



## Education Committee

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From Robert Halfon MP, Chair

Rt Hon. Gavin Williamson CBE MP  
Secretary of State for Education  
Department for Education  
Sanctuary Buildings  
Great Smith Street  
London SW1P 3BT

23 March 2021

### ***Alternative arrangements for awarding grades in 2021***

Dear Gavin,

We were grateful for the Minister for School Standards' readiness to come before us with Ofqual a couple weeks ago. Having now reflected on the alternative arrangements to exams for this summer, we wish to raise several concerns and observations with you.

#### ***Summary***

First, we have a real fear that the package of measures being proposed, as it stands, risks much higher grade inflation happening this summer, possibly well beyond what was seen last August. This would, of course, have absolutely no benefit or value to anyone, and especially not to students in the long term. It would also create chaos for the thousands of students chasing college, and further and higher education places come August. We already know that there has been an 8% increase in university applications this year, raising the prospect of a surge of well-qualified students looking for places.

Without standardised assessments and with a lack of external, impartial assessors to provide the checks and balances to guarantee fairness, there is every possibility of a 'wild West' playing out with grades this summer. A system without these components, relying principally on internal quality assurance and sample checks, really risks inconsistency in approaches and results between schools and colleges.

Secondly, at this point, it is concerning that Ofqual is unable to confirm the level of sampling of teacher assessed grades that should take place, and be deemed necessary, to shore up public confidence in grades. While we all shared the real hope that exams would take place this summer, we believe DfE and Ofqual, as part of their contingency planning, should have developed more robust ways to validate teacher assessed grades in the event of exams not being run, much earlier than they did. This does not appear to have happened.

Sir Jon Coles, a former director general for education standards at the DfE, believes that we are now risking seeing an outcome much worse than last year's. He has commented, "If 'no algorithm' is taken to mean 'no use of past data' and 'no exams by the back door' to mean 'no common assessment taken under standard conditions', then we really are lost".

Thirdly, if there is no need for external exam markers this year, and the exam boards are not doing thorough external checks, the Department must look urgently at what costs are being charged to schools and colleges by exam boards, given the very changed circumstances, and make an appraisal of what reduced charges to schools and colleges should apply.

### ***Teacher assessments and maintaining standards***

Using teacher assessments as a replacement system for exams is never going to be perfect, but this year's system ought to be designed to provide, as far as possible, consistency and comparability in standards across candidates and exam centres. We, like the Department, are extremely grateful for the efforts of teachers and other school staff over this past year, and acknowledge the pressure that they have already been under. While the proposed system rightly values their professional skills and judgment, it should also protect those staff from disproportionate additional pressures.

There is a risk that the teachers who "played by the rules" last year, whilst others perhaps inflated grades more heavily, are not going to make that same "mistake" this year and could potentially overcompensate when reaching their judgments on student grades. Last August many students were left feeling that their school's actions had placed them in an unfair position in comparison to others. This was despite the requirement for 'heads of centre' to sign off results in line with Ofqual's required declaration, which head teachers and college principals are being asked to do again. However, this year there will be a much wider basis on which students and parents can seek an appeal should they question their grades.

We recognise the challenge that the Department and Ofqual face. There is no straightforward solution to how best to make allowances and adjustment for the significant variability in learning that has occurred since the pandemic struck. **Nevertheless, for qualifications and standards to be seen as fair and valid, awarding bodies will need to set a clear minimum requirement to exam centres for coverage of the syllabus in each subject, so that a grade can be awarded and stand on its merit. Also, clarity is needed on what must happen if the requirement is not reached. For instance, should a student be required to repeat a course in order to be graded.**

We are also concerned that allowing students and parents to know how the evidence portfolio is being presented to exam boards may place pressure on teachers to push grades upwards. With no standardisation whatsoever, there is an even greater risk that come results day there will be an excessive hike in higher grades and potential

for real inconsistencies and fairness in the way that students have been graded by their schools and colleges.

### ***Checks on exam centres***

As things stand, this summer's system has a significant reliance on internal quality assurance processes working satisfactorily to ensure a consistent approach to grades across a school and more widely across all schools. We were told that exam boards would be required to undertake checks and would conduct samples of the evidence to support some students' proposed grades. Similarly, there would be investigations where centre grades appeared not to be justified on the evidence provided by a school or college. **Ofqual did not appear to have a clear measure of the scale of sampling and checking of results that would be necessary, and planned for, once teacher assessed grades had been submitted on 18 June. We would therefore ask to have clarification as soon as possible as to the amount of sampling that you expect must take place.**

### ***Exam board provided papers***

During Minister Gibb's evidence, he emphasised the point that teachers will know the students best. This is of course true but the reverse of this will be that the exam board could be in a weaker position in challenging teacher judgments and their selection of evidence. This could mean that many grades would have to stand even if the board found a centre's overall grading profile was much higher than in previous years.

Everything must be done to ensure there is a level playing field so that the awarding bodies can be reliably confident that the work produced by students has not been inappropriately selected to misrepresent ability and achievement. One way to guard against this would be to ask students to complete externally set papers, with a degree of flexibility for individual schools, such as when students sat these papers.

Sir Jon Coles supported the use of national tests but recommended that these should only be one of the pieces of evidence used by teachers in determining grades. However, he argues that national tests would only be valuable if they met the same standards as a normal examination. This means that they should, in his opinion, be taken by all, based on new and unseen items, taken at the same time across the country, with a common mark scheme, grade boundaries, marker training and substantial enough to allow for a spread of marks and therefore sensible grade boundaries.

Yet this is not the course that DfE and Ofqual have decided to take. It has also come to light that Ofqual will allow students to get advance sight of "exam" questions on which their teachers are being allowed to use to base their grades. Many commentators believe that publishing exam board papers after Easter will have the effect of embedding disadvantage. A real likely unintended consequence of this could be that the students who are most supported at home will be able to prepare answers in advance and perform better in these tests. **Publishing test papers in this way, in**

our opinion, will devalue their worth and be a distraction to students who should be focusing on covering as much of the syllabus as possible in the time remaining.

Using exam board provided papers should be the most reliable way of corroborating a student's knowledge and learning and ensuring public confidence in grades. However, these test papers should be on unseen material if they are to be of any real worth in determining a student's attainment and ability. Exam boards could also ask exam centres to provide broadly similar evidence portfolios for all pupils, comprising certain assessed work in controlled conditions, by subject, so that comparisons could be drawn at a centre level.

Another area that needs clarification is how heads of centre will be able to form an opinion on whether a student has been taught sufficient course content to allow progression to the next stage of their education. The onus is being put on head teachers and college leaders to sign a declaration to this effect. Yet we understand Ofqual itself will not set requirements for the assessment of a minimum proportion of overall content. Therefore, **we would ask how it will be possible for heads of centre to make clear judgments in each pupil's case and how standards across the country will be consistent given that we know there has been a significant variation in learning during the last year** at a pupil, class, school and regional level.

#### ***Grade equivalence and comparability***

This summer, grade equivalence and comparability across schools will be just as important as any other year. We know the summer grades of 2020 were more generous than previous years. At A-level, the proportion of candidates awarded an A\* or A went up an unprecedented 12.9 percentage points from 25.2% in 2019 to 38.1% in 2020. At GCSE, the proportion awarded grade 4 and above went up 8.8 percentage points from 67.1% to 75.9%.

We were grateful that Ofqual confirmed to us that their earlier commitment to release last year's data does still stand and will now happen. This data's public availability will allow full and open scrutiny and understanding of the effects of last year's use of centre assessed grades.

**Similarly, we would like to know what data on past performance schools and colleges will be required to provide to exam boards to demonstrate a student's past performance, as this will be a key reference point in many cases, for ensuring standards and verifying teacher assessments.**

In reaching the approach for this year's alternative arrangements, **can you also set out what work the Department itself undertook in looking at how teacher assessed grades might be moderated at a subject level by using external assessors going into schools**, for instance those who would normally mark papers or indeed any other appropriate professionals or retired teachers. **If this assessment did not take place, why was it not considered an appropriate avenue to investigate? And if it did, what**

were the barriers to introducing external moderation, for example, was it a case of resource?

### *Unconscious bias*

In light of the lack of standardisation and proper checks and balances being in place, we are worried that this could play out in two ways: both in grade suppression and also grades being overestimated. Numerous submissions to our inquiry into last year's arrangements outlined how particular groups, including pupils from low-income backgrounds, black, Asian and minority ethnic pupils, and pupils with special educational needs and disabilities (SEND), could be adversely affected by using teacher predicted grades. **What is vital is that Ofqual and the awarding bodies put safeguards in place to guard against any possibility of conscious or unconscious bias creeping into teacher assessments which could mean a student's ability is misunderstood or underestimated. Likewise, there must be checks and balances in place to ensure no teacher feels obliged or in any way pressured to downplay grades owing to a fear that their judgment could call into question their students' overall results.**

### *Private candidates*

Last year it was undoubtedly the case that home educated students, adult learners and those entering as private candidates were significantly impacted by not securing grades and missing out on progression to the next stage of their education or employment. While there has been a strong commitment, rightly in our opinion, to ensure that this summer private candidates are assessed in a similar way to other students by exam centres, this will present a huge challenge. It will be necessary to demonstrate their grades are built on the same foundations as those in schools and colleges, so that their achievements are held in the same regard. We note that the DfE has announced that a grant will be available to support approved exam centres to meet costs associated with the additional demands of assessment for private candidates this year. **In addition, the Department must remain ready to step in with support for private candidates in cases where any difficulties arise by virtue of a them not having an established relationship with an exam centre.**

There are many private candidates who had been expecting to prove themselves in an exam this summer, such as those who were due to retake an exam. At this point many of these candidates may not have a portfolio of evidence to allow an exam centre to make a reasonable judgment in awarding them a qualification. Therefore, **we ask for more information on how you see the system working for these candidates, both in ensuring they have every opportunity to be assessed and how this assessment will be a reliable and robust confirmation of their academic ability. Also, what planning and discussions are underway with regards to home educated private candidates to support their transition into sixth form or further and higher education who may now be at risk of not having enough evidence. How will FE and HE institutions be able to make any additional allowances for them and when will *all* relevant guidance be ready to cover what should happen in these cases?**

### ***Special educational needs***

We were reassured that Ofqual indicated that it should be possible for students to insist on being able to take exam board provided papers in their school or college should they wish to do so. This is particularly important for those who are better able to show their ability through sitting exams, which can often be the case for those with special educational needs. **We would be grateful for a full confirmation that these papers will be on offer on request and that the Department and Ofqual will send a clear message to this effect to schools and colleges so that there is no doubt that those who wish to can choose to sit papers in this way.** It would also be helpful to know how this message will reach students and their families.

### ***Exam board fees***

This year it is teachers who are being expected to mark any assessments, prepare portfolios of their pupils' work and make final judgments on grades. Therefore, we believe there is a pressing question on how much exam boards should be charging for 'exam' entries in 2021. We understand that last year schools were able to recoup a small percentage of their fees from the exam boards but as yet there has been no reduction offered. **Given the scale of the costs that apply in a normal year, and the fact that schools and colleges are setting out portfolios, marking and assessing all students this year, we would ask that you indicate what you think would be reasonable in terms of the fees' reductions being charged by exam boards to schools and colleges for the summer 2021 cohort.**

### ***Appeals***

We were surprised that Ofqual thought that the number of appeals could be lower this summer than in normal years. This is not the position that many others foresee if exam centres are to stand firm and not be pressured into awarding higher grades. However, regardless of this, we must ensure that those students who feel and can demonstrate grounds for appeal are supported in registering one. **There must be no fees which inhibit any student being able to challenge an assessed grade should they have grounds to believe their grades were not properly or fairly determined.** Ofqual state that they will allow students to appeal their grade on the grounds of either a procedural failing or an unreasonable exercise of academic judgment. In your response to this letter **could you fully explain what an unreasonable exercise of academic judgment would comprise and how it ought to be adjudicated by the awarding bodies?**

We have serious concerns that rather than fewer appeals, this year could witness a high volume of appeals, as parents and pupils seek speculatively to challenge grades. **It would therefore be helpful to know what planning is underway for the prospect of a much larger number of appeals by this year's intake.** For example, if a large number of cohorts were to appeal their grades, how will exam boards manage this, and within what timeframe? Similarly, what would be the resolution process where exam centres and awarding bodies are unable to resolve situations, in particular

where it is discovered that there is a paucity of evidence or reliable, objective data to back a grade which is subject to an appeal?

### ***Advice lines and guidance for pupils and parents***

As we called for last year, **it is essential that Ofqual must ensure high-quality advice and support is easily accessible for all pupils unhappy with their grades. The helplines provided by Ofqual and the National Careers Service must be freephone lines and be staffed by dedicated professionals with the training to provide sound and impartial step-by-step advice and support on options and appeals. We would welcome a confirmation that the Department will do everything possible to ensure this happens.**

### ***Future year groups and learning loss***

We discussed the impact learning loss has had on all year groups who are not due to sit exams this summer. We realise the Department's and Ofqual's focus have been on putting in place arrangements for the exam years as a first priority but it would be useful if you could set out at this point what are your next steps in making adjustments for those entering exams next year and in how the Department will approach measuring learning loss in other years. **For instance, would it be possible to conduct pupil testing, as Ofqual do routinely for exam years when reference testing, but on a national level so that every single pupil is assessed for learning loss across all year groups?**

Given the extent of the 2020 grade inflation, and the now real likelihood of even higher grades this summer, with no general moderation or standardisation being built into the system, we wish to know how you intend to set a path for returning to pre-pandemic grade profiles and over what time trajectory you expect this to be achieved given the learning loss we know has occurred in all year groups. For instance, even before exams for 2021 were cancelled, a decision had been taken to extend the 2020 grade generosity into 2021.

There needs to be an "exit strategy" from the grade inflation that has already occurred. Therefore, **we now need to see your own route map clearly setting out how we will revert back to "normal" grading standards and what the Government is doing to ensure that employers do not penalise these cohorts in the job market, once they have completed their formal education. In response to this letter, we would ask that you set out how you will ensure these cohorts do not suffer detriment in this way by having a dark shadow cast over their results.**

### ***A commitment to exams***

We firmly believe that exams remain the best way of judging student performance and that they are an indispensable way of assessing attainment at key stages of a pupil's progression, whether that be moving on to an apprenticeship, to further and higher education institutions or indeed into employment. **Whilst we all understand why it was necessary to cancel exams again this summer, we would also welcome a**

**statement from you that the Government remains committed to maintaining exams in 2022 and beyond.**

***Lessons learned from the pandemic***

Finally, in terms of contingency planning and need to cancel exams, can you detail what wider lessons have been learned by the Department from the Covid disruptions on planning for exams and how might in-year assessments in schools be used need to change in case of any further disruptions in 2022 and in future years?

Given the nature and the timeframe of this issue, we would be grateful for a response to this letter **by 12 April** so that we can consider your response once we return from the Easter recess.

Yours,

A handwritten signature in black ink, appearing to read 'Robert Halfon', written in a cursive style.

**Robert Halfon MP**  
**Chair of the Education Committee**