



Rt Hon Gavin Williamson CBE MP
Secretary of State for Education
Sanctuary Buildings
20 Great Smith Street
LONDON
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2 December 2020

Dear Secretary of State

I am writing in response to your letter sent today setting out your expectations for arrangements for GCSE, AS and A level qualifications in 2021 and to confirm Ofqual's decision about how these qualifications will be graded. I also set out our expectations for vocational and technical qualifications.

Grading

As you will know, summer 2020 results were unique, not just in how they were derived but in relation to the levels of achievement recorded, when compared to previous years. Overall, A level A and A* grades were up by 13 percentage points and GCSE grade 4 and above by 9 percentage points overall.

Regrettably, the pandemic continues to have a dispiriting and debilitating effect on education and on individual students, of a like never before seen. In these exceptional circumstances, there is a strong prevailing view that returning in summer 2021 to more established performance standards would be unconscionable. It would not be fair, in the eyes of most.

Having consulted widely, and considered options, we have decided to carry forward the overall level of generosity from 2020. In regulatory terms, we will be giving priority to our statutory objective to promote public confidence, over and above our more well-known objective to secure standards. In our view this is a significant, an unprecedented step, in recognition of the disruption and lost learning caused by the pandemic across England.

Details of our planned approach are set out in an annex to this letter. In practical terms, students will not need to demonstrate the same level of knowledge as in 2019 or in earlier years, to get a particular grade. Instead, we expect results in 2021 to look very similar to the 2020 grade profile. Students can be assured that

we will be setting standards to make sure that overall and, so far as is possible, they do not receive lower grades in 2021 because of the pandemic.

There are two important caveats that I hope will be readily accepted by students and the wider public. Firstly, there were unintended differences across subjects in summer 2020, and our aim will be to spread the generosity of 2020 between subjects more evenly, so that we do not bake in differential standards as between one subject and another. To do so would be unfair.

And secondly, in overseeing awarding, we will be mindful of the acceptability of grade boundaries, to avoid undermining public confidence in the credibility of grades. It will be important that grade boundaries – particularly at the lower grades – are not so low as to be implausible. A qualification must mean something by way of knowledge and understanding of the subject, and indeed we have a statutory objective in that regard.

We note that you agree with our position on grading for 2021. In evaluating the available options, we have also garnered the views of others through a combination of workshops, focus groups and individual conversations with representatives from across the education sector. We sought the views of students and their parents as well those working in schools, colleges and higher and further education, including representative organisations and individual institutions and teachers.

We heard a range of views, with no-one arguing for a more severe standard than 2019 or a more generous standard than 2020, and with the majority favouring a generous approach. We have sought to balance those views in our decision-making and we believe that setting standards as we propose will be more likely to secure public confidence.

We monitor awarding closely in any year. For 2021, we will put in place yet closer monitoring across all subjects so that we are able to take any steps necessary to secure awards that are as fair as possible.

Contingency arrangements

We welcome your commitment to GCSE, AS and A level exams and non-exam assessments going ahead in 2021. We strongly believe that this is the best and fairest way to assess student attainment. It is in this context that we have been working with your officials to evaluate the options you have been considering to mitigate the impact of the pandemic.

You have set out contingency arrangements to ensure that as many students as possible can take exams and assessments and receive a grade. As you know, decisions about the contingencies necessary to make sure exams go ahead this year rest with you. On our part, we are committed to playing our role to support the successful delivery of exams and other assessments next year.

We have considered the arrangements you wish to see, keeping in mind our duty to maintain standards and secure public confidence. We judge that we can effectively regulate the elements of your preferred approach which the exam

boards will be required to deliver, albeit the arrangements will make exceptional demands on exam boards, with additional costs.

We will change our rules so as to secure exam board delivery of the expected contingency arrangements, and regulate for the changes necessary so that exam boards make robust provision (at a greater scale than usual) to allow students to receive a result if they are able to take some, but not all, of their assessments – should a student be unwell or required to isolate at the time their assessments are due to be taken.

We will work with exam boards to consider how we can regulate for your expectation that students who have completed the course of study and are unable to take any assessments in a subject in 2021, because they are ill or for some other legitimate reason, are able to receive a grade. We expect this will be a very small number of students.

Of course, in any normal year, there are risks to the safe delivery of the exam series and we closely regulate the exam boards to mitigate these. The contingency arrangements bring with them additional risks. Producing additional papers outside of the established process and the short timescales for paper development increases the risk of errors. There are delivery risks involved in providing additional papers later than the normal exam window, including for schools and colleges in being able to administer them.

There will be additional pressures on the timing of marking and the delivery of results. Given how much later than usual these exams will be taken, it may be that where a student takes an exam in the contingency series their results might have to be delivered slightly later than the scheduled results days. We know that it will be important to work with higher education and post 16 providers on this issue.

Adaptations

As you know, we are responsible for determining how the subject content set by government should be assessed. Any changes that may affect how that content is taught need to be agreed by you. We know that students taking their exams next year have had their education disrupted by the pandemic, to a greater or lesser extent. We do not yet know the extent to which the disruption will continue in the run up to the exam series. However, we expect that some students will find the prospect of taking exams next summer particularly daunting and that some students will feel less prepared than others for their exams because of disruption they have experienced.

It is in this context that we have considered what changes can be made to exams this summer. Students will be reassured that we both agree that, in 2021, they can be given information in advance about some of topics that will or will not be covered in an exam and that, for some subjects, students can have access to some support materials.

We had considered a range of ways by which the exams could be adapted that would be reassuring to students, allowing teaching and revision to be more focused and imbue a sense of fairness, without undermining their validity. None of the

options would be straightforward. We have considered the pros and cons of each, including how they might affect particular groups of students. It is important to recognise that in normal times, we would not contemplate introducing changes to assessments due to be taken next summer at this point in the year, because of the risks of doing so.

There is no single solution that works for every subject. Adaptations will involve either providing advance information about the content to be covered in the papers or additional support materials for use in the exam or both. There will be some subjects for which alternative adaptations would be more appropriate, and we will work with exam boards to agree the detail and publish further information on this in January.

Where advance information is provided it should be sufficient to support teaching and revision. But it should not be so extensive or specific that students could safely spend their time developing and then memorising exam answers. The adaptations announced today will be in addition to those already agreed with you that we [announced](#) in August this year.

All the adaptations will apply to all students taking the qualifications, regardless of the degree to which their education has been affected by the pandemic. We believe, though, that because the adaptations will allow teachers and students to use the remaining time before the exams more effectively, this should be of particular benefit to those most affected by learning loss.

Learning loss

In our view, the package of measures for 2021 will go a long way to mitigate the impact of the pandemic, overall. Nonetheless, *differential* lost learning remains one of the most intractable issues that the education system faces, as the pandemic washes through.

Any further steps to address this issue through exams and assessments are fraught with difficulty, and yet changes to the exam and assessment system alone are not enough to address the significant risks to public confidence this presents. Knowing this, we applaud your announcement of the expert advisory group and the opportunity it provides for a broader view. We look forward to playing our part in supporting the advisory group and providing advice on this most difficult of problems.

Vocational and technical qualifications

For qualifications taken as an alternative to GCSEs, AS and A levels and with similar structures and the same progression routes, many of the same measures as those noted so far would likely be appropriate. Other vocational and technical qualifications may be better suited to different adaptations. We have regulated to allow for decisions on adaptations to be taken by awarding organisations on a case-by-case basis in a way that protects the integrity of the qualification.

We have already seen a range of adaptations put in place, including the use of remote invigilation or assessment, extended assessment windows and increased assessment opportunities. Nevertheless schools, colleges and training providers continue to face significant challenges. We are conscious that these adaptations, while appreciated, may not go far enough.

We are encouraging awarding organisations to make full use of the regulatory flexibility now available to them, and promoting a consistency of approach. We will continue to discuss these arrangements with your officials. We welcome your decision to allow greater flexibilities under the Performance Table rules, including permitting assessments for some units to be dropped. For vocational and technical qualifications where learners are competing alongside GCSE and A level learners for progression opportunities, we are mindful that outcomes will also need to reflect a more generous standard. We will work with awarding organisations to support them in making these awards in the fairest ways. Together, these changes will be beneficial and important in securing that students taking vocational, technical and other general qualifications are not disadvantaged.

I note your request for further advice on measures that can be taken for learners facing exceptional circumstances who are unable to complete all of the assessment necessary and for whom the special considerations process cannot be used. I will reply to you on this as soon as possible.

Next steps

We know that all students working towards these qualifications want to know what steps we, government and the exam boards and awarding organisations are taking to address the impact of the pandemic on teaching and learning. This is a complex picture with many thousands of qualifications being taken in the coming year, but we are mindful of the need to have a coordinated approach, even where arrangements may be different.

We are all rightly focused on exams for 2021 but, of course, as we consider the options and make policy decisions, we have an eye beyond that to consider the potential impact on students who will be taking exams in 2022 and beyond, and we are considering the resilience of the system in the longer term.

We will continue to work with your officials, exam boards and representatives from across the education sector to put 2021 arrangements into place. We are committed to making sure that teachers and students are fully informed about the changes at the earliest possible opportunity and understand what they mean for them. This will mean an ongoing programme of communication between now and next summer so that all those delivering and taking the qualifications have the information they need.

Finally, we appreciate the certainty that your announcements today will provide to students and their teachers, parents and carers. We recognise that all who are taking and teaching the qualifications are understandably seeking confirmation of arrangements as soon as possible. We hope these decisions provide some reassurance during this exceptionally difficult time. But we are not complacent, and

we recognise the significant amount of work to be done to implement these changes.

I am copying this letter to the Education Select Committee.

Yours sincerely

A handwritten signature in black ink, appearing to be 'G Stacey', written in a cursive style.

Dame Glenys Stacey
Acting Chief Regulator

Annex - Grading GCSEs AS and A levels in 2021