



House of Commons
Education Committee

**Getting the grades
they've earned:
COVID-19: the
cancellation of exams
and 'calculated'
grades: Response to
the Committee's First
Report**

**Second Special Report of
Session 2019–21**

*Report, together with formal minutes relating
to the report*

*Ordered by the House of Commons
to be printed 22 September 2020*

HC 812
Published on 24 September 2020
by authority of the House of Commons

The Education Committee

The Education Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department for Education and its associated public bodies.

Current membership

[Rt Hon Robert Halfon MP](#) (*Conservative, Harlow*) (Chair)

[Fleur Anderson MP](#) (*Labour, Putney*)

[Apsana Begum MP](#) (*Labour, Poplar and Limehouse*)

[Jonathan Gullis MP](#) (*Conservative, Stoke-on-Trent North*)

[Tom Hunt MP](#) (*Conservative, Ipswich*)

[Dr Caroline Johnson MP](#) (*Conservative, Sleaford and North Hykeham*)

[Kim Johnson MP](#) (*Labour, Liverpool, Riverside*)

[David Johnston MP](#) (*Conservative, Wantage*)

[Ian Mearns MP](#) (*Labour, Gateshead*)

[David Simmonds MP](#) (*Conservative, Ruislip, Northwood and Pinner*)

[Christian Wakeford MP](#) (*Conservative, Bury South*)

Powers

The Committee is one of the departmental select committees, the powers of which are set out in House of Commons Standing Orders, principally in SO No 152. These are available on the Internet via www.parliament.uk.

Publications

© Parliamentary Copyright House of Commons 2020. This publication may be reproduced under the terms of the Open Parliament Licence, which is published at www.parliament.uk/copyright.

Committee reports are published on the Committee's website at www.parliament.uk/education-committee and in print by Order of the House.

Evidence relating to this report is published on the [inquiry publications page](#) of the Committee's website.

Committee staff

The current staff of the Committee are Kevin Candy (Second Clerk), Vanessa Donhowe (Committee Specialist), Dr Mike Everett (Clerk), Oliver Florence (Senior Media Officer), Rosemary Hill (Committee Specialist), Nelson Idama (Media Officer), Robert McQuade (Committee Operations Manager), Rebecca Owen-Evans (Committee Specialist), Steiner Teixido-Oroza (Committee Operations Assistant), Kandirose Payne-Messias (Committee Support Apprentice).

Contacts

All correspondence should be addressed to the Clerk of the Education Committee, House of Commons, London, SW1A 0AA. The telephone number for general enquiries is 020 7219 2370; the Committee's email address is educom@parliament.uk.

You can follow the Committee on Twitter using [@CommonsEd](#).

Second Special Report

On 11 July 2020 the Education Committee published its First Report of Session 2019–21, *Getting the grades they've earned: Covid-19: the cancellation of exams and 'calculated' grades* (HC 617). Ofqual's response was received on 15 September 2020. The Government's response was received on 18 September 2020. Both responses are appended to this report.

In both responses, the Committee's recommendations are shown in **bold** type, and the Government's responses are shown in plain type.

Appendix: Government Response

Introduction

On 11 July 2020, the Education Select Committee published the first report of its inquiry into the impact of Covid-19 on education and children's services which focused on the cancellation of the 2020 summer exams and subsequent issuing of grades to students. The government welcomes the report and the Committee's ongoing work to understand the impact of Covid-19 on education.

The government also welcomes the Committee's recognition in the report of the challenges involved in both awarding grades in summer 2020 and running exam series in autumn 2020 and summer 2021. The government wants to work collaboratively with the Committee to learn lessons from the 2020 summer exams process as we move towards the 2021 summer exam series. We have apologised for what happened this summer, the distress it caused for many and that those who have borne the brunt of it have been the students themselves.

As the Committee will be aware, the government and the independent exams regulator, Ofqual, announced on 17 August that following the concerns that had arisen after the issuing of AS and A level results on 13 August, there would no longer be a standardisation process for AS, A levels and GCSEs (or extended project and AEA qualifications). Instead, centre assessment grades for AS, A levels and GCSEs in summer 2020 would be awarded (unless this grade was lower than a student's calculated grade, in which case the calculated grade would stand).

The decision to revert to centre assessment grades means that several of the recommendations set out in the Committee's July report regarding calculated grades address a system which no longer applies in the same way as when the report was published. Therefore, whilst the government notes the Committee's conclusions and the recommendations regarding awarding grades in summer 2020, this response sets out the government's response only to the other, still relevant, recommendations in the Committee's report.

This response also focuses only on the recommendations where the department holds responsibility. The government understands that Ofqual has already replied to the Committee separately addressing the recommendations in the report that, as the independent exams regulator, they are responsible for.

Responses to individual recommendations

Recommendations 12–13

12. *Both Ofqual and the National Careers Service will be offering helplines to provide support and advice on and after results day. Two helplines must not mean a two-tier system. It is imperative that whichever number pupils ring, they will be provided with the same gold-standard, professional advice.* (Paragraph 44)
13. *Ofqual must ensure advice and support is easily accessible for all pupils unhappy with their grades. Both the helplines provided by Ofqual and the National Careers Service must be freephone lines. These must both be staffed by dedicated professionals with the training to provide sound and impartial step-by-step advice and support on appeals.* (Paragraph 45)

We, and Ofqual, recognise the importance of students having clear and accessible information, as well as someone they can speak to if they are unhappy with or have questions about their results.

The department's Exam Results Helpline is delivered by the National Careers Service but goes much wider than just careers advice. Callers to the helpline have direct access to experienced careers advisers who can advise on the different options available to them including T levels, A levels, GCSEs, BTECs, apprenticeships and other vocational options. Support is also available on topics such as clearing, university, gap years and the autumn exam series. In the very difficult circumstances of this summer, the helpline has been extended beyond its usual cut off point and will now be available until 18 September to provide additional support to students and their parents as they receive their results and consider their next steps.

Ofqual has also been running a helpline for students, plus a dedicated helpline for MPs raising issues on behalf of their constituents.

Staff on both helplines received full training and both helplines were ready to receive larger than normal volumes of calls around results days, having significantly increased capacity to do so. The Exam Results Helpline is a freephone number and the Ofqual helpline is charged at standard network rate.

Recommendations 15–16

15. *Fairness and accessibility must be the guiding principles of an autumn exam series. Having directed Ofqual to provide pupils with “an opportunity to sit an exam at the earliest reasonable opportunity”, the Department must not now wash its hands of further responsibility.* (Paragraph 49)
16. *The Department must provide guidance for schools and colleges, outlining minimum requirements for provision of teaching support for pupils opting for an autumn exam. The Department must support schools and colleges to manage the logistics of this series, providing concrete solutions on how the burden of an additional series can be minimised.* (Paragraph 50)

In most cases, students receiving grades in the summer will be able to use them to move onto their next step of education or employment. However, we appreciate that there are some individuals (e.g. private candidates) that were not able to receive grades this summer which is one of the reasons we are holding an autumn exam series in all subjects.

We are encouraging schools and colleges to support students taking autumn exams if they have capacity, and anecdotally we know that many are providing high levels of support such as online support (both academic and pastoral); access to libraries; laptops and financial support for transport.

In addition, logistical support for the autumn series exams is available. The department has launched an Exam Support Service which is open to all types of schools and colleges to help manage the logistics of this additional autumn series. The department has published guidance for exam centres regarding how to use the Exam Support Service.

Some schools and colleges may not be able to run exams on their own sites without disruption to study. If schools and colleges require additional space to run autumn exams, they will be able to book venues through the government's specialist venue supplier or make their own arrangements and claim back. The supplier has been available for bookings from the beginning of the autumn term, with sites being fully funded.

Schools and colleges will also be offered the opportunity to book Disclosure and Barring Service (DBS) checked invigilators through an approved supplier to support the delivery of autumn exams. Most schools and colleges will have made savings on invigilation costs, following the cancellation of summer exams. They will, however, be able to claim back the deficit if their autumn invigilator costs exceed invigilator savings they have made in the summer.

The government is clear that students and their families should not have to meet the cost of fees for entry into the autumn series. Schools and colleges should not face additional costs for fees, over and above what they would have paid had summer exams gone ahead. The Exam Support Service will provide funding to ensure that schools and colleges do not incur a net loss, taking their autumn fees and any rebates they receive in respect of summer exams together. Schools and colleges will be able to make claims for any deficit between the cost of their autumn fees and summer fee rebates later in the autumn term.

Recommendations 19–20

19. ***We believe that modifications to assessments will lead to erosion of standards, and that the 2021 cohort of exam-takers could be disadvantaged by a perception that their exams were not as rigorous as those taken by other cohorts.*** (Paragraph 55)
20. ***We support a short delay for exams in summer 2021 as preferable to modifications to exam content. Any delay must be a matter of weeks, not months. Ofqual must publish details of the 2021 exam series as soon as possible, and before the end of the summer term.*** (Paragraph 56)

We recognise that students due to sit exams and assessments in 2021 will have experienced disruption to their education due to the coronavirus outbreak. As such, we have been working closely with Ofqual, the exam boards and groups representing teachers, schools and colleges to consider our approach to exams and other assessments next year.

From 2 July to 16 July, Ofqual consulted on a range of possible adaptations to GCSE, AS and A level exams and assessments in 2021 on a subject-by-subject basis, with the overriding aim of ensuring that exams and assessments are as fair as possible. The consultation proposed, in particular, a range of ways to free up additional time for teaching (including the possibility of a slight delay to the exams timetable in 2021) and to accommodate any public health requirements next year. The consultation received almost 29,000 responses.

On 3 August, Ofqual published a summary of the responses and the decisions taken in light of the responses. In line with the Secretary of State's letter to Ofqual of 18 June, the subject content that forms the foundation of GCSEs, AS and A level qualifications will not be changed. However, in certain subjects with a high volume of content, centres will have a choice of topics on which their students will be required to answer questions in their exams in 2021—releasing teaching time and reducing the pressure on students and their schools and colleges.

We believe that, overall, the changes confirmed by Ofqual will help to ensure that those young people taking exams in 2021 have the same opportunities to progress as the students before them. We will continue to discuss our approach with school and college stakeholders, Ofqual and the exam boards, to ensure that exams in 2021 are fair.

With regard to the timing of exams next year, the Secretary of State asked Ofqual in the letter of 18 June to consider a short delay to the GCSE, A and AS level exam timetable in 2021, to free up additional teaching time. We are continuing to work with Ofqual, the exam boards, regulators in the devolved administrations, and groups representing schools, colleges and higher education to consider the best approach, and decisions will be confirmed as soon as possible.

Recommendations 21–23

21. ***The pandemic's impact on learning loss does not stop when pupils turn 16. Post-16 learners, whether they are resitting key English and Maths GCSEs, or preparing to sit final exams before entering higher education or the workplace, deserve proper catch-up support.*** (Paragraph 58)
22. ***The Government must extend catch-up funding to include disadvantaged post-16 pupils to ensure this is not a lost generation. This should be done by doubling the disadvantage element in the 16–19 funding formula for pupils in Year 12, for at least the next year.*** (Paragraph 59)
23. ***Any post-16 pupils attending Alternative Provision and Pupil Referral Units, and those training for basic skills, must also be eligible for catch-up funding.*** (Paragraph 60)

The Government has made up to £96 million available for the 2020/21 academic year to support 16–19 year old students via the 16 to 19 Tuition Fund. Funding is ring fenced for schools, colleges and all other 16 to 19 providers to mitigate the disruption to education arising from Covid-19. The funding is being provided to support small group tuition for 16 to 19 students in English, maths, and other courses where education has been disrupted.

All 16–19 providers in receipt of ESFA funding (either directly or via a local authority) are eligible to receive an allocation. All 16–19 students (except those in special schools and

alternative provision) in schools, academies, special post-16 institutions and independent training providers are in scope, where they meet the fund criteria. We are providing all special and alternative provision schools with catch-up premium funding in line with the specialist setting rates for schools, in line with our usual approach to funding these schools.

Ofqual Response

Ofqual response to Education Select Committee Report: 'Getting the grades they've earned: Covid-19: the cancellation of exams and 'calculated' grades.'

Introduction

This is Ofqual's full response to 'Getting the grades they've earned: Covid-19: the cancellation of exams and 'calculated' grades.'

We welcome the Committee's report and its ongoing inquiry and we are committed to providing information to assist it. The report contains a number of conclusions and recommendations. Our response addresses each of the recommendations relevant to our responsibilities in turn.

We provided responses to some of the recommendations in our letter of 6 August (attached at Annex 1) when we confirmed the steps we had taken ahead of results days to respond to the Committee's report. These are repeated here where appropriate. Some of the recommendations relate to the approach we had planned this summer rather than the final approach taken, but we recognise the importance of addressing each recommendation in turn to explain what happened and why we took particular decisions.

We note that the Department for Education is responding to the Committee on the recommendations relating to its responsibilities.

Of course, the approach to issuing results that was planned at the time of the report changed after A level results were initially released. We provided a written statement to the Committee on 1 September (attached at Annex 2) setting out our view of events this summer ahead of our appearance before the Committee on 2 September.

We made clear in that statement and at our appearance before the Committee that, above all else, we are sorry for what happened this summer: the distress and anxiety it caused for many students and their parents; the problems it created for teachers; and the impact it had on higher and further education providers.

As we also made clear in our statement, we must now learn the lessons from this summer and establish a way forward that can command public confidence and give students what they need to progress, even in difficult circumstances. Our immediate focus is on the safe and effective delivery of the 2020 autumn exam series and the work needed now to prepare for the summer 2021 exam series.

Response to recommendations

Recommendation 2: *Ofqual's evaluation must include comprehensive data on attainment, by characteristics including gender, ethnicity, SEND, children looked after, and FSM eligibility, providing full transparency on whether there are statistically significant differences between attainment this year compared with previous years.* (Paragraph 20)

Our [interim technical report](#), published on A level results day, included equalities analyses of calculated results at both centre level and student level. We would have published a similar report on GCSE results day had calculated grades been the sole method of issuing grades.

We remain committed to a programme of work to evaluate summer 2020, including an updated equalities analysis on the final grades issued, the results of which we will publish as soon as possible.

Our initial equalities analyses of calculated grades examined the extent to which the relationship between grade outcomes and student background variables in 2018 and 2019 would have been maintained in 2020. Our analyses show no evidence of bias in calculated grades. For calculated grades, changes in outcomes for students with different protected characteristics and from different socio-economic backgrounds were similar to those seen between 2018 and 2019 and generally showed no widening of the gaps in attainment between different groups of students.

We are carrying out further analyses of the 2020 outcomes (centre assessment grades (CAGs) or calculated grades, whichever is higher) to consider whether there was any impact on students who share particular protected characteristics or socio-economic status. Early indications suggest that there are no material differences in the attainment gaps between different groups of students for the grades given to students this year compared with the calculated grades that would have been issued. Before publishing the findings of this work, we plan to discuss them with equalities groups, to explore suggestions for further analysis.

Recommendation 4: Ofqual must identify whether there is evidence that groups such as BAME pupils, FSM eligible pupils, children looked after, and pupils with SEND have been systematically disadvantaged by calculated grades. If this is the case, Ofqual's standardisation model must adjust the grades of the pupils affected upwards.
(Paragraph 27)

We have explained our approach to equalities analyses above.

Along with the Committee and others, we had been particularly concerned to make sure arrangements for this year did not exacerbate the attainment gaps between different groups of students seen in previous years.

We were pleased to confirm on 21 July, ahead of results days, that our initial analyses of GCSE, AS and A level calculated grades were reassuring, suggesting that there would generally be no widening of the gaps in attainment between different groups of students. We published information about this [here](#). This was also seen in the analysis we carried out on the final calculated grades, described above.

Therefore, it was not necessary to adjust the calculated grades of particular groups of students as suggested in this recommendation.

While our analyses of calculated grades showed no evidence of systemic bias, we recognised the potential for individual concerns about bias or discrimination. We explained how any such concerns should be raised in our [student guide to appeals and malpractice or maladministration complaints](#).

Recommendation 5: Ofqual must be completely transparent about its standardisation model and publish the model immediately to allow time for scrutiny. In addition, Ofqual must publish an explanatory memorandum on decisions and assumptions made during the model's development. This should include clearly setting out how it has ensured fairness for schools without 3 years of historic data, and for settings with small, variable cohorts. (Paragraph 28)

We sought to be as transparent as possible at all stages about the approach we took this summer.

[We consulted](#) between 15 and 29 April on the aims of statistical standardisation; the approach we would use—including the sources of evidence on which we would draw; how we should consider issues relating to schools and colleges with improving or declining historical results; and potential bias in CAGs. [We published](#) the details of our approach on 22 May. In particular we confirmed that a “statistical approach will mean that an individual student’s grade will be informed by their position in the centre’s rank order for that subject, their prior attainment where available, and the centre’s past performance.” We also confirmed that for small cohorts in schools and colleges for which “the data would be weaker”, we would “ensure that the standardisation model is sensitive to the size of error in the statistical predictions”.

We published further [information](#) on 21 July, after the deadline had passed for schools and colleges to submit their CAGs and rank order information. To provide more information earlier, mid-way through the period in which schools and colleges were submitting CAGs and rank order information, could have risked making teachers anxious, either because they thought they needed to take account of the information in their submission, or because they had already submitted their data and therefore could not take account of the extra information. There was also the risk that centre behaviour would change if additional information was published. On 21 July, we provided a detailed [fact sheet and film](#) and as well as information about the anticipated results this year.

We chose not to publish the full model ahead of A level results day, because we felt it was important that everyone finds out their results on results day. Early publication of the final details of the model could have allowed some centres to work out results early or cause unhelpful anxiety if the information was misunderstood. However, the information we published prior to that point provided significant detail on the approach and allowed a detailed understanding of the standardisation process. The only things we did not publish before results day were the algebra that was used in the model and the definition of what constituted a small centre. Although we can see why the Committee and others were keen to see the statistical model earlier, we waited until results day in the interests of fairness to students.

We published our [technical report](#) on A level results day (13 August). The report and associated documentation confirmed the decisions and the assumptions we had made during the model’s development, the model itself, and provided a detailed technical account of the approach to awarding GCSE, AS, A level, Advanced Extension Award and Extended Project Qualifications. The report also included metrics on the accuracy of results.

As the report makes clear, for schools or colleges with a small number of entries in a

subject, and for those schools and colleges that did not have historical results data, the statistical standardisation process operated differently. This was necessary because the statistics were less reliable for smaller cohorts. In the interests of fairness to individual students, the model moved from statistical evidence as the primary source of evidence for determining students' calculated grades to placing greater and, in some cases, sole weight on the CAGs. Our report sets out how we determined that for cohorts of fewer than 15 students progressively less weight should be placed on the statistical evidence and that for cohorts of 5 or fewer, or where there was no historical evidence, the CAG would be the student's grade.

Recommendation 6: *Ofqual must collect and publish anonymised data at the conclusion of the appeals process on where it received appeals from, including, as a minimum, type of school attended, region, gender, ethnicity, SEND status, children looked after (including children supported by virtual schools), and FSM eligibility.* (Paragraph 29)

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

To comply with the Code, we must make sure that the statistics we report are trustworthy, are of high quality and have value for those who use them. This year we plan to publish statistics on appeals in GCSE and AS and A level qualifications for the summer 2020 series in December 2020. Very few appeals will be outstanding at the time of publication so the statistics will be largely complete.

The statistics we publish include the number of appeals received and upheld, the number of grades challenged and changed, the average number of days taken to complete an appeal and a breakdown of the different reasons for appeals. We plan to publish similar statistics this year.

We are considering publishing additional data breaking down appeals, for example by geographical region, gender, ethnicity and centre type. However, we will be mindful when publishing such breakdowns—where numbers and groupings become small—to make sure individual candidates cannot be identified. This will guide us as we decide on the granularity with which we can publish appeals data. This will only be clear to us once we receive the final appeals data from the exam boards in the third week of November.

Recommendation 7: *As part of its evaluation Ofqual must publish comprehensive data on vocational and technical qualifications, by characteristics including gender, ethnicity, SEND, children looked after, and FSM eligibility, providing full transparency on whether there are statistically significant differences between attainment this year compared with previous years.* (Paragraph 33)

We published some [information](#) about results issued for vocational and technical and other general qualifications at Levels 3 and 4 on 13 August. We evaluated whether, within the cohort, different demographic and socio-economic groups appear to show different patterns of outcomes compared to previous years. We concluded that in most cases attainment gaps have not increased over time between different demographic groups. There were some specific cases where attainment gaps have appeared to change, although changes were small in real terms.

We have very recently received revised data from awarding organisations (covering those results that were regraded) which we will use to complete further analysis in the coming weeks. This will form a part of our evaluation of summer 2020 awarding, as referenced above.

Separately, we will continue to publish quarterly information about vocational and technical qualifications. We will publish information covering April to June 2020 on 17 September.

Recommendation 8: *Where calculated grades are used to award vocational and technical qualifications this year, Ofqual must identify whether there is evidence that groups such as BAME pupils, FSM eligible pupils, children looked after, and pupils with SEND have been systematically disadvantaged by calculated grades. If this is the case, Ofqual's standardisation model must adjust the grades of the pupils affected upwards.* (Paragraph 34)

Unlike GCSEs, AS and A levels, there is no overarching statistical standardisation model for vocational and technical qualifications (VTQs) and other general qualifications. To cater for the breadth of the VTQ landscape, we designed our extraordinary regulatory framework to allow awarding organisations flexibility to determine the most suitable approach for their qualifications. This has been operationalised by 147 awarding organisations for around 15,000 qualifications. In all cases, awarding organisations have been responsible for designing assessment models, within the framework of our rules, that allow assessments to be made in the most fair and valid way for the qualification type.

Different approaches to calculating results were taken depending on the evidence available and the nature and structure of a qualification. Whichever approach was taken, our rules required awarding organisations to:

- maximise use of the most trusted evidence available
- quality-assure the evidence that was to be relied upon
- ensure the outcomes were not out of line with expectations.

Recommendation 10: *Ofqual must urgently publish the evidence thresholds for proving bias or discrimination, clearly setting out what evidence will be required, including example case studies. This must be communicated to parents and pupils in advance of results day.* (Paragraph 42)

We published, ahead of results day on 6 August, a [guide for students](#). This explained what they should do if they had concerns or questions about their grades.

It detailed the appeals process for qualifications this summer and how students could complain about bias, discrimination, or other potential examples of malpractice or maladministration.

The guide made clear that, in the first instance, students should ask their school or college to check whether it made an administrative error when submitting information to the exam board. Such errors could include a clerical mistake or a failure to take into account relevant information about a student's likely performance. Where schools and colleges can provide evidence of such mistakes, they can be quickly put right.

The guide explains how a student concerned that their grade was affected by some sort of wrongdoing or a lack of care by their school or college, including any concerns of potential bias or discrimination, should complain. This would be considered as a complaint of malpractice or maladministration. The guide includes information to help students understand whether they had cause to complain. We explained that students would need to show evidence of something specific or surprising in relation to the grade submitted by their school or college and gave examples of how a student might look for evidence that something had gone wrong. Of course, in practice, circumstances will vary and we made clear the examples we gave were not exhaustive.

The guide advised students to raise any concerns with their school or college in the first instance, although we recognised that in some cases a student might wish to go directly to the exam board. We have made clear that the process for making such a complaint was not part of the appeals process, therefore is not subject to deadlines for appeals and was not directly affected by the proposed changes to the appeals process on the basis of mock results. The guide provided details of our helpline, and of the Exam Results Helpline, who students and parents could call to discuss these issues. We also provided details of the Equality Advisory and Support Service who students could contact if they thought they had evidence of discrimination. We publicised this information through a wide range of stakeholder groups and through social media, as well as on our website.

Recommendation 11: *Where pupils with SEND, or their families, have concerns about their grade, they must be allowed to see the evidence, such as past work or mock exams, used by teachers to arrive at their calculated grade. If appropriate access arrangements were not in place for the work used, or if their school did not use evidence from SEND specialists if this was appropriate, the pupil must be allowed to appeal on the basis of malpractice or maladministration.* (Paragraph 43)

As explained above, we provided information for students concerned about malpractice or maladministration, including concerns that a reasonable adjustment or evidence relating to a student's disability was not taken into account. We would expect the student's school or college would explain how their CAG was determined and would make available to the student the evidence used where available.

If a school or college identifies that it made a mistake that had disadvantaged a student, for example by not taking into account their reasonable adjustment, it should raise this with the exam board under the appeals arrangements. It is only in cases where the school or college does not believe it made an error that a student would need to complain about malpractice or maladministration. We cannot require schools and colleges to provide students with particular forms of evidence. However, students have a legal right to request information held about them by their school or college as set out [here](#) by the Information Commissioner's Office. Exam boards might decide to request further information and explanation from school and colleges as part of a malpractice or maladministration investigation.

Recommendation 13: *Ofqual must ensure advice and support is easily accessible for all pupils unhappy with their grades. Both the helplines provided by Ofqual and the National Careers Service must be freephone lines. These must both be staffed by dedicated professionals with the training to provide sound and impartial step-by-step advice and support on appeals.* (Paragraph 45)

We recognise the importance of students having clear and accessible information and that they can speak to someone when they are unhappy with their results. We provided full training for colleagues staffing our helpline to take calls in the run up to, on and after results days. We also supported the training of the careers advisers who staffed the government's national Exam Results Helpline. We and the Exam Results Helpline were ready to receive larger than normal volumes of calls, having significantly increased our capacity to do so. The Ofqual helpline is charged at standard network rate and the Exam Results Helpline is a freephone number.

We also arranged for the Equality Advisory and Support Service to take calls from students on their helpline if they had evidence of discrimination.

Recommendation 14: *Ofqual must issue guidance to schools and colleges about the options available for pupils unhappy with their results. Letters to pupils should be sent out by schools and colleges, to ensure they are aware of their options, including the standard of evidence required to bring an appeal on the basis of bias or discrimination. Schools and colleges should clearly communicate to pupils and families which staff member will be their point of contact for discussions about next steps.* (Paragraph 46)

We issued a number of guidance documents aimed at students and schools and colleges. The documents we published on our website this year received over one million downloads and we have had over four million impressions on our posts to social media.

As part of our commitment to support students during this difficult year, we published a [student guide to post-16 qualification results](#) on 27 July providing information about the exceptional arrangements in place. We also published a [student guide to appeals and malpractice or maladministration complaints](#) on 6 August, as discussed above. We provided [BSL translations](#) of these guides.

We [wrote to all schools and colleges](#) on 27 July with information about this year's arrangements. In this letter, we provided links to the student guide and other resources for students, parents and carers. We also provided hard copies of these documents to schools and colleges for them to give to students, parents and carers. Under our current regulatory framework, we could not require schools and colleges to provide this information to all their students.

We also published question and answer style [guidance documents](#) for teachers, students, parents and carers about the arrangements for general and vocational and technical qualifications throughout this period, from 3 April onwards. We updated these as information changed and to make sure they included answers to questions we received via our helpline and our Public Enquiries email address.

We updated our student guide to post-16 qualification results and our student guide to appeals and malpractice or maladministration complaints on 19 August after the change to awarding grades was announced on 17 August. We updated our question and answer style guidance document for teachers, students, parents and carers with a new [document](#) on 20 August.

We published further [summary guidance](#) on appeals, malpractice and maladministration complaints for GCSE, AS and A level grades on 26 August to respond to questions we received about appeals arrangements in light of the changes made to the approach to

issuing results for these qualifications. We sought views from the school and college leaders that are members of Department for Education's 'Appeals taskforce' as we developed that guidance and we welcomed their helpful input.

We publicised our information documents on our own website and via social media, as well as providing a wide range of stakeholder organisations, including equalities organisations, with links to the documents for them to publicise with their networks. We sought to promote the information as widely as possible.

Recommendation 18: *Ofqual must urgently publish dates for the autumn exam series and end uncertainty for pupils, teachers, schools and colleges.* (Paragraph 53)

On 9 July the Joint Council for Qualifications, which represents the exam boards, announced that the timetable will run as follows:

- GCE AS and A-level examinations start on Monday 5 October and finish on Friday 23 October
- GCSE examinations start on Monday 2 November and finish on Monday 23 November.

The deadlines for entry are:

- GCE AS & A-level – 4 September
- GCSE (except English Language and Mathematics) – 18 September
- GCSE (English Language and Mathematics) – 4 October.

Recommendation 20: *We support a short delay for exams in summer 2021 as preferable to modifications to exam content. Any delay must be a matter of weeks, not months. Ofqual must publish details of the 2021 exam series as soon as possible, and before the end of the summer term.* (Paragraph 56)

We [consulted](#) from 1 to 16 July on arrangements for the 2021 summer exam series and we asked questions about the desirability of delaying the GCSE, AS and A level exam timetable, perhaps so it started after the May half term. We received almost 29,000 responses. We [published a summary of the responses and the decisions we took](#) in light of the feedback on 3 August.

68% of those who responded to the consultation were in favour of a delay to the GCSE exam timetable and 60% in favour of a delay to the A level timetable.

However, support decreased to 51% and 42% respectively if, as a result of delayed exams, results days were also delayed. A decision to delay exams would have consequences across the education sector, for schools, further education colleges and higher education. It would also have consequences that extend beyond England. As we explained to the Committee at the hearing on 2 September, while we understand the benefits a short delay to the start of the exam timetable would bring, delaying exams would introduce risks to the timely completion of marking. These risks would need to be understood and mitigated, as far as possible, before a decision was taken to change the timetable.

We have proposed to the Secretary of State that we work with DfE and the exam boards to agree the timetable and any delay to this year's exams as a matter of urgency.

In addition, following our consultation, we have asked exam boards to make some modifications to the way in which they assess their qualifications ahead of next summer.

Some of the changes relate to non-exam assessment arrangements in a number of GCSE, AS and A level subjects and are designed to allow assessments to be undertaken within public health provisions. In a few subjects there will be consequences for the exams, notably in geography. Given the difficulties schools and colleges would have arranging fieldwork for their students in the current academic year, the exams will be changed so that students do not need to draw upon their own fieldwork experience in the exams.

The government, which is responsible for the content of GCSEs, AS and A levels, has agreed that students taking GCSEs in English literature, history and ancient history should not be examined on the full range of content, allowing teachers some choice of the topics or texts they teach. Whilst the changes will reduce the volume of content that needs to be taught, it will not impact on the standards of the assessment that students will take—the sorts of questions that students will be asked or the way in which they will be marked. The assessments taken by students in 2021 will otherwise be in the familiar format.

Conclusion

We welcome the opportunity to give written evidence to the Committee in addition to appearing before the Committee. We are committed to learning the lessons from 2020 whilst making sure that we work to ensure that all regulated qualifications are delivered safely and to rebuild public confidence in them.

Annex 1: Letter to Chair from Ofqual

Dear Mr Halfon,

Ahead of our full response to your Committee's report *Getting the grades they've earned Covid-19: the cancellation of exams and 'calculated' grades*, which we will send in September after this year's results are issued, I am writing to update you on progress towards the release of results for GCSEs, AS and A levels, vocational, technical and other general qualifications.

Transparency

We published on 21 July [a package of information](#) setting out how results are being produced this year and early indications of how the overall results are likely to look.

We also presented this information at our virtual summer symposium on the same day attended by some 150 people from a range of organisations across the sector, during which we took the opportunity to thank teachers for their hard work and professionalism in making this year's exceptional arrangements work.

We understand and agree with your Committee's calls for transparency about the statistical standardisation model used for GCSEs, AS and A levels. We explained, following consultation, the principles that would underpin the model and as soon as we were able following finalisation of the model provided [additional details](#) about how it works so that everyone with an interest in this year's arrangements can understand the approach that has been taken. We do not believe it would be appropriate to publish the complete statistical methodology until A level results days because this might lead to disclosure of results ahead of time, or result in students believing incorrectly they know what their results are ahead of time.

We were able to provide assurance at our symposium that national results will be similar to last year—in line with the Secretary of State's [Direction](#) to us that, as far as is possible, qualification standards are maintained. The results will be slightly higher than last year because, where there was an option, we decided when finalising the model to err on the side of leniency, in favour of students. For example, historical data used in the model is based on previous years' results after any reviews of marking or appeals. We anticipate an average increase of approximately 2% at A level and around 1% at GCSE when compared with 2019 results. Our analysis shows that the vast majority of final calculated grades will be either the same or no more than one grade different from centre assessment grades, showing the care and professionalism exercised by teachers. Understandably, overall schools and colleges have been more generous in their centre assessment grades than would be indicated by prior performance. Through the standardisation model we will ensure that the value of GCSEs, AS and A level grades is protected.

Along with the Committee and others we have been particularly concerned to ensure the arrangements for results this year do not exacerbate the attainment gaps between different groups of students seen in a normal year when exams have taken place. We were pleased to be able to confirm on 21 July that our initial analyses of GCSE, AS and A level outcomes is reassuring and suggests there will generally be no widening of the gaps in attainment between different groups of students. We published information about this [here](#).

Unlike GCSEs, AS and A levels, there is no overarching statistical standardisation model for vocational and technical qualifications (VTQs) and other general qualifications. To cater for the breadth of the VTQ landscape, we have designed our [extraordinary regulatory framework](#) to allow awarding organisations flexibility to determine the most suitable approach for their qualifications. This has been operationalised by 147 awarding organisations for just over 15,000 qualifications. In all cases, awarding organisations are responsible for designing assessment models, within the framework of our rules that allow assessments to be made in the most fair and valid way for the qualification type.

Different approaches to calculating results have been taken depending on the evidence available and the nature and structure of a qualification. Whichever approach taken, awarding organisations have:

- gathered evidence such as previously banked assessment results, centre assessment grades and school/college results from previous years
- quality-assured the evidence that is to be relied upon
- ensured the outcomes are not out of line with expectations

We have engaged directly with awarding organisations, and facilitated consistency where possible through working groups focusing on approaches to calculated grades for sector areas or qualification types (for example Functional Skills, Applied Generals). Using a risk-based approach, we have monitored awarding organisations particularly closely for over 1000 qualifications with the highest stakes and highest volume uptake. We anticipate that where the entry has remained similar, outcomes should remain broadly in line with previous years.

As we explained at our appearance, we are committed to evaluating this year's arrangements and will be publishing further information alongside and after results are issued.

Information for students

As part of our commitment to support students during this difficult year, we published a [guide for students](#) on 27 July. We are providing full training for colleagues who will staff our helpline to take calls in the run up to, on and after results days. We are also supporting the preparation of the careers advisers who will staff the government's national Exam Results Helpline. This will provide greater capacity to respond to queries from students and their parents or carers as advisors will receive the detailed briefing information and training received by Ofqual staff. The Ofqual helpline is charged at standard network rate and the Exam Results Helpline is a freephone number.

Today, we have [published a student guide to appeals and malpractice or maladministration complaints](#). This includes information for those with complaints about bias, discrimination or another factor that suggests their school or college did not behave with care or integrity when determining their centre assessment grade or rank order information. We have provided this information to help students understand whether they might have a reason to make a complaint about malpractice or maladministration, including if they have concerns about bias or discrimination. The document includes examples to help students consider whether they might have evidence. As well as contacting our helpline or that provided by the Exam Results Helpline to discuss these issues, students could also choose

to contact the Equality Advisory Support Service for advice if they think they have evidence of discrimination. We have provided these contact details in the student guide.

Alongside this information, we have also published [our final statutory guidance for exam boards on appeal arrangements for GCSE, AS and A levels this summer](#). This guidance confirms the grounds for appeal set out in our consultation proposals and following consultation provides additional examples of the circumstances in which appeals might apply.

Your report also calls for publication of the timetable for the Autumn series. JCQ has confirmed that AS and A level exams will start on Monday 5 October and finish on Friday 23 October (entry deadline 4 September) and results will be provided by Christmas

GCSE exams will start on Monday 2 November and finish on Monday 23 November (entry deadline for all subjects except English and maths 18 September; entry deadline for English and maths 4 October) and results will be provided by February.

For vocational and technical qualifications and other general qualifications, we require awarding organisations that normally provide an autumn assessment opportunity to take all reasonable steps to continue to provide this.

Where awarding organisations do not normally offer an autumn assessment opportunity, we have asked them to do so where there are students who need one, unless it would be impractical or create a disproportionate burden. We expect awarding organisations to work with centres, and to take decisions in the best interests of students. We have safeguards in place for us to intervene if we decide there is a particular need for an assessment that is not being met by awarding organisations. We also require awarding organisations to ensure that their approach to delivering these assessments minimises burdens and is as deliverable as possible, including by centres and teachers.

We are updating our [interactive tool](#) to include information about when the next available assessment opportunity will be for particular qualifications. The updated version will be available for use by centres, students, parents and all other interested parties by 7 August 2020.

Our consultation on proposed GCSE, AS and A levels exam and assessment arrangements in 2021 attracted almost 29,000 responses. On 3 August, we [published](#) a summary of the responses and our decisions for each subject.

We also published a [consultation](#) on assessment of VTQs in 2020/21 on 3 August. Our proposals include a requirement for awarding organisations to consider whether they should make adaptations to their assessments and qualifications to mitigate the impact of disruptions to teaching, learning and assessment. We will engage with awarding organisations during August on approaches for 2021 for different types of VTQs, and we anticipate publishing a further consultation later in the month.

I trust this information provides you with assurance that we take seriously your recommendations and have made considerable progress in responding to many of them. We will provide a full response to all your recommendations in September.

Sally Collier

Chief Regulator

Annex 2

Written statement from Chair of Ofqual to the Education Select Committee on this year's GCSE, AS, A level, extended project and advanced extension award qualification results

Confidential until published

On behalf of my Board, I welcome the opportunity to give evidence to the Select Committee and provide, by way of a written statement, some introductory comments.

Above all else, we want to make clear that we are sorry for what happened this summer: the distress and anxiety it has caused for many students and their parents; the problems it has created for teachers; and the impact it has had on higher and further education providers.

In March, Ofqual was consulted by the Secretary of State on how to manage school qualifications in the context of a pandemic. Our advice at that time was that the best option in terms of valid qualifications would be to hold exams in a socially distanced manner. We also set out alternative options including the use of standardised teacher assessments and the risks associated with them.

On March 18, the Secretary of State for Education took the decision to cancel exams this summer. The loss of schooling and the likely parental concerns about sending children back into schools to take exams meant that exams were not considered a viable option.

We were asked to implement a system of grading using standardised teacher assessments, and directed to ensure that any model did not lead to excessive grade inflation compared with last year's results. The primary objective was to allow young people to progress with their lives, whether to sixth form, college, university, work or training. Given that they could not demonstrate their abilities in summer exams, our approach was supplemented by an opportunity to sit exams in the autumn.

The principle of moderating teacher grades was accepted as a sound one, and indeed the relevant regulatory and examination bodies across the four nations of the United Kingdom separately put in place plans to do this. All the evidence shows that teachers vary considerably in the generosity of their grading—as every school pupil knows. Also, using teacher assessment alone might exacerbate socio-economic disadvantage. Using statistics to iron out these differences and ensure consistency looked, in principle, to be a good idea. That is why in our consultations and stakeholder discussions all the teaching unions supported the approach we adopted. Indeed, when we consulted on it, 89% of respondents agreed or strongly agreed with our proposed aims for the statistical standardisation approach.

We knew, however, that there would be specific issues associated with this approach. In particular, statistical standardisation of this kind will inevitably result in a very small proportion of quite anomalous results that would need to be corrected by applying human judgment through an appeals process.

For example, we were concerned about bright students in historically low attaining schools. We identified that approximately 0.2% of young peoples' grades were affected by

this but that it was not possible to determine in advance which cases warranted a change to grades. That is why the appeals process we designed and refined was so important. But we recognise that young people receiving these results experienced significant distress and that this caused people to question the process.

The statistical standardisation process was not biased—we did the analyses to check and found there was no widening of the attainment gap. We have published this analysis. Indeed, 'A' and 'A*' grade students in more disadvantaged areas did relatively better with standardised results than when results were not standardised.

However, the impossibility of standardising very small classes meant that some subjects and some centres could not be standardised, and so saw higher grades on average than would have been expected if it had been possible to standardise their results. This benefitted smaller schools and disadvantaged larger schools and colleges. It affected private schools in particular, as well as some smaller maintained schools and colleges, special schools, pupil referral units, hospital schools and similar institutions. We knew about this, but were unable to find a solution to this problem. However, we still regarded standardisation as preferable because overall it reduced the relative advantage of private schools compared to others.

Ultimately, however, the approach failed to win public confidence, even in circumstances where it was operating exactly as we had intended it to. While sound in principle, candidates who had reasonable expectations of achieving a grade were not willing to accept that they had been selected on the basis of teacher rankings and statistical predictions to receive a lower grade. To be told that you cannot progress as you wanted because you have been awarded a lower grade in this way was unacceptable and so the approach had to be withdrawn. We apologise for this. It caused distress to young people, problems for teachers, disrupted university admissions and left young people with qualifications in which confidence has been shaken. It will affect those taking qualifications next year who are competing for the same opportunities as those who received this year's grades.

We fully accept our share of responsibility in this. Throughout the whole period we worked in close partnership and transparently with the Department for Education. We also consulted widely including with exam boards and with relevant education unions to ensure the proposals had their support.

There has been much discussion about the design of the algorithm. Many designs were considered and many proposals put forward. The suggestion has been made that a different model might have led to a different outcome. But the evidence from this summer, including from similar models implemented and withdrawn in Scotland, Wales and Northern Ireland indicates a much more fundamental problem. With hindsight it appears unlikely that we could ever have delivered this policy successfully.

What became apparent in the days after issuing A level results was that neither the equalities analyses, nor the prospect of appeals, nor the opportunity to take exams in the autumn, could make up for the feeling of unfairness that a student had when given a grade other than what they and their teachers believed they were capable of, without having had the chance to sit the exam.

Understandably, there is now a desire to attribute blame. The decision to use a system of statistical standardised teacher assessments was taken by the Secretary of State and issued

as a direction to Ofqual. Ofqual could have rejected this, but we decided that this was in the best interests of students, so that they could progress to their next stage of education, training or work.

The implementation of that approach was entirely down to Ofqual. However, given the exceptional nature of this year, we worked in a much more collaborative way than we would in a normal year, sharing detailed information with partners.

We kept the Department for Education fully informed about the work we were doing and the approach we intended to take to qualifications, the risks and impact on results as they emerged. However, we are ultimately responsible for the decisions that fall to us as the regulator.

We believe it is important that we do not leap to inaccurate conclusions prematurely. It will take time to fully understand everything that happened here, less than three weeks after results day. But there are already some important lessons to be learned from this summer:

- any awarding process that does not give the individual the ability to affect their fate by demonstrating their skills and knowledge in a fair test will not command and retain public confidence
- the original policy was adopted on the basis that the autumn series would give young people who were disappointed with their results, the opportunity to sit an examination. However, the extended lockdown of schools and the failure to ensure that such candidates could still take their places at university meant that this option was, for many, effectively removed. This significantly shifted the public acceptability of awarding standardised grades
- it is easy for people to believe that a policy is fair at the overall level, but this belief changes very quickly when the impact is felt at an individual level. It is not clear to us that a more effective communications effort would have overcome this, but to be successful it would have to have engaged multiple levels of communication, not simply the activities of the regulator
- a 'better' algorithm would not have made the outcomes significantly more acceptable. The inherent limitations of the data and the nature of the process were what made it unacceptable.

The blame lies with us collectively—all of us who failed to design a mechanism for awarding grades that was acceptable to the public and met the Secretary of State's policy intent of ensuing grades were awarded in a way consistent with the previous year.

To try to deliver comparable qualification results in the absence of students having taken any assessments (examinations) proved to be an impossible task. It is now our collective responsibility to learn the lessons and to establish a way forward that can command public confidence and give students what they need to progress, even in difficult circumstances.

Roger Taylor

Chair, Ofqual Board

1 September 2020