An analysis of consultation responses:
marking reviews, appeals, grade boundaries and Code of Practice

**Report for
the Office of Qualifications and Examinations Regulation (Ofqual)**

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Sarah Maughan

Andrew Boyle

Jenny Smith

Saad Rafiq

Zak Horrocks

Alpha*Plus* Consultancy Ltd

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2.1 Introduction

This is a report of an independent analysis of responses to the Office of Qualifications and Examinations Regulation's (Ofqual's) consultation on marking reviews and appeals, withdrawal of the Code of Practice (the Code), and the setting of grade boundaries.

The consultation focused on three distinct but inter-related proposals:

- To improve the way concerns about General Certificate of Secondary Education (GCSE), Advanced Subsidiary (AS) or Advanced (A) level marks are considered by awarding organisations (new and legacy GCSEs, AS and A levels).

- To withdraw the *GCSE, GCE, Principal Learning and Project Code of Practice*. (The Code includes the current rules on reviewing marks and appeals.)

- To introduce new procedural rules on how awarding organisations set grade boundaries for GCSEs, AS and A levels. The proposals are about the procedures of grade boundary setting only, not about the substantive decisions as to where they are set.

Key issues in the consultation included: the way awarding organisations review their marking and moderation of GCSE, AS and A level assessments so that, for example, they correct mistakes but do not change legitimate marks; the grounds on which centres can appeal against marking and moderation decisions so appeals can be about unreasonable marks/decisions as well as procedures; and duplication in published rules and the removal of unnecessary rules, whilst making sure awarding organisations take a common approach to setting grade boundaries for GCSEs, AS and A levels.

2.2 Consultation methods and data collected

A public consultation was conducted between 10 December 2015 and 11 March 2016. The main structured data collection instrument was an online questionnaire. The questionnaire was written by Ofqual and analysis was carried out by Alpha*Plus* Consultancy Ltd., which is independent of the exams regulator. The questionnaire included a range of closed questions (strongly disagree … strongly agree), usually supported by an open question ('Please give reasons for your answer').

In addition to the questionnaire, interested parties were encouraged to submit unstructured responses via email, letter or similar communication methods.

In addition to the consultation, Ofqual also ran a survey with students. The student survey used a questionnaire, which consisted of four short questions grouped around two scenarios.

At the end of the data collection phase, Alpha*Plus* had received 91 responses to the main consultation (81 questionnaire responses and 10 unstructured responses), and 1348 responses to the student survey.

2.3 Summary of key responses

There was a high level of agreement on a number of the topics in the questionnaire. This included support for the review of marking and appeals of GCSE, AS and A levels and for extending the proposals to qualifications beyond GCSE, AS and A levels. There was disagreement on whether or not there should be standardisation of processes between awarding organisations.

Other topics, such as withdrawing the Code and when to implement the changes, had more mixed responses. In many cases, school-based responses and those from parents and students contrasted with those of the awarding organisations. Responses from other stakeholder groups were more variable.

Overall, there was a tendency for all stakeholders to agree with proposals that were perceived to enhance:

- Openness, transparency and fairness
- Faith and trust in the system
- Simplicity
- Commonality of approach between awarding organisations.

There was a tendency to disagree with proposals if and when they were perceived to:

- Undermine teachers' professional judgement
- Be vague
- Not enhance openness, transparency and fairness.

2.3.1 Review of marking and appeals of GCSEs, AS and A levels

Part A contained 26 separate questions. For the purposes of analysis and reporting, these were split into four sets of five and one set of six questions.

2.3.1.1 Set one: Q1a – Q1e

Set 1 (Q1a – Q1e) pertained to: making marked assessments available before the deadline for requesting a review (Q1a); making the mark scheme available at the same time (Q1b); arranging to correct administrative errors (Q1c); changing marks where an error had been made, but not changing a mark that could reasonably have been given by a marker applying the mark scheme and any relevant marking procedures to a candidate's assessment (Q1d); and explaining decisions to centres (Q1e).

There were high rates of agreement with Ofqual's proposals in this area, with the exception of Q1d with which around 30 per cent of respondents disagreed. A large proportion of the respondents to this set of questions also provided qualitative comments. Arguments were in favour of most of the proposed changes, although the awarding organisations emphasised that some of these would require costly systems development and would take time to implement. The question about changing a 'reasonable' mark (1d) was more controversial, with a number of respondents arguing that students should be given the highest possible mark, and that the process seems too subjective. The main argument in favour of the proposal was that the process would be fairer for students who do not request a review of marking.

2.3.1.2 Set two: Q1f – Q1j

This set contained questions about: candidates having access to teacher-marked assessments in time for a review (Q1f); having access to necessary materials for a review of a teacher assessment (Q1g); only allowing requests for a review of moderation by a centre (Q1h); changing only 'non-reasonable' outcomes following reviews of moderation (Q1i); and providing centres with explanations following a review of moderation (Q1j).

The responses to the closed questions showed the strongest agreement with Q1j (with under 10 per cent disagreement); but, although there was still a clear majority in agreement with Q1f to Q1i, there was more disagreement with these questions (between 25 and 35 per cent).

This set of questions produced some mixed comments. Many argued in favour of the proposed changes as they were thought to increase fairness, enabling an informed decision and building ongoing trust in the system. Concerns centred on practicalities and the view that trust in teachers'

judgements could be undermined. The subjectivity of the term 'reasonable' was also questioned. The awarding organisations in particular noted that individual students should not be allowed to appeal moderated marks, as moderation affects all students in a centre. In general, the awarding organisations agreed it was a good idea for centres to have review processes in place, but they commented that they would not be able to monitor if and how this review was taking place.

2.3.1.3   Set three: Q1k – Q1o

The themes of these questions were: allowing a centre to appeal only when a review was complete (Q1k); allowing an appeal if the mark or the moderation decision could not have reasonably been given, or if the awarding organisation did not apply their procedures (Q1l); allowing appeals against responses to requests for a special consideration or reasonable adjustment (Q1m); only allowing appeals following moderation from a centre (Q1n); and identifying other candidates affected when an error is discovered, taking action to reduce the effect of the error and ensuring it does not recur (Q1o).

Opinion consistently favoured these proposals, ranging from no disagreement to Q1o to around 25 per cent disagreement with Q1n.

Comments on question Q1l were the most diverse, with many arguing that students should be given the highest possible mark, rather than the original mark, where this was reasonable. Again, it was argued that as moderation affects all students' marks individual students should not be permitted to appeal. One awarding organisation argued strongly that the standard is based on the judgement of the Principal Examiner and this is a fundamental design point. Amendments to the system should continue to maintain this standard, rather than a standard defined by the question paper and mark scheme.

2.3.1.4   Set four: Q1p – Q1t

This set had questions about: allowing a candidate to appeal a centre's decision (Q1p); training and monitoring those who review awarding organisations' marking (Q1q); barring reviewers from reviewing their own marking or moderation (Q1r); including in appeals panels at least one person independent of the awarding organisation concerned (Q1s); and setting reasonable deadlines for receipt of requests of various types (Q1t).

There was very strong agreement with all the proposals in this set of questions with overall agreement rates around 90 per cent, of which a high proportion was 'strong agreement'. There was some debate about ensuring that a reviewer did not review their own original marking, with awarding organisations arguing that there ought to be some flexibility for small entry subjects. The make-up of appeals panels was also subject to some disagreement. Some, especially the awarding organisations, argued that it is important that appeals are decided by those working to the same standard as those who did the original marking, as this would ensure fairness to all students.

2.3.1.5   Set five: Q1u – Q1z

This set of questions related to: awarding organisations publishing their position on accepting requests for post-marking services directly from candidates (Q1u); publishing clear information concerning review arrangements (Q1v); publishing target periods in which the awarding organisation would deal with requests (Q1w); publishing the frequency of achieved and missed targets (Q1x); publishing information about the number of requests received (Q1y); and publishing information about approaches to training reviewers (Q1z).

This set of questions had high levels of support. 'Strongly agree' was much the largest category in all cases. 'Total disagreement' was never more than 10 per cent of responses, with the exception of Q1z with which around 15 per cent disagreed.

The questions in this section focused on publishing more information, and this was largely supported in terms of delivering transparency and trust. It was argued, primarily by awarding organisations, that appeals from students should not be accepted. There was disagreement about which would be more beneficial - awarding organisations acting independently or following a more uniform approach. Most, however, including the awarding organisations, argued for a uniform approach. There were some concerns about the manageability of collecting the amount of information required; and also that some of the information could undermine, rather than support, trust in the system.

2.3.2   Standardising processes between awarding organisations and across qualifications

There was a set of five quantitative questions in this part (Q2a to Q2d and Q4), with Q3 asking for specific comments. Questions 2a – 4 pertained to: the process for providing access to marked assessments (Q2a); the fees charged and the approach to the refund of fees (Q2b); the dates by which awarding organisations require centres to make requests for access to scripts, reviews and appeals (Q2c); the dates by which awarding organisations will respond to such requests (Q2d); and the extent to which respondents agreed to introducing similar changes in relation to qualifications other than GCSEs, AS and A levels (Q4).

In this set of questions, there were strong majorities disagreeing with the proposals in Q2a – Q2d. For all these items, disagreement ranged between approximately 75 and 85 per cent. Only in respect of Q4 did the majority agree.

As with the questions at the end of question 1, most comments on question 2 supported a uniform approach, and the awarding organisations proposed working together to agree common processes. For question 4, comments largely supported extending the proposals to other qualifications where this is possible, such as those with similar assessment designs or those with large cohorts. Simplicity and building confidence were common themes. The comments to Q3 were varied. Amongst them, including some from awarding organisations, was the need for a clearer definition of 'reasonable' and 'administrative error'.

2.3.3   Withdrawing the Code

There were three questions in part C (Q5, Q6 and Q7) which related to withdrawing the Code. Q5 asked about withdrawing the Code; Q6 was about whether any elements should be retained; and Q7 was about whether Ofqual should permit awarding organisations to decide which errors they correct, subject to guidance, and whether students should automatically have a wrong result protected.

Quantitative results for these questions were the most balanced. Opinion was approximately evenly split between agreeing and disagreeing with the proposal to withdraw the Code. There was majority (around 70 per cent) disagreement with the proposal that awarding organisations should have latitude to decide which errors to correct (Q7). For all the questions, however, sample sizes were less than with previous questions.

The main arguments in favour of removing the Code (Q5) were that it was not needed and that it was too restrictive. There were, however, those in favour of retaining it, including some awarding organisations. They argued, for example, that the Code helps to ensure minimum standards and consistency between awarding organisations. Reasons for not allowing awarding organisations themselves to decide which errors to correct, included the view that, as awarding organisations were subject to market pressures, it could undermine service standards. Correction of errors should, therefore, be closely defined and regulated.

2.3.4 Setting grade boundaries

In part D, three questions (Q8, Q9 and Q10) related, respectively, to Ofqual's proposals for specific evidence to inform setting grade boundaries in GCSEs, AS and A levels (Q8); comments on the proposed Conditions (Q9); and whether the Conditions should be applied to other qualifications beyond GCSEs, AS and A levels (Q10).

The main feature of the quantitative responses to questions Q8 and Q9 was that many respondents either did not complete the item at all, or did not take a fixed view. There were larger than usual groups of respondents in the middle, 'don't know/no opinion' category. Amongst those expressing a definite view, most agreed with the proposals. Such agreement, however, was typically 'moderate' rather than 'strong'.

Most respondents agreed that the list of evidence was appropriate and did not add specific comments. There were a few comments about other elements to include, such as common schools data for which the awarding organisations argued.

2.3.5 Implementation

Part E on implementation contained four questions (Q11 – Q14). These questions were on: the proposed date for withdrawing the Code (Q11); the new date for implementing Conditions relating to enquiries about results (Q12); new Conditions relating to awarding GCSEs, AS and A levels (Q13); and extending proposals to Principal Learning and Project qualifications (Q14).

As with part D, there were relatively few responses to this part of the instrument. There was majority disagreement to questions Q11 and Q12; rough parity on question Q13; and large majority agreement with the proposition to extend Ofqual's proposals to the Principal Learning and Project qualifications (Q14), albeit with a small sample size and most agreement being 'moderate' rather than 'strong'.

There were a number of arguments that the proposed changes should be introduced as soon as possible. Others, however, argued that they needed careful consideration and should not be rushed. Awarding organisations expressed concerns that it would not be possible to update systems in the proposed timescales, although some limited changes could be introduced in 2016. For questions Q13 and Q14, most of those who commented argued for a consistent approach.

2.3.6 Student survey

The student survey had four closed items. Q1 proposed that two examiners could legitimately give slightly different marks to the same answer; Q2 that a student should not have a reasonable original mark replaced on review; Q3 that appeals should consider how well awarding organisations had followed their procedures; and Q4 that appeals should consider whether the mark scheme had been applied reasonably.

The items had differing levels of agreement. There was a clear majority (around 75 per cent) agreement for Q1, and a slight majority disagreement for Q2. There was strong agreement (around 95 per cent) for Q3 and Q4.

3 Introduction

The Office of Qualifications and Examinations Regulation (Ofqual) regulates qualifications, examinations and assessments in England. Ofqual endeavours to comply with UK government principles for consultation.[1]

Ofqual was responsible for writing and hosting the questionnaire that constituted this consultation. Alpha*Plus* Consultancy Ltd., an organisation that is independent from Ofqual, was responsible for the analysis and report writing.

The consultation presented proposals and asked for views on the proposed changes to three distinct but related areas, which are detailed in the following section. A list of the questions included in the questionnaire is included in the Appendices (below, at p. 95).

3.1   Summary of consultation proposals

This consultation was about three distinct but inter-related proposals:
- To improve the way concerns about a candidate's General Certificate of Secondary Education (GCSE), Advanced Subsidiary (AS) or Advanced (A) level marks are considered by awarding organisations. The proposals apply to new GCSEs, AS and A levels and to legacy GCSEs, AS and A levels while these continue to be available.[2]
- To withdraw the *GCSE, GCE, Principal Learning and Project Code of Practice*[3] (the Code) which contains the rules awarding organisations must follow when they deliver and award legacy GCSEs, AS and A levels and Principal Learning and Project qualifications. The Code includes the current rules on reviewing marks and appeals.
- To introduce new procedural rules on how awarding organisations set grade boundaries for GCSEs, AS and A levels. The current rules for the legacy qualifications are in the Code. The proposals are about the procedures of grade boundary setting only, not about the substantive decisions as to where they are set.

The proposals would:
- Change the way awarding organisations review their marking and moderation of GCSE, AS and A level assessments, including an explicit rule for awarding organisations to correct mistakes identified without making changes to legitimate marks.
- Extend the grounds on which centres[4] (and in some cases candidates) following a review, can appeal against marking and moderation decisions for GCSEs, AS and A levels, so that appeals can be about unreasonable marks/decisions as well as procedures.

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[1] Consultation principles
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/255180/Consultation-Principles-Oct-2013.pdf (accessed 14/03/16.)
[2] GCSEs, AS and A levels are being changed. New qualifications are being phased in and earlier versions of those qualifications phased out. In this document, where we need to distinguish between the versions of the qualifications we refer to them as 'new' and 'legacy', respectively or to the new qualifications and earlier versions. The new qualifications have not yet been awarded and so there have been no requests for review of marking or appeals about them. There are no rules yet in place to deal with such requests.
[3] http://www.gov.uk/government/publications/gcse-gce-principal-learning-and-project-code-of-practice (accessed 14/03/16.)
[4] 'Centres' includes schools and colleges and any other organisation that has an arrangement with an awarding organisation to deliver its qualifications.

- Remove duplication in published rules and remove some rules which may be unnecessary, whilst making sure awarding organisations take a common approach to setting grade boundaries for GCSEs, AS and A levels.

Ofqual was seeking initial views about whether, once the Code was withdrawn, the new rules set out in the consultation should also apply to Principal Learning and Project qualifications and to other qualifications, such as international GCSE qualifications.

3.2 Background on the Code

The Code was introduced in 1993, and has been revised regularly since then by the regulators for England, Wales and Northern Ireland, working with the relevant awarding organisations. The Code sets out:

- the agreed principles and practices for the assessment and quality assurance of qualifications covered by the Code;
- the roles and responsibilities of awarding organisations and centres; and
- the requirements for a high-quality examinations process.

The Code remains jointly owned by the regulators for England, Wales and Northern Ireland. It was last revised in 2011. Since then, the way in which Ofqual regulates has been transformed. It has introduced the General Conditions of Recognition and related statutory guidance. These newer requirements are more outcomes-focussed and are not as prescriptive as the Code.

Ofqual is proposing that much of the Code is now not necessary, that it is outdated and in tension with other regulatory requirements. The proposed changes are intended to increase the effectiveness of Ofqual's regulation of key awarding organisation processes, whilst freeing awarding organisations covered by the Code from unnecessary regulatory burden.

4 Consultation methods

4.1 Data collection

The consultation was carried out between 10 December 2015 and 11 March 2016. The main structured data collection instrument was an online questionnaire. This instrument had a 'your details' section at the start, and sets of questions in respect of the context of the response (personal or official), role and/or type of organisation and nation. The questions covered:

Part A – Review of marking and appeals of GCSEs, AS and A levels

[Part B – Proposed rules for reviews of marking and appeals. There were no consultation questions for part B].

Part C – Withdrawing the Code of Practice

Part D – Setting grade boundaries

Part E – Implementation.

All sections started with some closed questions where respondents could choose a response on a scale from 'strongly disagree' to 'strongly agree' ('Likert items'). Most Likert items in the consultation were also complemented by open questions ('constructed response items'), which were worded as: 'Please give reasons for your answer'.

The questionnaire was available in two modes. There was an online version hosted in the Survey Gizmo online platform (this was the main version); and potential respondents were also given the option of completing a version of the questionnaire in a Microsoft Word document and emailing it to Ofqual.

As well as responding to the questionnaire, respondents could send in unstructured comments by letter, email or similar communications methods.

In addition, a student survey was available. The first submission to this instrument was on 18 February 2016, and the last was on 11 March 2016. The survey involved a short questionnaire made up of four Likert items of the type used for the main consultation. The items were all on the review of marking and appeals, rather than on the other topics in the main consultation. They were not complemented by open questions. The responses are reported in Section 6 below.

As with any public consultation, responses were received from a self-selecting range of participants. This inevitably introduces the potential for selection bias. Accordingly, there can be no assumption that the stakeholders who responded to the consultation were, or were not, fully representative of the wider stakeholder population.

4.2 Data analysis

In the quantitative analysis, the emphasis was on producing summaries of stakeholder opinion by producing figures and tables that were as clear as possible. Tables and figures are typically followed by brief summarising comments.

We adopted the stacked bar chart approach to data visualisation (see, for instance, Figure 5). The rationale for this approach is given here: http://tinyurl.com/kv5akzz. In essence, the strength of this method is that it allows the viewer to compare agreement and disagreement directly, without any 'interference' from neutral ('Don't know/No opinion') responses.

5 Data returned to consultation

5.1 Consultation Responses

5.1.1 Counts of numbers of responses of different types

As noted in section 4.1, the consultation used several methods to gather data. The numbers of responses gathered through these different methods are given in Table 1.

Table 1: Numbers of responses submitted to the consultation via different channels

Consultation instrument	Mode of sending	Number	Totals
Questionnaire responses	Online	58	81
	By email	23	
Non-standard responses	Personal non-standard responses	1	10
	Organisational non-standard responses	9	
Total			91

Where a response was sent electronically, we checked for a duplicate or a second response from the respondent in the online questionnaire data. If a duplicate was found the online version was used.

5.2 Student survey

The numbers of responses to the student survey and the main locations of respondents are shown in Table 2. Towns or cities that had ten or more respondents are listed. Those that had nine or fewer are summed in one row.

Table 2: Numbers of responses to student survey showing major areas of response

Location of respondent (country/town or city)	Numbers of respondents
United Kingdom	**1325**
Ten or more	
London	183
Maidstone	177
Leyland	70
BLANK	70
Romsey	46
York	37
Cranbrook	30
Norwich	27
Basildon	27
Leicester	25
Winchester	24
Preston	23
Chorley	23
Blackburn	20
Manchester	19
Southampton	14
Bolton	12
Newport	12
Beverley	12
Watford	11
Basingstoke	11
Wigan	10
Nine or fewer	**442**
BLANK	**11**
United States	**3**
Jersey	**2**
Malawi	**1**
Israel	**1**
United Arab Emirates	**1**
Canada	**1**
Austria	**1**
Germany	**1**
Isle of Man	**1**
Grand Total	**1348**

From nearly 1350 respondents, the majority were from a range of English towns and cities. Most came from London, but Maidstone, Leyland, Romsey, York and Cranbrook all had 30 or more respondents. Seventy respondents left their city name blank.

Table 3 counts respondents' school years.

Table 3: Numbers of responses student survey by school year

School year	Number of responses
year 7	27
year 8	45
year 9	58
year 10	114
year 11	294
year 12 /Lower sixth	406
year 13/Upper sixth	404
Total	**1348**

A large majority of respondents were from the two sixth form years.

5.3 Responses to 'your details' questions

The questionnaire started with several questions about respondents' backgrounds, rather than their views on the topics of the consultation. A summary of these responses is given in sub-section 5.3.2, below.

5.3.1 Treat my response as confidential

Respondents were asked if they wished their responses to be kept confidential or not. A list of organisational respondents who were willing for their information to be shared is included in the Appendices.

5.3.2 Proportion of official and personal responses

The questionnaire asked 'Are the views expressed in response to this consultation your personal views or an official response from the organisation you represent?' The numbers of responses to this question are given in Figure 1.
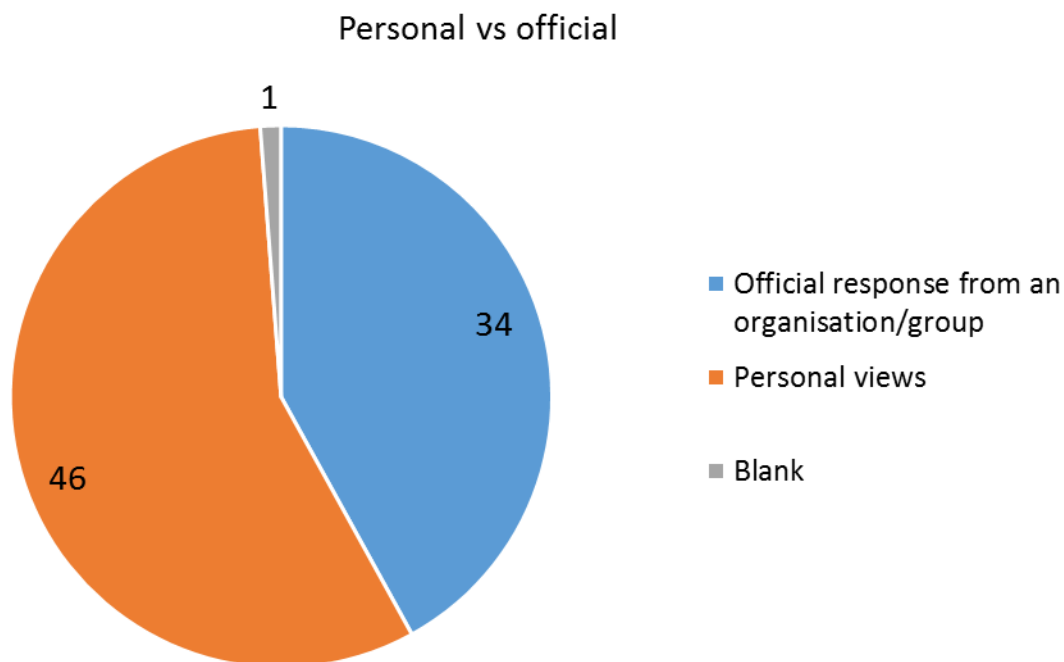
Figure 1: Numbers of official and personal responses

A slight majority (around 57 per cent) of responses were submitted in a personal, rather than an official, capacity[5].

We can break down both the personal and the official responses into constituent categories. The personal responses are broken down in Figure 2.

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[5] The 'non-standard' responses were nine from organisations, and one in a personal capacity (see Table 1). Non-standard responses are not captured in the breakdowns that follow.

Types of personal response

Legend:
- Parent/carer
- Student
- Other, including general public
- Teacher (but not responding on behalf of a school)
- Parent or carer / Teacher
- Educational specialist (retired teacher, examiner, assessment expert, subject expert, governor)
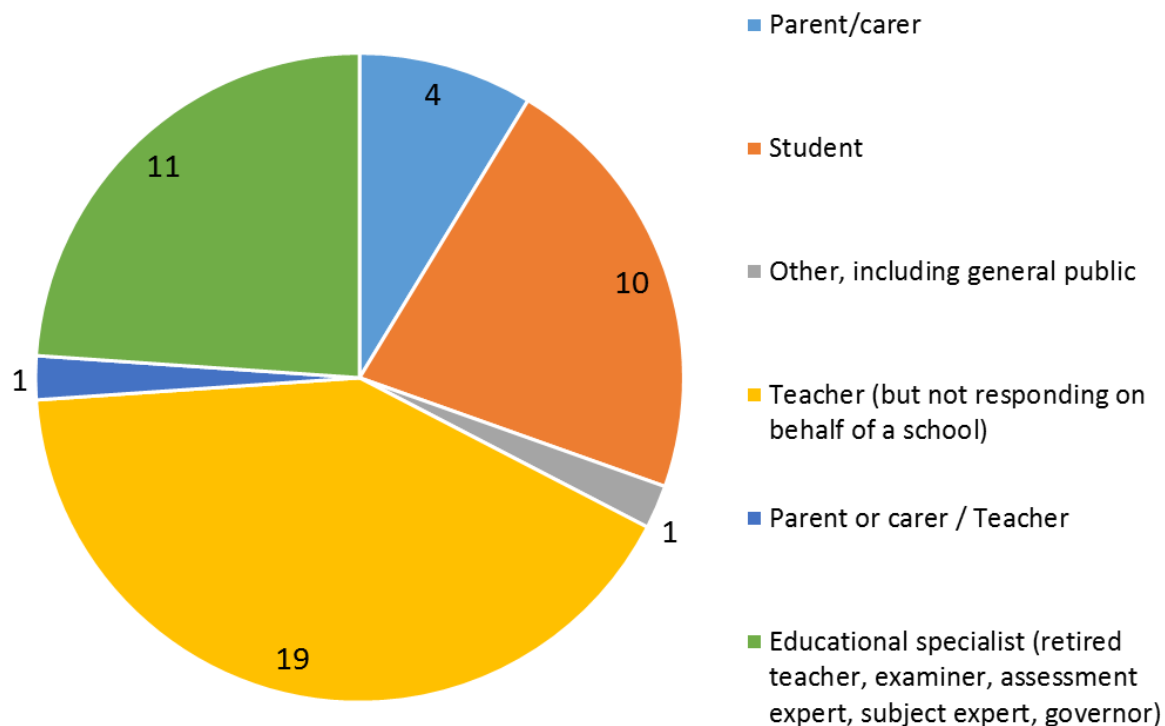
Figure 2: Types of personal response to the questionnaire

The biggest group of respondents were teachers answering in a personal capacity (19), followed by educational specialists (11), and they – in turn – were closely followed by ten responses from students. These student responses were present in the main survey, even though there was a separate survey for students.

The breakdown of official responses is summarised in Figure 3.

Types of official response
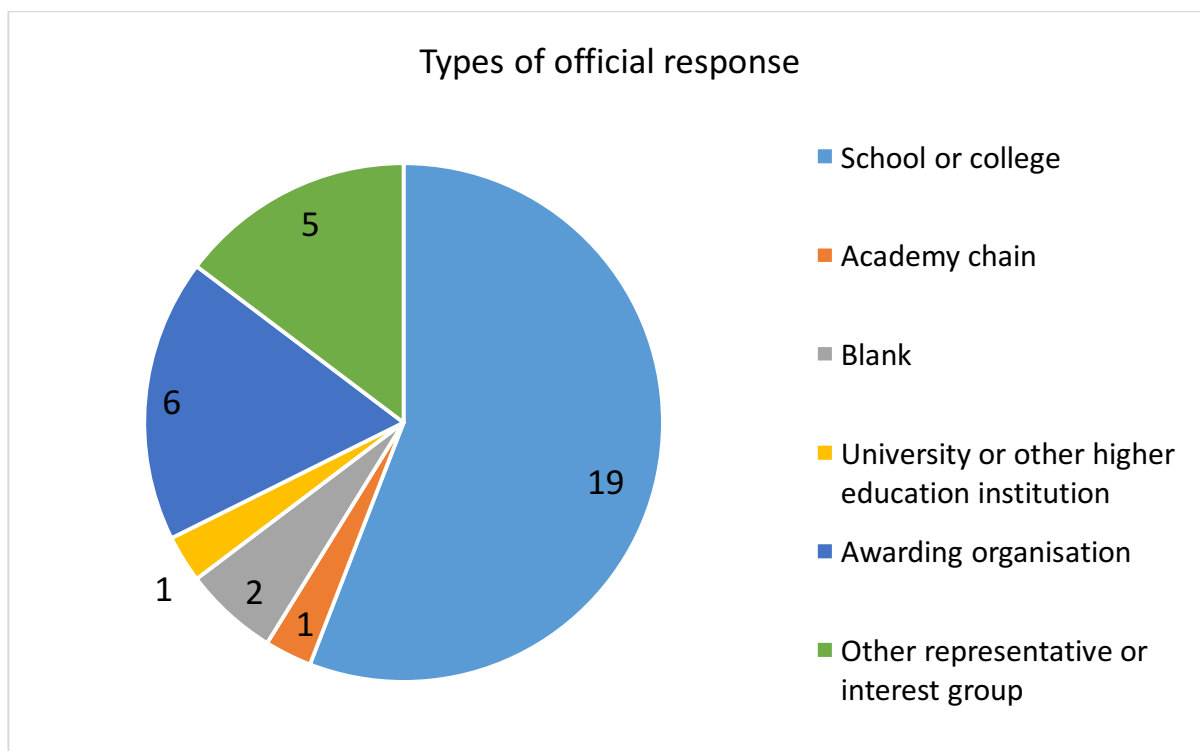
Figure 3: Types of official response to the questionnaire

The biggest group of official responses was from schools (19 from 34). There were six responses from awarding organisations and five responses from other representative groups.

6 Student survey findings

6.1 Responses to closed questions

The student survey was realised via the Survey Gizmo online engine. It consisted of four questions, which were grouped around two scenarios: questions one and two pertained to scenario A, and questions three and four pertained to scenario B.

The scenarios were as follows:

Scenario A:

Nicola is an examiner working for an awarding organisation. After results have been issued, the school asks for a review of a student's mark and the awarding organisation asks Nicola to carry out the review.

Nicola generally agrees that the mark given by the first examiner reflects the quality of the student's work, but thinks that if she had marked it originally, then she would have given it a slightly different mark.

Nicola understands that examiners marking the exam paper often have to use their professional judgement and that some answers can be given a slightly different mark by two examiners and both be reasonable applications of the mark scheme. She leaves the original mark unchanged and this is communicated to the school.

Scenario B:

Joseph has just received the outcome of a review of his exam paper and the mark has stayed the same. His school still believes that the mark scheme was applied unreasonably and decide to appeal the decision.

At the appeal hearing the discussion focuses on whether or not the awarding organisation fairly followed the proper procedures, since this is the only factor that can be considered at an appeal at present. The school loses the appeal and Joseph's original mark stands.

Results for the four questions are as follows:

Table 4: Levels of agreement with student survey questions

Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total
Where examiners have to use their professional judgement, two examiners can give slightly different marks to the same student's answer without one being more appropriate than the other.	97	278	151	640	182	**1348**
A student whose mark is reviewed after results have been issued should not have a reasonable original mark replaced by a different mark.	170	404	299	375	100	**1348**
Appeals should consider whether the awarding organisation has fairly and consistently followed its procedures.	17	28	78	598	627	**1348**
Appeals should consider whether the mark scheme was reasonably applied.	14	20	48	522	744	**1348**

Student questions

a)[n = 1197] Where examiners use prof' judgement, different marks to the same answer can be given without one being more appropriate.

c)[n = 1049] Marks reviewed after issued results, shouldn't have a reasonable original mark replaced.

e)[n = 1270] Appeals should consider if exam board has fairly & consistently followed its procedures.

g)[n = 1300] Appeals should consider whether the mark scheme was reasonably applied.

Net response

■ Strongly disagree ■ Disagree ■ Agree ■ Strongly agree

Figure 4: Stacked bar chart for student survey questions

There were strong levels of agreement with the questions relating to scenario B, but scenario A questions had more mixed results. There was around 70 per cent agreement with item 1 (relating to legitimate differences between two examiners); but slightly less than half of firm opinions agreeing with question 2 (about not replacing a reasonable mark with a different one); and around 300 respondents (a large proportion) neither agreeing nor disagreeing.

7   Main consultation findings

The main consultation findings are detailed below. Quantitative results are first provided for each set of questions, followed by a summary of the qualitative responses to those questions. The qualitative comments highlight differences between stakeholder groups, where these are notable. Throughout the qualitative responses, comments from the awarding bodies are included in the summaries and in the counts of comments in favour of or against the proposals. Specific comments from the awarding organisations are pulled out under a separate heading for each question. This was done as the comments frequently, although not always, differed from those of other stakeholder groups

As detailed in section 5.1.1 above, 10 responses were received that did not follow the questionnaire format. In addition, a number of respondents also included a non-standard introduction to their questionnaire response.   Both these forms of non-standard responses were coded and where possible, the comments were linked to specific questions. These comments are provided under the qualitative response summaries from the questionnaire responses.

Where the non-standard responses were directly relevant to the consultation, but could not be linked to specific questions, they are summarised in a general section on page 942 below.

The non-standard comments from awarding organisations that could be linked to specific questions have been included in the section entitled 'comments from awarding organisations' under each question, rather than with the other non-standard comments.

7.1 Part A – review of marking and appeals of GCSEs, AS and A levels

Part A had 26 sub-questions (1a – 1z) pertaining to a new system for reviewing marking. For convenience these questions are presented in sets of five (the final table has six questions in it). Table 5 and Figure 5 show the distribution of consultation responses for sub-questions 1a – 1e.

7.1.1 Set one: Q1a – Q1e

Set 1 (Q1a – Q1e) pertained to: making marked assessments available before the deadline for requesting a review (Q1a); making the mark scheme available at the same time (Q1b); arranging to correct administrative errors (Q1c); changing marks where an error had been made, but not changing a mark that could reasonably have been given by a marker applying the mark scheme and any relevant marking procedures to a candidate's assessment (Q1d); and explaining decisions to centres (Q1e).

7.1.1.1 Quantitative responses

Table 5: Part A (Q1a – Q1e) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1a	Make marked assessments available to centres and/or candidates before its deadline for requesting a review of marking or the correction of an administrative error.	1	2	2	13	63	**81**
Q1b	Make the mark scheme for an assessment available at the same time as or before it makes the marked assessments available.	2	1	0	14	63	**80**
Q1c	Have arrangements in place to correct administrative errors that are identified.	0	1	3	5	72	**81**
Q1d	At a review of marking, change marks where an error has been made, but not change a mark that could reasonably have been given by a marker applying the mark scheme and any relevant marking procedures to a candidate's assessment.	14	12	3	29	23	**81**
Q1e	Following a review of marking, provide centres with an explanation for the decision taken.	0	6	1	11	61	**79**

Part A (Q1a - 1e)

a[n = 79] Make marked assessments available before the deadline for post results services.

b[n = 80] Make the mark scheme for an assessment available.

c[n = 78] Have arrangements in place to correct administrative errors that are identified.

d[n = 78] Change marks where error made, but not change mark reasonably given.

e[n = 78] Following a review of marking, provide centres with an explanation for the decision taken.

Net response

■ Strongly disagree ■ Disagree ■ Agree ■ Strongly agree

Figure 5: Stacked bar chart for Part A (Q1a – Q1e)

All questions amongst this group have strong 'agreement ratings'. Questions 1a, 1b, 1c and 1e, in particular, had large majorities of respondents agreeing strongly with the statements in the consultation items. Q1d was the exception in this set in that it had fewer 'strongly agree' responses, and around 30 per cent of respondents disagreeing.

7.1.1.2   Qualitative responses

The majority of questions also asked respondents for a reason for the response given. These comments are detailed for 1a to 1e below. For each set of qualitative responses we also reproduce the table of Likert question responses, just for those who commented, split by official and personal responses. This allows the reader to ascertain any differences in the make-up of the group that responded to the questions compared to the group that commented.

Table 6: Part A (Q1a – Q1e) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1a	Official	0	1	0	5	18	**24**
	Personal	1	1	1	4	27	**34**
Q1b	Official	0	0	0	4	16	**20**
	Personal	2	1	0	4	24	**31**
Q1c	Official	0	0	0	0	20	**20**
	Personal	0	1	0	1	19	**21**
Q1d	Official	4	7	0	10	5	**26**
	Personal	8	3	1	8	11	**31**
Q1e	Official	0	0	0	5	16	**21**
	Personal	0	6	1	3	22	**32**

Q1a: Make marked assessments available to centres and/or candidates before its deadline for requesting a review of marking or the correction of an administrative error.

Fifty nine respondents provided further free-text responses to this question. Twenty four were official responses and 34 were personal responses[6]. Personal respondents who commented on this topic were mostly teachers (13), with the next largest group being educational specialists (10) (which in the consultation includes retired teachers, examiners, assessment experts, subject experts and governors). The official respondents to this question were schools or colleges (13), awarding organisations (5), representative or interest groups (5) and one was a university or higher education institution HEI).

SUMMARY POINTS

- The majority of the respondents either agreed or strongly agreed that marked assessments should be made available to centres prior to the deadline for requesting a review of marking.
- The most common reason given for agreeing with the proposal was that it would allow an informed decision to be made when deciding on whether to request a review or not (36). In particular respondents commented that they would be able to tell whether there had been an administrative error, if the mark scheme had been incorrectly applied, or if the student had performed less well than expected.
- Other reasons given in favour of the proposal were that it would prevent unnecessary appeals and would therefore save money and time.

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[6] One respondent left this blank.

KEY POINTS BY STAKEHOLDER GROUP

- Thirty six of those who agreed or strongly agreed with the proposal commented that it would allow an informed decision to be made about whether to appeal or not.
- Five respondents commented that it would save time or money.
- Four of those in support of the proposal also expressed a concern about the impact of the extra time required by schools.
- Two suggested this should be offered as a free service.
- Only one comment was not in favour of the proposals and this was due to a concern about timing for examiners.

COMMENTS FROM AWARDING ORGANISATIONS

- Four awarding organisations responded positively but went on to emphasise the challenge of doing this and said it would not be possible for 2016.
- Two awarding organisations also addressed this question in a non-standard response.
  - One comment described the significant systems development that would be required for the provision of this service, and emphasised the significant cost and time required for this. They do not currently hold most scripts electronically. They would want to be sure of demand before they made this investment. It would not be possible for 2016 and probably not for 2017.
  - One commented that this would require significant changes to existing processes and systems.

COMMENTS FROM NON-STANDARD RESPONSES

- An academy chain commented in favour of this proposal. They argued that this would allow an informed decision to be made about an EAR. The change would eliminate guesswork and save money.
- A school network commented that this would allow centres to make evidence-based decisions about requests. This should not impact financially and should be fair to candidates.
- One representative group for HE admissions supported the proposal for increased transparency by making marked assessments available.
- One representative or interest group expressed support for the proposal as it would allow centres to make an informed decision. They also expressed concerns about the potential cost and time demands on centres. They would not want the centre involvement to be viewed as an additional check on marking.
- One representative or interest group expressed support for this proposal in that it would mean that all students could have their scripts checked. They added that there might be differential unfairness in centre willingness to conduct the checks, and that the extra demand placed on schools should be taken into account.
- One representative or interest group expressed a concern about this proposal and the impact that it would have on teacher workloads.

Q1b: Make the mark scheme for an assessment available at the same time as or before it makes the marked assessments available.

Fifty two respondents provided further free-text responses to this question. Personal respondents who commented on this topic were mostly teachers (13), the next largest group was educational specialists (9). The 20 official responses were from schools or colleges (10), other representative or interest groups (4), awarding organisations (5) and university or HEI (1).

SUMMARY POINTS

- The majority of those that commented to this proposal either agreed or strongly agreed with it. Almost all of those who commented said it would allow them to judge the marking more accurately before they decide to appeal. Three respondents said it would be useful for professional development reasons.
- Two respondents (including one who responded negatively) said that the mark schemes in isolation do not provide sufficient information to make an informed decision.

KEY POINTS BY STAKEHOLDER GROUP

- Twelve teachers responded positively to this question. These teachers mostly commented that having the mark scheme would allow them to judge the marking accurately. One suggested that the standardisation scripts should also be available. The other positive teacher stated that this was important for transparency.
- One teacher responded negatively to the question and said it would undermine school-based assessment.
- Ten schools or colleges made an official response and all commented that provision of mark schemes would allow them to make an informed judgement about the marking, or that it would help with transparency.
- One teacher and the one educational specialist who commented after a negative response to this question suggested that additional materials, such as standardising scripts, would also be required.

COMMENTS FROM AWARDING ORGANISATIONS

- Four awarding organisations, including an awarding organisation representative group, emphasised that this is already established practice. One commented that the priority must be to get the results out rather than updating the mark schemes.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network commented that there was no logical reason why different awarding organisations have different approaches to this.
- One representative group for HE admissions supported the proposal for increased transparency by making mark schemes available.
- One representative or interest group expressed support for this proposal in that it would mean that all students could have their scripts checked. They add that there might be differential unfairness in centre willingness to conduct the checks, and that the extra demand placed on schools should be taken into account.

Q1c: Have arrangements in place to correct administrative errors that are identified.

Forty one respondents provided further free-text responses to this question. Personal respondents who commented on this topic were mostly teachers (9), the next largest group was educational

specialists (6). The twenty official responses were from schools or colleges (9), other representative or interest groups (5), awarding organisations (5) and university or HEI (1).

SUMMARY POINTS

- The majority of those that commented on this proposal either agreed or strongly agreed with it. Almost all of those who commented emphasised strong agreement in some way, often generally, but sometimes referring to the speed or fairness of the process.
- One respondent responded negatively and said that administrative errors should be picked up earlier.

KEY POINTS BY STAKEHOLDER GROUP

- Nine teachers and six schools or colleges responded to this question. They were all in favour and comments emphasised general agreement. Many commented that this was fair, and some emphasised that it was important to pick these up quickly.
- The one respondent (education specialist) who commented after a negative response to this question suggested that errors should be picked up earlier in the process.

COMMENTS FROM AWARDING ORGANISATIONS
- Four awarding organisations, including an awarding organisation representative group, emphasised that this is already established practice, and each awarding organisation should be permitted to set up their own processes. One awarding organisation commented that they need to balance integrity of the assessment and fairness for individual students.

COMMENTS FROM NON-STANDARD RESPONSES
- One representative or interest group expressed full support for this proposal.

Q1d: At a review of marking, change marks where an error has been made, but not change a mark that could reasonably have been given by a marker applying the mark scheme and any relevant marking procedures to a candidate's assessment.

Fifty eight respondents provided further free-text responses to this question. The personal respondents who commented on this topic were mostly teachers (14), the next largest group was educational specialists (8). The twenty six official responses were from schools or colleges (13), other representative or interest groups (6), awarding organisations (6) and university or HEI (1).

SUMMARY POINTS

- This was the most controversial question in this section, with thirty five of those who commented agreeing or strongly agreeing with the proposal, and twenty two disagreeing or strongly disagreeing.
- Almost all of those who agreed commented that this was the fairest approach (to those who appeal and those who do not). There were suggestions that the mark scheme should be as objective as possible and that tolerances should be carefully reviewed and not be too large.
- The negative comments were more diverse. There were arguments that the student should be given the highest possible mark within the reasonable range; that as it is difficult to define 'reasonable' the process would be too subjective; and that the only fair process would be a blind re-mark.

KEY POINTS BY STAKEHOLDER GROUP

- Nine teachers and four schools or colleges responded positively to this question. Comments included that the mark schemes should be less subjective; that overall impact of mark changes should be considered; and that fairness to the students is paramount. One commented that approaches should be consistent between awarding organisations.
- Five teachers and five schools or colleges responded negatively. Comments included that reasonable needs to be defined; that all possible marks should be given (some teachers commented that the highest possible mark should be given); that the proposal limits changes to marks; and that a blind re-mark would be fairer.

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation representative group and four awarding organisations commented. The awarding organisation representative group responded positively and commented that 'reasonable' needs to be carefully defined; the process would need to be carefully communicated to stakeholders so they have informed expectations; they should use all available evidence so the approach is more 'forensic' than a re-mark; there should be an agreed approach across all awarding organisations; and that training of the reviewers would be important. Three other awarding organisations commented that some small changes, such as emphasising the review rather than a re-mark, could be made for 2016. Other changes, such as the reviewer recruitment and contracts, could change in 2017; and that systems change would not be possible before 2018. One awarding organisation emphasised that the standard is defined by the Principal Examiner. This is the standard that must be maintained. The issue is not about how the mark scheme is applied.
- Two non-standard responses from awarding organisations also addressed this question.
  - One comment was made that detailed communication with centres would be needed to explain any change of focus. A concern was expressed over possible disagreement with centres about their interpretation of the mark scheme.
  - One commented that there is a lack of clarity about what reasonable means. Ofqual's approach does not seem to include any checks of reasonableness.

COMMENTS FROM NON-STANDARD RESPONSES

- An academy chain commented not supporting this proposal. They argued that legitimate mark changes might not be made which could have a significant impact on students.
- One representative group for HE admissions requested clarification on what constitutes a reasonable mark.
- One representative or interest group expressed support for widening the grounds for appeal to include 'reasonableness', although went on to express a concern that the term was difficult to pin down.
- One representative or interest group expressed concern about the use of the term 'reasonable' and suggested that this could become synonymous with tolerances.

Q1e: Following a review of marking, provide centres with an explanation for the decision taken.

Fifty five respondents provided further free-text responses to this question. Personal respondents who commented on this topic were mostly teachers (13), the next largest group was educational specialists (10). The thirteen official responses were from schools or colleges (11), other representative or interest groups (5), awarding organisations (6) and university or HEI (1).

SUMMARY POINTS

- The majority of those that commented on this proposal either agreed or strongly agreed with it (46).
- Almost all of those who commented said it would inform future appeal decisions. Other frequent responses were that it would improve transparency and therefore trust in the system. Six responded that it would be useful professional development.
- Six respondents responded negatively and also provided a comment. Three comments were that the cost and time of providing something meaningful would be prohibitive; and two that feedback in isolation could end up raising more questions than it answers.

KEY POINTS BY STAKEHOLDER GROUP

- Ten teachers and seven schools or colleges responded positively to this question. The teachers mostly commented that the feedback would inform future appeal requests. Three also commented that it would improve confidence and transparency in the system. Their comments generally emphasised their positive response; three commented that it would build faith in the system. One, although positive, emphasised that those providing the reviews would require careful training.
- The negative responses to the question were from teachers (2), educational specialists (2) and students (2). The two teachers and one educational specialist expressed concerns about the cost and time required to provide meaningful information. The other comments included that it would make people question the awarding organisations (a student); that in isolation the comments might lead to more questions (an educational specialist); and that it was just not needed (a student).

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation representative group emphasised that this proposal would require systems development and changes to reviewer contracts that could not now be made for 2016. They added that it might be possible to introduce some of the changes within existing arrangements.
- Four individual awarding organisations commented, all in favour. Three emphasised the group response and said that for 2016 they would review the content of the letters sent to schools and colleges where no change in student outcome had occurred; and would consider the potential to provide more detailed feedback where grades have changed by two grades or more. The other awarding organisation agreed with the proposal, but extended this to say that the changes should take into account proportionality and only apply when such explanation adds value to the school.
- Two non-standard responses were received from awarding organisations.
  - One respondent agreed with this proposal, but commented that it would not be possible for 2016.
  - One commented that the requirement to provide outcomes to centres, details to Ofqual and explanations to centres would require intensive resource planning.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network commented that this was a positive proposal.
- One representative or interest group expressed full support for this proposal and said the transparency would be welcomed.

7.1.2 Set two: Q1f – Q1j

This set contained questions about: candidates having access to teacher-marked assessments in time for a review (Q1f); having access to necessary materials for a review of a teacher assessment (Q1g); only allowing requests for a review of moderation by a centre (Q1h); changing only 'non-reasonable' outcomes following reviews of moderation (Q1i); and providing centres with explanations, following a review of moderation (Q1j).

7.1.2.1 Quantitative responses

Table 7: Part A (Q1f – Q1j) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1f	Make sure that candidates have access to the marks for teacher-marked assessments in time to consider whether to request a review of these marks by the centre.	6	16	7	23	29	**81**
Q1g	Make sure that candidates can seek a review of teacher-marked assessment by their centre and have access to the materials they need to consider whether to request such a review.	5	22	5	23	26	**81**
Q1h	Only allow requests for a review of moderation to be made by a centre.	7	11	8	19	36	**81**
Q1i	Following a review of a moderation decision, change the outcome of that moderation only where that outcome could not reasonably have been arrived at by a moderator who had considered candidates' work, the teacher's mark and the mark scheme and any relevant procedures, but not change the outcome of the moderation where it represented a reasonable outcome.	10	9	11	25	24	**79**
Q1j	Following a review of moderation, provide centres with an explanation for the decision taken.	0	4	1	15	60	**80**

Part A (Q1f - 1j)

f[n = 74] Candidates have access to their marks in time to request a review.

g[n = 76] Candidates can seek a review, and have the information to inform their decision.

h[n = 73] Only allow requests for a review of moderation to be made by a centre.

i[n = 68] Following moderation review, change outcome not reasonably given.

j[n = 79] Provide centres with an explanation of the outcome of the review of moderation.

Net response

■ Strongly disagree   ■ Disagree   ■ Agree   ■ Strongly agree

Figure 6: Stacked bar chart for Part A (Q1f – Q1j)

Once again, all statements in this set received a majority of agreement from respondents. Q1j, which proposed giving centres feedback after moderation, had the strongest support.

7.1.2.2   Qualitative responses

Table 8: Part A (Q1f – Q1j) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1f	Official	4	8	1	7	4	24
	Personal	2	7	2	3	12	26
Q1g	Official	3	12	0	4	5	24
	Personal	1	7	1	7	10	26
Q1h	Official	1	2	0	6	13	22
	Personal	4	6	2	3	9	24
Q1i	Official	3	5	1	4	6	19
	Personal	6	4	4	3	5	22
Q1j	Official	0	1	0	7	12	20
	Personal	0	2	0	2	20	24

Q1f: Make sure that candidates have access to the marks for teacher-marked assessments in time to consider whether to request a review of these marks by the centre.

Fifty one respondents provided further free-text responses to this question. The personal respondents who commented on this topic were teachers (9), the next largest group was educational specialists (8). The twenty four official responses were mainly from schools or colleges (13), six were representative or interest groups and five were from awarding organisations.

SUMMARY POINTS

- Just over half of those that commented on this proposal either agreed or strongly agreed with it (27). A range of reasons were given by those agreeing or strongly agreeing. These included fairness, enabling an informed decision and ensuring faith in the system. Four respondents commented that students would not understand the process or mark schemes.
- Where there was disagreement, concerns mainly focused on the practicalities of implementation for schools within the timeframe and whether teachers' professional opinion would be undermined.

KEY POINTS BY STAKEHOLDER GROUP

- Five teachers and five schools or colleges responded positively and commented. Comments generally emphasised support and suggested that this was to do with transparency and fairness. Other comments included that students need to be made aware of the moderation process; and another mentioned the need for consistency over the level of support that students were given with coursework.
- Two students and a parent/carer thought that students reviewing their marks would help to identify errors.
- The 21 respondents who disagreed or strongly disagreed with the statement included four teachers and seven schools or colleges. Their concerns largely focused on the practicalities of implementation before moderation for schools and concerns that teachers' professional opinion would be undermined.
- One teacher and one educational specialist were concerned that raw marks might be misleading for students.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group that commented disagreed with the proposal and stated that awarding organisations should require schools to have processes in place, but the exact process should be at the school's discretion. Three of the awarding organisations that commented expressed their agreement with the group approach.
- A non-standard response from an awarding organisation also addressed this question. The comments emphasised agreement with this proposal.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network commented that this could create substantial tension between centres and students/ parents.
- One representative or interest group expressed a concern about this proposal. Another said that centres must retain discretion over when and how to reveal unmoderated assessments.

Q1g: Make sure that candidates can seek a review of teacher-marked assessment by their centre and have access to the materials they need to consider whether to request such a review.

Fifty one respondents provided further free-text responses to this question. The personal respondents who commented on this topic were mostly teachers (11), the next largest group was educational specialists (7). The 24 official responses were from schools or colleges (13), representative or interest groups (6) and awarding organisations (5).

SUMMARY POINTS

- Twenty six respondents who commented agreed or strongly agreed with the proposal. The comments in favour were mostly that this ensured transparency and fairness in the system; one also expressed the benefit of student autonomy. Many of those who responded positively also added concerns about practical issues, and that this would need to be managed carefully.

- Twenty four respondents who commented disagreed or strongly disagreed with the proposal. The largest number of comments was to the effect that this would undermine teachers' professional judgement. Other comments included that this would not be practical to implement; that students would not understand the mark schemes; and that it would risk the security of the assessments.

KEY POINTS BY STAKEHOLDER GROUP

- Of the 26 agreeing or strongly agreeing, eight were teachers and five were schools or colleges. The comments generally raised practical issues that would need managing.

- Three parents commented who agreed. They felt the proposal would help to ensure fairness.

- Four students responded positively and comments included that it would enable an informed decision and that it would avoid confusion.

- There were 24 respondents who disagreed or strongly disagreed and explained their reasons. Three of these were from individual teachers and eight were from schools or colleges. These school representatives raised practical concerns, especially that the timing would be too tight, and that the process would undermine teachers.

- Four were educational specialists who commented that teachers would get the marking right or that this would undermine teachers. One commented that this would increase the number of requests.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group that commented said that schools should have processes in place but the awarding organisations would not be able to monitor this. Three individual awarding organisations that commented reiterated this view. One awarding organisation agreed with the proposal, but then went on to suggest it would not be possible to ensure it.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group expressed a concern about this proposal. They went on to say that the students do not have the professional understanding to make such

judgements. They also expressed concern about malicious queries and equity of opportunity.

Q1h: Only allow requests for a review of moderation to be made by a centre.

Forty six respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (10), educational specialists (6), parents/ carers (3) and students (5). The twenty two official responses were from schools and colleges (11), representative or interest groups (5) and awarding organisations (6).

SUMMARY POINTS

- Thirty three respondents who commented agreed or strongly agreed with the proposals. Comments included that the centres understand the process and that this would keep it manageable. Ten comments noted that the review would be of the process, therefore affecting all students in the centre, and so it could not be requested by individual students.
- Thirteen respondents who commented disagreed or strongly disagreed with the proposals. The comments were mostly that the individual rights of the students were important and that transparency was needed in the system. One disagreed, but added it should only be used as a last resort.

KEY POINTS BY STAKEHOLDER GROUP

- Five teachers and seven schools or colleges responded positively and commented. In general they commented that the centres understand the process and context better than the students, and that this was needed to keep the system manageable.
- There were six comments from educational specialists who agreed or strongly agreed. They mostly felt that this approach was appropriate, given that it was a review of moderation (rather than of an individual student's work).
- The three teachers and the two schools or colleges who disagreed or strongly disagreed and gave reasons for their response made comments relating to fairness for individual students.
- Seven responses were from parents or carers and students. These comments all related to the autonomy of the student and fairness of the system; and one also commented that the centre might miss something.

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation representative group and five awarding organisations commented on this question. They all strongly agreed with the proposal and stated that as moderation affects the whole centres' marks only the centre should be permitted to request a review.

Q1i: Following a review of a moderation decision, change the outcome of that moderation only where that outcome could not reasonably have been arrived at by a moderator who had considered candidates' work, the teacher's mark and the mark scheme and any relevant procedures, but not change the outcome of the moderation where it represented a reasonable outcome.

Forty three respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (12), educational specialists (5), students (4), parents

(1) and one examiner. The 20 official responses were from schools and colleges (9), representative or interest groups (6), and awarding organisations (5).

SUMMARY POINTS

- Eighteen respondents who commented agreed or strongly agreed with the proposals. The majority of comments either confirmed their agreement or gave fairness as the reason for their response.
- Eighteen respondents who commented disagreed or strongly disagreed with the proposals. Four respondents who disagreed or strongly disagreed also expressed concerns about what 'reasonable' might mean; one respondent felt this was too subjective; and one felt it might lead to litigation. Other respondents felt that if a senior examiner thought the mark was incorrect it should be changed. One commented that it could have an impact on staff/ student relations.

KEY POINTS BY STAKEHOLDER GROUP

- Four teachers and three schools or colleges responded positively and commented that this was about fairness. One commented that it did not allow for a review of the moderation decisions.
- One student responded positively and emphasised general agreement in their comment.
- Four teachers responded negatively to the proposal. The most common comment was that 'reasonable' needs to be defined. One parent and one student also provided the same comment.

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation representative group and two individual awarding organisations strongly agreed with the proposals. One awarding organisation agreed and emphasised that it is the Principal Examiner standard which is the baseline.
- One awarding organisation strongly disagreed, stating concerns about the definition of reasonableness.

Q1j: Following a review of moderation, provide centres with an explanation for the decision taken.

Forty five respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (8), educational specialists (10), students (4), parent or carer (1) and examiner (1). The twenty one official responses were from schools or colleges (10), representative or interest groups (5) and awarding organisations (6).

SUMMARY POINTS

- Forty one respondents who gave a reason for their response agreed or strongly agreed with the statement. Reasons included the need for transparency, fairness, support for future decisions and professional development for teachers.
- Three respondents disagreed with the proposal, with two commenting it was unnecessary.

KEY POINTS BY STAKEHOLDER GROUP

- Seven teachers and ten schools or colleges who commented responded positively. Comments were general agreement, about transparency and faith in the system, and about professional development.

- Nine educational specialists who commented responded positively and mostly stated that this would provide useful professional development.
- The four students and one parent who responded positively commented that this was important for transparency in the system and for teacher professional development.
- The three negative comments were from one teacher, one educational specialist and one awarding organisation.

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation representative group agreed with the proposal and said that they would include more information in feedback to centres, but that systems were not in place to collect this level of detail for 2016. They also said that some contracts have been issued for 2016 and do not include this requirement. They suggested a review of letters for 2016 where no change to grade is made, or where a grade change of two or more grades is made. Three other awarding organisations supported this view.
- One awarding organisation responded positively, but added that the amount of detail included must be proportionate.
- One awarding organisation responded negatively.
- One non-standard response from an awarding organisation also addressed this question. The comments emphasised agreement with this proposal.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network commented that this was a positive proposal.
- One representative or interest group expressed full support for this proposal and said the transparency would be welcomed.

7.1.3 Set three: Q1k – Q1o

The themes of these questions were: allowing a centre to appeal only when a review was complete (Q1k); allowing an appeal if the mark or the moderation decision could not have reasonably been given, or if the awarding organisation did not apply their procedures (Q1l); allowing appeals against responses to requests for a special consideration or reasonable adjustment (Q1m); only allowing appeals following moderation from a centre (Q1n); and identifying other candidates affected when an error is discovered, taking action to reduce the effect of the error and ensuring it does not recur (Q1o).

7.1.3.1 Quantitative responses

Table 9: Part A (Q1k – Q1o) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1k	k) Allow a centre or an external candidate to appeal against a mark (or outcome of moderation) only once a review of marking (or moderation) is complete.	4	5	6	29	37	**81**
Q1l	l) Allow an appeal against marking or moderation only on the grounds that: the mark could not reasonably have been awarded on the basis of consideration of the candidate's work against the mark scheme and any relevant procedures, the moderation decision could not reasonably have been made by a moderator who had considered the candidate's work, the teacher's mark and the mark scheme and any relevant procedures, or the awarding organisation did not properly apply its own procedures.	10	9	3	27	31	**80**
Q1m	m) Allow an appeal against an awarding organisation's response to a request for a special consideration or a reasonable adjustment.	2	4	8	27	40	**81**
Q1n	n) Only allow appeals following a review of moderation to be made by a centre.	9	6	7	25	32	**79**

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1o	o) Where an error is discovered through an administrative error review, a review of marking/ moderation or an appeal, identify any other candidates who are affected by the error, take steps to correct the error or reduce the effect of the error and ensure the error does not recur.	0	0	2	10	69	**81**

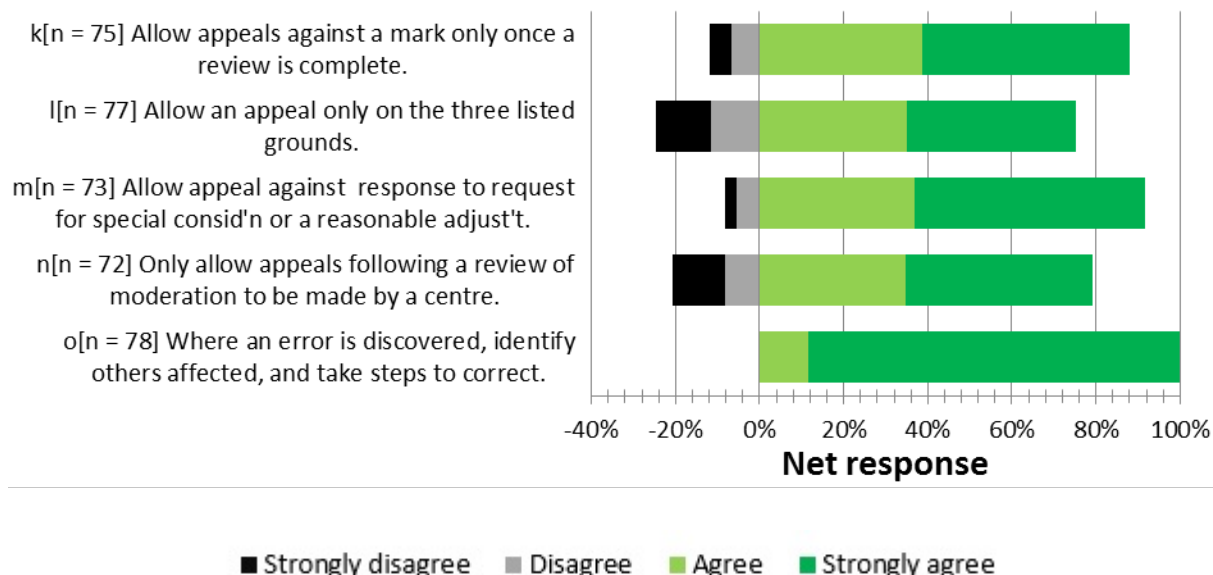
Figure 7: Stacked bar chart for Part A (Q1l – Q1o)

In this set of questions, there was strong agreement throughout. The most disagreement was to question 1l, with which about one quarter of respondents either strongly or moderately disagreed. Q1o, which was about all candidates affected by an error that had come to light, had 100 per cent agreement, with over 80 per cent strong agreement.

7.1.3.2 Qualitative responses

Table 10: Part A (Q1k – Q1o) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1k	Official	1	1	1	6	12	21
	Personal	3	3	0	8	6	20
Q1l	Official	3	5	0	7	5	20
	Personal	6	2	0	1	5	14
Q1m	Official	0	1	3	6	12	22
	Personal	1	2	0	8	10	21
Q1n	Official	0	1	0	5	11	17
	Personal	4	5	0	3	7	19
Q1o	Official	0	0	1	1	18	20
	Personal	0	0	0	2	18	20

Q1k: Allow a centre or an external candidate to appeal against a mark (or outcome of moderation) only once a review of marking (or moderation) is complete.

Forty one respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (9), educational specialists (4), students (4), parent or carer (2) and examiner (1). The 21 official responses were from schools or colleges (9), representative or interest groups (5), awarding organisations (6) and university or HEI (1).

SUMMARY POINTS

- Thirty two of those who responded agreed or strongly agreed with the proposal. Several respondents went on to voice some concern about the length of time appeals might take. However the majority of comments just confirmed agreement or expressed the opinion that there would be fewer appeals with these new processes in place. Two respondents queried why independent students would appeal rather than the centre. A number commented that the appeal affects the whole centre for moderation.

- There were eight disagree responses where a comment had been made. Two respondents disagreed because of the time they felt the process would take; two felt appeals should be allowed at any time; and another respondent stated that mistakes happen.

KEY POINTS BY STAKEHOLDER GROUP

- Six teachers and seven schools or colleges provided a comment to support a positive response. Comments generally confirmed agreement, and some went on to express concern about timing.

- One parent who responded positively said it was best to keep the appeals process flexible.

- One student who commented positively expressed general agreement, and one student suggested that if the reviews were improved there might be fewer appeals.

- Three teachers and one school or college responded negatively and commented. Comments were varied and included practical issues regarding time, that it was unfair, and that appeals should be allowed at any time.
- Two students who responded negatively commented that appeals should be allowed at any time.
- One university commented and expressed a concern about the time needed.

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation representative group and five awarding organisations responded. All strongly agreed with the proposal.   The awarding organisation group and four of the awarding organisations went on to express concerns about the manageability of the process, adding that it would not be possible to accept appeals from individual students for moderation as it affects the whole centre. The other awarding organisation expressed concerns about manageability and added that it would not be possible to accept appeals earlier in the process.
- A non-standard response from an awarding organisation also addressed this question. The comments emphasised disagreement with the proposal to allow appeals from students. They would not have the appropriate level of knowledge of the process and the subject. The awarding organisation would not know if they were a genuine candidate without checking with the centre. This would also require system development.

Q1l: Allow an appeal against marking or moderation only on the grounds that: the mark could not reasonably have been awarded on the basis of consideration of the candidate's work against the mark scheme and any relevant procedures, the moderation decision could not reasonably have been made by a moderator who had considered the candidate's work, the teacher's mark and the mark scheme and any relevant procedures, or the awarding organisation did not properly apply its own procedures.

Thirty five respondents provided further free-text responses to this question. Personal respondents were teachers (6), educational specialists (4), parent or carer (1), students (12) and examiners (1). The twenty one official responses were from schools (9), representative or interest groups (6), and awarding organisations (6).

SUMMARY POINTS

- Eighteen respondents agreed or strongly agreed with the proposal. The majority of comments just confirmed their general agreement. Two comments welcomed the wider remit, and one respondent went on to suggest the proposal 'blurred' review, appeal and re-mark. Another respondent felt that individuals might be penalised.
- Sixteen respondents disagreed or strongly disagreed with the proposal. The comments from these respondents suggested they felt the proposal was unfair, especially to individual students, or that it should go wider. One respondent felt that there should be the right to appeal where the moderator was consistently strict.

KEY POINTS BY STAKEHOLDER GROUP

- Two teachers and six schools or colleges responded positively and commented. Most of the comments were general agreement, but the query about the definition of 'reasonable' was raised again.
- Four teachers and two schools or colleges disagreed with the proposals and commented. Their comments were largely about transparency and that the proposal was unfair.
- One parent or carer and one student disagreed and commented that the proposal was unfair and should be wider.

COMMENTS FROM AWARDING ORGANISATIONS

- Five awarding organisations commented (one from an awarding organisation representative group), all expressing disagreement. One queried the definition of 'reasonable'. The group response was more detailed and covered a number of points, including that it is problematic to query marking because if an error had been obvious it would have been changed. The approach in the system is that the standard is with the Principle Examiner and an appeal would fundamentally change that. Further, it was difficult to know who could be on the panel that had not been directly involved but would still have a detailed understanding of the assessment and its mark scheme. Two other awarding organisations largely endorsed this view. One comment from a single awarding organisation within the group response was that it might be interesting to explore an ombudsman approach. One final awarding organisation emphasised that the panel could not be allowed to override the Principal Examiner's judgement, as this was the foundation of the standard.

COMMENTS FROM NON-STANDARD RESPONSES

- An academy chain sent a comment in favour of this proposal. They argued that changes should be allowed for unreasonable mark changes. The proposal should also allow appeals where procedures were not followed correctly.
- A school network commented that the word 'reasonable' should be changed to 'accurate'. They gave strong support to the proposal for centres to appeal marks/ moderation as well as procedures.
- One representative or interest group expressed full support for this proposal.

Q1m: Allow an appeal against an awarding organisation's response to a request for a special consideration or a reasonable adjustment.

Forty three respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (6), educational specialists (7), parents (3), students (4) and examiners (1). The 22 official responses were from schools or colleges (10), representative or interest groups (5), awarding organisations (6) and university or HEI (1).

SUMMARY POINTS

- The majority of respondents who commented agreed or strongly agreed with this proposal (36). Many just confirmed their agreement with the proposal and that it was fair that this option should be available. Four respondents were in favour of this proposal as they felt awarding organisations could make mistakes. One respondent felt that time might be an issue, and another stated that centres do not always have all the information available to

them when they complete the forms. One respondent was concerned that the process might be open to abuse by centres.

- The four respondents who expressed negative views stated that students must meet the criteria, the current process is fair and that this happened anyway.

KEY POINTS BY STAKEHOLDER GROUP

- Five teachers and six schools or colleges commented in favour of the proposals. The comments were largely general emphasis of their support. There were three comments that the awarding organisations might not be in an informed position regarding this.
- The seven parents and students who commented were all in favour. Three stated that the awarding organisations can make mistakes, and the remainder expressed general agreement.
- The four negative respondents were one teacher, one school or college, one educational specialist and one examiner.

COMMENTS FROM AWARDING ORGANISATIONS

- The one awarding organisation representative group and five awarding organisations that responded all agreed or strongly agreed with the proposal and stated that this reflected the current process and was fair.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group expressed support for this proposal.

Q1n: Only allow appeals following a review of moderation to be made by a centre.

Thirty seven respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (6), educational specialists (6), parents (2), students (4) and examiners (1). The 18 official responses were from schools or colleges (7), representative or interest groups (5), and awarding organisations (6).

SUMMARY POINTS

- Twenty six respondents agreed or strongly agreed and made a free-text response. The comments mainly mentioned that moderation decisions impact on the whole cohort rather than an individual and therefore the decision should be made by the centre. Other comments included that it would be impractical for individuals to appeal and that centres rather than individuals had the expertise needed for an appeal. One also commented that subject expertise was needed.
- The 10 respondents disagreeing or strongly disagreeing who made a further comment emphasised the right of the individual to appeal. Three respondents felt that centres might make a decision based on their workload or the cost rather than on an individual student's best interests.

KEY POINTS BY STAKEHOLDER GROUP

- Three teachers and six schools or colleges commented in favour of the proposals. The comments were largely that the centres understood the process and that the impact would be on the whole cohort.
- The three teachers and one school or college who responded negatively made comments, including that anyone should have the right to appeal and at any time - except, according to the school or college, when a review of moderation had already taken place.
- The two parents and four students who commented disagreed or strongly disagreed with the proposal. They referred to the rights of individual students and the impact upon them.

COMMENTS FROM AWARDING ORGANISATIONS

- The one awarding organisation representative group and five awarding organisations that commented all strongly agreed with the proposal. All but one of the awarding organisations commented that moderation is at the centre level so individual appeals cannot be accepted.

Q1o: Where an error is discovered through an administrative error review, a review of marking/moderation or an appeal, identify any other candidates who are affected by the error, take steps to correct the error or reduce the effect of the error and ensure the error does not recur.

Forty one respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (7), educational specialists (7), parents (3), students (2) and examiners (1). The 20 official responses were from schools or colleges (10), representative or interest groups (5), awarding organisations (4) and university or HEI (1).

SUMMARY POINTS

- Thirty nine respondents agreed or strongly agreed with this statement and made a comment. Almost all the comments related to fairness or just confirmed their agreement. Four, however, also said this should only happen where marks were increased.
- There were no further comments from anyone disagreeing or strongly disagreeing with the statement.

KEY POINTS BY STAKEHOLDER GROUP

- Seven teachers and nine schools or colleges commented in favour of the proposals. The comments were mostly that the proposal was fair or confirmed their agreement. All four concerns about marks being decreased came from this group.
- The three parents and two students who commented were all in favour and stated this was to do with fairness.

COMMENTS FROM AWARDING ORGANISATIONS

- The one awarding organisation representative group response and three individual responses emphasised that this was current practice.

COMMENTS FROM NON-STANDARD RESPONSES

- An academy chain commented in favour of this proposal. They commented that all other candidates for that paper from the centre should be automatically reviewed and the marks adjusted accordingly.
- A school network commented that this was a logical proposal. They added that if the systems were appropriately digitised this would happen automatically.
- One representative or interest group expressed full support for this proposal and went on to suggest that checking should be undertaken both before and during marking.

7.1.4 Set four: Q1p – Q1t

This set had questions about: allowing a candidate to appeal a centre's decision (Q1p); training and monitoring those who review awarding organisations' marking (Q1q); barring reviewers from reviewing their own marking or moderation (Q1r); including in appeals panels at least one person independent of the awarding organisation concerned (Q1s); and setting reasonable deadlines for receipt of requests of various types (Q1t).

7.1.4.1 Quantitative responses

Table 11: Part A (Q1p – Q1t) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1p	p) Where it only accepts requests for reviews of marking for centre-based candidates from the centre itself, and not from candidates directly (other than external candidates), make sure that, in the event of a dispute between the centre and the candidate about the appropriateness of such a request, the centre allows the candidate to appeal the decision.	3	4	7	40	26	**80**
Q1q	q) Train and monitor the performance of the reviewers who undertake reviews of the awarding organisation's marking or moderation and take action where reviewers are not acting appropriately.	0	3	2	8	66	**79**
Q1r	r) Not allow reviewers to review their own marking or moderation decisions.	2	4	2	12	60	**80**
Q1s	s) Require appeal decisions to include at least one person who is independent of the awarding organisation.	0	0	7	21	53	**81**
Q1t	t) Set reasonable deadlines for receipt of requests for access to marked assessment materials, administrative error reviews, reviews of marking, and reviews of moderation and appeals.	3	0	2	13	63	**81**

Part A (Q1p - 1t)
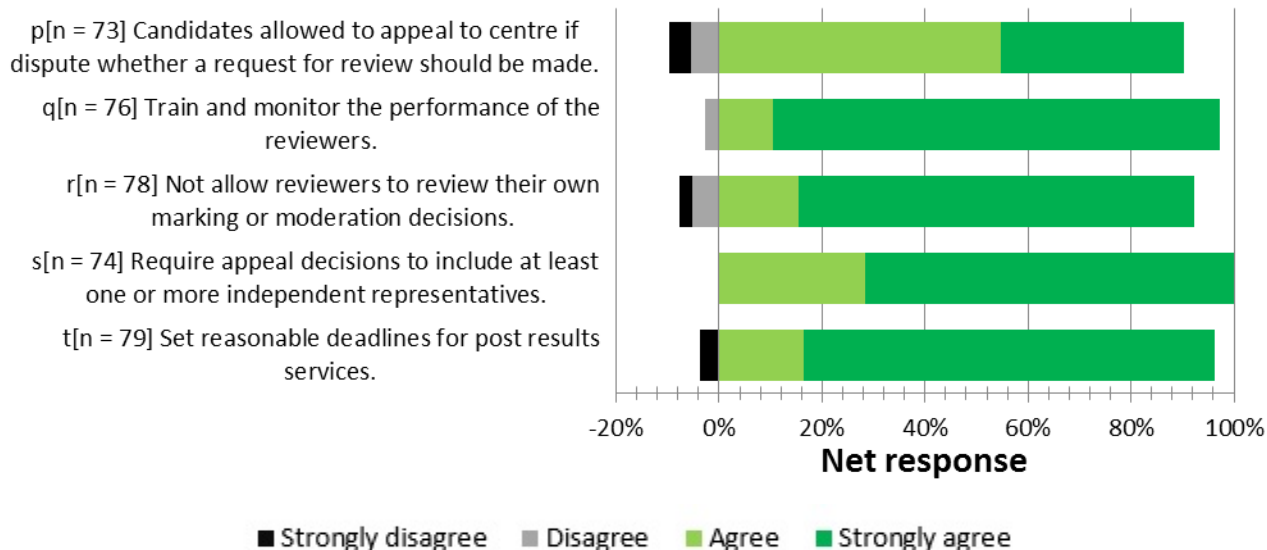
Figure 8: Stacked bar chart for Part A (Q1p – Q1t)

This set of questions had very strong levels of approval. There was less than ten per cent disagreement in all cases, and for Q1s, no disagreement at all. Most questions had strongly agree as much the largest category; the exception was Q1p, which had rather more 'agree' than 'strongly agree' responses.

7.1.4.2 Qualitative analysis

Table 12: Part A (Q1p – Q1t) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1p	Official	1	1	2	9	4	17
	Personal	1	0	0	4	9	14
Q1q	Official	0	1	0	2	16	19
	Personal	0	1	1	1	16	19
Q1r	Official	1	3	1	2	14	21
	Personal	0	0	0	1	16	17
Q1s	Official	0	0	1	6	12	19
	Personal	0	0	1	2	10	13
Q1t	Official	1	0	0	2	17	20
	Personal	2	0	1	4	13	20

Q1p: Where it only accepts requests for reviews of marking for centre-based candidates from the centre itself, and not from candidates directly (other than external candidates), make sure that, in the event of a dispute between the centre and the candidate about the appropriateness of such a request, the centre allows the candidate to appeal the decision.

Thirty one respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (3), educational specialists (5), parents (2), students (3) and examiners (1). The 17 official responses were from schools or colleges (7), representative or interest groups (5), and awarding organisations (5).

SUMMARY POINTS

- Twenty six respondents agreed or strongly agreed with this statement and made a comment. Almost all the comments related to fairness and many suggested that as it was the student's result they should decide. Three suggested that it would improve fairness.
- There were three further comments from respondents disagreeing or strongly disagreeing with the statement. The comments suggested that this was not for awarding organisations to dictate to a centre, that it could lead to some demanding parents taking a lot of time, and that it might work if the candidate notified the awarding organisation that they had appealed.

KEY POINTS BY STAKEHOLDER GROUP

- Three teachers and five schools or colleges commented in favour of the proposals. The comments were mostly that the student should decide and this was about fairness.
- The two parents and three students who commented suggested that the student should decide and that the centres varied in quality.
- The three negative comments were from an educational specialist and two representative or interest groups.

COMMENTS FROM AWARDING ORGANISATIONS

- The one awarding organisation representative group response and four responses from awarding organisations were all in agreement. They all went on to emphasise that although they can require centres to have appropriate processes they cannot monitor this.

Q1q: Train and monitor the performance of the reviewers who undertake reviews of the awarding organisation's marking or moderation and take action where reviewers are not acting appropriately.

Forty respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (7), educational specialists (6), parent (2), student (3) and examiners (1). The 21 official responses were from schools or colleges (9), representative or interest groups (6), awarding organisations (5) and university or HEI (1).

SUMMARY POINTS

- Thirty five respondents agreed or strongly agreed with this statement and made a comment. Almost all the comments emphasised their agreement and suggested that this was common sense or ensured fairness. Four commented that it will improve trust in the system. Five raised queries or made suggestions about who could undertake such reviews.

- There were two further comments from respondents disagreeing with the statement. One comment suggested that the process should rely on senior examiners who were already trained.

KEY POINTS BY STAKEHOLDER GROUP

- Six teachers and eight schools or colleges commented in favour of the proposals. The comments were mostly that this was about fairness and that it would minimise error. One teacher and one school or college also emphasised that the process should use senior examiners.
- The two parents and three students who commented suggested that this was about fairness and transparency, and that it made sense.
- The one comment from a university or HEI just stressed their general agreement.
- The one negative comment was from a teacher who suggested that the process should rely on senior examiners who were already trained.

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation representative group response and three awarding organisations strongly agreed with the proposals. They went on to add that training would be essential, especially around reasonableness. They also added that this would not be possible for 2016.
- One awarding organisation commented in a non-standard response that the proposed training did not seem to relate back to the original training, but was just for the purpose of the review - perhaps at component level. This would mean that marking standards applied at the review could be different from those applied in the original marking.

COMMENTS FROM NON-STANDARD RESPONSES

- An academy chain sent a comment in favour of this proposal. They commented that the qualification and competency of reviewers should be transparent to centres.
- A school network commented that a heightened focus on training and performance monitoring was essential to improve quality and consistency of marking. Training should not be about 'mark harder'. Centres wanted to see the assessment of reviewers used to drive up standards in marking.
- One representative or interest group expressed full support for this proposal and said that reviewing was a distinctive skill.

Q1r: Not allow reviewers to review their own marking or moderation decisions.

Thirty nine respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (5), educational specialists (7), parents (2), students (2) and examiners (1). The 22 official responses were from schools or colleges (11), representative or interest groups (5), awarding organisations (5) and university or HEI (1).

SUMMARY POINTS

- Thirty three respondents agreed or strongly agreed with this statement and made a comment. Almost all the comments emphasised their agreement and stated that all marking must be subject to a check by a second person. One commented that review results that were returned too quickly undermined confidence.

- There were further comments from respondents disagreeing with the statement. Three suggested that there should be some flexibility for very low entry subjects. One suggested that the standard lay with the Principal Examiner, so the person in that role did not need checking.

KEY POINTS BY STAKEHOLDER GROUP

- Five teachers and ten schools or colleges commented in favour of the proposals. The comments emphasised general agreement and stated that marking should be checked by a second person. In some cases responses emphasised that this was important for trust in the system.
- The two parents and two students who commented also suggested that marking should be checked by a second person.
- The one comment from a university or HEI stressed general agreement.

COMMENTS FROM AWARDING ORGANISATIONS

- All four negative comments were from awarding organisations. One representative group response and two individual responses emphasised the need for flexibility, especially in small entry subjects which might only have one examiner. One emphasised that the standard rests with the Principal Examiner so the person in that role would be able to check their own work.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network emphasised that it should be mandatory for reviewers not to be the same person who conducted the original marking.
- Three representative or interest groups expressed concern that centres might be expected to have a 'spare' member of staff available to conduct an independent review.

Q1s: Require appeal decisions to include at least one person who is independent of the awarding organisation.

Thirty two respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (2), educational specialists (5), parents (2), students (3) and examiners (1). The nine official responses were from schools or colleges (9), representative or interest groups (5), and awarding organisations (5).

SUMMARY POINTS

- Thirty respondents agreed or strongly agreed with this statement and made a comment. The comments emphasised that accountability was needed and that this would give transparency and fairness.
- There were no further comments from a respondent disagreeing with the statement.

KEY POINTS BY STAKEHOLDER GROUP

- Two teachers and eight schools or colleges commented in favour of the proposals. The comments emphasised that accountability and transparency were needed. Three colleges also added that we should use subject specialists, that they should be senior examiners or that they should know the exams process.

- The two parents and three students who commented stated that we need accountability in the system and that this would ensure fairness.

COMMENT FROM AWARDING ORGANISATIONS

- There was one comment from an awarding organisation representative group and three awarding organisations in agreement. They all added that we needed to be clear about what was meant by 'independent'. One awarding organisation also commented independently as part of the group response and stated that they already had this in place. A different awarding organisation commented that the panel members also needed to be independent of the other stakeholders.
- One awarding organisation queried in a non-standard response how this could work. If the panel had not been standardised they would apply the mark scheme inconsistently between appeals and initial marking. Marks would be awarded differently to students who were subject to appeals and those who weren't. Because reasonableness was not clearly defined, there were no limits to how non-standardised markers might apply this.

Q1t: Set reasonable deadlines for receipt of requests for access to marked assessment materials, administrative error reviews, reviews of marking, and reviews of moderation and appeals.

Forty respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (7), educational specialists (7), parents (1), students (4) and examiners (1). The 20 official responses were from schools or colleges (10), representative or interest groups (5), and awarding organisations (5).

SUMMARY POINTS

- Thirty six respondents agreed or strongly agreed with this statement and made a comment. Many respondents commented that the deadlines should be the same for all awarding organisations, although one suggested that allowing competition between awarding organisations might make it quicker. Three respondents commented that deadlines were important for schools and this must work for them too. Two commented that there needs to be a timely response for students. One commented that the process should not drag on past the start of the new academic year.
- There were three further comments from respondents strongly disagreeing with the statement. The comments said that teachers needed time to review the scripts after the holiday, that students needed a timely response and that there should be uniform deadlines. These comments were similar to comments given by those that agreed with the proposal.

KEY POINTS BY STAKEHOLDER GROUP

- Six teachers and 10 schools or colleges commented in favour of the proposals. The comments added that the deadlines should be the same for all awarding organisations, that they should allow for time to contact students who might have moved on, and that students needed timely responses. One suggested that 20 September would be a good deadline.
- The one parent and four students who commented suggested that deadlines should not rush exams officers who might have to deal with hundreds of students, that it might be useful to have different deadlines for different subjects, and that 18 days was too long and 10 days would be more reasonable.

COMMENTS FROM AWARDING ORGANISATIONS

- The one comment from the awarding organisation representative group and three from individual awarding organisations gave a general agreement and stated that a common timetable would be valuable and they intended to work together to achieve it. One awarding organisation commented that the challenge would be in defining 'reasonable'.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group commented that a move away from uniformity could lead to confusion and inefficiency.

7.1.5 Set five: Q1u – Q1z

This set of questions related to: awarding organisations publishing their position on accepting requests for post-marking services directly from candidates (Q1u); publishing clear information concerning review arrangements (Q1v); publishing target periods in which the awarding organisation would deal with requests (Q1w); publishing the frequency of achieved and missed targets (Q1x); publishing information about the number of requests received (Q1y); and publishing information about approaches to training reviewers (Q1z).

7.1.5.1 Quantitative analysis

Table 13: Part A (Q1u – Q1z) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1u	u) Publish its position on accepting requests for access to marked assessments, administrative error reviews, reviews of marking and appeals directly from candidates, including external candidates and from centres on behalf of candidates.	1	1	4	13	62	**81**
Q1v	v) Publish clear information about its review arrangements including its dates for receipt of requests for access to marked assessment materials, administrative error reviews, reviews of marking, reviews of moderation and appeals.	1	0	1	10	68	**80**
Q1w	w) Publish (and take reasonable steps to	1	2	1	11	66	**81**

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
	meet) the target periods in which it intends to provide requested marked assessments and notify centres and/or learners of the outcome of administrative error reviews, reviews of marking/moderation and of appeals.						
Q1x	x) Publish the frequency with which it achieves and misses its target periods.	1	4	5	20	51	**81**
Q1y	y) Publish information about the number of requests it receives for administrative error reviews, reviews of marking/moderation and appeals and the nature of its decisions and the reasons for those decisions.	1	4	2	20	54	**81**
Q1z	z) Publish information about how it trains and prepares reviewers, its monitoring arrangements, the findings of this monitoring and the actions taken as a result.	1	8	4	21	47	**81**

Part A (Q1u - 1z)

u[n = 77] Publish position on accept'g requests for post results services from cand's, ext. cand's and centres.

v[n = 78] Publish clear info about review arrang'ts including deadlines.

w[n = 79] Publish target periods return scripts, complete reviews and appeals.

x[n = 76] Publish the frequency with which it achieves and misses its target periods.

y[n = 78] Publish # of requests received for post results services.

z[n = 76] Publish info on how trains and monitors reviewers, & findings and actions.

Net response

■ Strongly disagree ■ Disagree ■ Agree ■ Strongly agree

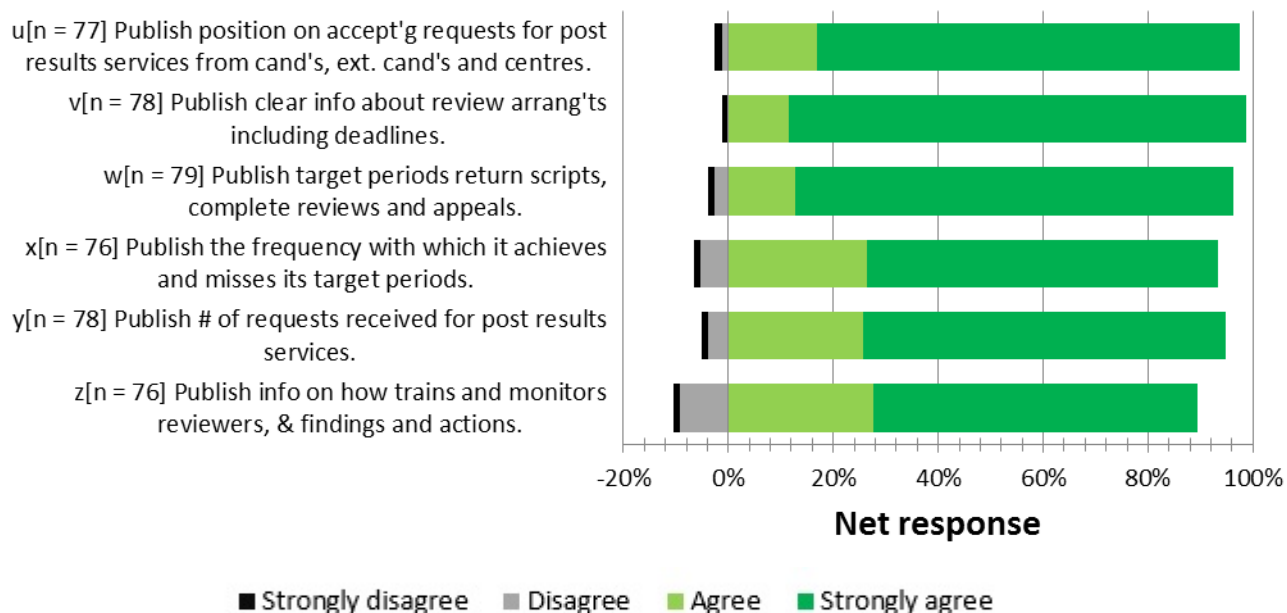**Figure 9: Stacked bar chart for Part A (Q1u – Q1z)[7]**

Once again, this set of questions has strong levels of support. Strongly agree is much the largest category in all cases, and total disagreement is never more than 10 per cent of responses. The exception to this rule is Q1z, which had approximately 15 per cent disagreement.

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[7] In Q1y 'number' was shortened to '#' to fit an otherwise long question on screen.

7.1.5.2 Qualitative analysis

Table 14: Part A (Q1u – Q1z) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q1u	Official	1	0	0	4	14	19
	Personal	0	1	0	0	9	10
Q1v	Official	1	0	0	2	15	18
	Personal	0	0	0	0	11	11
Q1w	Official	This response was omitted from the online questionnaire in error.					
	Personal						
Q1x	Official	0	2	0	3	14	19
	Personal	1	1	0	1	9	12
Q1y	Official	0	2	0	4	14	20
	Personal	1	0	0	2	12	15
Q1z	Official	0	7	0	2	9	18
	Personal	0	0	0	4	11	15

Q1u: Publish its position on accepting requests for access to marked assessments, administrative error reviews, reviews of marking and appeals directly from candidates, including external candidates and from centres on behalf of candidates.

Twenty nine respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (2), educational specialists (4), parents (1), students (2) and examiners (1). The 19 official responses were from schools or colleges (8), representative or interest groups (5), awarding organisations (5) and university or HEI (1).

SUMMARY POINTS

- Twenty seven respondents agreed or strongly agreed with this statement and made a comment. Many responses commented that this would ensure transparency, and one went on to say that this would rebuild trust in the system.
- There were two further comments from respondents disagreeing or strongly disagreeing with the statement. The comments added that awarding organisations should not accept appeals from students and that there should be a uniform approach.

KEY POINTS BY STAKEHOLDER GROUP

- Two teachers and eight schools or colleges commented in favour of the proposals. The comments emphasised general agreement and suggested that this would ensure transparency.
- The one parent and two students who commented agreed that the proposal would ensure transparency.
- The one comment from a university again emphasised that this approach would ensure transparency.
- The two negative comments were from an educational specialist and a representative or interest group.

COMMENTS FROM AWARDING ORGANISATIONS

- The one comment from the awarding organisation representative group was positive but went on to say that requests should not be permitted from students. Three other awarding organisations reiterated this. The final awarding organisation expressed general agreement.
- A non-standard response from an awarding organisation also addressed this question. The comments emphasised disagreement with the option for awarding organisations to have different approaches and commented that differences would cause increased workload and confusion. New processes needed to be trialled.

COMMENT FROM NON-STANDARD RESPONSES

- One representative group for HE admissions expressed support for the proposal.
- One representative or interest group expressed a concern about this proposal. They suggested that the centre should make the decision and ask for a review if needed. They added that this would be fairest as it would happen regardless of a student's ability to pay or family circumstances.

Q1v: Publish clear information about its review arrangements including its dates for receipt of requests for access to marked assessment materials, administrative error reviews, reviews of marking, reviews of moderation and appeals.

Thirty respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (4), educational specialists (3), parents (1), students (2) and examiners (1). The nine official responses were from schools or colleges (5), representative or interest groups (2), awarding organisations (1) and university or HEI (1).

SUMMARY POINTS

- Twenty eight respondents who commented agreed or strongly agreed with this statement. The comments were that the deadlines should be published and available to all stakeholders and that this would ensure transparency. They included emphasising that the deadlines should be the same for all awarding organisations. One respondent commented that there should also be an acknowledgement that sometimes things take longer.
- There was one further comment from a respondent disagreeing with the statement. They said that there should be a uniform approach.

KEY POINTS BY STAKEHOLDER GROUP

- Four teachers and seven schools or colleges commented in favour of the proposals. The comments emphasised general agreement.
- The one parent and two students who commented agreed that the proposal would ensure transparency and allow informed decisions to be made.
- The one negative comment was from a representative or interest group.

COMMENTS FROM AWARDING ORGANISATIONS

- The comment from the awarding organisation representative group was positive and suggested that the awarding organisations should work together to agree a common timetable. Three other awarding organisations reiterated this. One awarding organisation stated that schools and students needed to have a clear understanding of these details.

- A non-standard response from an awarding organisation also addressed this question. The comments emphasised disagreement with the option for awarding organisations to have different approaches and commented that differences would cause increased workload and confusion.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative group for HE admissions expressed support for the proposal.

Q1w: Publish (and take reasonable steps to meet) the target periods in which it intends to provide requested marked assessments and notify centres and/or learners of the outcome of administrative error reviews, reviews of marking/moderation and of appeals.

Unfortunately, the prompt for reasons was omitted from the online survey so there are few responses to report for this question. Twelve responses were received by email. They were all official responses. Five were from representative or interest groups, four were from awarding organisations, two were from schools and colleges and one was from a university or HEI.

SUMMARY POINTS

- The two responses from schools or colleges both commented on the importance of clarity and transparency; one also said that awarding organisations needed to be held to account. One representative or interest group also made the same point.
- A second representative or interest group again made the same point about clarity and transparency and added that the information would allow centres to make informed choices when selecting awarding organisations.
- Two further representative or interest groups commented on the wording of the question and stated that 'taking reasonable steps' to meet the targets provided too much leeway. They should be held to the deadlines, as schools are.
- The final representative or interest group's comment emphasised general agreement.
- The university or HEI commented that this should not lead to a second 'results day'.

COMMENTS FROM AWARDING ORGANISATIONS

- All the awarding organisations and the awarding organisation representative group commented that awarding organisations would work together to agree targets and to publish results against these. They added that there was value in Ofqual's continued independent scrutiny of the published data.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative group for HE admissions expressed support for the proposal.
- A second representative group for HE admissions expressed concern about the proposal that awarding organisations could determine their own timeframes in a time critical process. They went on to add that competition in speed might be at the expense of quality.

Q1x: Publish the frequency with which it achieves and misses its target periods.

Thirty one respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (3), educational specialists (5), parents (1), students (2) and examiners (1). The 19 official responses were from schools or colleges (9), representative or interest groups (5), awarding organisations (4) and university or HEI (1).

SUMMARY POINTS

- Twenty seven respondents agreed or strongly agreed with this statement and made a comment. Comments included that this would ensure transparency and that we needed accountability in the system. One added that there should be penalties for missed targets.
- There were four further comments from respondents disagreeing or strongly disagreeing with the statement. Three commented that awarding organisations should be responsible for this internally; and the other that publishing did not necessarily make things happen, and it should just be done.

KEY POINTS BY STAKEHOLDER GROUP

- Three teachers and nine schools or colleges commented in favour of the proposals. The comments emphasised the need for transparency in the system. One commented that this would help centres decide on which awarding organisation to use.
- The one parent and two students who commented suggested that the data was needed to ensure awarding organisations were performing as expected.
- The respondents who commented negatively were one educational specialist, one examiner, one representative or interest group and one awarding organisation.

COMMENTS FROM AWARDING ORGANISATIONS

- The comment from the awarding organisation representative group was positive and suggested that the awarding organisations should work together to agree common targets. Two awarding organisations reiterated this comment. One awarding organisation disagreed with the proposal and commented that awarding organisations should monitor this internally.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group expressed full support for this proposal and said the transparency would be welcomed. They went on to say that centres have no flexibility in meeting awarding organisation targets and awarding organisations should provide compensation if they do not meet their deadlines.

Q1y: Publish information about the number of requests it receives for administrative error reviews, reviews of marking/moderation and appeals and the nature of its decisions and the reasons for those decisions.

Thirty five respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (4), educational specialists (4), parents (3), students (2) and examiners (1). The 20 official responses were from schools or colleges (9), representative or interest groups (5), awarding organisations (5) and university or HEI (1).

SUMMARY POINTS

- Thirty two respondents strongly agreed or agreed with this statement and made a comment. Most commented that this would ensure transparency and that accountability was needed. One comment suggested that this would put awarding organisations under pressure not to change grades; another suggested that extra detail would be needed for mitigating

circumstances. Two comments were that this would allow centres to make decisions about awarding organisations.

- There were three further comments from respondents disagreeing or strongly disagreeing with the statement. One commented that the information was not relevant to other centres; one that it would be difficult to harmonise approaches between awarding organisations in a meaningful way; and one that publishing reasons would not be helpful.

KEY POINTS BY STAKEHOLDER GROUP

- Four teachers and nine schools or colleges commented in favour of the proposals. The comments emphasised the need for transparency in the system. Two suggested that extra information would be needed to explain application of mark schemes or any mitigating circumstances. One commented that the feedback should also detail what action would be taken.
- The three parents and two students who commented stated that the information is needed for transparency. One student added that this would allow a check that the awarding organisations were not rushing the reviews.
- The examiner commented that the priority should be to get the job done.
- The university or HEI commented positively that this was useful information for those working on university entrance.
- The respondents who commented negatively were one student and two awarding organisations.

COMMENTS FROM AWARDING ORGANISATIONS

- The one comment from the awarding organisation representative group was positive and suggested that the awarding organisations should work together to publish data against agreed common targets. Two other awarding organisations reiterated this.
- Two awarding organisations responded negatively to this proposal. One commented that they agree with the proposal except publishing the reasons which would not be helpful.
- A non-standard response from an awarding organisation also addressed this question. The comments emphasised that current systems do not hold this level of detail and that systems change could take a long time, possibly beyond 2018. The full extent of the work needs to be scoped.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network commented that this would be a valuable change and should drive up standards. They requested that regional data also be published.
- One representative group for HE admissions expressed support for the proposal. They requested the information broken down by subject and centre.
- A second representative group for HE admissions expressed support for the proposal and the transparency it would provide.
- One representative or interest group expressed full support for this proposal.

Q1z: Publish information about how it trains and prepares reviewers, its monitoring arrangements, the findings of this monitoring and the actions taken as a result.

Thirty three respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (5), educational specialists (6), parents (1), students (2) and examiners (1). The 18 official responses were from schools or colleges (7), representative or interest groups (5) and awarding organisations (6).

SUMMARY POINTS

- Twenty six respondents strongly agreed or agreed with this statement and made a comment. Most commented that this would ensure transparency and that accountability was needed. A number of respondents commented that it would help restore trust in the system.

- There were seven further comments from respondents disagreeing or strongly disagreeing with the statement. The comments were that this would undermine trust in the system and that the system should be trusted without all the details needing to be published. Further comments were that it could impact on the integrity of the exams or that it might prove an incentive not to change grades.

KEY POINTS BY STAKEHOLDER GROUP

- Five teachers and six schools or colleges commented in favour of the proposals. The comments emphasised the need for transparency in the system. Although one went on to suggest that the findings might increase nervousness. One also suggested that awarding organisations should be prevented from influencing reviewers not to change marks. Finally one teacher commented that this should apply to all examiners.

- The parent and two students who commented stated that the information was needed for transparency.

- The examiner commented that the training should be focused on the initial examining.

- One school or college commented negatively and suggested that the proposed processes should take place but it should not be necessary for all the details to be published.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group and five awarding organisations disagreed with the proposals. All suggested that this would undermine trust in the system and bring into doubt the integrity of the exams.

- A non-standard response from an awarding organisation also addressed this question. The comments explained how senior examiners were used in this process, and questioned who would be available to monitor the senior examiners.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network agreed with this proposal and commented that Ofqual should provide guidelines on the content of the reports to make them meaningful to centres.

Do you have any other comments on our proposals?

The section at the end of question 1 asked if there were any other comments on the proposals. Twenty two respondents provided an additional comment. These comments were quite diverse and included:

Positive comments

- These changes would allow informed choices for centres and, in addition, reporting should be done at subject and syllabus level to support this.

Negative comments:

- Concerns about the timing for schools and comments that teachers and exams officers are not paid to work in August.
- Concerns about workload and timing for examiners under the new proposals.
- The proposals do not go far enough and favour the awarding organisations, eg by only having one independent person on the review panel, awarding organisations being allowed to set fees for appeals, the use of tolerances which may be seen to reduce the number of changes.
- Concern about increasing complexity and diversity among awarding organisations.
- The proposals address individual concerns but not national issues such as GCSE English results.
- The only reliable way to conduct reviews is blind re-marking (2).
- It is a flaw to abandon the concept of single correct mark. If we do this awarding needs to take it into account.

General comments:

- Proposals are based on the view that the current system overestimates marking mistakes. The opposite may be true - candidates not wanting to risk results going down, cost and lack of trust may reduce the number of appeals.
- The introduction of online marking has had a big impact and probably led to many experienced markers leaving (2).
- The recruitment and retention of examiners needs to be addressed, and the recruitment of reviewers would be a problem if the number of appeals increases.
- Grade boundaries should be published after the deadline for reviews to prevent centres gambling for borderline students.
- All requests for remarks for a candidate should be submitted at the same time to reduce gaming of the system.
- There is a need to improve initial marking.
- There would be a need to manage expectations under the new system.
- Double marking should be introduced for all open ended questions.
- Cost needs to be reduced to make the system more accessible.
- The focus must be on what is fairest for the whole cohort, not individual teachers or students.

- Professionals should have access to awarding organisations and centre expertise should hold more weight.
- Changes to grades should be presented as rectifying an awarding organisation mistake.

7.1.6 Standardising processes between awarding organisations and across qualifications

There was a set of five quantitative questions in this part (Q2a to Q2d and Q4), with Q3 asking for specific comments. Questions 2a – 4 pertained to: the process for providing access to marked assessments (Q2a); the fees charged and the approach to the refund of fees (Q2b); the dates by which awarding organisations require centres to make requests for access to scripts, reviews and appeals (Q2c); the dates by which awarding organisations will respond to such requests (Q2d); and the extent to which respondents agreed to introducing similar changes in relation to qualifications other than GCSE, AS and A level (Q4).

7.1.6.1 Quantitative responses

Table 15: Part A (Q2 and Q4) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q2a	The process for providing access to marked assessments to centres.	39	23	3	3	7	**75**
Q2b	The fees charged, and any approach to the refund of fees for access to marked assessments, administrative error reviews, reviews of marking, reviews of moderation and appeals.	30	19	7	12	7	**75**
Q2c	The dates by which awarding organisations require centres to make requests for access to scripts, administrative error reviews, reviews of marking, reviews of moderation and appeals.	39	21	4	4	6	**74**
Q2d	The dates by which awarding organisations will respond to requests for access to scripts, administrative error reviews, reviews of marking, reviews of moderation and appeals.	33	24	2	8	8	**75**
Q4	To what extent do you agree or disagree that our proposals in relation to reviews of marking/moderation and appeals should apply to other qualifications	3	3	39	17	15	**77**

Part A (Q2 - 4)

a[n = 72] The process for providing access to marked assessments to centres.

b[n = 68] The fees charged for all elements and the approach to refunds.

c[n = 70] The dates by which exam boards require centres to make requests.

d[n = 73] The dates by which exam boards will respond to requests.

4[n = 38] Do you agree/disagree that these proposals should apply to other qualifications?

-100% -80% -60% -40% -20% 0% 20% 40% 60% 80% 100%

Net response

■ Strongly disagree ■ Disagree ■ Agree ■ Strongly agree
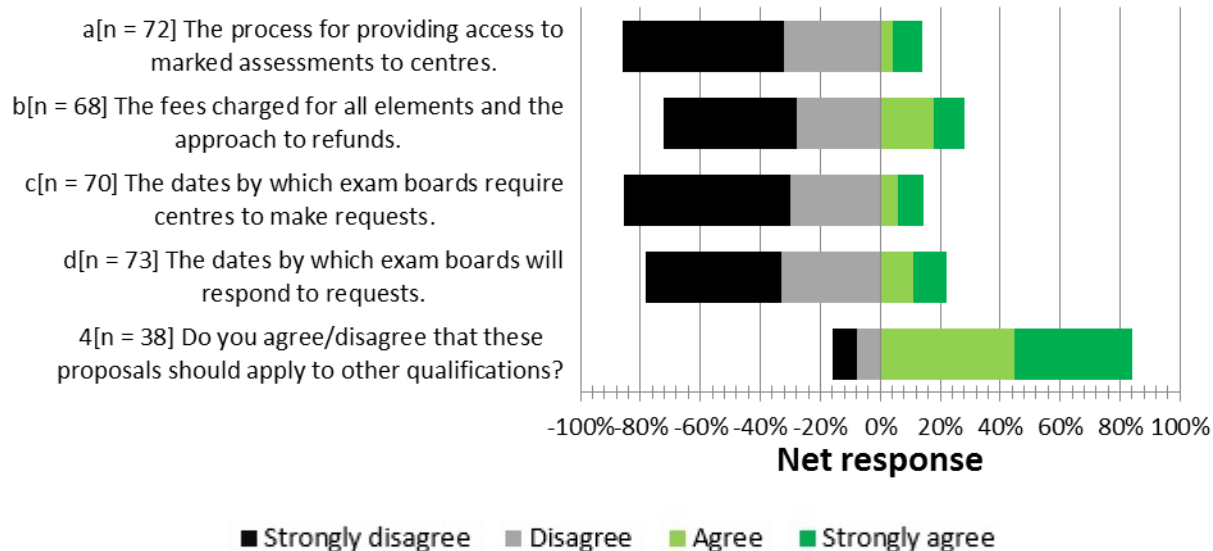
Figure 10: Stacked bar chart for Part A (Q2 and Q4)

In this set of questions, there was majority disagreement to the first four (which pertained to awarding organisations' approaches in respect of: the process for providing access to marked assessments (2a), the fees charged and the approach to refunding (2b), the dates by which awarding organisations require centres to make requests (2c) and the dates by which the awarding organisations will respond (2d). This disagreement was widespread amongst respondents; with between 70 and 85 per cent of those answering either strongly or moderately disagreeing.

In contrast, question 4, which pertained to Ofqual's suggestion to extend the new proposals to qualifications beyond general qualifications, was almost a 'mirror image' with a ratio of around 85 : 15 (agree : disagree). It should be noted, however, that this agreement is based on a much smaller sample of people with firm opinions. There was a large group (39 out of a total of 77) who either didn't know or neither agreed or disagreed.

7.1.6.2   Qualitative responses

Table 16: Part A (Q2 and Q4) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q2a	Official	12	5	0	2	2	21
	Personal	19	9	0	1	1	30
Q2b	Official	7	5	1	5	2	20
	Personal	13	7	1	5	3	29
Q2c	Official	10	6	0	0	2	18
	Personal	15	6	0	1	3	25
Q2d	Official	9	5	0	1	3	18
	Personal	10	5	0	2	3	20
[8]Q4	Official	2	0	1	6	4	13
	Personal	0	0	4	2	5	11

Q2a: The process for providing access to marked assessments to centres.
Fifty four respondents provided further free-text responses to this question. Personal respondents who commented on this topic were individual teachers (11), although parents or carers (4), students (4), educational specialists (10) and one examiner also commented. The 23 official responses were from schools or colleges (13), awarding organisations (4) and representative or interest groups (6).

SUMMARY POINTS

- Almost all of the respondents (46) disagreed or strongly disagreed with the statement and commented that all the awarding organisations should follow the same process. Some emphasised that this was important for centres, others that it was important for students and some mentioned both groups. One or two respondents also mentioned employers or FE colleges benefitting from uniform processes.

- Six respondents agreed or strongly agreed with the statement, and comments included that the awarding organisations should be able to vary their approaches within rules set by Ofqual, that flexibility would allow for innovation, that awarding organisations might need to vary their approaches depending on their marking methods, and that competition based on customer service might force awarding organisations to drive up standards and allow centres to choose.

KEY POINTS BY STAKEHOLDER GROUP

- There was very little diversity in responses to this question, with almost all the respondents arguing for uniformity in approach. Two commented that there was no value in competition, and two suggested that the service should be offered free of charge.

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[8] Question 3 did not follow this format and responses are given below, after question 4.

- Six respondents agreed with the proposal and gave a diversity of reasons. These comments came from one educational specialist, one student, one school or college, one representative or interest group, and two awarding organisations.

COMMENTS FROM AWARDING ORGANISATIONS

- There was more diversity among the awarding organisations on this response than on other questions. Four awarding organisations commented, two either agreed or strongly agreed with the proposal, and two left the response blank. Comments were that innovation and experimentation should be allowed, that the awarding organisations would work together to come up with a uniform approach, that differences in processes would arise if they have onscreen or paper-based marking, and that differences would undermine trust in the system.

Q2b: The fees charged, and any approach to the refund of fees for access to marked assessments, administrative error reviews, reviews of marking, reviews of moderation and appeals.
Fifty three respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (12), parents or carers (3), students (3), educational specialists (10) and one examiner. The 23 official responses were from schools or colleges (13) representative or interest groups (5) and awarding organisations (5).

SUMMARY POINTS

- Thirty three respondents disagreed or strongly disagreed with the statement. They commented that all the awarding organisations should follow the same process. Some emphasised that this was important for centres in terms of simplicity, others that it was important for students in terms of fairness and some mentioned both groups. A number of respondents emphasised that cost should not be the deciding factor when considering whether to appeal or not.
- Sixteen respondents agreed or strongly agreed with the statement. Three of these commented that the fees should be the same (perhaps indicating some confusion with the question), two commented that the fees should be similar, two that they should be allowed to vary within guidelines set by Ofqual and one that they should be flexible but capped. Two argued that the fees should be lower than now or charged at cost, and two argued that competition should be allowed.

KEY POINTS BY STAKEHOLDER GROUP

- Ten teachers and eight schools or colleges responded negatively to the statement and commented. There was little diversity in comments, with almost all the respondents arguing for uniformity in approach. They argued that this would aid simplicity. One commented that competition was needed.
- Two parents and one student responded negatively and also argued that the fees should be the same.
- Two teachers and five schools or colleges responded positively and argued that the fees should be similar or the same. One argued that the service should be provided at cost, and one that competition was needed.
- One parent and two students responded positively and commented that the fees should be the same or cheaper than now.

COMMENTS FROM AWARDING ORGANISATIONS

- Five awarding organisations provided a comment. One agreed, one strongly agreed and three left it blank. One argued that the system was not designed to make a profit, although the cost of the new developments might need to be passed on. Two argued that innovation should be allowed, one that awarding organisations would work together to come up with a common approach, and one that differences would undermine trust in the system.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group commented that any benefits in terms of reduced fees brought about by this proposal would be more than offset by administrative complexity.

Q2c: The dates by which awarding organisations require centres to make requests for access to scripts, administrative error reviews, reviews of marking, reviews of moderation and appeals.
Forty eight respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (10), educational specialists (9), parents or carers (3), students (2) and examiners (1). The 22 official responses were from schools or colleges (12), representative or interest groups (4), awarding organisations (5) and one university or HEI.

SUMMARY POINTS

- Thirty eight respondents disagreed or strongly disagreed with the statement and the majority of these commented that all the awarding organisations should follow the same process. Some emphasised that this was important for centres, others that it was important for students and some mentioned both groups. The main reason given was for simplicity. One argued that the final cut-off date should be the same.
- Six respondents agreed or strongly agreed with the proposals. Four of these commented that the approaches should be the same, perhaps indicating confusion with the question. The remaining respondents commented that there should be flexibility in the processes within rules set by Ofqual and that innovation should be allowed.

KEY POINTS BY STAKEHOLDER GROUP

- There was no diversity in the responses by type of respondent.

COMMENTS FROM AWARDING ORGANISATIONS

- Five awarding organisations commented. One strongly agreed with the proposal and one disagreed. One argued that innovation should be allowed, two that awarding organisations would work together to come up with a common approach, and one that differences would undermine trust in the system.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network commented that this was a flawed proposal. They commented that there was no rationale for not publishing common deadlines. They added a suggestion that Ofqual penalise awarding organisations which failed to comply with the timetable.

Q2d: The dates by which awarding organisations will respond to requests for access to scripts, administrative error reviews, reviews of marking, reviews of moderation and appeals.

Forty one respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (7), educational specialists (7), parents or carers (3), students (2) and one examiner. The 20 official responses were from schools or colleges (11), representative or interest group (4), awarding organisations (4), and one university or HEI.

SUMMARY POINTS

- Twenty three respondents disagreed or strongly disagreed with the statement. The majority of these commented that all the awarding organisations should follow the same process as this would provide clarity and simplicity for stakeholders. One further respondent said the processes should be similar.

- Nine respondents agreed or strongly agreed with the statement. Five suggested that the processes should be the same (perhaps indicating confusion with the question) and one that the cut-off date should be the same. One respondent commented that flexibility should be allowed within rules set by Ofqual, one that innovation should be allowed and one that it would depend on the exam dates.

KEY POINTS BY STAKEHOLDER GROUP

- There was no diversity in the responses by type of respondent.

COMMENTS FROM AWARDING ORGANISATIONS

- Four awarding organisations commented. One strongly agreed with the proposal and one disagreed, two left it blank. One argued that innovation should be allowed, two that awarding organisations would work together to come up with a common approach, and one that differences would undermine trust in the system.

COMMENTS FROM NON-STANDARD RESPONSES

- A school network commented that this was a flawed proposal. They commented that there was no rationale for not publishing common deadlines. They added a suggestion that Ofqual penalise awarding organisations which failed to comply with the timetable.

Do you have any other comments on these areas where we propose that awarding organisations' approaches should be allowed to differ?

Twenty six respondents commented in the final section in question 2 which asked for any other comments. Fourteen were personal responses and 12 were official. As with the earlier responses to this question, the majority were from schools, including individual teachers. The 12 official responses were from schools or colleges or academy chain (6), representative or special interest group (2) and awarding organisations (4).

SUMMARY POINTS

- Eighteen respondents commented that all key processes should be the same, in terms of simplicity in the system, leading to fairness for candidates. A number of the comments emphasised the impact on centres or on candidates, or both, of having complexity in the system. One further comment suggested that the increased workload generated by diversity in the processes would lead to mistakes.

- One respondent raised a concern that business interests could be put above student interests if diversity were allowed; and the final comment suggested that this was an important area and needed to be regulated carefully in order to develop public confidence.

COMMENTS FROM AWARDING ORGANISATIONS

- Four awarding organisations commented. One argued that international awarding organisations would need a different approach, two that awarding organisations would work together to come up with a common approach, and one that differences would undermine trust in the system.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative group for HE admissions requested further clarification over what Ofqual consider a reasonable deadline for an awarding organisation to set, and reassurance that higher education providers' requirements would be taken into account.
- One representative or special interest group expressed 'serious concerns' about questions 2a, 2b, 2c and 2d, and said that awarding organisations' approaches should not be allowed to differ. Timescales for reviews of marks should be uniform.

Q4: To what extent do you agree or disagree that our proposals in relation to reviews of marking/moderation and appeals should apply to other qualifications beyond new and legacy GCSEs, AS and A levels?

Eighteen respondents provided further free-text responses to this question (and a further six commented that they were unable to respond as they do not know the area or did not answer the question). Seven responses reflected personal views and 11 reflected official views. The personal views were from teachers (2), educational specialists (3), parents or carers (1) and students (1). The official responses were from five schools or colleges, four representative or special interest group and two awarding organisations.

SUMMARY POINTS

- Sixteen respondents agreed or strongly agreed with the proposals being extended to other qualifications.
- Nine responded that changes should apply to all qualifications and all awarding organisations, although one qualified this as only for large cohort syllabuses and another only for external assessments. Consistent approaches were believed to clarify things for users. These comments were from one teacher and three schools or colleges, two educational specialists, one parent or carer, and two representative or interest groups. One other respondent commented they should be the same as far as possible. Two commented on the fairness of the proposals for students, and stated that they should apply more widely. This was from one teacher and one school or carer. The remaining comments emphasised general agreement, stating that consistency would keep it simple and help build confidence.

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation respondent, who commented strongly, disagreed with the proposals, suggesting that there would be complex technical issues with applying these rules to other qualifications without significant benefit.

If you think we should extend the provisions, to which qualifications do you think they should apply and why?

Nineteen respondents provided a response to this question; seven personal responses, two from teachers, three from educational specialists and two from students. There were 12 official responses, five from schools or colleges, four from representative or interest groups and three from awarding organisations.

- Six commented that the changes should apply to all qualifications where possible, and one expanded on this to say for large cohort syllabuses and two for external assessments. A further two respondents suggested the changes should apply to all vocational qualifications and one suggested it should apply to professional and technical qualifications with external assessments. These comments were made by one teacher, one student, one educational specialist, three schools or colleges and one representative or interest group.

- Six respondents specifically named BTECs, and one of these also mentioned CTECs. These comments were made by two schools or colleges, one teacher, one educational specialist, one representative or interest group and one student.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group said that the proposals should be applied to all qualifications that followed similar assessment models to general qualifications. Two other awarding organisations reiterated this comment.

- One awarding organisation said in a non-standard response that the proposals should not be extended to other qualifications as they already offered a system that was fairer. They went on to state that the changes required would be unduly burdensome, especially against the proposed timeline. The needs of international students would need to be taken into account to ensure the changes did not disadvantage them. The changes would require extensive systems development and careful planning.

Q3 Do you have any comments on the draft Conditions (on Appendix 2) on the review of marking, moderation and appeals that will be used to deliver these proposals?

Table 17: Part C (Q3) Levels of agreement with closed question

Question number	Question	Yes	No	Total number of responses
Q3	Do you have any comments on the draft Conditions (in Annex 1) on the review of marking, moderation or appeals that will be used to deliver these proposals?	14	59	**73**

In terms of qualitative responses to question 3, there was a total of 14 'yes' responses and one 'no' response, to the question from respondents who then went on the provide a further comment. Personal responses were from two teachers and one parent or carer. Official responses were from schools or colleges (3), representative or interest groups (3) and awarding organisations (6).

SUMMARY POINTS

The following points were made:

- Marking should be criterion referenced and not linked to Key Stage 2 results.

- Fees should be proportionate and just cover the costs.

- Benefits to students, not reducing the number of mistakes, should be paramount.

- Only blind re-marking would provide a fair process.

- Awarding organisations should agree arrangements together.

- There should be a consistent use of terminology (eg 'candidate' or 'learner').

- There was a need for better definition of terms such as 'reasonable' and 'administrative error'.

- This was putting in place what should already have been done.

- Trust must be restored.

- The Code should not be withdrawn.

COMMENTS FROM AWARDING ORGANISATIONS

Six awarding organisations responded although one had said they didn't have any comments. The awarding organisation representative group commented that the Conditions should use the term 'feedback to centres' rather than 'learners' as this was more appropriate. They also requested clearer definitions of 'reasonable' and 'administrative error'. Three other awarding organisations reiterated these points. One awarding organisation commented that the Conditions were too restrictive for other qualifications.

7.2 Part C – withdrawing the Code of Practice

There were three questions in part C (Q5, Q6 and Q7) which related to withdrawing the Code. Q5 asked about withdrawing the Code; Q6 was about whether any elements should be retained; and Q7 was about whether Ofqual should permit awarding organisations to decide which errors they correct, subject to guidance, and whether students should automatically have a wrong result protected.

7.2.1 Quantitative responses

Table 18: Part C (Q5 and Q7) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q5	To what extent do you agree or disagree that we should withdraw the Code of Practice?	7	8	18	8	5	**46**
Q7	To what extent do you agree or disagree that when we withdraw the Code, we should allow awarding organisations to decide which errors they correct, having regard to guidance, and that no candidates should automatically have a wrong result protected?	13	11	8	6	4	**42**

Part C (Q5 - 7)

5[n = 28] Do you agree to the withdrawal of the Code?

7[n = 34] Should exam boards decide which errors they correct, having regard to guidance, and no candidates should automatically have a wrong result protected?

Net response

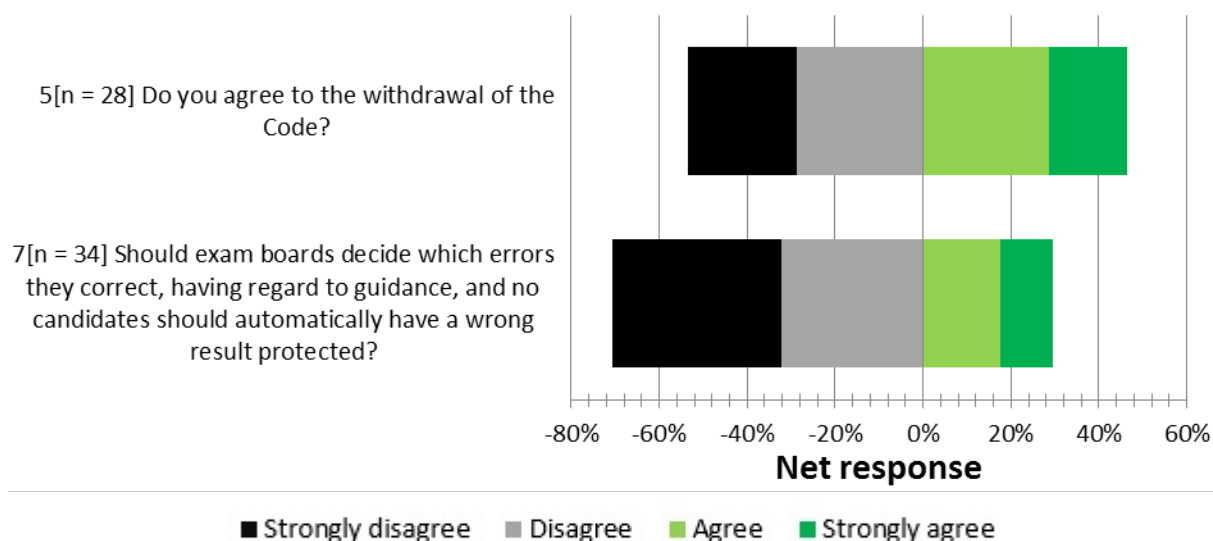■ Strongly disagree ■ Disagree ■ Agree ■ Strongly agree

Figure 11: Stacked bar chart for Part C (Q5 and Q7)

The main finding in respect of part C questions (relating to withdrawing the Code) is that sample sizes were rather smaller (a little over half the number of respondents) compared with responses to some of the earlier questions. Opinion was mixed between the two questions. The split between agreement and disagreement for Q5 (Ofqual should withdraw the Code) was around half and half. But there was stronger disagreement (over 70 per cent) to the proposition that Ofqual allow awarding organisations to decide which errors they corrected (subject to guidance), and the removal of candidates' automatic protection of a wrong result (Q7).

7.2.2 Qualitative responses

Table 19: Part C (Q5 and Q7) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q5	Official	4	4	2	3	1	**14**
	Personal	1	2	2	2	3	**10**
Q7	Official	4	7	0	3	1	**15**
	Personal	6	1	2	0	0	**9**

Q5: To what extent do you agree or disagree that we should withdraw the Code of Practice?

Twenty four respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (4), educational specialists (3) and parents or carers (3). The 14 organisational views were from four schools or colleges, five representative or interest groups and five awarding organisations.

SUMMARY POINTS

- Nine of those who commented agreed or strongly agreed with the proposal to withdraw the Code. One commented that this would allow new rules to be put in place and four said it should only be removed if new rules were put in place. One commented that the change was needed to restore faith in the system; one that the Code was not needed if we have the Conditions; and one that it was too restrictive.
- Eleven respondents disagreed or strongly disagreed with the proposal. Three commented that it was needed to hold awarding organisations to account. Four commented that it provided minimum standards and details that ensured some important consistency between awarding organisations. One said it should be retained and updated, and one commented it should be retained because it was easy to understand.

KEY POINTS BY STAKEHOLDER GROUP

- Three teachers and three schools or colleges commented in favour of the proposal. With one parent, one educational specialist and one representative or interest group these were the nine positive comments mentioned above.
- Two other educational specialists commented that the Code was not perfect but we needed something.
- A parent or carer and a representative or interest group commented that it was needed in order to hold awarding organisations to account.

COMMENTS FROM AWARDING ORGANISATIONS

- All five awarding organisation responses disagreed or strongly disagreed with the proposal to withdraw the Code. The awarding organisation representative group which also disagreed with the proposal commented that there was a gap in detail between the Code and the Conditions, and that the awarding organisations would need to codify this. They suggested, however, that the consistent approaches ensured by the Code were a better approach. They also argued that the Code set a minimum standard of performance that all awarding organisations were required to meet. Three other awarding organisations reiterated these comments. One awarding organisation commented that it needed retaining and updating.
- A non-standard response from an awarding organisation also addressed this question. The comments emphasised disagreement and said that the Code provided useful guidance and did not limit innovation. Section 4 of the Code needed updating to reference online marking.

COMMENT FROM NON-STANDARD RESPONSES

- Three representative or interest groups stated that they did not agree with the withdrawal of the Code, suggesting that a detailed code was useful to ensure a consistent approach. The Code should be subject to periodic review.

Q7: To what extent do you agree or disagree that when we withdraw the Code, we should allow awarding organisations to decide which errors they correct, having regard to guidance, and that no candidates should automatically have a wrong result protected?

Twenty four respondents provided further free-text responses to this question. Five teachers, one parent or carer and three educational specialists gave personal comments on this topic. Five official responses were from a schools or college, five were from representative or interest groups and five were from awarding organisations.

SUMMARY POINTS

- Eighteen of those who commented disagreed or strongly disagreed with the proposal. Five commented that there should be the same procedures across the awarding organisations; three that awarding organisations lacked judgement or were subject to market pressures; three expressed concern about the removal of protection of the student grade; and four commented that there were situations when the grade should be protected.

- Four of those who commented agreed or strongly agreed with the proposal. They commented that this would ensure faith in the system; one that we needed to have more faith in awarding organisations before we could let them do this; and one that it was good to delegate to awarding organisations as they could take individual needs into account.

KEY POINTS BY STAKEHOLDER GROUP

- Four teachers and two schools or colleges disagreed or strongly disagreed with the proposals. Comments included that all the procedures should be consistent, that awarding organisations can lack judgement, and that total transparency would be needed if this happened.

- One parent strongly disagreed and said this should be beyond the scope of the awarding organisations' remit.

- The four respondents that were in favour of the proposal were two schools or colleges, a representative or interest group and an awarding organisation. As noted above, they suggested that this would lead to faith in the system, or that we needed more faith in the awarding organisations.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group disagreed and argued that there were cases when a student grade needed to be protected. Three other awarding organisations reiterated this comment.

- One awarding organisation agreed with the proposal and commented that it was good to delegate to awarding organisations as they could take individual needs into account.

- A non-standard response from an awarding organisation also addressed this question. The comments emphasised disagreement with the proposal and said that without the protection centres would need to get permission of all the candidates before they could request a re-moderation.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group commented that the proposal to relax some common processes was ill-conceived. They went on to add that the relaxations were likely to further

undermine confidence. The Code was a single rule book that all stakeholders could understand.

- A second representative or interest group also commented that the Code was well-understood and it was concerning to replace it with technical Conditions which would have less coherence.
- A representative or interest group for HE admissions commented that this could lead to problems if they accepted a student whose grade was then decreased, whilst having rejected others.

Q6 Are there requirements in the Code that we should retain, other than those for reviews of marking, reviews of moderation, appeals and setting specified levels of attainment?

Table 20: Part C (Q6) Levels of agreement with closed question

Question number	Question	Yes	No	Total number of responses
Q6	Are there any requirements in the Code that we should retain, other than those for reviews of marking, reviews of moderation, appeals and setting specified levels of attainment?	9	20	**29**

Yes/ no response
There was a total of nine 'yes' responses and 20 'no' responses**.**

Eleven respondents provided further free-text responses to this question. Two teachers, one parent or carer, one examiner and one educational specialist gave personal comments on this topic. Two official responses were from schools or colleges and five were from representative or interest groups.

SUMMARY POINTS

- Four respondents commented that they did not know enough to say what should be retained.
- Two commented that consistency should be maintained, and two said that the Code should not be withdrawn. One said the Code was not necessary and another that the contents in the Code were covered elsewhere.

If yes, please tell us what other requirements from the Code should be retained and why.

COMMENTS FROM AWARDING ORGANISATIONS

The awarding organisation representative group gave some concrete suggestions about what should be retained from the Code. Three others reiterated the same comments. Suggestions included:

- explicit reference to the use of expert judgement as part of awarding;
- an updated glossary; and
- definitions of roles and responsibilities.

A non-standard response from an awarding organisation also addressed this question. The comments expressed concern about the loss of detail as given in the Code and said this might adversely affect public confidence.

7.3 Part D – setting grade boundaries

In part D, two questions (Q8 and Q10) related, respectively, to Ofqual's proposals for specific evidence to inform setting grade boundaries in GCSEs, AS and A levels, and in other qualifications beyond GCSEs, AS and A levels.

7.3.1 Quantitative responses

Table 21: Part D (Q8 and Q10) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q8	To what extent do you agree or disagree with the evidence that we propose should be considered by awarding organisations when setting specified levels of attainment for new and legacy GCSEs, AS and A levels?	0	4	24	31	12	**71**
Q10	To what extent do you agree or disagree that our proposals in relation to setting specified levels of attainment should apply to other qualifications beyond new and legacy GCSEs, AS and A levels?	1	1	35	21	6	**64**

Part D (Q8, and Q10)

8[n = 47] Do you agree/disagree with the evidence that we propose should be considered when setting specified levels of attainment?

10[n = 29] Do you agree/disagree that these proposals should apply to other qualifications?

Net response

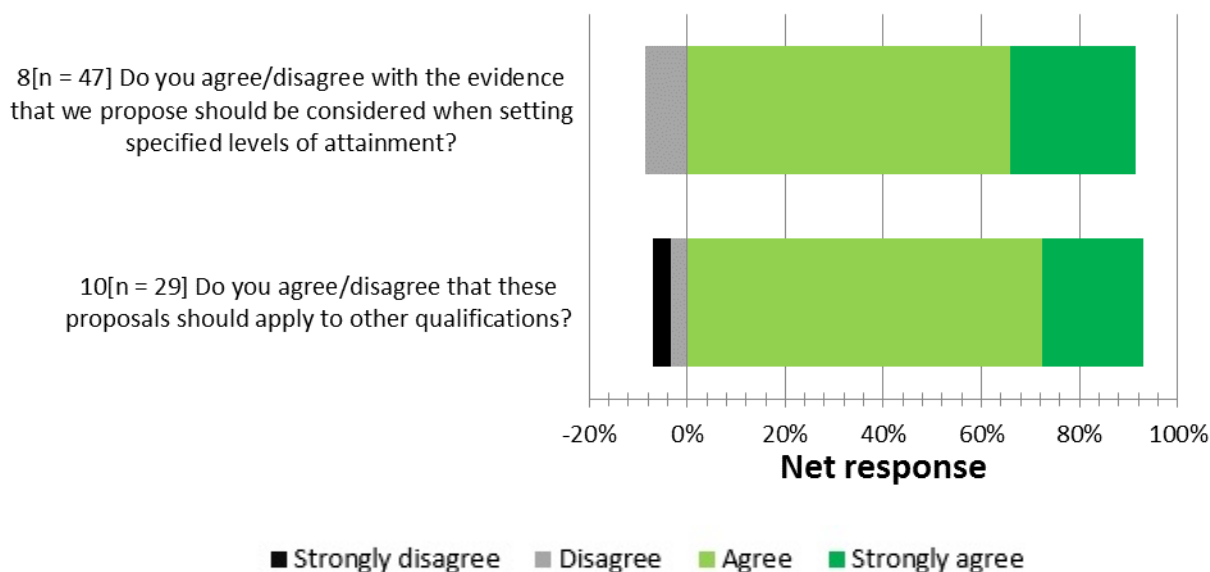■ Strongly disagree ■ Disagree ■ Agree ■ Strongly agree

Figure 12: Stacked bar chart for Part D (Q8 and Q10)

With both these questions there was very little disagreement. There were substantial numbers of respondents who did not have a strong view, and hence who were not captured by the stacked bar chart. This was particularly the case with question 10, for which only 29 respondents had a definite opinion.

7.3.2 Qualitative responses

Table 22: Part D (Q8 and Q10) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q8	Official	0	1	2	8	1	**12**
	Personal	0	1	1	2	3	**7**
Q10	Official	1	1	3	6	0	**11**
	Personal	0	0	3	1	2	**6**

Q8: To what extent do you agree or disagree with the evidence that we propose should be considered by awarding organisations when setting specified levels of attainment for new and legacy GCSEs, AS and A levels?

Nineteen respondents provided further free-text responses to this question. Personal responses came from three teachers, three educationalists and a parent / carer. The 12 official responses were from schools or colleges (4), representative or interest groups (3), and five awarding organisations.

SUMMARY POINTS

• Fourteen respondents agreed or strongly agreed with the proposals. Most comments expressed general agreement, although there were also some suggestions including:

- the statistical evidence should hold more weight and use expert judgement for fine tuning;
- as wide a range of evidence as possible should be used;
- as proposed, use prior information at A Level too; and
- all the awarding organisations should follow the same approach.

- Two respondents disagreed with the proposals. One was an educational specialist who argued that awarding should be based on criterion referencing rather than norm referencing. One was a school or college concerned with the use of prior attainment.

KEY POINTS BY STAKEHOLDER GROUP

- There was very little diversity in responses to this question by the stakeholder group.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group suggested that there should be a better definition of some terms, more clarity about which evidence was mandatory and which for guidance, and queried whether there was a need for reports on awards where procedures had been followed. Three other awarding organisations reiterated these comments. One awarding organisation expressed general agreement for the proposals.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group expressed support for use of the proposed evidence.
- One representative or interest group expressed a concern about this proposal, particularly in regard to the use of the National Reference Test, which they said was not trusted.

Table 23: Part D (Q8) Levels of agreement with closed question

Question number	Question	Yes	No	Total number of responses
Q8	Is there any evidence that should be considered?	13	30	43

Is there any evidence that should be considered?

There was a total of 13 'yes' responses and 30 'no' responses.

Although there were 13 yes responses, only nine respondents suggested what data should be used in addition. These included:

- Principal Examiner judgement;
- statistical information on inter-subject comparability (2);
- MIDYIS, ALIS, YELLIS data; and
- common centres data (4).

Q10: To what extent do you agree or disagree that our proposals in relation to setting specified levels of attainment should apply to other qualifications beyond new and legacy GCSEs, AS and A levels?

Eighteen respondents provided further free-text responses to this question. Three teachers and three educational specialists provided personal responses. The official responses were from representative or interest groups (3), three schools or colleges and six were from awarding organisations.

SUMMARY POINTS

- Nine of those who commented agreed or strongly agreed with the proposals. The comments mostly confirmed agreement.
- One respondent disagreed and one strongly disagreed with the proposals and commented that there should be flexibility and that international students cannot provide prior attainment data.

KEY POINTS BY STAKEHOLDER GROUP

- Four comments just said they did not know which other qualifications should be included.
- Four comments stated that the same processes should be applied to all qualifications, with one stating that they should apply to all large entry qualifications.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group and four other awarding organisations commented that flexibility was needed, with one expanding this to say that not all the data were available for all qualifications.
- One awarding organisation said that all the necessary data were not available for international students.
- One awarding organisation commented in a non-standard response that this was acceptable in principle and requirements should be flexible enough to cater for the full range of qualifications. For example, prior assessment information was not likely to be available for international students. They added that awarding organisations needed to be permitted to make an assessment of the reliability of each source of evidence and to weight them accordingly.

If you think we should extend these provisions, to which qualifications do you think they should apply and why?

There were 12 respondents to this question. Two teachers and two educational specialists commented on this topic. The official responses were from schools or colleges or academy chains (2), representative or interest group (2) and four awarding organisations.

SUMMARY POINTS

- Four comments suggested all qualifications, one suggested all level 2 and level 3 qualifications, one suggested all large entry qualifications, one suggested all technical and professional qualifications with external assessments, and four suggested all qualifications with similar assessment models.
- One respondent specifically suggested level 2 and level 3 BTECs.

COMMENTS FROM AWARDING ORGANISATIONS

- One awarding organisation representative group and three awarding organisations commented that provision should apply to all qualifications with similar assessment models.

Q9: Do you have any comments on our proposed Conditions for setting specified levels of attainment?

Yes/ no required

Table 24: Part D (Q9) Levels of agreement with closed question

Question number	Question	Yes	No	Total number of responses
Q9	Do you have any comments on our proposed Conditions for setting specified levels of attainment?	14	48	**62**

There was a total of 14 'yes' responses and 48 'no' responses.

There were 10 further responses to the question. Some comments were general agreement and the others are summarised below:

- Agreeing with the proposals, two respondents commented that criterion referencing should be used rather than norm referencing.
- Two respondents commented that information on prior performance was of limited value, either because Key Stage 2 information was unreliable, or because it was not available for all students or all qualifications.
- One commented that standards over time were important.
- One commented that the qualifications should have fewer grades in order to improve reliability.
- One commented that the Conditions were less detailed and allowed scope for awarding organisations to diverge in practice.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group raised a query about how long data would need to be held, and how the proposals fit with Ofqual's Data Exchange Procedures document. Three other awarding organisations reiterated these comments.
- One awarding organisation suggested that this was already covered in the General Conditions.

7.4 Part E – implementation

Part E on implementation contained four questions (Q11 – Q14). These questions were on these topics: the proposed date for withdrawing the Code (Q11); the new date for implementing Conditions relating to enquiries about results (Q12); new Conditions relating to awarding GCSE, AS and A levels (Q13); and extending proposals to Principal Learning and Project qualifications (Q14).

7.4.1 Quantitative responses

Table 25: Part E (Q11 – Q14) Levels of agreement with closed questions

| Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q11	We propose to withdraw the Code of Practice in 2016. To what extent do you agree or disagree with this proposed date?	12	10	17	7	5	**51**
Q12	We propose to put in place our new Conditions to implement the changes to the enquiries about results system in summer 2016, but after centre-based marking for 2015/16 has concluded. To what extent do you agree or disagree with this proposed date?	14	8	10	12	5	**49**
Q13	We propose to put in place our new Conditions for setting specified levels of attainment before GCSEs, AS and A levels are awarded in summer 2016. To what extent do you agree or disagree with this proposed date?	10	5	14	12	7	**48**
Q14	We propose to extend our proposals to Principal Learning and Project qualifications. To what extent do you agree or disagree with this proposal?	1	0	23	21	2	**47**
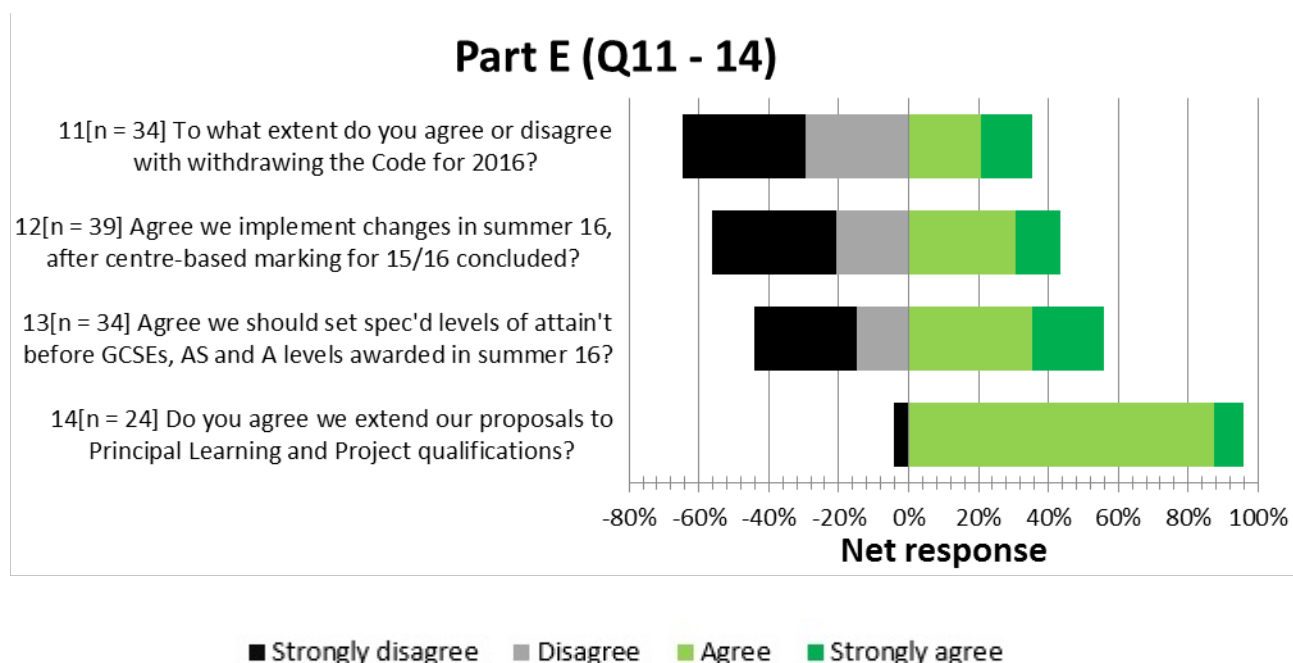
Figure 13: Stacked bar chart for Part E (Q11 – Q14)

As with some of the other question sets towards the latter part of the survey, the main feature of this group was the relatively low levels of response. The absolute number of responses ranged between 47 and 51, and when undecideds were removed to create the bar chart, all sample sizes were below 40 and the smallest was 24.

There was majority disagreement to questions 11 and 12, rough parity on question 13 and large majority agreement with the proposition to extend Ofqual's proposals to the Principal Learning and Project qualifications (q. 14), albeit with a small sample size, and most agreement being moderate rather than strong.

7.4.2 Qualitative responses

Table 26: Part E (Q11 – Q14) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q11	Official	4	3	2	1	1	**11**
	Personal	3	4	1	1	3	**12**
Q12	Official	7	3	3	3	1	**17**
	Personal	5	4	0	2	2	**13**
Q13	Official	2	1	2	7	1	**13**
	Personal	3	2	0	0	3	**8**
Q14	Official	0	0	1	6	0	**7**
	Personal	0	0	3	1	1	**5**

Q11: We propose to withdraw the Code of Practice in 2016. To what extent do you agree or disagree with this proposed date?

Twenty three respondents provided further free-text responses to this question. Five teachers, three parents / carers, two educational specialists, one student and one other commented on this topic. The official responses were from representative or interest groups (5), school or colleges (4) and awarding organisations (2).

SUMMARY POINTS

- Fourteen respondents disagreed or strongly disagreed with the proposed date. Seven commented that it was best not to rush it and this was expanded to say there was currently a lot going on already and that time was needed to put something in its place. Two commented that the Code should not be withdrawn, two that this was very short notice, and one that it could be withdrawn but changes would not be in place.

- Six respondents agreed and commented. Two commented that it needed doing as soon as possible, one that it tied in with changes to qualifications, and one that the timing was reasonable for centres, but awarding organisations might struggle.

KEY POINTS BY STAKEHOLDER GROUP

- Three teachers and a school or college, two parents, one educational specialist, one awarding organisation and three representative or interest groups disagreed with the proposed timing.

- Those in favour of this timing were two teachers, two schools or colleges, one educational specialist and one parent.

COMMENTS FROM AWARDING ORGANISATIONS

- Two awarding organisations commented. One had no opinion about the proposal and one strongly disagreed. One commented that they would need two years' notice to make such

changes, and the other that the Code could be removed but new changes would not be in place.

If you disagree, please tell us when we should withdraw the Code.

There were 16 respondents to this question. Four teachers, two parents / carers, one educational specialist and an examiner commented on this topic. The three official responses were from two schools or colleges, three awarding organisations, and three representative or interest groups.

SUMMARY POINTS

- Six respondents suggested the Code should be withdrawn in 2017, two suggested 2018.
- Two respondents suggested the Code should be withdrawn when the issues have been fully addressed.
- Three respondents commented that it should not be withdrawn.

COMMENTS FROM AWARDING ORGANISATIONS

- The one awarding organisation representative group and two awarding organisations that commented suggested that the Code could be replaced in 2016, but the amendments needed to replace it would not be in place by that time. Agreement would be needed between the awarding organisations about a timetable for the developments needed to replace the items in the Code.

Q12: We propose to put in place our new Conditions to implement the changes to the enquiries about results system in summer 2016, but after centre-based marking for 2015/16 has concluded. To what extent do you agree or disagree with this proposed date?

Thirty respondents provided further free-text responses to this question. Five teachers, three parents / carers, two students, two educational specialists and an examiner commented on this topic. The official responses were from representative or interest groups (6), six were from schools or colleges, five were from awarding organisations.

SUMMARY POINTS

- Nineteen respondents disagreed with the proposed date. Two commented that it should be introduced as soon as possible, one suggested that some elements could be introduced in 2016 but other parts needed more consideration, three suggested that 2016 was too soon and one that teachers needed more notice. One respondent specifically suggested introducing the new Conditions in 2017 when the new qualifications were coming in. Four commented that the Code could be removed but the new changes would not be in place. One commented that the Code should not be withdrawn, so the Conditions would not be needed.
- Eight respondents agreed or strongly agreed with the proposed date. Three commented that it should be done as soon as possible and one that a staggered introduction would cause confusion. Two commented that time was needed to put the new system in place.

KEY POINTS BY STAKEHOLDER GROUP

- Those who disagreed with the proposed date included three teachers and two schools or colleges, all three parents, two students, and the examiner. They also included the four

representative or interest groups and the awarding organisation representative group and three awarding organisations.

- Two teachers and three schools or colleges, two educational specialists and one representative or interest group agreed with the proposed date.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group strongly disagreed with the proposed timing and emphasised their comment to question 11, (ie that time was needed to decide on what should replace the Code).

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group expressed concern about the proposed timescale. They went on to add that there was insufficient time to ensure adequate communication and understanding. Three awarding organisations made similar comments. One other awarding organisation commented that they would be concerned if these changes were imposed at such short timescales.
- One representative or interest group suggested that the proposal with regard to appeals could be brought in for 2016 as this was a discrete process, but that it would be unworkable to introduce other elements for a cycle that was already underway.

If you disagree, please tell us when we should implement our requirements for the new enquiries about results system.

There were 13 respondents to this question. Three teachers, two parents or carers, two students and an examiner commented on this topic. The official responses were from two awarding organisations, two schools or colleges and one representative or interest group.

SUMMARY POINTS

- Four respondents said 2017 and two said 2018.
- Two commented that it should be introduced as soon as possible, and one said at least one year after communication to schools.
- Two commented that it should be introduced after due consideration of the issues.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group commented that the Code could be removed but new changes would not be in place by 2016. One awarding organisation reiterated this. One awarding organisation said that some changes could be introduced for 2016 but most would need to come in from 2018 onwards.

Q13: We propose to put in place our new Conditions for setting specified levels of attainment before GCSEs, AS and A levels are awarded in summer 2016. To what extent do you agree or disagree with this proposed date?

Twenty two respondents provided further free-text responses to this question. Personal respondents who commented on this topic were teachers (5), educational specialists (1) and two parents or carers. The 14 official responses were from schools or colleges (4), representative or special interest groups (5) and awarding organisations (5).

SUMMARY POINTS

- Eight respondents disagreed or strongly disagreed with the proposals. Three commented that there was too much happening at once. Other comments suggested that this would be too fast for robust processes to be introduced and the changes might impact adversely on standards, when there was already lots of change.
- Eleven respondents agreed or strongly agreed with the proposal. Comments included general agreement and to implement it as soon as possible. Four comments said that it could be implemented for 2016 where the Conditions comply with current practice. They went on to say that new processes, in particular those being consulted on here, could not be included in this timescale.

KEY POINTS BY STAKEHOLDER GROUP

- Four teachers and a school or college, one parent, and two representative or interest groups disagreed with the proposals.
- A teacher and three schools or colleges, one parent, one representative or interest group and four awarding organisations agreed with the proposals.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group commented that the new proposals being consulted on here cannot be introduced for 2016, because it provided insufficient time for awarding organisations to make the necessary changes (for example to their recruitment and training practices and to their examination systems). Three other awarding organisations reiterated this.

If you disagree, please tell us when we should implement our requirements for setting specified levels of attainment

There were 14 respondents to this question. Four teachers, two parents or carers, one student and an examiner commented on this topic. There were six official responses, one from a school or college and two from representative or interest groups.

- Five respondents suggested the changes should be introduced in 2017.
- Two respondents suggested the changes be introduced in 2018.
- Two commented that the changes should be made only after time to think about the issues carefully.
- One reiterated that we should not withdraw the Code.

COMMENTS FROM AWARDING ORGANISATIONS

- A non-standard response from an awarding organisation also addressed this question. The comments suggested that some limited amendments could be introduced in 2016 but not aspects that required system development. They expressed a concern about meeting the UCAS deadline for 2016 if proposals were introduced for then.

Q14: We propose to extend our proposals to Principal Learning and Project qualifications. To what extent do you agree or disagree with this proposal?

Twelve respondents provided further free-text responses to this question. Two teachers, one parent or carer, an educational specialist and an examiner commented on this topic. The seven official responses were from a school or college, two representative or interest groups and four awarding organisations.

SUMMARY POINTS

- Eight respondents agreed or strongly agreed with the proposal to extend the changes to Principal Learning and Project qualifications. One was an educational specialist, one examiner, one school or college, two representative or interest groups and three awarding organisations. Comments included that this was acceptable but the timing needed to be considered, that this would be good for consistency (4), that it should be extended to any qualification that was similar in design to a general qualification (3).
- No respondents disagreed.

COMMENTS FROM AWARDING ORGANISATIONS

- Three commented that the changes should apply to any qualifications that were similar in design to a general qualification, and one said that there was no need to break the existing link.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group expressed initial support for this proposal and said they would welcome the opportunity to comment further when more detail was available.

Are there any other qualifications that should be covered by our proposals?

There were six respondents to this question. All were official responses, one from a school or college, one from a representative or interest group, and four from awarding organisations.

Suggestions for other qualifications to extend the proposals to were:

- technical and professional qualifications with external assessments;
- assessments with similar approaches to general qualifications (4 awarding organisations); and
- CAD, ESOL or IB assessments.

COMMENTS FROM NON-STANDARD RESPONSES

- One representative or interest group suggested they might also be extended to IGCSE.

7.5   Impact assessment

There were two impact assessment questions. Ofqual has identified a potential impact of these proposals on persons who have protected characteristics and Q15 asked for views on this. Q16 asked respondents to either agree or disagree with Ofqual's evaluation of the regulatory impact of these proposals.

7.5.1   Quantitative responses

Table 27: Impact Assessment (Q15 – Q16) Levels of agreement with closed questions

Question number	Question	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q15	We have identified one potential impact on people with protected characteristics, as our new Conditions will expressly allow awarding organisations to charge for appeals against decisions in relation to reasonable adjustments and special consideration. As they will not be required to do so however, we believe the impact of this is likely to be limited. We have not identified any other impacts on people because of their protected characteristics. To what extent do you agree or disagree with our conclusions?	4	7	14	17	4	**46**
Q16	We have set out separately our assessment of the regulatory impact of these proposals. To what extent do you agree or disagree with our conclusions?	1	1	25	13	2	**42**

Impact Assessment (Q15 - 16)

15[n = 32] Have we identified the likely impact of our proposals on people with protected characteristics?

16[n = 17] Have we identified the likely regulatory impact of our proposals?

Net response

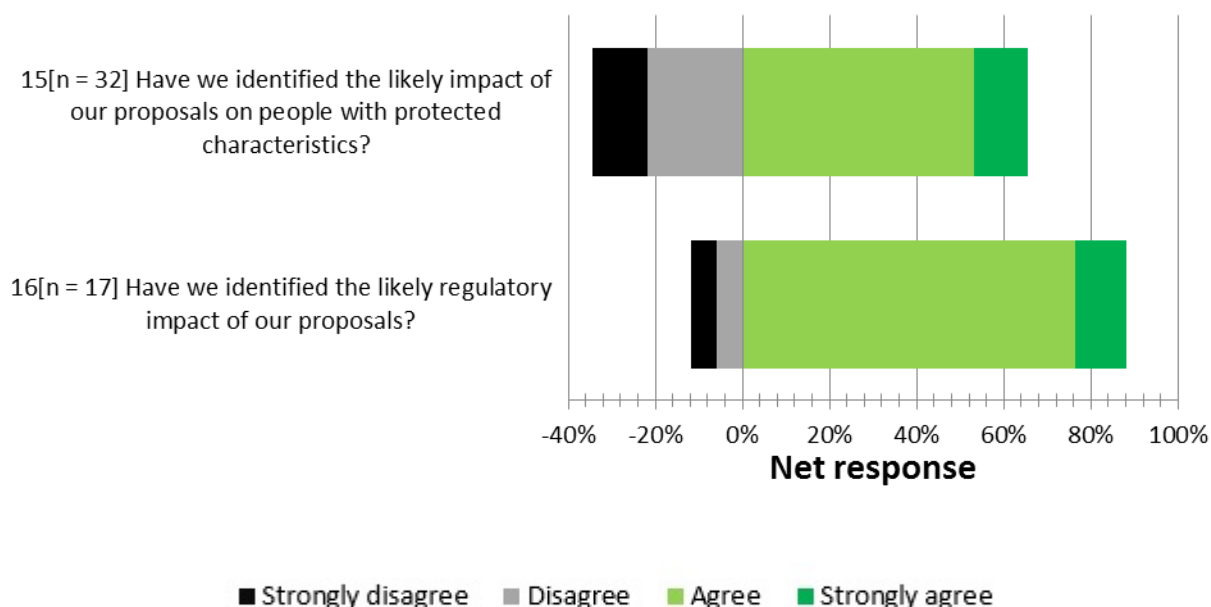■ Strongly disagree   ■ Disagree   ■ Agree   ■ Strongly agree

Figure 14: Stacked bar chart for Impact Assessment (Q15 – Q16)

As with other items towards the end of the survey, fewer respondents gave answers, both in terms of giving any response at all, and in terms of giving a response that denoted a definite opinion. This was particularly the case for question 16 (on agreement with Ofqual's regulatory impact assessment). Only 17 respondents had a definite view on this.

The few respondents to Q16 tended to agree with the proposition. This was also so for Q15, although there was more disagreement, and from a somewhat larger sample.

7.5.2 Qualitative responses

Table 28: Impact Assessment (Q15 – Q16) summary of the number of comments made, by level of agreement with the proposals

Question number	Type of response	Strongly disagree	Disagree	Don't know/No opinion	Agree	Strongly agree	Total number of responses
Q15	Official	1	3	1	7	0	**12**
	Personal	3	2	2	1	2	**10**
Q16	Official	1	1	3	6	0	**11**
	Personal	0	0	1	0	1	**2**

Equality Impact

Q15: We have identified one potential impact on people with protected characteristics, as our new Conditions will expressly allow awarding organisations to charge for appeals against decisions in relation to reasonable adjustments and special consideration. As they will not be required to do so however, we believe the impact of this is likely to be limited. We have not identified any other impacts on people because of their protected characteristics. To what extent do you agree or disagree with our conclusions?

Twenty two respondents provided further free-text responses to this question. Three teachers, two parents / carers, two educational specialists, two students and an examiner commented on this topic. There were 12 official responses, three from schools or colleges, five from representative or interest groups, and four from awarding organisations.

SUMMARY POINTS

- Nine respondents disagreed or strongly disagreed with the proposals. Four suggested that awarding organisations were likely to charge and three commented that the proposal was unfair. Three suggested that charges should not be allowed. Comments were from a teacher and two schools or colleges, an educational specialist, a parent, a student and two representative or interest groups.
- Ten respondents agreed or strongly agreed with the proposals. Comments mostly emphasised their agreement. One commented that the proposals could lead to greater transparency and consistency, and one that, although the changes might be small, they could have a significant impact on individual students.

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisation representative group stated that they supported the conclusion reached in the consultation, and three awarding organisations reiterated this comment.

Are there any other impacts that we have not identified? Yes/no

Table 29: Part E (Q15) Levels of agreement with closed question

Question number	Question	Yes	No	Total number of responses
Q15	Are there any other impacts that we have not identified?	2	25	**27**

There were a total of two 'yes' responses and twenty five 'no' responses.

Please give reasons for your response

There were two respondents to this question. One from a school or college and one from a representative or interest group.

- One respondent suggested that the proposal would ensure greater consistency and transparency.

- One respondent stated that charging for appeals for low income students would essentially prevent them appealing in the first place.

Q16: We have set out separately our assessment of the regulatory impact of these proposals. To what extent do you agree or disagree with our conclusions?

Thirteen respondents provided further free-text responses to this question. One teacher and one student commented on this topic. There were 11 official responses, one school or college, four from representative or interest groups, and six from awarding organisations.

SUMMARY POINTS

- Seven respondents agreed or strongly agreed with the conclusions: a student, three representative or interest groups and three awarding organisations. Comments included that the proposal should be constantly reviewed and updated and that they should refer to other learning environments and not just schools. The awarding organisations commented that they generally agreed but not with the timing of the proposal or some of the finer detail.
- Two respondents disagreed or strongly disagreed with the proposal (see awarding organisation comments below).

COMMENTS FROM AWARDING ORGANISATIONS

- The awarding organisations in favour of the proposals commented that they generally agreed but not with the timing of the proposal or some of the finer detail.
- Two awarding organisations disagreed or strongly disagreed with the proposals and one added that the proposals had not been fully tested and argued that they would not solve the concerns they were intended to address. As such it was not worth the burden of implementing them. The other awarding organisation commented that the proposals would have significant cost and time implications that did not seem to have been taken into account.

7.6   General comments from non-standard responses

A number of additional comments were provided in non-standard responses that were directly relevant to the consultation. These are listed by stakeholder group below.

Seven sets of non-standard comments were received from centre or teacher representative or interest groups (5), an academy chain (1) and individual centres or teachers (1).

Comments included:

- The importance of the review and appeals process not being dependent on the centre's or student's ability to pay (3). This was extended in some cases to suggest that funding be allocated centrally or that it should follow need. One respondent suggested that the cost of enquiries should be built into exam fees.
- Concerns about workloads in schools to review the marked scripts when they were returned.

- A request that teachers have sufficient training in how to assess students' work.
- The potential need to require work to be submitted earlier to allow time for centre-based review of marks, thereby impacting on teaching time in some subjects.
- A concern that cost is a barrier to blind double-marking which is considered to be the most appropriate approach.
- A suggestion that the processes for grading should ensure that there are sufficient marks within each grade for the chance of grade misclassification to be minimised (2).
- A suggestion that reviews should be conducted to a higher level of quality than original marking, where a centre believes an error has been made.
- That a review panel of school leaders be set up to inspect the awarding organisations.
- Centres should be able to enter into a specific dialogue with awarding organisations about individual scripts so that fewer or more focused review/ appeal requests can be made.
- A concern about the use of the word 'reasonable' and that this may lead to litigation cases.

Three sets of non-standard comments were received from representative or interest groups with an interest in university admissions. Comments included:

- An emphasis on the accessibility of the review and appeals processes to all students (i.e. not limited by cost).
- A concern about the impact of the increasing numbers of Enquiries about Results on higher education providers, and the desire (and the challenge of this) to keep places open while a review or appeal is underway (2).
- An emphasis of the time sensitive nature and challenges caused by delays.
- A concern that students do not always understand the Enquiries about Results processes and the associated timelines.
- A request for more general research into the characteristics of centres and students who are more likely to request a review.
- A concern about unintended consequences of the proposals, including legal challenges.
- A need for clear, detailed and uniform information from all awarding organisations.

One awarding organisation representative group and four awarding organisations submitted non-standard responses to the consultation (including one awarding body as an addendum to the representative group response). Comments included:

- That communication of the proposed changes should be carefully communicated as they have the potential to cause confusion at a time of a lot of existing qualification reform (2).
- Concerns about the proposed timing of the changes, with the awarding organisation representative group stating that the level of system development and testing that is required rules out changes for 2016. One awarding organisation suggested that 2018 was the soonest they could implement many of the changes, and another awarding organisation saying that 2020 is the earliest series in which the changes could be implemented. A further awarding organisation stated that fees for 2016 have already been published so any changes would require working out new costs and publishing them for 2017
- One awarding organisation offering qualifications other than GCSE, AS and A Level suggested that the proposals impact on other qualifications at a later time.

- That consistency of approach across England, Wales and Northern Ireland would be desirable, along with encouragement for Ofqual to work with other regulators on this (the awarding organisation representative group and one other).
- A concern about the cost of the system and that reviews and appeals become available to those with money (2).
- A reiteration of the comment that the Chief Examiner carries the standard for the paper and the processes need to support that.
- A comment that the principle is that post-results services are between centres and awarding organisations and to change this represents a 'seismic shift'.
- A concern that the use of the term 'reasonable' would increase the amount of litigation (2), and linked to this, the increasing cost of appeals (hiring witnesses) and the bias towards those with resources.

8 Appendices

8.1 List of questions included in the questionnaire

Part A – Review of marking and appeals of GCSEs, AS and A levels

1. To what extent do you agree or disagree with the following proposals for the new system for reviews of marking?

That we should require an awarding organisation to:

a) Make marked assessments available to centres and/or candidates before its deadline for requesting a review of marking or the correction of an administrative error.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

b) Make the mark scheme for an assessment available at the same time as or before it makes the marked assessments available.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

c) Have arrangements in place to correct administrative errors that are identified.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

d) At a review of marking, change marks where an error has been made, but not change a mark that could reasonably have been given by a marker applying the mark scheme and any relevant marking procedures to a candidate's assessment.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

e) Following a review of marking, provide centres with an explanation for the decision taken.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

f) Make sure that candidates have access to the marks for teacher-marked assessments in time to consider whether to request a review of these marks by the centre.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

g) Make sure that candidates can seek a review of teacher-marked assessment by their centre and have access to the materials they need to consider whether to request such a review.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

h) Only allow requests for a review of moderation to be made by a centre.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

i) Following a review of a moderation decision, change the outcome of that moderation only where that outcome could not reasonably have been arrived at by a moderator who had considered candidates' work, the teacher's mark and the mark scheme and any relevant procedures, but not change the outcome of the moderation where it represented a reasonable outcome.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

j) Following a review of moderation, provide centres with an explanation for the decision taken.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

k) Allow a centre or an external candidate to appeal against a mark (or outcome of moderation) only once a review of marking (or moderation) is complete.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

l) Allow an appeal against marking or moderation only on the grounds that:

- **the mark could not reasonably have been awarded on the basis of consideration of the candidate's work against the mark scheme and any relevant procedures,**

- **the moderation decision could not reasonably have been made by a moderator who had considered the candidate's work, the teacher's mark and the mark scheme and any relevant procedures, or**

- **the awarding organisation did not properly apply its own procedures**

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

m) Allow an appeal against an awarding organisation's response to a request for a special consideration or a reasonable adjustment.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

n) Only allow appeals following a review of moderation to be made by a centre.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

o) Where an error is discovered through an administrative error review, a review of marking/moderation or an appeal, identify any other candidates who are affected by the error, take steps to correct the error or reduce the effect of the error and ensure the error does not recur.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

p) Where it only accepts requests for reviews of marking for centre-based candidates from the centre itself, and not from candidates directly (other than external candidates), make sure that, in

the event of a dispute between the centre and the candidate about the appropriateness of such a request, the centre allows the candidate to appeal the its decision.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

q) Train and monitor the performance of the reviewers who undertake reviews of the awarding organisation's marking or moderation and take action where reviewers are not acting appropriately.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

r) Not allow reviewers to review their own marking or moderation decisions.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

s) Require appeal decisions to include at least one person who is independent of the awarding organisation.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

t) Set reasonable deadlines for receipt of requests for access to marked assessment materials, administrative error reviews, reviews of marking, and reviews of moderation and appeals.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

u) Publish its position on accepting requests for access to marked assessments, administrative error reviews, reviews of marking and appeals directly from candidates, including external candidates and from centres on behalf of candidates.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

v) Publish clear information about its review arrangements including its dates for receipt of requests for access to marked assessment materials, administrative error reviews, reviews of marking, reviews of moderation and appeals.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

w) Publish (and take reasonable steps to meet) the target periods in which it intends to provide requested marked assessments and notify centres and/or learners of the outcome of administrative error reviews, reviews of marking/moderation and of appeals.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

x) Publish the frequency with which it achieves and misses its target periods.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

y) Publish information about the number of requests it receives for administrative error reviews, reviews of marking/moderation and appeals and the nature of its decisions and the reasons for those decisions.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

z) Publish information about how it trains and prepares reviewers, its monitoring arrangements, the findings of this monitoring and the actions taken as a result.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

Do you have any other comments on our proposals?

2. To what extent do you agree or disagree that we should allow awarding organisations' approaches to differ in the following areas?

a) The process for providing access to marked assessments to centres.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

b) The fees charged, and any approach to the refund of fees for access to marked assessments, administrative error reviews, reviews of marking, reviews of moderation and appeals.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

c) The dates by which awarding organisations require centres to make requests for access to scripts, administrative error reviews, reviews of marking, reviews of moderation and appeals.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

d) The dates by which awarding organisations will respond to requests for access to scripts, administrative error reviews, reviews of marking, reviews of moderation and appeals.

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

Do you have any other comments on these areas where we propose that awarding organisations' approaches should be allowed to differ?

3. Do you have any comments on the draft Conditions (in Appendix 2) on the review of marking, moderation or appeals that will be used to deliver these proposals?

( ) Yes   ( ) No

Please give reasons for your answer.

4. To what extent do you agree or disagree that our proposals in relation to reviews of marking/moderation and appeals should apply to other qualifications beyond new and legacy GCSEs, AS and A levels?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

If you think we should extend the provisions, to which qualifications do you think they should apply and why?

Part B – Proposed rules for reviews of marking and appeals

There are no questions for part B.

Part C – Withdrawing the Code of Practice

5. To what extent do you agree or disagree that we should withdraw the Code of Practice?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

6. Are there any requirements in the Code that we should retain, other than those for reviews of marking, reviews of moderation, appeals and setting specified levels of attainment?

( ) Yes   ( ) No

Please give reasons for your answer.

If yes, please tell us what other requirements from the Code should be retained and why.

7. To what extent do you agree or disagree that when we withdraw the Code, we should allow awarding organisations to decide which errors they correct, having regard to guidance, and that no candidates should automatically have a wrong result protected?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

Part D – Setting grade boundaries

8. To what extent do you agree or disagree with the evidence that we propose should be considered by awarding organisations when setting specified levels of attainment for new and legacy GCSEs, AS and A levels?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

Is there any other evidence that should be considered?

( ) Yes   ( ) No

Please give reasons for your answer.

9. Do you have any comments on our proposed Conditions for setting specified levels of attainment?

( ) Yes   ( ) No

Please give reasons for your answer.

10. To what extent do you agree or disagree that our proposals in relation to setting specified levels of attainment should apply to other qualifications beyond new and legacy GCSEs, AS and A levels?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

If you think we should extend these provisions, to which qualifications do you think they should apply and why?

Part E – Implementation

11. We propose to withdraw the Code of Practice before GCSEs, AS and A levels are awarded in summer 2016. To what extent do you agree or disagree with this proposed date?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

If you disagree, please tell us when we should withdraw the Code.

12. We propose to put in place our new Conditions to implement the changes to the enquiries about results system in summer 2016, but after centre-based marking for 2015/16 has concluded. To what extent do you agree or disagree with this proposed date?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

If you disagree, please tell us when we should implement our requirements for the new enquiries about results system.

13. We propose to put in place our new Conditions for setting specified levels of attainment before GCSEs, AS and A levels are awarded in summer 2016. To what extent do you agree or disagree with this proposed date?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

If you disagree, please tell us when we should implement our requirements for setting specified levels of attainment.

14. We propose to extend our proposals to Principal Learning and Project qualifications. To what extent do you agree or disagree with this proposal?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

Are there any other qualifications that should be covered by our proposals?

15. We have identified one potential impact on people with protected characteristics, as our new Conditions will expressly allow awarding organisations to charge for appeals against decisions in relation to reasonable adjustments and special consideration. As they will not be required to do so however, we believe the impact of this is likely to be limited. We have not identified any other impacts on people because of their protected characteristics. To what extent do you agree or disagree with our conclusions?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

Are there any other impacts that we have not identified?

( ) Yes   ( ) No

Please give reasons for your answer.

16. We have set out separately our assessment of the regulatory impact of these proposals. To what extent do you agree or disagree with our conclusions?

( ) Strongly agree

( ) Agree

( ) Disagree

( ) Strongly disagree

( ) Don't know / No opinion

Please give reasons for your answer.

8.2 List of non-confidential respondents

The following is a list of questionnaire respondents who stated that their response did not need to be treated as confidential. The following were all 'official' respondents, and only organisation name is given. Those that submitted a non-standard response were contacted by email to check that they were happy for their organisation name to be included.

Table 30: list of non-confidential responding organisations

Abbot's Hill School

AQA

Association of Colleges

ASCL

Cambridge International Examination

CCEA Awarding

Durham University

Edgbaston High School

Esher College

Failsworth School

Girls' Schools Association

Grammar School Heads' Association

Henley in Arden School

Highgate Wood School

Highworth Grammar School

Institute of Mathematics and its Applications

International Baccalaureate

JCQ

LMS

NASUWT

Notre dame Catholic Sixth Form College

OCR Examinations

Pearson

Pensby High School

Peter Symonds College

Reigate Grammar School

Samuel Ryder Academy

SCHOOLS NorthEast

St Brendan's Sixth Form College

St Mary's School, Calne

St Peter's School York

Supporting Professionalism in Admissions (SPA)

UCAS

Voice the union for education professionals

WJEC

8.3   Documents cited in this report

Becker, J.P. (2011). Net stacked distribution – a better way to visualize Likert data. http://tinyurl.com/kv5akzz (accessed 20/11/14.)

Cabinet Office (2013). *Consultation principles*. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/255180/Consultation-Principles-Oct-2013.pdf (accessed 09/10/14.)

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Office of Qualifications and Examinations Regulation

Spring Place
Coventry Business Park
Herald Avenue
Coventry CV5 6UB

Telephone 0300 303 3344
Textphone 0300 303 3345
Helpline   0300 303 3346