

**ofqual**

GCSE, AS & A level  
Summer Report

**2019**

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## Background

Ofqual monitors exam boards' preparation for, and delivery of, summer exams in GCSE, AS and A level (GCE) qualifications. These are provided to schools and colleges in England by 4 exam boards: AQA, OCR, Pearson and WJEC (Eduqas).

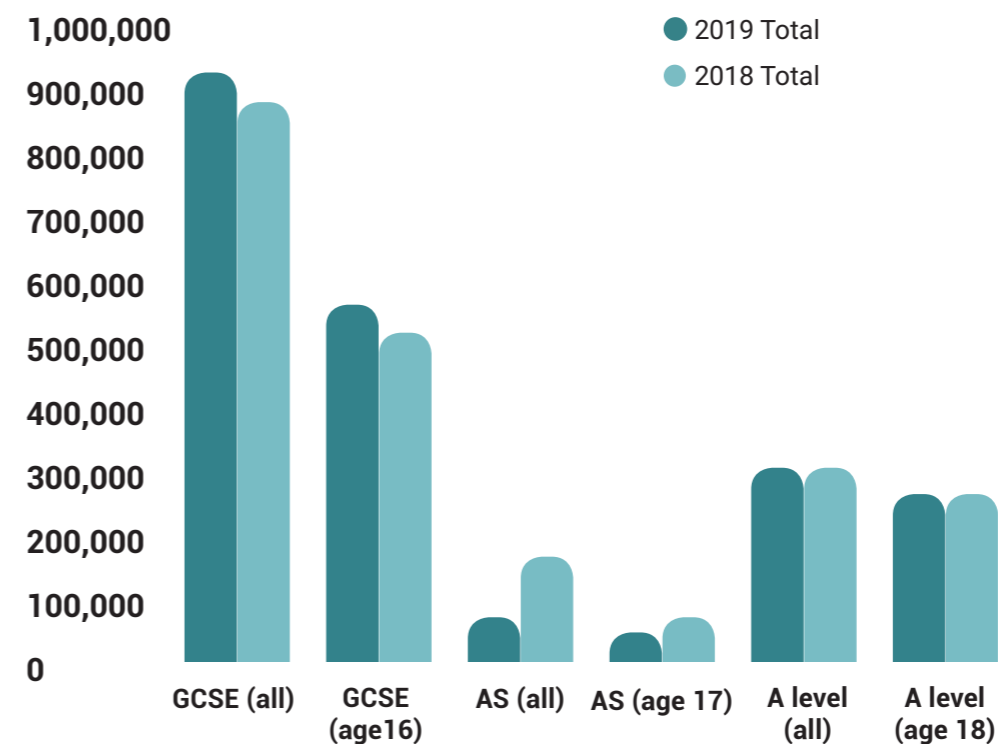
Our priorities during any exam series are that:

- exams are fit for purpose and delivered to plan
- results are issued on time and are accurate so that users can rely on them
- standards are maintained in each qualification between exam boards and over time

In England, 25 new GCSEs and 19 new A levels were awarded for the first time this summer. Most subjects are now reformed (there is a small number of new GCSE and A level language qualifications that will be awarded for the first time in summer 2020).

The summer exam series is the largest of any single exam series we regulate. **Annex chart 1**

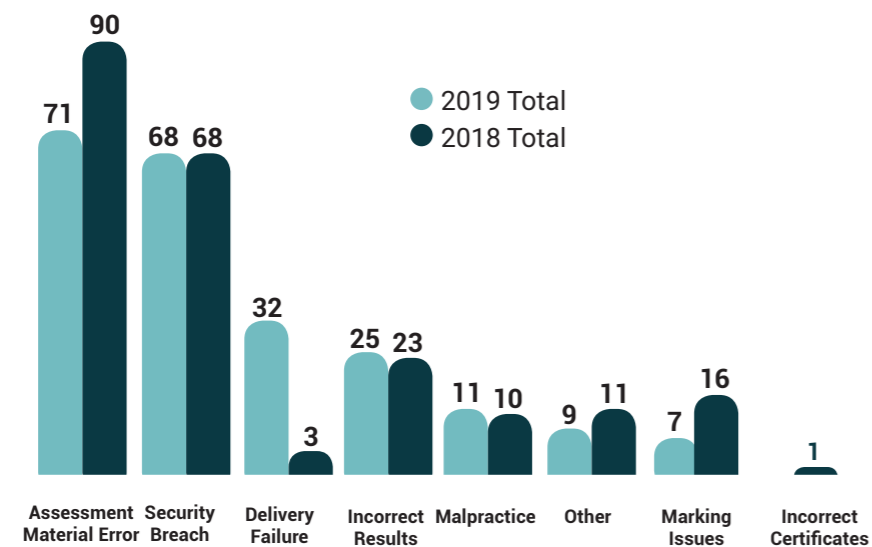
### Student numbers



# Introduction

Overall we found that the exams in 2019 were carefully planned, effectively managed and successfully delivered. However, there were a number of isolated issues. This report includes a summary of the key issues which arose in the lead up to, during and immediately after the 2019 summer exam series, and the actions we and the exam boards took. This report focusses only on GCSE, AS and A level qualifications offered in England.

**Chart 1**  
**Types of issues reported**



During the exam period, each exam board is responsible for managing, and reporting to us, any issues that arise. We monitor the actions exam boards take and we intervene only where we feel it is necessary to protect standards, public confidence or to mitigate any impact on students.

After the exams are finished and results are published, we analyse the issues which occurred and evaluate the cause, impact and how effectively they were managed by each exam board. We decide if any regulatory response is necessary. We follow up specific incidents with individual exam boards, consider the focus of our ongoing monitoring and, where necessary, conduct additional work to understand how to minimise the likelihood of particular types of issues from recurring.

The delivery of the exam series can be divided into 5 phases: planning; exam delivery; marking; setting standards; and post results. We have structured this report to reflect those phases.

# Phase 1: Planning

## Following up issues in 2018

Following the 2018 series, we asked the exam boards to investigate some specific events that had occurred. As a result of these investigations we took [regulatory action](#) during 2019.

Our analysis of the 2018 exam series informed our rolling programme of monitoring and technical evaluations.

Ahead of the 2019 exams we reviewed:

- the assessment materials and mark schemes for reformed GCSE and A level qualifications awarded in 2018
- the extent to which exam boards were complying with our rules in their marking and reviews of marking. We told exam boards that from 2019 onwards we would consider the outcomes of their reviews of marking as one of the indicators we use to monitor their quality of marking
- a sample of cases where there was a particular pattern of grade changes following requests for a review of marking or moderation
- the [JCQ malpractice policy document](#) and a sample of each exam boards' investigation and management of malpractice cases. We shared our findings (appendix 1) with each exam board. We expect the exam boards to ensure JCQ\* puts in place any necessary changes to its policy
- the [JCQ 'Access Arrangements' policy](#) to consider if it would enable exam boards to comply with our rules. We shared our findings (appendix 1) with the exam boards. We expect the exam boards to ensure JCQ puts in place any necessary changes to its policy
- exam boards' progress in implementing extra safeguards around teacher involvement in the development of confidential assessment materials

We also raised some specific concerns with exam boards about a number of recurring issues we had identified in 2018 and asked them to tell us how they planned to reduce the risks of such incidents occurring in the future:

- in 2018 some erratum\* notices provided more information about the affected question than was necessary, risking the confidentiality of the assessment. Ahead of the 2019 exams, the exam boards reviewed the format of their erratum notices to ensure they did not share the question itself, only the detail of the error
- in 2018 we saw an increase in the number of incorrect papers being handed out, usually by invigilators and exams officers, to students. Ahead of 2019, exam boards required schools and colleges to evidence that 2 people were present to check the papers when opening and distributing exam papers
- in 2018 we saw some inconsistency in how schools and colleges dealt with students who had been given the incorrect paper. Ahead of 2019, exam boards issued instructions to schools and colleges about how to deal with the distribution of an incorrect paper

## Exam board readiness

In early 2019, we met with each of the 4 GCSE and A level exam boards to assess their readiness for the 2019 summer exam series. We reviewed the extent to which they had identified and were managing the risks to the safe delivery of the series. We looked, in particular, at the steps they had taken to prevent a repeat of any issues that occurred in 2018. Although we identified no serious concerns, we presented our observations to each exam board for their consideration and followed up on their preparations for the summer at individual meetings in April.

As in other years, we wrote to each exam board (appendix 2) ahead of the series to set out how we expected them to manage any issues that arose. We also outlined the types of issues about which we expected to be notified.\*\*

We reminded them that we expect exam boards to manage issues quickly and effectively to minimise any impact on students and we did not expect them to wait until they had all the facts before alerting us.

\* An erratum notice is a document issued to schools and colleges to tell them about, and how to correct, an error in a question paper or an exam instruction. The erratum notice is either provided for information only (if no correction is necessary) or with an instruction to be read out to students at the start of the exam.

\*\*See Condition B3 of our General Conditions of Recognition for a definition of an Adverse Effect and reporting requirements: <https://www.gov.uk/guidance/ofqual-handbook>

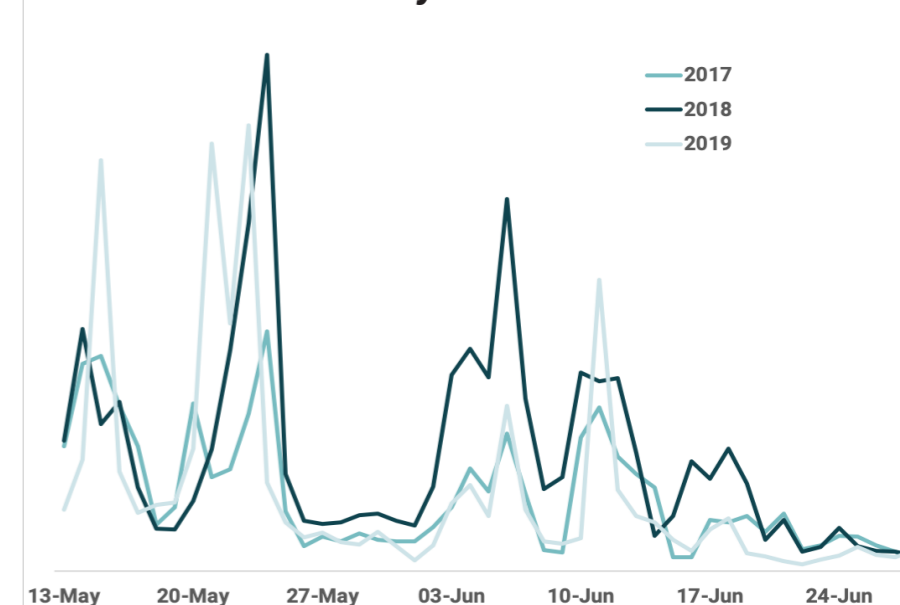
## Ofqual communications and public engagement

We continued our communications and public engagement campaigns to help students prepare for their exams, and to help parents and teachers to support them. This included providing information about the reformed qualifications, making appropriate tier entry decisions and practical advice for avoiding malpractice. Our materials also included information to explain how grade boundaries are set, how exams are marked, and how to request reviews of marking. We produced a range of resources, including films, [blogs](#) and social media activity, and held a Facebook live chat.

We also published a range of [materials](#) and [blogs](#) to help students avoid exam anxiety.

We actively monitored social media, so that we were aware of any potential areas of concern and were able to act accordingly. As in previous years, we saw posts which we queried with the relevant exam board, but many more where we did not consider it necessary to take any action (beyond continued monitoring).

**Chart 2**  
Social media activity about summer exams



## Exam entries

Schools and colleges are responsible for submitting entries to the exam boards for each exam or assessment their students will take.

In May 2019 we published statistics on provisional exam entries for GCSE, AS and A level qualifications. This showed the following:

- GCSE entries in 2019 (5.2m) increased by just under 1% compared to 2018
- entries in EBacc subjects increased (by 4%) and entries in non-EBacc subjects decreased (by 9%) compared to 2018
- A level entries in 2019 (0.75m) dropped slightly, by 2% from 2018. This follows a similar reduction in 2018, where overall entries fell 3% from 0.79m in 2017 to 0.76m
- AS entries (0.12m) continued to fall (almost 60% fewer than 2018). This continues the trend seen in 2016, 2017 and 2018. This is partly because new AS qualifications are stand-alone qualifications in England (meaning students do not have to take an AS as part of a reformed A level)

## GCSE combined science and modern foreign languages (MFL)

Ahead of the entry deadline for the summer 2019 exams, we issued an open letter to heads of schools and colleges to reiterate the importance of considering tier entry very carefully. In 2018 around a third of schools had some higher tier students who were awarded a grade 3-3 in combined science, but many more had students who benefited from the wider grade 4-3 – or 3 for MFL – that exam boards awarded as an exceptional arrangement. These exceptional arrangements were made to avoid thousands of students who would have been more appropriately entered for the foundation tier being ungraded.

We wrote to all schools and colleges to emphasise that the arrangements in 2018 would not be repeated in summer 2019. Exam boards also contacted those schools and colleges that were affected in 2018 to support them in making appropriate tier entries for summer 2019.

We recommended that students who were predicted to achieve a grade 4-4 or 5-4 in combined science, or grade 4 in MFL, should be entered for foundation tier.

Our analysis of the entry data ahead of summer 2019 suggested that most schools and colleges responded to the advice provided by exam boards and us, and made appropriate entry decisions.

## Applications for adjustments to exam arrangements

Exam boards make adjustments to some exam arrangements for students who would otherwise be unfairly disadvantaged due to a disability, illness or injury at the time of their exams. They refer to these as 'Access Arrangements'.

Access arrangements for students who were ill or injured or experienced an event outside of their control, are known as Special Consideration. But any student with a disability (ie a physical or mental impairment that has a substantial and long-term negative effect on their ability to do normal daily activities as defined by the Equality Act 2010) is legally entitled to reasonable adjustments, which are also administered through the exam boards' access arrangements process. Individual students may require more than one form of access arrangement.

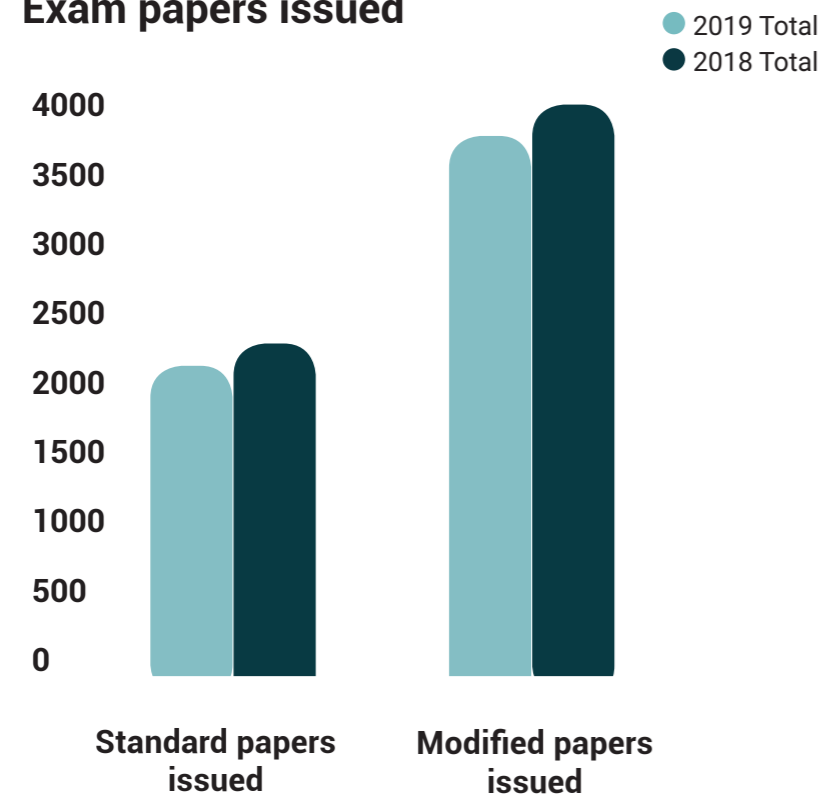
In November 2019 we published statistics on access arrangements for GCSEs, AS and A levels during the 2018/19 academic year. These showed that there were 404,600 approved access arrangements, up 3.4% on 2017/18. And 91% of all schools and colleges had approved access arrangements for one or more of their students this year, a similar percentage to last year. There were 58,245 requests for modified papers in summer 2019, up 16.5% on summer 2018.

It is right and only fair that our exam system allows disabled students to have reasonable adjustments to the way they take their assessments so they can demonstrate their knowledge, skills and understanding alongside their peers. Nonetheless, we again note with concern the further increase in the number of students being granted extra time. This is up 9.2% from 2018 (when we also saw an increase of 5% from 2017). From 2020 we have requested that the exam boards provide us with more granular data to give us better visibility of the extent to which the system is operating as intended. We are pleased that the [Malpractice Commission](#) has similarly identified and made recommendations about how JCQ, and we, should improve our data collection in this area.

## Question paper production

Exam boards typically write assessment materials for upcoming exam series, including question papers, stimulus materials, and mark schemes, a year or more before the exams take place. We require exam boards to produce assessment materials which are clear, appropriate and fit for purpose. In 2019, exam boards issued a total of 6,304 question papers. This comprises 2,199 standard question papers and 4,105 discrete modified question papers.\*

**Chart 3**  
Exam papers issued



During the 2019 exam series we were made aware of some questions that were similar to questions which appeared in past papers, other qualifications' past or sample papers, or textbooks. We do not consider the occasional use or adaptation of previous questions, necessarily, to be an issue. However, we do expect exam boards to ensure that the assessments they produce do not infringe copyright and that they give full consideration to the context of any replication, to ensure it does not impact negatively on public confidence or on fairness to all students.

\*Exam boards issue more modified papers than standard papers as they create different types of paper for different disabilities.

## Replica questions

WJEC notified us that its Principal Examiner noticed that an unseen piece of music (score and audio extract) in the summer 2019 paper and 2 of the sub-questions were similar, although worded differently, to a task within an unendorsed AS textbook. WJEC conducted statistical analysis of student responses and found no evidence that the item functioned unusually.

OCR identified a number of tweets indicating that nearly 30% of the questions in 2 of its GCSE foundation chemistry papers were similar to a Pearson sample paper. OCR reviewed the questions and noted some similarity. However, OCR was assured that the items and the papers, as a whole, were sufficiently different to be considered a valid assessment.

Pearson identified that 1 question in its GCSE mathematics paper and 1 question in its GCE mathematics paper were similar to questions contained within an AQA text book and a Pearson international A level paper, respectively. Pearson performed statistical analysis to understand how students performed and found no evidence that the items functioned unusually.

Each exam board investigated how this had occurred and has put in steps to prevent re-occurrence.

## Difficulty of Pearson A level maths

Students raised concerns about the level of difficulty of some of Pearson's A level mathematics papers. We closely monitored the steps Pearson took in awarding A level mathematics to ensure the fairest outcomes for students. We also considered the demand of Pearson's 2019 papers in the context of our investigation into all exam boards' A level maths grade boundaries set in 2018 and 2019. Pearson has now [published information](#) on how it plans to improve the accessibility of its maths papers for 2020 onwards.

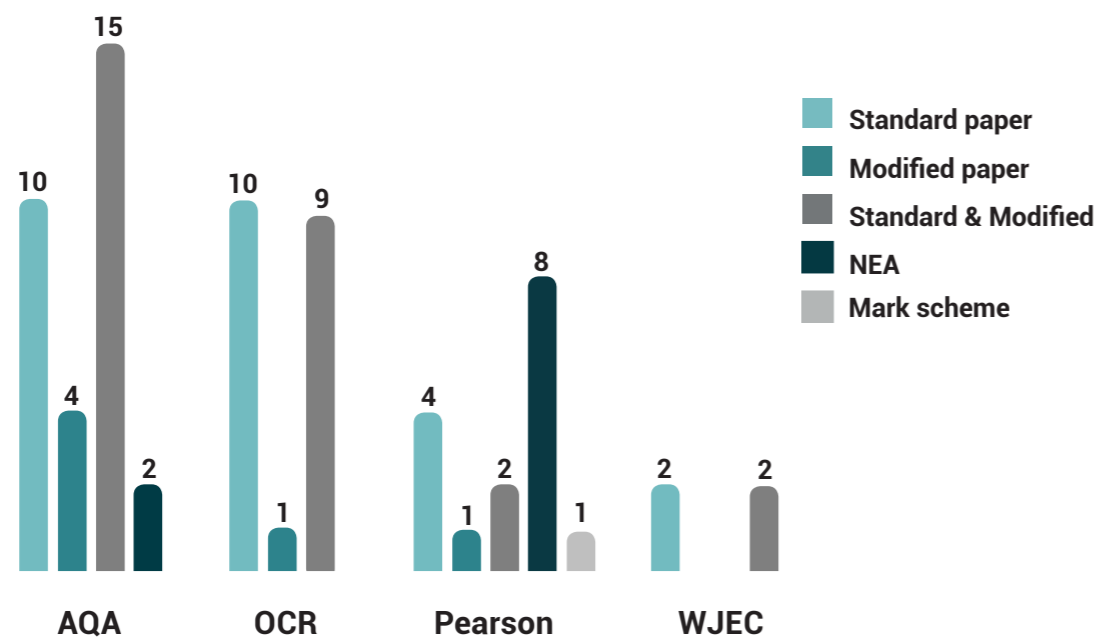
## Assessment material errors

Errors can affect a student’s ability to answer questions as intended or cause confusion about how to undertake tasks and this might cause students unnecessary stress in the exam. Likewise, errors in mark schemes can lead to students being awarded incorrect marks.

We followed up on each of the 90 errors that occurred in 2018 with the exam boards concerned. Each exam board had to tell us the cause of the error(s) and the steps they were taking to prevent reoccurrence in 2019. While we were pleased to see a 21% reduction in errors this year it was still disappointing to see 71 errors identified in question papers, non-exam assessments (NEA) and materials in 2019. However, we do not consider the impact of the majority of the errors in 2019, once mitigated, was not significant.

Chart 4 shows the number of errors that appeared in each board’s standard or modified papers (or associated materials, NEA tasks or mark schemes)

**Chart 4**  
All assessment material errors by exam board



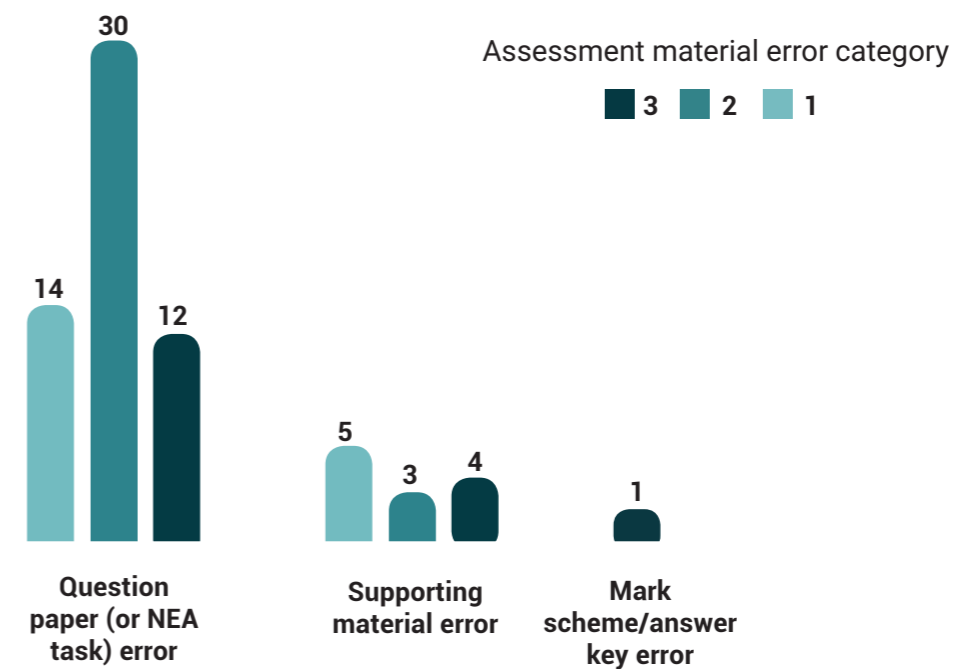
We categorise all errors by their potential level of impact before the exam board applies any mitigation.

## Total errors by category

<b>Category 3</b> assessment material errors which will not affect a learner’s ability to generate a meaningful response to a question / task	17
<b>Category 2</b> assessment material errors which could or do cause unintentional difficulties for learners to generate a meaningful response to a question / task	33
<b>Category 1</b> assessment material errors which could or do make it impossible for learners to generate a meaningful response to a question / task	21

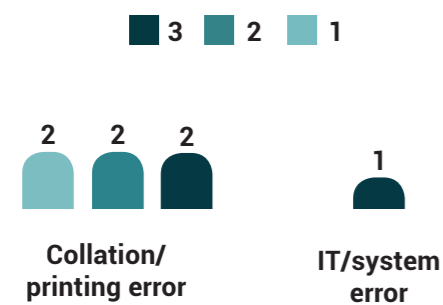
Chart 5a shows the categories of errors in the different types of assessment materials.

**Chart 5a**  
Where error appeared by category



**Chart 5b**  
Reason for errors

Assessment material error category



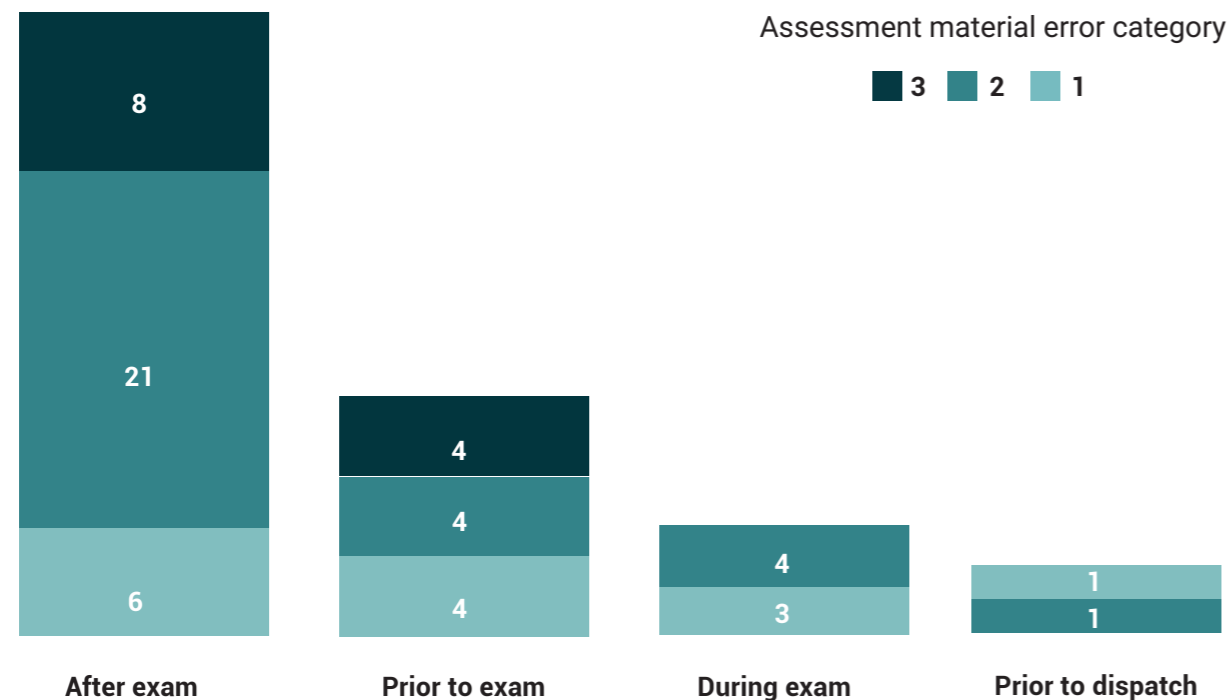
Some of these errors were introduced during printing. This meant that the questions did not necessarily contain errors but may have been presented in the wrong order, alongside incorrect information, or been difficult to understand.

**Question paper errors**

Of the 2,199 standard question papers\* produced by exam boards, 98% were error free and not all of the errors that did occur affected all of the students taking the assessments. However, we expect all papers to be created without errors and that any errors are identified before the exams are sat.

A third of the errors were identified by the exam boards before exams took place. But a number of errors were reported by students or school/college staff during, or shortly after, the exams. Others were identified during marking or reviews of marking.

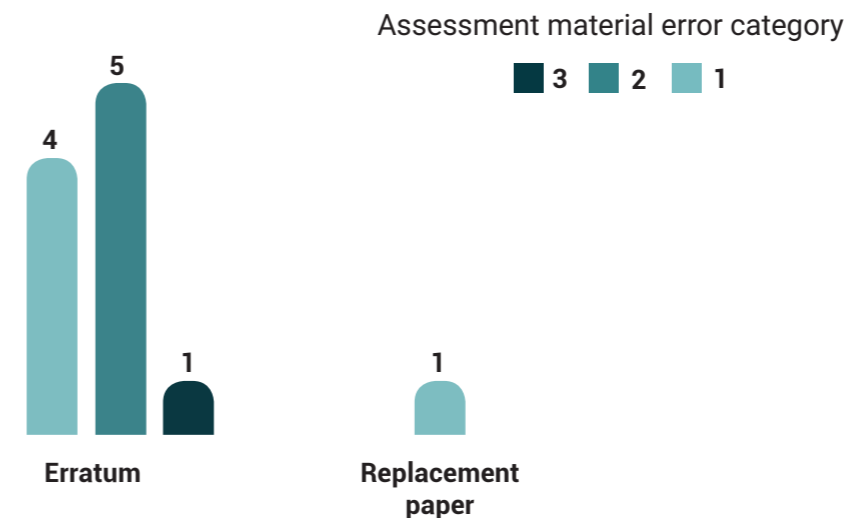
**Chart 6**  
Question paper errors by time identified



Where possible, exam boards will replace the assessment papers or issue a correction (known as an 'erratum' - see definition on p6) ahead of the exams being taken. In summer 2019, 10 errata were issued and 1 paper was replaced, prior to dispatch, due to an error.

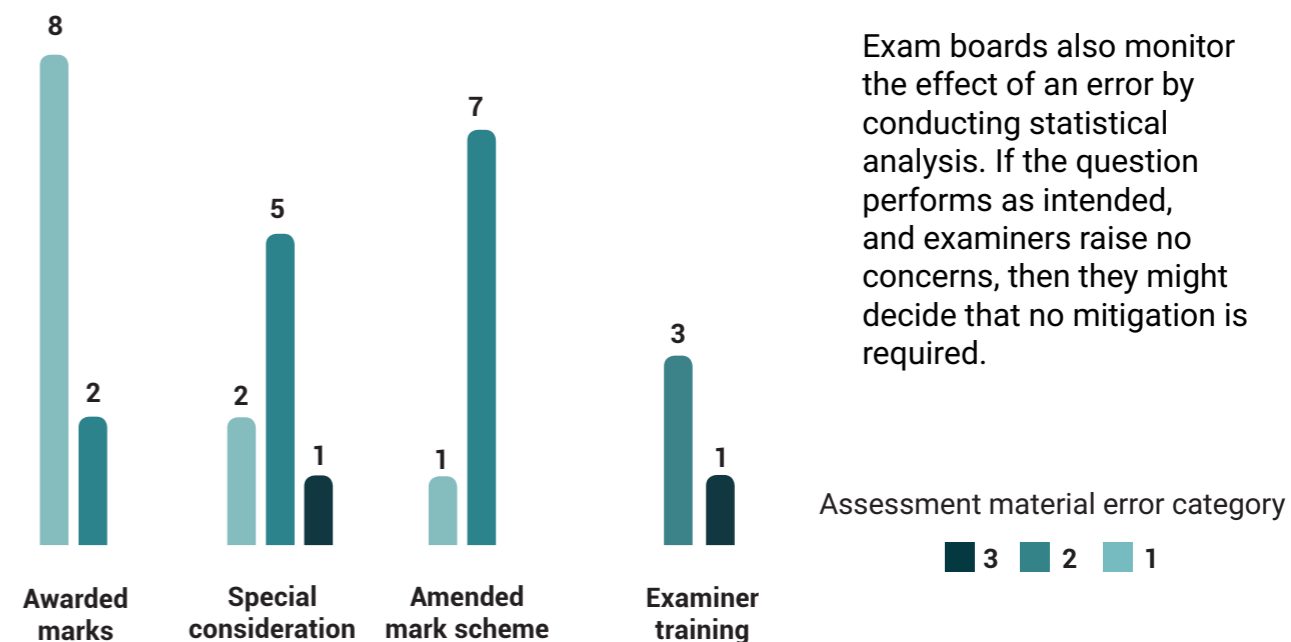
\* Question papers refers to time tabled exam papers

**Chart 7a**  
Mitigation for errors found before exams, by category



Where an exam board does not identify an error before the exam takes place we expect it to consider the possible impact of the error and to mitigate the effect of it as far as possible. Exam boards advise examiners to flag any unusual answers or those which suggest students were confused. Where exam boards consider, or have evidence to suggest, the error caused confusion or impacted on students' performance they might adjust the mark scheme to take into account different possible responses, or award the mark or marks to all students. In some cases, for example where the error affected a modified paper, they might give Special Consideration. Exam boards might put in place multiple mitigations in some instances.

**Chart 7b**  
Mitigations for errors that could not be corrected prior to exams, by category



Exam boards also monitor the effect of an error by conducting statistical analysis. If the question performs as intended, and examiners raise no concerns, then they might decide that no mitigation is required.

Assessment material error category

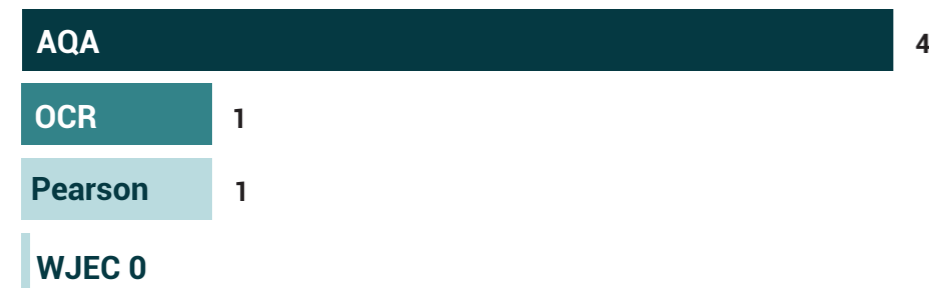




## Modified paper errors

Exam boards also notified us about errors that appeared only in modified papers. Last year we saw 16 errors in modified papers. This year, we were pleased to see a significant reduction, with only 6 errors identified. These errors were introduced during the modification process, therefore they did not appear in the standard versions of the paper.

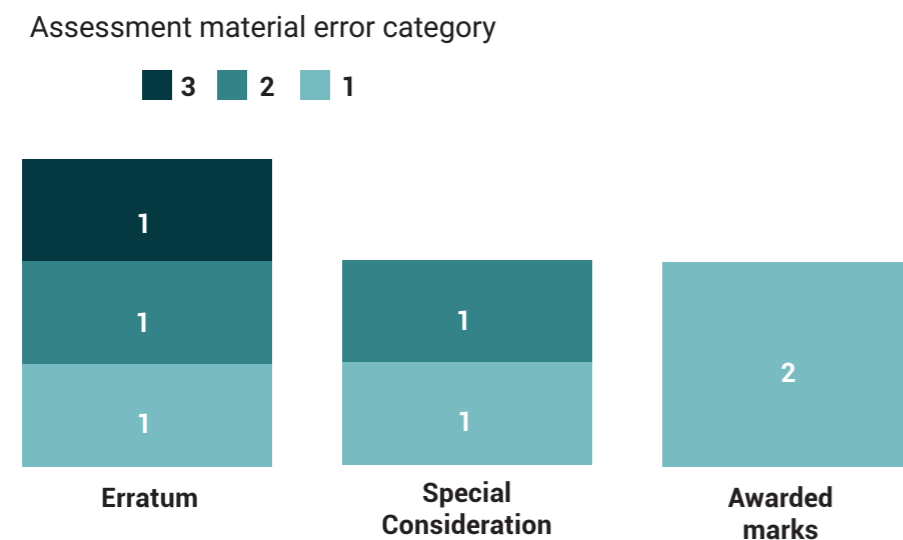
**Chart 8**  
Number of modified question paper errors



Exam boards consider how best to mitigate the effect of these errors.

For example, an error in a Braille paper made a question unanswerable. A school alerted the exam board to the error shortly before the exam took place. The exam board notified other affected schools and colleges of the error before the exam was due to start but did not have time to correct it or to issue an erratum. Instead it removed the question and awarded the marks to all affected students. The exam board gave Special Consideration to those students who the school or college identified were additionally affected by the error.

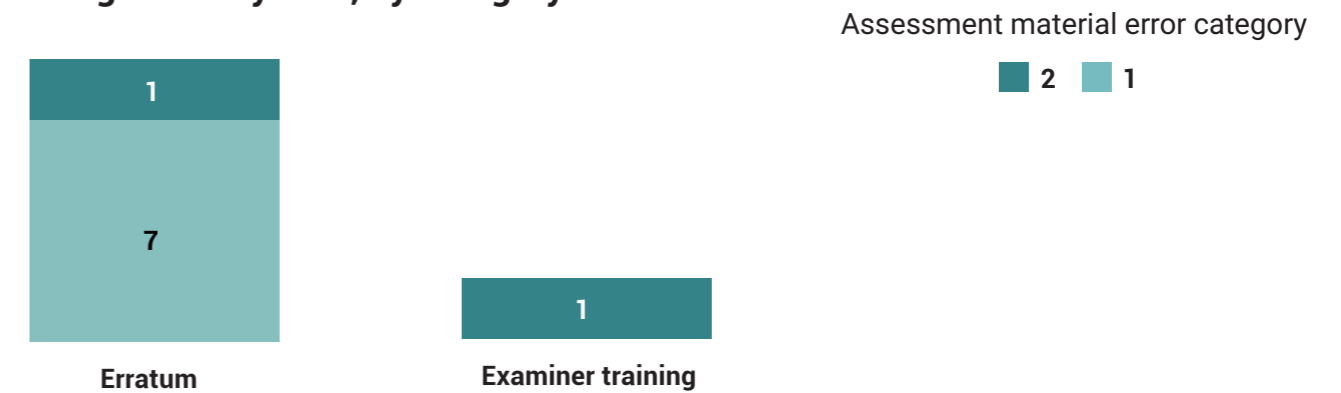
**Chart 9**  
Mitigations for modified paper errors, by category



## Non-exam assessment (NEA) errors

This year 10 errors appeared in the non-exam assessment tasks or in the associated instructions. A number of these were a recurrence of an issue seen last year, where the sequencing grids for some modern foreign language spoken language tests were incorrect. The sequencing grid ensures that each student is tested on the required content, sampling from a number of themes. In other instances, some teacher and/or student prompts were missing from the assessment cards.

**Chart 10**  
Mitigations by NEA, by category



## Supporting material errors

A small number of errors this year appeared in supporting materials or in instructions for schools and colleges or examiners, on the front cover of a question paper, or in the mark scheme.

## Phase 2: Exam delivery

### Question paper dispatch and storage

It is in everyone's interests that the security of papers is maintained, so that the exam system is fair for all students. Schools and colleges normally receive exam papers and supporting materials some weeks before the exams are taken.

Exam boards set out how schools and colleges must store and open packets. For 2019, [JCQ produced a video](#) to explain the process school and college staff must follow. It set out 3 key points:

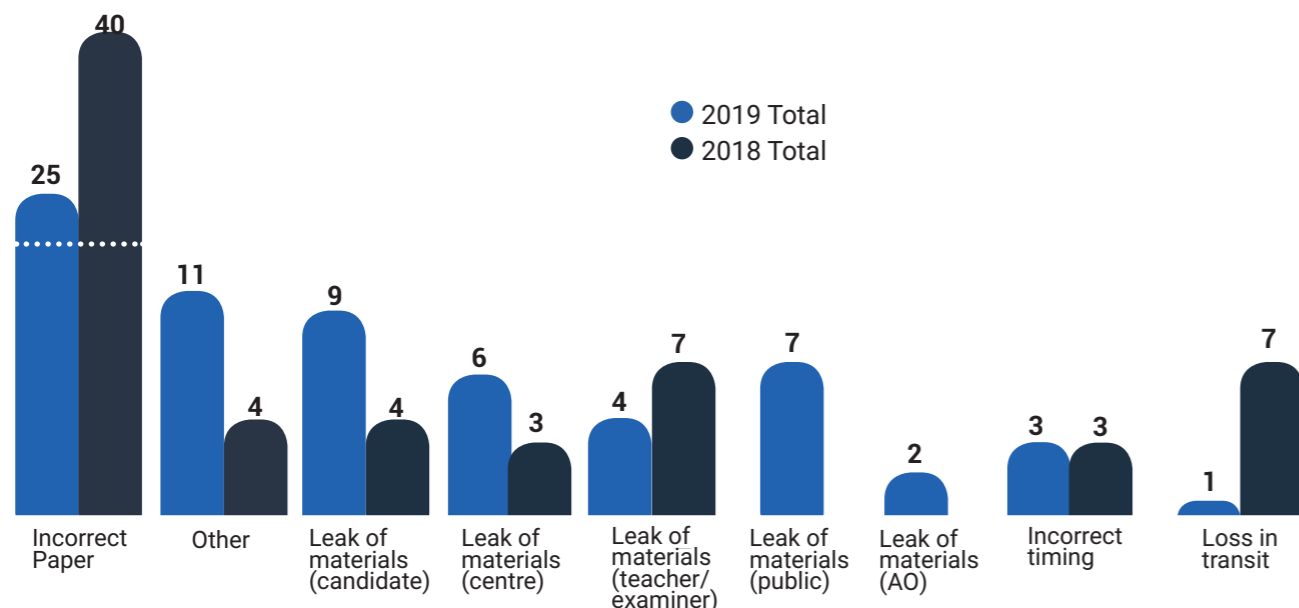
- papers must be stored securely at all times
- 2 people must check the time, date and any other relevant information before each packet is opened, and sign to say they have done that
- packets should only be opened within 60 minutes of the published start time (either 9.00am or 1.30pm)

Despite this, a small number of mistakes were made. Mostly, the error was quickly spotted, but in other cases, exam papers were given out by school or college staff at the wrong time and/or to the wrong students.

### Security breaches

We ask exam boards to tell us when there has been an actual security breach, as well as when there was the potential for a security breach which was contained. Where a breach happens, we expect the affected exam board to investigate the extent of the breach, if any, and take all reasonable steps to mitigate its impact.

**Chart 11**  
Types of security breaches



## Pearson A level mathematics

In 2017 and 2018 Pearson launched investigations into allegations that the security of some of its A level mathematics papers had been breached. Following these investigations, Pearson introduced some additional security steps to safeguard these papers at a number of schools and colleges and to help it identify the source of a breach of security should one occur. This summer, shortly before one of the papers was due to be taken, Pearson identified evidence of a security breach on social media. And as a result of the safeguards Pearson had put in place, it was quickly able to identify the source of the leak, and to identify students who were most likely to have had prior access to the materials. We monitored Pearson's ongoing investigation and subsequent sanctions placed on staff and students. We monitored its analysis of the results and the actions it took to make sure students were treated fairly. We were satisfied that Pearson took appropriate steps to secure the delivery of the 2019 exam and recognised that some of the preventative steps it took had helped it to quickly identify the source of the leak.

## AQA GCSE French & A level sociology

In April 2019, a centre reported to AQA that they had been sent details of 2 short videos posted to a user's Snapchat story. In the first video, AQA GCSE French and GCE sociology papers were visible. In the second video, the outer consignment package was visible with the address label.

AQA replaced the papers and arranged for the originals to be collected from the schools and colleges to which they had been sent.

AQA investigated the breach and the police later arrested and interviewed the individual believed to be the person responsible for taking the exam papers and sharing them on Snapchat.

## AQA GCSE religious studies

AQA was contacted by a number of schools and colleges to report that students had seen one page of a GCSE religious studies question paper on Snapchat. This happened over the weekend before the exam was due to take place.

AQA conducted statistical analysis to try and identify any geographical area or particular school or college(s) that appeared to have been advantaged. However, the data did not indicate any anomalous performance. AQA identified some students who had had access to the Snapchat message in advance of the exam and provided them with estimated marks.

The number of security breaches in 2019 equalled the number for 2018 (68). However many of these were isolated incidents where only centre staff saw the material. The number of security breaches for each exam board was in line with their market share. A small number of the security breaches resulted in confidential material being shared more widely among students or via social media.

### Incorrect papers

Ahead of 2019, exam boards put in place a new requirement for schools and colleges to keep a record of the 2 people who are required to be present when opening papers to check the correct papers are distributed. This was to reduce incidents where schools and colleges open (and sometimes distribute) the wrong papers, as the implications for individual students affected can be significant. It might mean that a student does not sit all the papers for a qualification and so some of their marks for the final grade are estimated or, if the paper gets breached, it might mean that the paper needs to be replaced or the exam moved. We also emphasised the importance of this with exams officers in a [webinar after the summer of 2018](#).

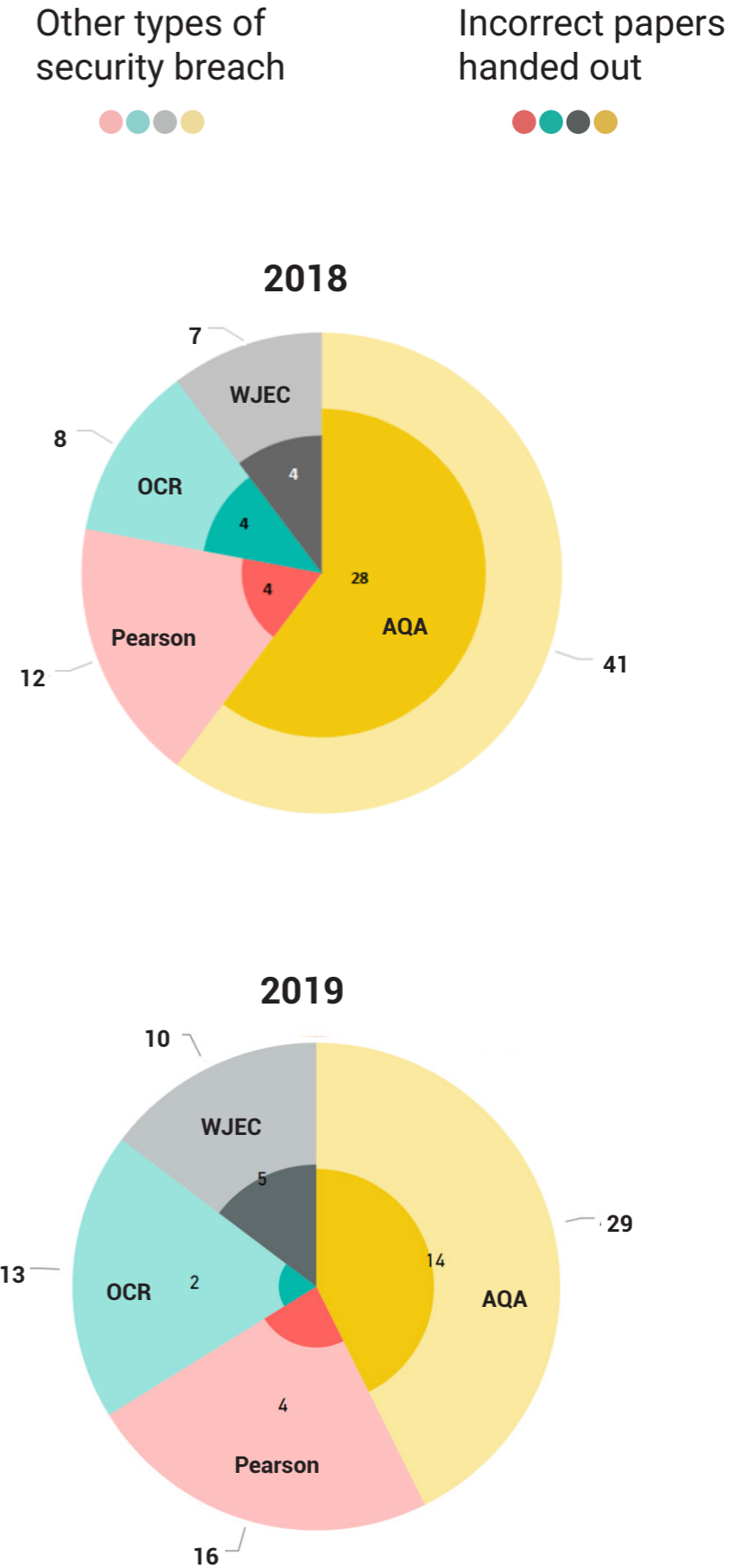
In 25 cases the security breach was due to schools or colleges opening, and sometimes handing out, the wrong exam paper. This is a considerable reduction on the number reported in 2018. This is possibly a reflection on the new requirement to have 2 people evidence they were present to check that the content was correct when paper packages were opened. In nearly half of cases where the incorrect question paper packet was opened, 2 people did evidence that they had checked the papers. However in some instances the staff were inexperienced or not clear about the purpose of the check.

### Sharing of confidential material on social media

The use of social media and digital messaging can mean that a security breach in one school is more difficult to contain, as confidential information can be more easily disseminated.

This year, we saw several instances of individuals on social media claiming to have copies of live papers, and in some cases offering them for sale. The exam boards followed up all the posts that we, and they, identified. Where exam boards were able to identify students, they sanctioned those students who had requested or had shared the information.

**Chart 12**  
Nature of security breaches

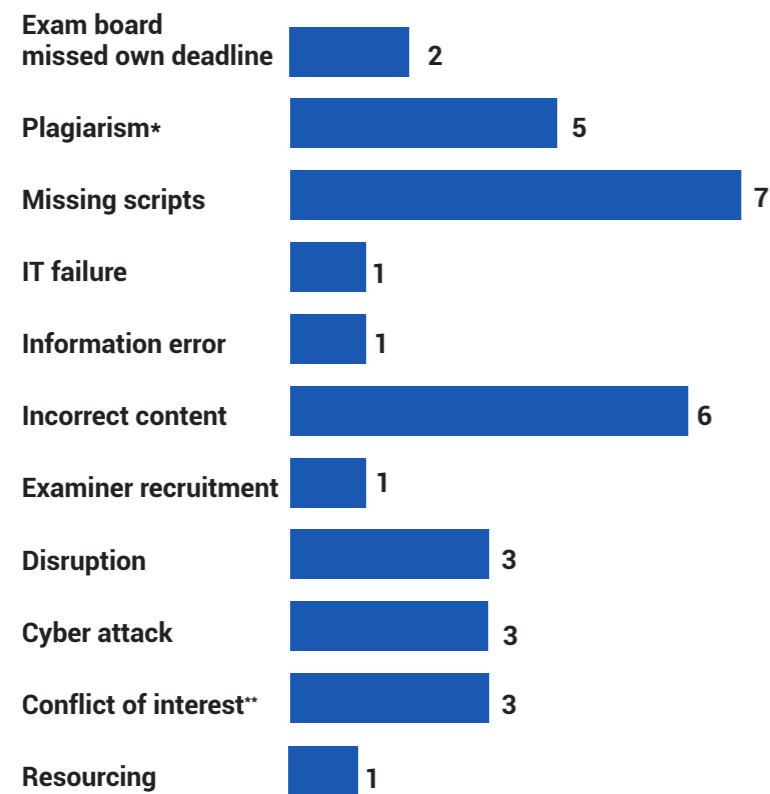


We also saw an increase in the number of [social media posts offering fake exam materials for sale](#). We are concerned that such practice fuels exam anxiety and undermines confidence in the exam system. Exam boards reported relevant matters to [Action Fraud](#).

## Exam delivery failures

This year we were notified about 33 events that compromised, in different ways, aspects of the delivery of an exam. This compared to 3 events in 2018. This increase is largely because exam boards are clearer about what they should notify us about and because we have updated our system to better categorise such delivery issues (last year we might have categorised a number of these as 'other' events). These issues included a small number of cyber-attacks on schools or colleges, including the use of ransomware, which affected assessment materials that were being stored electronically and a small number of missing scripts. We were also notified about 7 instances where a school or college failed to teach students the correct content or entered them for an incorrect version of the qualification.

**Chart 13**  
**Delivery failure, by type**



\* See pages 10/11

\*\* See page 30

## Malpractice

Everyone involved in the delivery of an exam has a role to play in preventing and reporting malpractice, whether they are teachers, students or examiners. JCQ's [independent commission on malpractice](#) recognised this in its comprehensive set of recommendations.

Exam boards require schools, colleges and their own examiners to report all suspected incidents of malpractice and to cooperate with any subsequent investigation. We take allegations of malpractice very seriously and we expect exam boards to do the same.

Exam boards must investigate all instances where there are reasonable grounds for an allegation of malpractice. Where malpractice is proven, the exam board should take proportionate action against those responsible.

We do not require exam boards to notify us about all cases of suspected malpractice while they are still under investigation. They tell us only of the most serious issues, including those that might affect a number of students and/or other awarding organisations.

They must also provide us with data about the total number of investigations they are both conducting and have completed. For GCSEs and A levels we publish data on the number of offences and penalties imposed by exam boards.

We published these statistics in December.

This year, 3,040 penalties were issued to students, an increase of 11% from 2018 (2,735), and representing 0.02% of entries; the same proportion as last year. The most common type of student malpractice was the introduction of a mobile phone or other communications device into the examination room, the same as in previous years.

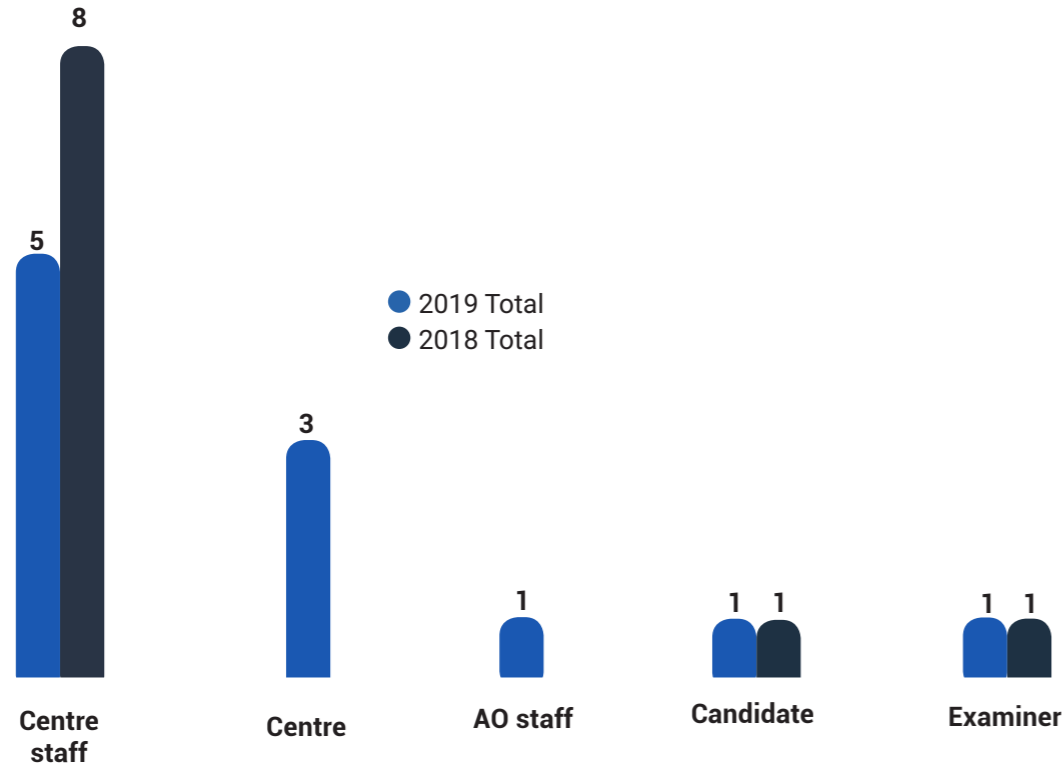
A very small proportion of the total number of staff in England (nearly 350K) received penalties (335, down from 650 in 2018). The largest proportion of penalties were for maladministration with breach of security the second most common type of offence.

We expect exam boards to prioritise the security of exam papers for 2020. We will continue to support them in this through our communications with schools and colleges.

## Exam board notifications of malpractice investigations

This summer, the exam boards notified us of 11 allegations or suspicions of malpractice under investigation, this compared to 10 notifications in 2018. As explained above, these notifications related to only the most serious concerns.

**Chart 14**  
Notifications of malpractice investigations



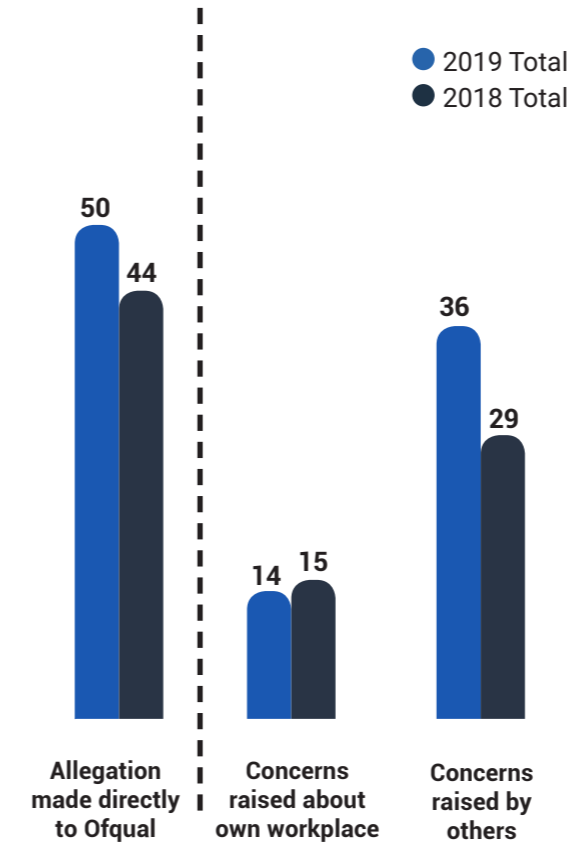
## Whistleblowers

In addition to those malpractice cases reported to us by the exam boards, we also received direct reports of alleged malpractice relating to schools and colleges from students, teachers, parents and others.

Anyone can tell us about concerns they have about exam or assessment-related wrongdoing. We always raise any allegation with the exam board in question. We do not provide the names of individuals who do not wish to be identified, but we share the allegations, where doing so will not lead to the person who raised the concern being identified. When we pass allegations on to exam boards about potential school, college or student malpractice we monitor whether they take appropriate action. We follow up where necessary to assure ourselves that the allegations were properly investigated and, if appropriate, that sanctions were applied. We will investigate any concerns regarding an exam board's approach.

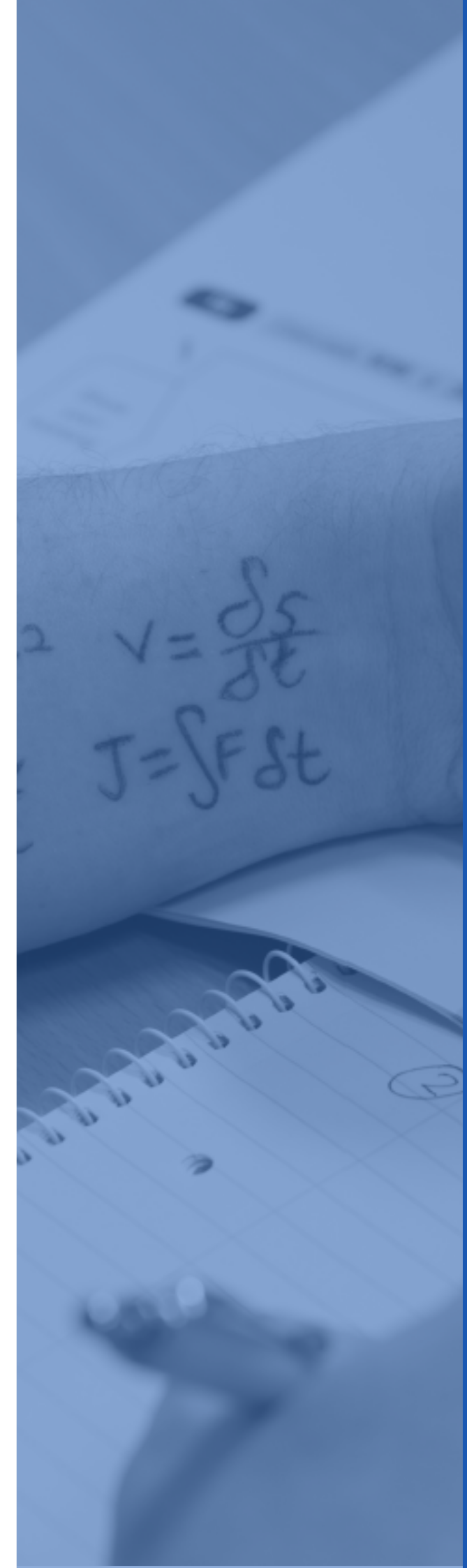
As in previous years, we will report our whistleblowing data for April 2018 to March 2019 in our 2019 Annual Report.

**Chart 15**  
Types of allegation



## Ongoing work to tackle malpractice

Tackling malpractice is an ongoing priority of our work. We will continue our efforts to prevent malpractice, working closely with exam boards, schools and colleges to protect the integrity of our exam system. In particular, we will focus our attention on raising awareness, amongst students and parents, of what constitutes malpractice; including communications about taking prohibited materials, such as phones, into exams and what students should do if they encounter real or hoax material on social media.



## Phase 3: Marking

Exam boards can mark students' scripts on paper and onscreen. Where marking is onscreen, it can be by item (an individual question or several related part questions) or at whole paper level. Marking at item level has advantages, in that many different examiners will mark part of each paper. This minimises the impact of any leniency or severity on the part of any one examiner on an individual student.

Each examiner's work is quality checked by their respective exam board to ensure their marking is consistent, and to the required standard. The types of check vary, depending on whether scripts are marked on paper or electronically (onscreen), as well as whether they are marked by question (item) or as a whole paper.

Where marking is onscreen, checking includes 'seeds' randomly included in the items given to each examiner to mark. These 'seeds' are real student responses for which senior examiners have previously agreed a mark. Examiners are required to mark these 'seeds' and the marks they award are checked. Examiners do not know which items are 'seeds'.

Where scripts are marked on paper, examiners send samples of their marking to a more senior examiner for checking.

If an examiner is not marking to the required standard they can be stopped from marking until they have had guidance from a more senior examiner. If they continue to mark to the wrong standard, they might not be allowed to continue marking at all. If so, their scripts would be given to a different examiner. In both instances, work that has already been marked by that examiner is checked and adjusted, if necessary.

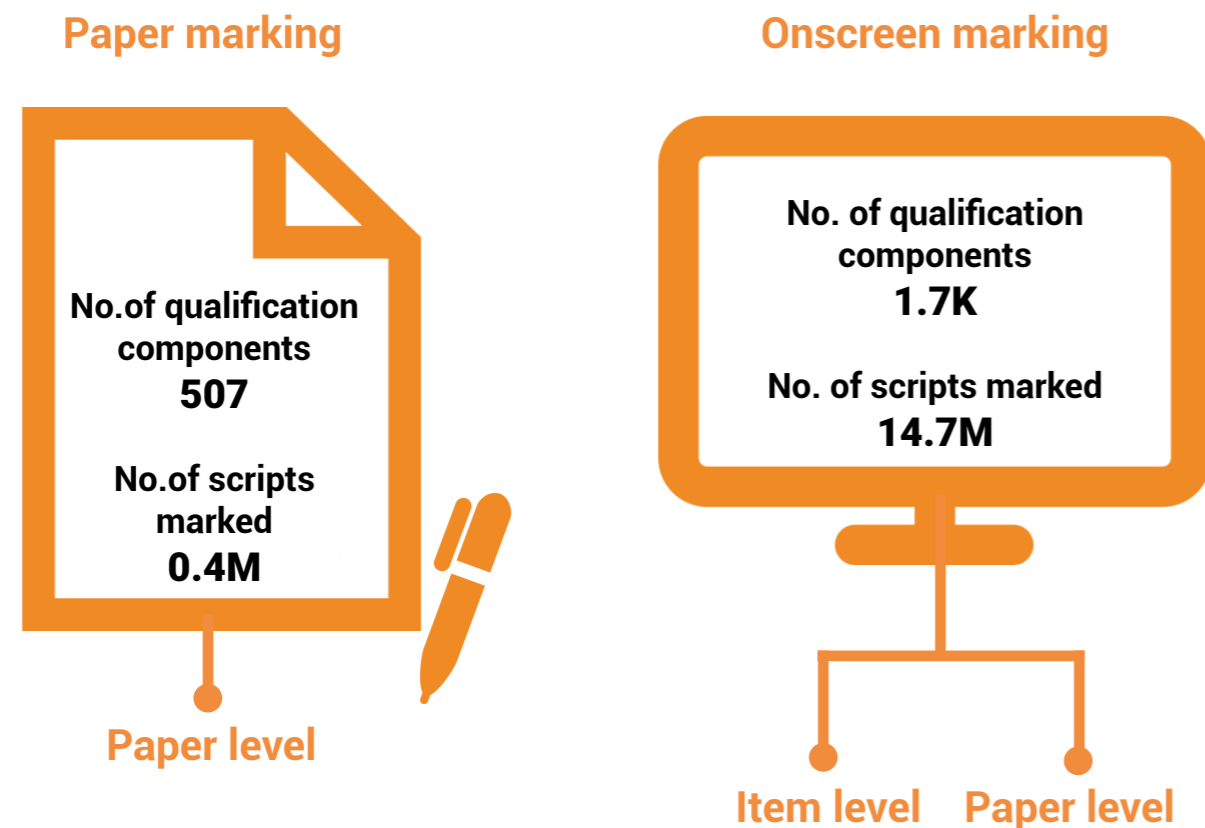


Chart 2 in the Annex to this report provides more information.

## Improving quality of marking

We use a range of information to assess how exam boards ensure quality of marking. For example, we evaluate marker monitoring data to produce consistency metrics, and we monitor review of marking data. We also conduct examiner surveys to gain insight into examiner profiles. We share information and metrics with exam boards which highlight areas where we consider there might be room for improvement.

Ahead of the summer 2019 series, each exam board told us what it was doing to enhance its overall quality of marking. We will continue to monitor exam boards' efforts in this area and to monitor their quality of marking.

## OCR examiner recruitment

A reporter applied online to mark OCR A level papers. The reporter made 2 applications under 2 separate names, supplying a false education history and claiming to have teaching qualifications. The reporter claimed that they were accepted as an approved assessor, giving them access to exam scripts. OCR clarified that the reporter had got as far as joining a list of potential examiners. Access is restricted at that stage to a separate administrative portal; it is not the online marking platform where examiners mark real papers. Only examiners who have passed through training tests and are invited to examine have access to the online marking platform.

In July, OCR introduced a requirement for information about applicants' eligibility to work in the UK. OCR has also now introduced a reference check.

## Sunday Times story

Just ahead of A level results day, the Sunday Times published a story stating that 'teenagers who sat essay-based A levels may be awarded the "wrong" grade when results come out on Thursday because of inconsistent marking'. This fundamentally misrepresented research that we had conducted and we published a [rebuttal to the article](#).

## Monitoring exam board standardisation

Each year we observe a number of standardisation events to ensure that they deliver the outcomes that we expect. This year we attended 28 events across all 4 exam boards; 13 GCSEs and 15 A levels. Where we identified concerns we followed these up with the exam boards.

## 'Secret examiner'

An anonymous individual, claiming to be a GCSE English language examiner, raised concerns about AQA's quality of marking in, some, now deleted, messages on Twitter. They alleged that there were issues with the standardisation for the English language GCSE. The tweets received [some media coverage](#).

As a result of these concerns, we considered AQA's GCSE English language standardisation materials including the scripts selected for use during the standardisation meetings. We asked subject experts to review these materials and to compare them with the materials used in 2018. The subject experts found no evidence to support the anonymous claims.



## Managing conflicts of interest

Exam boards collect information from examiners about who they work for and about relatives who might be completing exams that year. They log the information to manage any potential conflict of interest.

This process relies on examiners making full and complete declarations and on the exam boards' processing that information properly. We became aware of a small number of examiners who had not fully understood what they should declare. The exam boards in question were alerted to this and quickly dealt with it.

During the marking period, an examiner also contacted us directly to report that they had been asked to mark multiple responses from students at a school or college for which they had recorded a conflict of interest. We asked the exam board to investigate this allegation and it identified a number of instances where this had occurred on its online marking system. Another exam board also alerted us to a similar issue with its online marking system. These 2 exam boards checked all marking that had already occurred and put in place additional, manual checks to ensure that all remaining marking was completed by examiners who had not declared any personal interest in the outcome.

Although the exam boards concerned were able to check and correct the problem, we will seek further assurance that the exam boards have put in place sufficient steps to prevent this recurring. We will also ask all exam boards to review the advice they give to examiners about what they must declare and to check that this is being properly understood and managed.

## Adjustments to marks

In the event that a student misses an exam or is affected by an event that could impact on their performance in an exam, exam boards can adjust the marks a student has been given. In both types of case, the student must have been affected by an event outside of their control, such as illness, injury or bereavement at the time of the assessment. Such an adjustment is a form of Special Consideration.

Where a student is absent from an exam for a reason beyond their control, the exam board will determine the grade for the qualification based on the student's performance in any other assessments for the subject. Exam boards refer to this as an 'assessed grade' or a 'calculated grade'. The exam boards normally require a student to have taken at least 25% of the overall assessments for the qualification before they will award an assessed/calculated grade.

We have separately published statistics about Special Consideration in GCSEs, AS and A levels. In total, there were 590,855 Special Consideration requests, down 4% from 2018. There was an approved special consideration request for 3% of all assessments. 95% of the total approved requests are for mark adjustments. A lower proportion of candidates received a mark adjustment of the highest tariff (5%) in 2019 than previously, but there was a small shift towards the awards of 3%, 4% or 5%: 60% in 2019 compared to 56% in the previous two years.





## Phase 4: Setting and maintaining standards

We closely monitor standard setting in GCSEs, AS and A levels. We expect very close comparability of grade standards between different exam boards and between different specifications in any one subject.

Before results are issued, exam boards send us data from their GCSE, AS and A level awards, detailing the results against statistical predictions of the proportions of students likely to achieve the key grades.

Our aims in this monitoring are to:

- maintain standards year on year
- align standards across exam boards in a subject
- secure public confidence in the results being issued

In August, we published a [summary of our 2019 monitoring work](#). We have also published a separate report on our work to monitor standards in 2019.

## Phase 5: Post results

### Incorrect results

We expect exam boards to mark all assessments accurately and to issue results which reflect the performance of each student. However, we recognise that it is possible for errors to be made and so it is important that exam boards can recognise an error and correct it. An incorrect result could arise from a processing error, from incorrect adding up of marks, or a marker's unreasonable exercise of academic judgement. We take the issue of incorrect results, regardless of their cause seriously. We have reported separately on the numbers of incorrect results corrected following a review of marking or moderation.

### Processing errors

Exam boards can also identify processing errors while dealing with review of marking requests, carrying out internal reviews, or responding to complaints. They must notify us when they have issued incorrect results because of such an error.

The small number of processing errors, about which we were notified this year, largely occurred while the exam boards were applying manual mark adjustments for Special Consideration or to address confirmed malpractice or were due to IT or scanning issues.



7 Human error



10 Process weakness



3 IT system error



3 Third party related issues

## Reviews of marking and moderation

The focus of reviews of marking and moderation and appeals is on correcting marking errors. Marks should not be changed for any other reason.

We require each exam board to ensure that the marks awarded reflect the performance demonstrated by a student and that its markers apply the mark scheme consistently. However, in subjects such as English, it can be the case that two markers, exercising their academic judgment reasonably and without making any mistake, could award different marks to the same student's answer. Both of these marks are legitimate.

If a school or college is concerned that there has been an error in the original marking then they can ask for that marking to be reviewed. Our rules require an exam board to review the original marking to identify if a marking error has occurred, but the paper is not marked again (remarked). Where the exam board identifies a marking error it is required to correct the error (marks may go up or down). However, a mark that reflects a reasonable application of the mark scheme and of the examiner's academic judgement should not be changed.

If an exam board discovers, as a result of a review or by any other means, that there has been a failure in its assessment process (for example, that a particular marker was consistently not marking in line with expectations) then we require the exam board to correct or mitigate the effect of that failure.

### AQA & OCR 2018 reviews of marking

We became aware in September 2018, through a review of OCR and AQA's appeals processes, that some reviews of marking and moderation by these boards had been completely, or partly, carried out by the same person who conducted the initial marking or moderation.

We took action in response to this and [AQA](#) and [OCR](#) each provided us with an Undertaking and Action Plan to ensure that their arrangements for reviews of marking and moderation in 2019 were compliant with the Conditions.

## Summer 2019 outcomes

We have published official statistics on reviews of marking and moderation in GCSEs, AS and A levels for summer 2019. This year, at GCSE, the proportion of reviews requested and subsequent grade changes has remained consistent with 2018. We note that 5.4% of all GCSE grades awarded were challenged and 1.1% of grades awarded were changed but that 79.8% of grades challenged did not change.

At GCE 7.4% of all grades (including AS and A level) awarded were challenged and 1.5% of grades awarded were changed (up from 5.6% and 1.2% respectively in 2018). 20.4% of all grades challenged were changed (down from 21.0% in 2018). However we note that there has been a significant increase in requests for a review of marking at A level, particularly in mathematics. It is likely that this may in part be due to the linear structure of reformed A level mathematics, and the decoupling of AS, as students no longer have the opportunity to seek a resit of particular components as they would have done in the legacy qualification. However we also note the proportion of successful reviews across all subjects at A level. We will conduct work early in the New Year to understand the reason for this increase.

In 2018, we saw a large rise in requests for a review of moderation, often resulting in a significant grade change. We considered that the increase might reflect both teacher and moderator unfamiliarity with the number of new GCSEs containing non exam assessment and assessed for the first time in 2018. We consider that the reduction of requests for a review of moderation may reflect that teachers and moderators have become more familiar with the qualifications in their second year of teaching. In April 2019 we wrote to exam boards to reiterate our expectations with regard to their conduct of reviews of moderation. We will explore the extent to which changes they have made, account for the reduction in grade changes following a review of moderation this year.

Before the summer we told the exam boards that we now expected their approach to reviews of marking and moderation to be fully embedded. As a result we told them that we would consider the outcomes of reviews to be one of the indicators we would use to measure their quality of marking. We will conduct work early in 2020 to understand the extent to which mark corrections (following a review), in both GCSE and A level, suggest issues with an exam board's quality of marking or whether it suggests the way in which they have conducted their reviews is not in accordance with our rules. We will also consider a number of reviews that resulted in no change, to ensure that exam boards are finding, and correcting, errors.

### Review of grade changes

In 2018 we identified that more GCSE grades were changed that year than in 2017, following a review of moderation. This suggests either that there was an issue with the original moderation or the review process. We conducted a review of those subjects where there was a particular pattern of grade changes following requests for a review of moderation. We will share our findings with the exam boards and expect them to put in place any necessary improvements.

## Conclusions and next steps

The 2019 exam series was successfully delivered; 138 reformed qualifications were awarded, with marking completed and results announced on time. 6.19 million certificates were awarded to 1.3 million students. We are now looking ahead to next summer.

We wrote to exam boards in November setting out the follow up work we expect them to conduct ahead of 2020. We are awaiting the outcomes of exam boards' own investigations into some specific events. These will inform our responses to these matters.

### Ongoing work to tackle exam malpractice

We welcome the recommendations made by [JCQ's independent commission into malpractice](#). Some of the recommendations support work that we have underway, for example improving the granularity of the access arrangements data exam boards provide to us. Over the next year we will continue our work to ensure that exam boards are effectively preventing and investigating malpractice.

### Question paper security

The current system of exam paper delivery and exam administration has been in place for many years. But the context and environment in which exams are now delivered has evolved. The increased 'value' of qualifications has led a small number of individuals, who take advantage of weak controls or chance opportunities, to share confidential materials. The continued growth of smart devices has increased the opportunity to quickly and discretely capture information and the reach of social media means that materials can be shared quickly and widely. Platforms such as Snapchat and WhatsApp, alongside the dark web, mean that materials can also be shared privately.

While exam boards have introduced small changes year on year to tackle some of these risks, we consider that the time has come for exam security arrangements to be fundamentally reviewed. In September we called a summit of the exam boards and their representative body, JCQ, during which we shared our concerns. We discussed our consideration of the key areas of risk in the exam paper lifecycle. We asked them to consider additional safeguards and alternative approaches to exam administration.

We have looked to Ireland and other sectors to consider options for increasing the security of exam administration in England. We have talked with some of the main social media companies to explore ways they can help to tackle the sale of real or fake papers online. We are also planning to introduce additional guidance to support our existing requirements for preventing and dealing with malpractice.

The exam boards, and JCQ, have now provided us with their short and longer term strategies to reduce the risk of exam paper leaks in the future. The first of these changes were introduced or piloted during the November 2019 exam series and will continue to be rolled out during 2020 and onwards. These include:

- improving the approval process for schools and colleges who wish to deliver exams
- improving ongoing monitoring and inspection of how exams are delivered in schools and colleges
- applying a risk-based approach to question paper delivery; including
  - improving packaging and tracking information
  - reducing the amount of time that schools and colleges have to store secure materials
  - reducing the number of late dispatches
  - making changes to the exam timetable to ensure secure arrangements can be put in place in a timely and manageable way (for example to allow for 'just in time' delivery of some exam papers)

### Further monitoring

Our analysis of the exam series has informed our rolling programme of monitoring, audits and technical evaluations which will include monitoring:

- exam boards' plans to reduce errors in assessment material production
- how exam boards record and manage conflicts of interest in the marking process
- the extent to which exam boards are complying with our requirements for accurate and consistent marking and/or reviews of marking
- the extent to which exam boards have made improvements to their safeguards around teacher involvement in the development of confidential assessment materials

We will use the findings to inform action we might require the exam boards to take to reduce any risks to the safe delivery and awarding of qualifications next year.

As we did in 2019, we plan to review the GCSE, AS and A level exam boards' readiness for the challenges and risks identified for examinations in 2020. We also continue to strengthen our understanding of the most effective methods to protect confidential assessment materials from cyber-attack and other forms of security breach.

## Letter to awarding organisations about JCQ documentation, sent 3 October 2018

Dear Responsible Officer,

At GQOB on 18 September, we said we would provide you with feedback to inform your next review of some of the JCQ documentation.

As you are aware, it is each exam board's responsibility to ensure it complies with our regulations, even where it may delegate some of that responsibility to centres. We also recognise it is helpful for centres and candidates if, in some instances, exam boards take a common approach.

We have recently received a legal review of JCQ documentation, prompted by some recent and, in some instances, unusual case studies. We have identified a number of challenges with aspects of some existing policies. We know that JCQ regularly reviews its documentation and that it is currently planning to make substantial changes to some of its documents. Therefore, we consider that our feedback at this point is timely and expect that you will reflect on it in your improvement of your (and JCQ) documentation.

We have focused our review on two main JCQ policies and associated documentation; Access Arrangements and Reasonable Adjustments and Malpractice. We have enclosed the detail of risks to your compliance, which we have identified, in the attached Annexes.

### **Access Arrangements and Reasonable Adjustments**

We understand that you plan a substantial review of your arrangements for exams in 2020. We therefore also expect you to consider the issues set out in the enclosed annex and to ensure your arrangements for 2020 and beyond will secure ongoing compliance.

In June this year, we wrote to Michael Turner at JCQ, welcoming its review of the JCQ document and forms for Access Arrangements and Reasonable Adjustments 2017-2018. At that time, we outlined to JCQ some of our overarching concerns regarding the accessibility of the documentation and recommended that it clarified some of the requirements for exams in 2019.

### **Malpractice**

In August this year we shared with you some legal advice on the consideration of proportionality in malpractice sanctions. We have summarised wider legal feedback we received on other aspects of your documentation and are also sharing that with you now.

We understand that the JCQ's Independent Commission may drive timescales on your wider work on malpractice but we expect you to consider what changes you need to make now and in subsequent iterations of JCQ documentation, in order to ensure your ongoing compliance.

We plan to write separately to the JCQ's Independent Commission on Malpractice on wider areas that it may want to consider.

### **Next steps**

Please can you confirm receipt of this letter and accompanying annexes and provide us with your proposed timescale for addressing the identified risks to compliance by 15 October.

We would be happy to discuss this with you and the other exam boards.

## Access Arrangements

### ANNEX A

#### 1. Clarity of documentation

The document is lengthy and complex to both understand and follow. There is a risk that centres do not follow your required processes properly and/or that you are unable to monitor the degree to which a centre is complying with your processes.

There is a lot of duplication in the document. This exacerbates the risk of confusion and/or inconsistent application by centre staff and in monitoring.

Throughout the document there is highlighted, emboldened and coloured text, as well as some text being in a box-out. The application of these features do not appear consistent and adding to the risk of confusion and/or misapplication.

#### 2. Consideration of the nature of appropriate Reasonable Adjustments

The document is not clear about how centres should consider the type of adjustments they should apply for and that might be appropriate for particular candidates.

The document also does not provide sufficient information for applications where subjective judgement is required. There is a risk that users are not clear about which Reasonable Adjustments are, or are not, likely to be suitable and/or permissible for a given candidate. The steps to inform decisions here are overly complicated; over a number of pages and there are highlighted, emboldened and separated sections that are difficult to follow.

The general principle that centres should adopt an evidence-based approach, supply that evidence in good time, and use their judgement to determine if reasonable adjustments should be made seems sound. However, the complexity of the JCQ document means that this process risks becoming misused or misapplied.

#### 3. Extra time

The document is not clear about the evidence needed to demonstrate a 'normal way of working' consistent with an arrangement for 25% extra time; for example, what is a normal way of working in which a learner has 25% extra time and how should this be documented.

Where there are specific tests applied, the structure and repetitiveness of the document makes the requirements overly complex and risks centres applying the requirements inconsistently. Simplifying the document is likely to benefit users significantly. For example, in the document, the requirements to apply for extra time span a number of pages and information is repeated within that too.

#### 4. Reasonable Adjustments vs special consideration

There is not a consistent or clear distinction between 'access arrangements' made for disabled candidates (Reasonable Adjustments which must be made in accordance with the Equality Act 2010) and those made for students who are not disabled but are required because of a short-term impairment (which you term access arrangements, but which we would consider to be a form of Special Consideration). For example, section 1.7 on page 6 outlines that reasonable adjustments are for disabled

candidates but then goes on to say candidates not defined as disabled under the Equalities Act 2010 can also access the arrangements. The evidential obligations made on centres for access arrangements offered as a form of Special Consideration are different to, and in some instances less than, those offered as a similar form of Reasonable Adjustment (for example use of a scribe). Centres simply complete the online form for Special Consideration applications with supporting evidence – this may undermine the integrity of the JCQ requirements for Reasonable Adjustments and may cause further confusion for users. Given that disabled students have a legal right to Reasonable Adjustments, it does not seem not appropriate that they are being required to do more than those requesting Special Consideration.

#### 5. Associated Forms and Submission Criteria

It is not possible to apply successfully for a number of access arrangements using the online portal, the system will automatically reject the application (eg requests for >25% extra time); however, the documentation nevertheless requires the centre/ third party to submit an application this way. Page 92 of the Access Arrangements document illustrates this.

#### Summary

In light of the points raised above, we are concerned that you are therefore at risk of non-compliance with:

- GCR C1.1 – which requires you to have arrangements with third parties, undertaking any part of the development, delivery or award of qualifications that
  - o enable you to develop, deliver and award qualifications in accordance with your Conditions of Recognition;
  - o (b) you can effectively monitor and, where appropriate, enforce.
- GCR C1.2 – which requires that all reasonable steps are taken to ensure that you do not impose unnecessary or unduly burdensome requirements on third parties (including centres)
- GCR C2.5 – which requires you to:
  - o provide effective guidance to the Centre
  - o make available to the Centre any information which, for the purposes of that delivery, the Centre may reasonably require to be provided by the awarding organisation
- GCR G6.2 – which requires you to put in place clear arrangements for making Reasonable Adjustments.
- GCR G6.3 – which requires you to publish clear arrangements about how a Learner qualifies for a Reasonable Adjustment and what Reasonable Adjustments may be made.
- GCR G7.2 – which requires you to put in place clear arrangements for making Special Consideration.
- GCR G7.3 – which requires you to publish clear arrangements about how a Learner qualifies for a Special Consideration and what Special Consideration may be made.

## ANNEX B

### Malpractice

#### 1. Malpractice reporting

Candidate malpractice is reported using only one form (M11). However, reporting centre malpractice has two forms (M2a2 and M2b3); form M2a for an initial notification of suspected centre malpractice and form M2b to report an investigation of centre malpractice. Having two processes for different strands of malpractice is not in itself an issue of non-compliance, but it may lead to confusion and inconsistent, or poor, centre practice.

There is a risk that a centre will mistakenly adopt a single process; only informing you of confirmed malpractice once it has completed its investigation. This would prevent you from discharging your duties with regards to who conducts any subsequent investigation and to establish whether malpractice has occurred.

We are concerned that you are therefore at risk of non-compliance with:

- GCR C1.1 – which requires you to have arrangements with third parties, undertaking any part of the development, delivery or award of qualifications that:
  - o enable you to develop, deliver and award qualifications in accordance with your Conditions of Recognition;
  - o you can effectively monitor and, where appropriate, enforce.
- GCR A8.2 because you may not have the opportunity to formally establish whether malpractice/maladministration has occurred in order to promptly take steps to prevent any Adverse Effect; and
- GCR A8.3 because you may not have an opportunity to check the competence of the person investigating, or check whether they have a personal interest, in each case. There is also a risk that centres could omit relevant information from an initial investigation hoping that you will not investigate further.

#### 2. Inconsistencies between JCQ policy and General Conditions of Recognition

##### Malpractice definition

We are concerned that the JCQ policy definition of malpractice (Section 1 Page 3) does not include the same definition for Adverse Effect as is set out in the General Conditions. Later in the JCQ policy (Section 13 Page 27) AOs are expected to report cases of centre staff malpractice to the regulators if the circumstances are likely to meet the definition of an Adverse Effect. It is unclear how you are able to do this if the definition of malpractice you are using does not fully cover the same definition for an Adverse Effect as the General Conditions.

The JCQ definition is also not wide enough to cover unusual cases eg those not directly related to sitting an exam and novel or innovative malpractice moving forward, even though such cases might cause an Adverse Effect.

You are therefore at risk of non-compliance with GCR B3.1 as you may be unable to

identify potential and actual Adverse Effects in all cases and may not be able to act on novel and innovative cases of malpractice.

#### Personal Interest

Personal interest does not factor explicitly in the JCQ policy, however, Condition A8.3(b) requires that investigations are carried out by persons of appropriate competence who have no personal interest in the outcome of an investigation. On 3 September 2018 we published our consultation on the implementation of technical qualifications.

The draft guidance document includes a suggested definition of personal interest (Page 14) which, subject to consultation, we may incorporate into guidance for other Conditions that reference personal interest. You might find it helpful to consider that draft guidance as you finalise your malpractice document for this year.

#### 3. Centre Contracts

An awarding organisation must take all reasonable steps to prevent the occurrence of any malpractice or maladministration in the development, delivery and award of qualifications. You must therefore ensure that, through your centre agreements, you require every centre to put in place effective steps to prevent malpractice and maladministration and you must ensure that a centre follows your established policy during any investigation into malpractice or maladministration.

We are concerned that you are therefore at risk of non-compliance with:

- GCR C1.1 – which requires you to have arrangements with third parties, undertaking on any part of the development, delivery or award of qualifications that:
  - o enable you to develop, deliver and award qualifications in accordance with your Conditions of Recognition;
  - o you can effectively monitor and, where appropriate, enforce.
- GCR A8.4 because your current centre contracts, if based on the arrangements in the JCQ guidance, may not enable you to hold centres sufficiently to account for all types of malpractice / maladministration.

#### 4. Certificates reflecting attainment

In some instances, such as where the malpractice directly affects the validity of a learner's results, it may be straightforward to identify that the learner does not have a valid entitlement to a certificate showing such results and a decision to withhold the certificate will follow.

However, the current JCQ approach suggests that you might decide not to issue a certificate to a learner in circumstances where the malpractice does not, or cannot, affect the validity of the learner's results (for example Penalty 8: Disqualification from all qualifications taken in that series).

We consider it is important that you are able to identify whether the nature of the malpractice means the learner does not have a valid entitlement to a certificate and/or why it is proportionate to withhold a certificate, which would otherwise show valid results.

In considering your definition of malpractice, you might consider that any breach of your rules constitutes malpractice and that in such cases there's no automatic legal entitlement to a certificate. Therefore, some breaches might lead you to withhold a

learner's otherwise valid entitlement to a certificate. On a case by case basis, your decision-makers will then need to consider whether it is proportionate to impose that sanction (withholding a certificate(s)), taking into account all of the evidence in each case.

We are concerned that you are therefore at risk of non-compliance with:

- GCR I4.2, which requires you to issue a certificate to every learner who has a valid entitlement to such a certificate and to refrain from issuing a certificate to any learner who does not have a valid entitlement.

### 5. Breadth of documentation

JCQ has a number of documents that indirectly deal with malpractice policy. The 'JCQ policy' document is the main document, but there are also documents such as the notice to centres regarding plagiarism and the JCQ Instructions for Conducting Examinations (ICE) 2017-2018. It is not obvious whether or, if so, how this range of documents is linked and this increases the risk that malpractice is either unwittingly committed and/or not properly identified because all the necessary information relating to the prevention of, and what constitutes, malpractice is not in one place.

Helpfully, there is a defined and recognised policy on plagiarism. However, this exists in a vacuum, devoid of other similar documents for other discrete areas of concern (eg. collusion/tampering etc). This means that, unless the particular act of plagiarism is committed, there are no specific documents to support centres in dealing with other types of malpractice. This may mean centres would/could not investigate other cases of malpractice as effectively as they might plagiarism.

We are concerned that you are therefore at risk of non-compliance with:

- GCR C2.5 – which requires you to:
  - o provide effective guidance to the Centre
  - o make available to the Centre any information which, for the purposes of that delivery, the Centre may reasonably require to be provided by the awarding organisation
- GCR A8.1. because you are not covering all areas equally and sufficiently. Therefore, you could be seen to not be actively preventing malpractice.

### 6. Consistent use of sanctions

The JCQ policy provides a matrix of sanctions to be used depending on the severity of the proved malpractice/maladministration. We are aware through our monitoring of event notifications that the use of sanctions does not appear consistent between exam boards where the case or issue is common to more than exam board.

We acknowledge that we do not always know the exact circumstances of each case. We are concerned that you are therefore at risk of non-compliance with:

- GCR A8.6, because inconsistent application of sanctions may undermine your ability to deter malpractice or maladministration from recurring; as the centre may perceive inconsistency in approach. You should consider how you could ensure you make consistent decisions for similar cases within, and across, exam boards who use the JCQ documentation.

### 7. Head of centre responsibility

Exam boards typically make the head of centre lead for an investigation, unless they are the focus of the investigation.

'The awarding body will normally authorise the head of centre, acting on behalf of the awarding body, to carry out the investigation or to collect evidence on its behalf.' It is possible, that a Head of Centre will have a Personal Interest in the outcome of an investigation even where they are not directly the focus of the investigation.

The JCQ process also permits the Head of Centre to delegate responsibility for the investigation, but ultimately the Head of Centre bears the main responsibility to report and act on information supplied to them.

You should consider how you ensure and/or monitor that the person who conducts the investigation is competent and has no Personal Interest in the outcome.

We are concerned that you are therefore at risk of non-compliance with:

- GCR A8.3 because, the Head of Centre, when investigating malpractice, may not be sufficiently competent to investigate and/or is likely to have a personal interest.

### 8. Publishing JCQ policy on awarding organisation websites

It is worth noting that not all JCQ awarding organisations publish the full JCQ policy and some demonstrate significant divergence from it. There are also various approaches to displaying the forms. Some awarding organisations display only some forms, others none. Centres will find it difficult to use the right form at the right point in the process if the form they need is not readily available to them.

You should consider the degree to which you are using and publishing the malpractice policy and the associated forms and whether they are readily accessible to centres. If you are using only a selection of policies and/or forms you will need to ensure that this is clear to centres and be clear about any additional or alternative documentation. In all instances, you need to ensure that the package of resources and policies you use enables you to comply with your Conditions.

### 9. Notifying other awarding organisations

Conditions A8.7 requires that if an awarding organisation has any cause to believe that malpractice or maladministration may affect a Centre or another awarding organisation it must inform them.

The policy for notifying affected centres or other awarding organisations (including those who are not members of JCQ) is not clear.

## Letter to awarding organisations ahead of the summer exam series, sent 8 May 2019

Dear Responsible Officer,

As usual at this time of year, we are writing to set out our expectations about your delivery of the summer 2019 exam series and how we will monitor you. Many of your qualifications are available to learners in Wales and Northern Ireland, and the regulators in these jurisdictions (Qualifications Wales and CCEA) support our expectations. Our expectations are in line with those of previous years.

We know that you, like us, want every exam series to run smoothly. We expect you to have already taken all reasonable steps to identify the risks associated with the summer series and that you have appropriate contingency plans in place to prevent or mitigate any Adverse Effect. We expect you to deal with any issues that arise promptly and effectively.

### Management of risks and incidents

Earlier this year we spoke with you and your senior leadership team to seek assurance that you were ready for the summer 2019 exam series. Following that review, we wrote to you highlighting a number of areas of risk for this summer. We expect you to effectively manage those risks, and any other risks you identify, over the summer.

### Notifying us about events

In accordance with your General Conditions of Recognition (GCR), you must tell us promptly if you believe an event has occurred, or is likely to occur, that could lead to a potential or actual Adverse Effect (GCR B3). You should also have regard to our Guidance about when you should notify us of an event. You should make any notification through our Portal.

In previous years, we highlighted particular types of issues which we consider notifiable. We continue to expect you to notify us about those types of issues this year:

- We expect you to notify us promptly about any out of the ordinary event, or one affecting a number of centres, that could cause a significant and / or uncontained disturbance or disruption. Particularly those which require you or Page 2 of 5 your centres to follow a specific course of action (for example, unusual disturbance or disruption to the delivery of an assessment, cyber security issues etc).
- We expect you to notify us promptly where scripts are confirmed missing (e.g. destroyed or stolen) before the issuing of results or before you conduct a review of marking or moderation. We would not expect you to inform us of instances where you become aware of absent scripts before you have finished looking for them.
- We expect you to notify us promptly about any potential for, or actual, media or social media coverage, especially where that would have a potential or actual Adverse Effect. This includes where the volume of coverage triggers

you to take some form of action to monitor or respond to the potential issues raised.

We, like you, wish to minimise any unnecessary and time-consuming exchanges. So, where you do not have the information available at the time of your notification, please set out when you expect to be able to provide additional details. If the event is complex and it would be easier to have a discussion, please let us know and we are happy to discuss. We would then expect the necessary notification or information via the Portal.

As you know, it is important that you also complete the fields on the Portal as fully as possible, but particularly those linking to the relevant qualification from the Register. In terms of the vocational qualifications included in performance tables, it is important that we can accurately identify the relevant qualification titles as being included in these categories when we come to assess and manage any events. This all aids our consideration of how you are dealing with any issue and our subsequent reporting.

### Assessment material errors

You must continue to notify us promptly of assessment material errors (including in modified or Braille papers) in accordance with Condition B3.

We will consider any assessment material error in assessments for a reformed GCSE, AS or A level, or in any of the four categories of vocational qualification in the DfE performance tables, to constitute a 'substantial error'. Therefore, we expect you to notify us promptly about all assessment material errors in these assessments, including those for which you issue an erratum notice or replacement paper. We will also continue to collect data about all assessment material errors for these qualifications after the summer.

You should submit a separate notification for each assessment material error. When you notify us about an error in your assessment materials, we will categorise the error using the definitions below. We have retained the wording we used in previous years.

#### Category 1

Assessment material errors which could or do make it impossible for learners to generate a meaningful response to a question / task

#### Category 2

Assessment material errors which could or do cause unintentional difficulties for learners to generate a meaningful response to a question / task

#### Category 3

Assessment material errors which will not affect a learner's ability to generate a meaningful response to a question / task

### Provision of assessment materials

Please provide us with all assessment materials, including question papers and supporting materials, for all Ofqual regulated GCSE, AS and A levels and also for your Level 3 Applied General and Tech Level qualifications. Please upload the assessment materials to the Document Sharing Hub, the morning after the relevant



exam takes place. If a serious issue arises, we may request a paper sooner.

We will not usually review these materials unless we have cause to believe that there has been an issue with the assessment. We may keep the assessment materials for other purposes. We will let you know if we plan to use them. If we wish to review any mark schemes, we will request them separately. Please let us know if you have any difficulties uploading your materials.

### Missing scripts

We will again be collecting data in relation to missing scripts for GCSEs, A levels and AS qualifications but not for vocational qualifications included in performance tables. We expect you to submit the data in the same format as previous years and to send it after results days. Please indicate the earliest date you are likely to submit the data.

We will share this data with Qualifications Wales and CCEA to reduce the regulatory burden on you and to avoid duplicate requests. If you have any concerns please let us know.

### Our approach to monitoring your delivery

We will continue to acknowledge and monitor any notifications you send to us. We will leave you to manage the event once we have sufficient information about the nature, scale and impact of the event, to assure that you are managing it appropriately. We will close the event notification as soon as we are assured that the event itself has been contained, and that you have sufficiently prevented or mitigated any Adverse Effects. We may carry out further work or actions after the summer to address any outstanding thematic or compliance issues.

We define missing scripts as any whole or part learner scripts, recordings or work for which there is confirmed attendance, but which are unavailable for marking or moderation prior to the issue of results.

We may intervene if we believe your approach is inadequate or inappropriate, or if we believe you are likely to breach your Conditions. Depending on the nature of the event and the urgency with which it must be dealt, we may:

- Give you the opportunity to review your approach in light of our concerns; and /or
- Direct you to take a specific course of action.

Where appropriate, we will monitor your delivery in a coordinated way with the other qualification regulators.

We will provide you with interim updates on the trends and patterns we have observed and we may ask you for further information on the way in which you have delivered the summer series.

### Your named contact

If you identify an urgent issue outside business hours please use the out of hours contact details we have provided separately.

During normal working hours, your named contact at Ofqual for any matter related to the delivery and performance of the summer series (including vocational qualifications in performance tables) is: **xx**, telephone: **xxxxxxxxxx**.

If you wish to discuss an emerging issue which you do not yet consider to be notifiable, or any complex event notification with us, you should approach your named contact (either by telephone or through the Portal) to arrange for a meeting or phone call. We will respond to you as soon as possible, and, if required, we will arrange for a teleconference or meeting to take place within 24 hours.

### Setting and maintaining standards

We will want to ensure fair awarding of the qualifications so that learners in summer 2019 are not unfairly advantaged or disadvantaged. We will write to you separately about this.

### Reporting

In line with previous years, we will publish a report on issues that occur during the summer exam series. We will give you an opportunity to provide feedback on the report's factual accuracy before we publish. We will share a complete version of the draft report (unredacted - so each exam board's data is visible) with the other exam boards, unless you express concern about this approach.

## Chart 1

### Number of candidates who took GCSEs, AS and A levels in summer 2019 and 2018 (England only figures)

Exam Series	GCSE (all)	GCSE (age 16)	AS (all)	AS (age 17)	A level (all)	A level (age 18)
Summer 2019	942,155	581,145	58,570	40,880	284,850	245,335
Summer 2018	912,115	561,175	153,405	64,815	288,865	246,305

The figures give the count of unique candidates after removing those with -2, Q, and X grades, where:

- -2 = Grade missing/unknown/not applicable
- Q = Grade pending
- X = Candidate absent from assessment

The figures are rounded to the nearest 5.

## Chart 2

### Online vs traditional marking

Qualification	Summer series	Papers marked online	Candidate scripts marked online	Papers traditionally marked	Candidate scripts traditionally marked	Papers Marked Total	Scripts Marked Total	% of papers marked online	% of scripts marked online
AS/A level	2018	943	2,146,148	593	290,921	1,536	2,455,069	61	88
AS/A level	2019	966	2,181,799	382	93,171	1,348	2,274,970	72	96
GCSE	2018	765	11,675,024	179	720,321	944	12,395,345	81	94
GCSE	2019	716	12,478,290	125	316,815	841	12,795,105	85	98
2018 Total	2018	1,708	13,839,172	772	1,011,242	2,480	14,850,414	69	93
2019 Total	2019	1,682	14,660,089	507	409,986	2,189	15,070,075	77	97



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