

Written evidence submitted by The Silver Bullet Machine  
Manufacturing Company Limited

**Submission to the Inquiry into  
The Impact of Covid-19 on education and children's services**

Friday 26<sup>th</sup> June 2020, second (revised) version, replacing earlier version of the same date, with minor errors corrected - please accept my apologies for those errors!

This is my third submission: the first, CIE0007, was submitted on 4<sup>th</sup> April, very early in the process; the second on Thursday 18<sup>th</sup> June - which has not yet been published, so I don't know the reference.

The submission concerns the proposed process for appeals.

Now that all centre assessment grades have been submitted, the process for "statistical standardisation" is in train, and the results will be announced in August. Whatever will happen will happen; there is no opportunity to change these processes now.

The appeals process, however, will take place after the results have been announced, and so, in principle, could still be changed. Hence this submission, for the Select Committee might have the opportunity to help bring about some valuable changes, to everyone's benefit.

To explain why I believe that the appeals process could, and should, beneficially be changed, may I refer to point 5 in the summary of the submission by the Royal Statistical Society, CIE0199:

"We have some concerns about the lack of clarity and transparency so far provided by Ofqual about their plans for estimating grades."

As I am sure the Committee knows well, the details of "statistical standardisation" have not been made public, and there has been considerable concern about, for example, [bright students in otherwise weak schools](#), who might be trapped in their centre's past, and about small cohorts, to take just two examples.

It is possible that "statistical standardisation" will in fact deal fairly with all such cases. But it is also possible that it will not. I do not know, nor - as endorsed by the Royal Statistical Society - does anyone else.

It is therefore possible that "statistical standardisation" will not treat some candidates fairly. Should that happen, the rules of the appeals process have been specified so as to deny any right of appeal.

This is a double injustice. The “statistical standardisation” process might treat a candidate unfairly by awarding an inappropriate grade; the appeals process denies that candidate any redress.

I further note what I believe to be a shortcoming in the consultation process. Reference to the [Consultation Document](#) will show this question on page 35:

**QUESTION – to what extent do you agree or disagree that we should not provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre’s assessment grades are determined?**

Such an enquiry could well be of interest to a candidate, but it is of little importance: the important grade is not the centre assessment grade, but the actual grade as awarded as a result of “statistical standardisation”, to which this question makes no reference.

A further question, on page 38, is:

**QUESTION – to what extent do you agree or disagree that we should provide for a centre to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated?**

This does refer to the results of “statistical standardisation”, but in only a very narrow, technical, way.

There are some other questions relating to the appeals process, but the one question that seems to me by far the most important is not there: a question along the lines of:

**QUESTION – to what extent do you agree or disagree that the appeals process should allow ‘outliers’ and other examples of unfairness to be discovered, verified and rectified?**

My wording is poor, but I’m sure you understand my point. A question of this type was never asked; accordingly, it was never answered. I can only speculate as to what the response might have been.

I also point out that in 2016, Ofqual changed the rules for exam appeals, making it [harder for challenges to be raised](#). They consulted on that too, but seemed not to pay much heed to the [responses](#) (that link, by the way, is for some reason dated 8<sup>th</sup> February 2018 - it was in fact written on 18<sup>th</sup> March 2016).

There is still time for the appeals process for this year’s grades to be made just and fair. I do hope that the Select Committee will exert an appropriate influence to help make that happen.

Thank you

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