

Written evidence submitted by Keith Geary

Submission for 02.09.20 Committee session from:

Keith Geary: Parent of 2020 A Level candidate and retired Headteacher

Three questions for Ofqual representatives about issues relating to the failure of their statistical standardisation process which they imposed on 2020's A Level candidates.

In the absence of Sally Collier, following her resignation as Chief Regulator, these questions are still appropriate for any of the following as they all share with the Education Secretary direct responsibility for the damage caused:

- Roger Taylor, Chair of Ofqual Board
- Michelle Meadows, Executive Director – Strategy, Risk and Research, Deputy Chief Regulator
- Cath Jadhav, Director, Standards and Comparability
- Any member of the Ofqual External Advisory Group on Exam Grading, but particularly its Chair and anyone involved in constructing its membership

QUESTION 1: On what grounds did Ofqual officials ignore warnings about the now well-publicised issues built into their proposed statistical standardisation model which had been raised *directly* in private and public correspondence with the Chief Regulator beginning in early April?

Basis for question:

I myself first raised these issues with the Chief Regulator in a letter sent on 14th April providing an analysis of Ofqual's initial proposals (published on 3rd April). I followed this with further detailed responses to subsequent information published by Ofqual. In summary, these responses were received by the Chief Regulator's office on:

14th April: Response to Ofqual's 2020 assessment and grading information document, published 3rd April

29th April: Commentary on *Ofqual's Exceptional arrangements for exam grading and assessment in 2020*, published 15th April

11th May: Letter commenting on revised version (published 5th May and marked FINAL) of 3rd April 2020 assessment and grading information document for centres and teachers

19th May; Letter and comments on Cath Jadhav, Director, Standards and Comparability, Ofqual blog post 'Making grades as fair as they can be: advice for schools and colleges' and Ofqual document *Additional information for Heads of Centre, Heads of Department and teachers on objectivity in grading and ranking*, both published on 15th May.

2nd July: Response to *Consultation Decisions* document published on 22nd May and the accompanying *Analysis of Consultation Responses* document

14th July: Further response to *Consultation Decisions* document published on 22nd May

17th July, 20th July, 23rd July: Queries regarding *Requirements for the Calculation of Results in Summer 2020*

27th July: Response to Cath Jadhav, Director, Standards and Comparability, 24th July Ofqual blog post, 'Reflections on the Summer Symposium'

7th August: Comments on Cath Jadhav, Director, Standards and Comparability, 6th August Ofqual blog post, 'Fairness in awarding'

12th August: Comment on mock results 'triple lock' announcement by DfE, published 12th August

Taken together these responses amount to an evolving analysis of over 30 pages with a series of questions, many of them specifically relevant to the issues that emerged into the light in the days immediately preceding A Level results day and then, of course, on results day itself and its aftermath.

Throughout I have (like others) encountered an absolute refusal to engage with—let alone answer—questions related to the issues raised in this correspondence. This includes responses to Cath Jadhav's Ofqual Blog entries which actually *invite* questions in response. In reality, questions about the issues were ignored, the concerns raised dismissed as 'technical issues' (2nd June) by the Chief Regulator's office when challenged on lack of response.

QUESTION 2: In the light of the indisputable failure of Ofqual's statistical standardisation model, how do you explain the fact that members of the Ofqual External Advisory Group on Exam Grading gave me written assurances that the issues I raised in a 16th July letter to them (the same issues raised with the Chief Regulator) would be addressed by the model?

Basis for question:

Here are three replies from members of the group with names redacted. Each in its way is particularly telling and will be of interest, I am sure, to Committee members.

Dear Mr Geary

Thank you for your email at the end of last week. I would like to reassure you that, throughout the development of the model for 2020 grading of GCSE, AS and A-level qualifications, Ofqual have been sharing their proposals with the Ofqual External Advisory Group on Exam Grading. The committee can bear witness to the comprehensive testing that has been performed. A particular focus throughout has been equality across all subgroups of the population.

Kind regards

[Name redacted]

Dear Mr Geary

Thank you for your email.

The questions you raise are interesting, but I am in a difficult position. In joining the Ofqual Advisory Group I had to sign a confidentiality agreement which prohibits me from discussing the standardization processes, and associated checks and balances, that are being used to set grades this year.

I think I am safe to say that the concerns you raise are understood within Ofqual. I hope that when the results, and the methodology used to produce them, are published in August you will be reassured on many of the points you raise.

Best wishes

[Name redacted]

Dear Mr Geary,

Thank you for your email - I understand your concerns and appreciate the trouble you have taken to articulate them . I can assure you that many people have contributed to the development of the process for awarding GCSE and A level grades in England this summer, but ultimately the adopted approach has been determined by Ofqual and I do not feel that it would be appropriate for me to comment ahead of results being published.

Best wishes,

[Name redacted]

QUESTION 3: With hindsight do you think that the narrow Oxford-centric membership of the External Advisory Group on Exam Grading may have had anything to do with Ofqual's reluctance to engage the assistance of other experienced and skilled statisticians from beyond that circle as seen, for example, in Ofqual's failure to accept advisory assistance from the Royal Statistical Society who nominated two independent statisticians (Professor Guy Nasen at Imperial and Professor Paula Williamson at Liverpool) for this role?

Basis for question:

- The External Advisory Group had 11 members (see below).
- Three members currently hold academic positions at Oxford's Department of Education: Rebecca Allen, Jo-Anne Baird, Anne Pinot de Moira. This is acknowledged in Ofqual's listing for only one member.
- Michelle Meadows (Executive Director – Strategy, Risk and Research, Deputy Chief Regulator), who presumably worked with this group is also an Honorary Research Fellow at Oxford's Department of Education.

- At least four other members of the group are Oxford alumni: Jason Bradbury, Tom Bramley, Tim Leunig, Neil Sheldon
- It is worth noting that Roger Taylor, Ofqual Chair, is also an Oxford graduate.

Membership of the advisory group taken from Ofqual document

University of Oxford positions added in green where not already mentioned in the document's listing. Asterisks indicate Oxford alumni.

Dr. Rebecca Allen, Teacher Tapp Honorary Research Fellow, Department of Education.
University of Oxford

Prof. Jo-Anne Baird (Vice-Chair) Professor of Educational Assessment, University of Oxford

Dr. David Best, UCAS

David Blow, Ashcombe School

Jason Bradbury, Ofsted *

Tom Bramley, Cambridge Assessment *

Dr. Mike Cresswell (Chair), Ofqual Board

Prof. John Jerrim, UCL Institute of Education

Dr. Tim Leunig, HM Treasury *

Anne Pinot de Moira, Independent consultant Honorary Norham Fellow, Department of Education, University of Oxford

Neil Sheldon, Independent consultant *

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