams etc.

The guidance suggested that schools and colleges should look to ensure consistency between different teachers in their centre. The guidance set out a range of information and noted that different evidence was available to different centres. The performance of the centre's students in previous years and the prior attainment of the 2020 cohort relative to that of previous cohorts is one of the sources of information that schools and colleges should have taken into account.

The guidance also explained that information about the grades achieved by previous years' students at the centre and their prior attainments relative to the 2020 cohort of students within the school or college would be taken into account when the centre assessment grades were standardised on a national basis.

The head of the school or college submitted the centre assessment grades and rank order information to the exam boards with a declaration:

I confirm that these centre assessment grades, and the rank order of students have been checked for accuracy, reviewed by a second member of staff (where possible) and are accurate and represent the objective and professional judgements made by my staff, that entries were appropriate for each candidate and that each candidate has no more than one entry per subject. Having reviewed the relevant processes and data, I am confident that they honestly and fairly represent the grades that these students would have been most likely to achieve if they had sat their exams as planned, and that they have not been disclosed to either the candidate or their parent/guardian. I understand that exam boards will conduct a statistical standardisation exercise, using a model developed with Ofqual, and that, if the profile of grades submitted is substantially different from what might be expected based on my centre's historical results and the prior attainment of this year's students, the grades for my centre will be adjusted to bring them into line with national standards.

A school or college has not made a mistake simply because it took into account the performance and the prior attainment of previous years' students when coming to a view on the grades their students would most likely have achieved if they had been able to take exams this summer. It has not made an administrative error. In fact, a school or college's judgements of the grades this year's students would most likely have achieved would likely be less accurate without reference to the grades their students have achieved in previous years.

We understand that some schools and colleges feel aggrieved because not all approached the exercise in the same way. Had the standardisation model proved acceptable, the effect of such inconsistencies in approach would have been ironed out. However, it would be inappropriate to allow a

school or college to appeal simply because it took a wider range of evidence into account and is, therefore, likely to have submitted more accurate centre assessment grades than others.

Of course, a school or college that now finds evidence that it made a mistake when it submitted its centre assessment grades or rank order information, for example because it transposed the names of two students or did not take into account a students' agreed reasonable adjustment, can appeal to the exam board. We have published a [summary](#) of the appeal arrangements which the Committee may find helpful.

Centres which made mistakes

We would like to clarify one of the answers we gave at the hearing regarding how students might appeal if their centre made a mistake. Roger Taylor said:

If the student appeals and says, "We think you've got it wrong", the school can simply contact the exam board and say, "I'm sorry, we've made a mistake. We gave you the wrong information." That would not require an appeal; under the mechanism, the school could simply say, "Yeah, okay, we've got that wrong", and inform the exam board.

It is important to note that a mistake by a school or college does not require the students themselves to appeal. The exam boards would treat cases such as these as an appeal from the school or college, however, and would require centres to provide evidence that they made a mistake, so as to validate the position.

However, we have specifically provided for exams boards to run a 'fast track' system to deal with simple administrative errors where the mistake is clear.

Appeals data

We publish statistics on appeals received in GCSE and AS/A level qualifications. The statistics for the last academic year (2018/19) are available [at this link](#). These statistics are published as Official Statistics, which are required to meet the principles of the Code of Practice for Statistics.

To comply with the Code we need to make sure that the statistics we report are trustworthy and carry high quality and value for our users. The timing of the release is based on production and review so that we can quality assure the statistics we report. We aim to publish statistics as soon as possible after we receive the data. The Code also prescribes that internal access to statistics is limited to those involved in producing, quality assuring and releasing the statistics and for operational purposes.

This year we plan to publish statistics on appeals in GCSE and AS/A level qualifications for the summer 2020 series in December 2020. This means that some appeals might be outstanding at the time of publication but that the statistics will be largely complete.

Routinely, the statistics we publish include the number of appeals received and upheld, number of grades challenged and changed, average number

of days taken to complete an appeal and a breakdown of different reasons for appeals. We plan to publish similar statistics this year as well.

This year we are looking to publish this data with additional breakdowns, for example by geographical region, gender, ethnicity, and centre type. However, we are mindful when publishing such breakdowns – where numbers and groupings can become small – to avoid allowing any unintentional identification of individual candidates. Such important considerations will guide us with respect to the detail and granularity in which we can publish appeals data. This will only be clear to us once we receive the final appeals data which is due in the third week of November.

Publication of Minutes and correspondence

The Committee asked that we publish Minutes and notes of the communications we had with ministers about the award of grades this summer. We have attended a range of meetings with ministers. From 26 March, we attended weekly meetings with Minister Gibb. Sally Collier also attended regular meetings with the Secretary of State and a range of school and college stakeholders. Ministerial meetings were arranged by DfE and any minutes would have been recorded by them, therefore the Committee would need to approach DfE regarding these documents.

Julie Swan referred to three papers during our evidence session. We will send to the Committee the Ofqual paper: ‘Summer 2020 GCSE and A/AS level exam series contingency planning for Covid-19 – options and risks.’ The other two papers referenced during the hearing were a briefing for the General Public Sector Ministerial Implementation Group on 1 May and a briefing for No 10 policy unit staff on 7 August. Although Ofqual provided contributions to these papers, they were written by DfE, therefore the Committee should approach DfE regarding these documents.

I also wanted to confirm our plans to publish minutes of Ofqual Board meetings. We will publish minutes up to March 2020 shortly. We intend to agree all minutes up to the end of August 2020 at our Board meeting on 16 September 2020 and will publish shortly after that meeting.

BTECs

I wanted to clarify the statement made during the evidence session about BTEC results, and provide some further context. It is not the case that BTECs were an afterthought in relation to the decision to move away from use of the algorithm in GCSEs and A levels in favour of CAGs.

That decision was communicated on Monday 17 August. On the same day we published a [statement](#) setting out our view that the impact of the decision on vocational and technical qualifications (VTQs) would be limited, because few VTQ awarding organisations used the same kind of statistical standardisation process of CAGs.

Instead, awarding organisations used a range of different methods to quality assure CAGs. The statement explained why the approach for VTQs (including BTECs) was different, that in many cases where CAGs formed part of the awarding approach, they were issued at unit level (and not at qualification level) and this was generally not the only piece of evidence used. Many VTQs are modular in nature and so students had “banked”

results from units they had already taken. CAGs had not, in most cases, weighed so heavily in VTQ qualification-level results and the decision in relation to GQs therefore did not inevitably lead to a decision to regrade.

On 17 August we asked awarding organisations that had used a statistical standardisation approach similar to the Ofqual model, to review their approach. Some immediately confirmed their intention to revisit grading decisions. At that stage it was not clear that BTECs should be recalculated, given that Pearson's approach was different (as explained above) - a point we emphasised in a further [statement](#) on 18 August.

There was considerable public pressure at this time for BTECs to "revert to CAGs" in the wake of the GQ decision, in order to maintain fairness with GCSEs and A levels. Pearson considered the implications of the GQ decision for their model, and on the afternoon of 19 August, less than 48 hours after the GQ decision was communicated (and while also handling the regrading of A levels and GCSEs), Pearson decided that they needed to recalculate BTEC grades.

We published a [statement](#) that day, explaining the position. As Julie Swan explained in the evidence session last week, given that the process of recalculation was more complex than the equivalent process for GCSEs and A levels, it was inevitable that this would take a little time.

We said at the session that the decision was Pearson's, but that we could understand why they took it.

As discussed in the July evidence session, the regulatory framework covering the broad range of VTQs was different from the framework covering GCSEs and A levels. The VTQ framework was flexible to allow awarding organisations to put in place tailored arrangements appropriate for their qualifications.

To be clear, while Ofqual did have the authority to intervene in Pearson's decision and would have done so had we considered their planned course of action to be inappropriate, it was not necessary because both their original approach and their revised approach were in line with the VTQ regulatory framework.

Around 450,000 BTEC results were recalculated as a result of the GQ decision; the proportion of grades that actually changed varied but in general the degree was less than in GQ because of the presence of banked component grades exerting effectively an anchoring effect on the influence of CAGs.

While it was regrettable that students expecting to receive Level 2 BTEC results alongside their GCSE results on 20 August were not able to do so, and this caused anxiety for some students, our view is that it would have been worse for Pearson to have issued results on time when some of those would be changed. As the [joint statement](#) by the Department for Education, the Federation of Awarding Bodies and Ofqual on 28 August made clear, significant efforts were made to ensure that learners were not adversely affected.

Finally, I would want to mention that many hundreds of thousands of VTQs were issued this summer, following the development and implementation

of an entirely new regulatory framework, novel systems and processes and the extremely hard work and commitment of staff right across the sector. In the face of the unprecedented circumstances of the pandemic, this overall achievement is noteworthy.

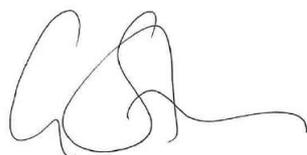
Ofqual communications resource

The Committee questioned Ofqual's communications resource, in particular referring to a tender for additional PR support. That tender has now been withdrawn as we have secured additional capacity for the organisation by working with Ofsted.

Full response to the Committee's report

We wrote to you on 6 August with some initial points of response to your report of 11 July: *Getting the grades they've earned: Covid-19: the cancellation of exams and 'calculated' grades*. We committed then to providing a full response to all your recommendations in September. We will do this by 16 September.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'G Stacey', written in a cursive style.

Dame Glenys Stacey
Acting Chief Regulator