

Written evidence submitted by Dennis Sherwood

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This is my fourth submission: the first, CIE0007, was submitted on 4th April; the second, CIE0256 on Thursday 18th June; the third on 29th June.

On 30th June, the day following my third submission, Ofqual announced their [Consultation on Statutory Guidance in relation to Appeals under the GQCovid Regulatory Framework](#), including (amongst other things) “the circumstances in which an appeal might be allowed because the wrong data has been used in the standardisation process”.

This is narrow. Given that there is the possibility that the results of “statistical standardisation” might result in some candidates being awarded unfair grades, to deny those students the opportunity to appeal is doubly unfair.

The purpose of this submission is therefore to request that the Select Committee use their influence to convince Ofqual to allow for a broader category of appeals, on the grounds that the actual award is unfair, as of course justified by appropriate evidence.

To support this, I cite two precedents.

The first is in Scotland, where the SQA has [recently confirmed](#) that the appeals process in Scotland will be free, and allow for “**further, evidence-based consideration of grades if schools and colleges do not think awarded grades fairly reflect learner performance**”.

If this is the case in Scotland, so should it be in England.

The second is the Republic of Ireland, where [their appeals process](#) involves three stages (see section 45):

- *Stage 1: Checks will be undertaken to ensure that the data was recorded correctly by the school and that it was transferred correctly into the data collection system.*
- *Stage 2: There will also be a review to ensure that the data was correctly received and processed in the calculated grade model.*
- *Stage 3: If the student remains unhappy with the outcome after stages 1 and 2 he/she can seek a review by Independent Appeal Scrutineers.*

Stage 3 provides a “safety net” to protect against unfairness.

Furthermore, this is an extract from the description of the Republic of Ireland’s process for “statistical standardisation” ([section 9](#)):

“Calculated Grades will be generated using a systematic statistical model. It will combine estimates of a student’s expected performance in a subject and level, with information about how students in this school have fared in this subject in recent years in line with national performance standards over time.

The statistical process will take account of the fact that the particular group of students in the school in 2020 may be stronger or weaker than in previous years, and will also allow for the fact that particular individuals within those groups might have levels of achievement that vary considerably from what has previously been seen in the school.”

The second paragraph is substantially different from, and much fairer than, the process being used by Ofqual: for example, with reference to Ofqual’s [“Consultation Decisions”](#) document dated May 2020:

“Having considered all the options available to us in the circumstances of awarding grades in summer 2020, we have decided to adopt our proposal that the trajectory of centres’ results should not be included in the statistical standardisation process.” (page 11)

If the Republic of Ireland can adopt a process in which “statistical standardisation” is fairer, as well as providing an appeals “safety net”, why cannot England?

Doubtless someone might reply “The Republic of Ireland has a much smaller population, and so the process is therefore easier”.

To which I would respond, firstly, that it is indeed true that the Republic of Ireland has a much smaller population - but England has correspondingly much greater resources. And secondly, I would challenge “easier”. Operationally, I agree that the Irish volumes are smaller, but once again England’s resources are greater, if only with all those exam boards. Intellectually, however, there can be no difference: if Ireland have worked out how to build a “statistical standardisation” model that is intrinsically fair, then why cannot this be done in England? Are Ireland’s statisticians and modellers significantly more able?

The process of “statistical standardisation” in England is already in train, and so, I suspect, cannot be changed. It may, or may not, give unfair results - no one knows, for the details have not been made clear, as Submission CIE0199 from the Royal Statistical Society states. But unfair awards might be made. And if they are, there is no recourse to justice.

The appeals process will not take effect until after the results are announced in August. There is therefore still the opportunity to change it. To make it fair. To ensure that no candidate suffers an injustice, with no recourse.

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