



Rt Hon Robert Halfon MP
Chair, Education Select
Committee
House of Commons
Westminster
London
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18 December 2020

Dear Mr Halfon

I am writing to you following my recent appearance before the Committee on 8 December to provide some information on a number of points discussed during the session.

Engagement with employers

Ahead of the package of measures announced on 3 December to support students taking exams and assessments in 2021, we met with a wide range of stakeholders. This included meetings with over 70 representative organisations and individuals from across the sector. We sought views on the grading standard of the qualifications in 2021, contingency measures and adaptations to exams.

As we worked closely with the Department for Education on the proposals, we carried out much of the engagement together. In doing so, we nonetheless made clear our distinct responsibilities for making decisions in relation to arrangements for exams and other assessments in 2021.

As I mentioned during the session, I personally met with the Confederation of British Industry (CBI) and discussed with them the work we, and the Department, were doing on the arrangements for exams and assessments in 2021. We heard from them that employers recognise that these are exceptional times that require flexibility. They did not express any concern about the proposed approach to grading standards in 2021.

As part of our joint stakeholder engagement, we and the Department contacted stakeholders confidentially before the announcement and this included the following employer organisations: the CBI, the Federation of Small Businesses, British Chambers of Commerce and the Institute of Directors. None of these organisations raised any concerns about the proposed package of measures being introduced. We also received feedback from them that suggested employers would likely be broadly supportive of the measures introduced and that the intended grading standard for 2021 is the fairest approach for learners in the current circumstances

The approach to stakeholder engagement that we have agreed with the Department, is an ongoing programme between now and the summer – it is not

restricted to pre-announcement discussions. We recognise the importance of continuing to speak with and seek views from a wide range of organisations. We will follow up in more detail across the sector, including with a range of employer organisations so that we understand their views alongside other users of qualifications, and to make sure they understand the arrangements in place for qualifications in 2021.

We will also use employer organisations' networks to raise awareness and understanding of the arrangements in place for regulated qualifications in 2021, amongst their members and the sector as a whole. We will continue to work closely with a wide range of stakeholders to consider arrangements in 2022 and beyond.

Student focus groups

During the session, Kim Johnson asked me to confirm the cohort sizes involved in our qualitative research on learning loss. We are conducting the focus groups for this research in three phases. The first of these is now complete and included 16 students in total; five in Year 13; two in Year 12; and nine in Year 11. We plan to speak to at least 60 students over the three phases of the project and we are currently developing plans to extend our programme of focus groups and surveys for the next year.

In addition to this work, we also held focus groups in November to explore views on approaches to grading in summer 2021 and contingency arrangements, these discussions also touched on some aspects of learning loss. This group involved 12 students from Year 13.

We are currently running a consultation on the adaptations for summer GCSE, AS and A level exams. This closes on 20 December. We have already received over 3,600 responses from students, and over 4,500 responses from teachers.

Higher education places

You referred to our publication of 3 December about the [grading of GCSEs, AS and A levels in 2021](#) in which we noted that in deciding not to carry forward the grade distribution from 2019, we considered the context of arrangements in Wales and Scotland. You asked me about the reference that 'only a small proportion of English students compete for higher or further education places in Wales and Scotland.' I said that I would confirm the figures to you.

I have included a table at Annex 1 which shows that out of over 485,000 UK students progressing to higher education courses across the UK, around 10,000 students from Scotland and Wales were accepted on undergraduate courses at higher education providers in England in 2020. Around 16,000 students from England were accepted on undergraduate courses by providers in Scotland and Wales. We do not have equivalent figures for further education places.

A level pass rates

You asked me about the A level pass rates in 2019 and 2020. I can confirm that in 2020 99.7% of students received a pass (grades A* - E), with 0.3% failing to gain a

grade (U). In 2019, 97.5% of students received a pass (grades A* - E), with 2.5% failing to gain a grade (U). We expect overall results in 2021 to look very similar to the 2020 grade profile, although results may look different in individual subjects.

Quality of marking

During the session, Ian Mearns suggested that research from Ofqual shows 'that a quarter of all grades are probably inaccurate plus or minus one grade either way'. We would like to clarify the findings of our research into [marking consistency](#) as we do not agree with this interpretation.

Our research into marking of exams in GCSE, AS and A levels shows that the majority of grades awarded are the same as those that would be awarded by a different, senior examiner. The precise figures for this vary by subject, reflecting the fact that each subject lends itself to being assessed in different ways, from multiple choice questions to long essays. For multiple choice questions, there will be a single right mark. Many subjects, certainly at GCSE and A level, need longer, extended responses in order to assess knowledge, understanding and skills validly.

Where two examiners give different marks for an answer to an extended response question, it does not follow in any way that automatically one of the marks is wrong and the other right. Rather it often reflects the fact that two examiners can legitimately give the same work slightly different marks. In some cases, this could result in different grades. Of course, some mark differences will be illegitimate. Where this is the case we expect exam boards to seek to identify and correct such cases before results are issued to students. If they fail to do so, they must correct any marking errors which are found through their established review and appeals arrangements. However, certainly in the case of the more 'subjective' subjects, to characterise all mark differences as illegitimate or wrong is a mischaracterisation.

This is because all marking is a human process, and examiners have to use their professional judgement when marking exam papers. Some students could be awarded a mark for a response that is either slightly lower, or higher, than another that could be awarded. Both marks could well be a legitimate reflection of the student's performance and will be a sound estimate of any student's ability at that point in time based on the evidence from the assessment they have taken. For example, there may be a situation where a student's essay is 'on the cusp' between showing 'clear knowledge' and 'detailed knowledge'. One examiner might give it a mark of 7 and another a mark of 8. It might not be possible to argue definitively that the mark of 8 is wrong and the mark of 7 is right. This equally applies to the overall grade awarded.

We must, and do, continually strive for exam boards to ensure that marking in every subject is the very best it can be. However, this is a human process, relying on human judgement, and there are natural limitations as to how far different examiners will attain perfect agreement on a mark of a complex response. This is not a new issue, nor is it unique to GCSEs and A levels; it is something that has existed as long as qualifications have been marked and graded.

It is important in this context to consider that whilst there are of course alternative forms of assessment, these are subject to many of the same issues as exam marking, sometimes to a greater extent, as well as other limitations. Whilst we may seek it, there is no panacea. In fact, our research suggests that overall the quality

of marking of GCSEs, AS and A levels in England is good, and compares favourably to other examination systems internationally.

Ofqual governance

In order to provide yet more resilience and responsiveness in the year ahead, the Board is establishing (as from 1 January 2021) a sub-committee, to oversee 2021 general, vocational and technical qualifications. I have agreed to be the independent Chair of the sub-committee, with membership made up of a mix of Ofqual Board and independent members.

I feel privileged to have had the chance to be the organisation's Chief Regulator in recent months. I understand that the Department will be in touch with the Committee soon to confirm arrangements for my replacement. Meanwhile I would like to put on record that I have been enormously impressed with the competence of the team at Ofqual, and so admiring of their continued efforts on behalf of those studying for qualifications this year, and beyond.

Your sincerely

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

Dame Glenys Stacey
Acting Chief Regulator

Enc: Annex 1 - Information on applicants accepted on undergraduate courses in 2020

Annex 1

The table below sets out information on applicants accepted on undergraduate courses in 2020, by UK domicile and country of provider, extracted from [data published by UCAS](#) .

	Domicile of accepted applicant				
		England	N.Ireland	Scotland	Wales
Country of HE Provider	England	395,630	3,325	1,525	8,225
	N. Ireland	360	10,810	15	20
	Scotland	5,275	800	36,930	150
	Wales	10,485	125	45	11,670

Information about accepted applicants from the EU (other than the UK) and outside the EU is not included here but is available in the data published by UCAS.