

Marking reviews, appeals, grade boundaries and Code of Practice

Regulatory Impact Assessment



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1 Introduction and summary

A range of post-results services are currently available to schools and colleges who have concerns about the marks awarded to their learners. These services include a clerical check¹, a review of marking and access to marked scripts for some qualifications. If, following a review of marking, schools and colleges are concerned about whether an exam board has followed procedures consistent with the *GCSE, GCE, Principal Learning and Project Code of Practice* (the Code) or whether it has applied its procedures properly and fairly, they can consider appealing.

Our *General Conditions of Recognition* require exam boards to ensure that marking is consistent. However, some questions legitimately allow two different markers, exercising their professional judgement, to give different marks for the same answer. This does not mean that either mark is wrong, as both could represent a reasonable application of the mark scheme.

Our research² found evidence that, in the current system, sometimes reviewers are changing marks that could have been properly given, and that the changes made are more likely to increase than decrease the marks. This makes the process unfair for those who did not request a review of marking.

We are introducing new rules which exam boards must follow when reviewing marks and offering other post-results services to improve the current system and address the following deficiencies:

- a lack of transparency in the system
- the speculative nature of some requests for reviews or marking and clerical checks
- misunderstandings that on review, assessments are re-marked afresh rather than the original marking being reviewed
- reviews leading to appropriate marks being changed
- a system whereby learners could be disadvantaged by not seeking a review
- appeals only being allowed on limited grounds.

¹ Clerical checks involve exam boards checking that all the pages have been marked, and the scores have been correctly added and recorded. In the future these will be known as administrative checks.

² <https://www.gov.uk/government/publications/alternative-marking-review-processes-for-exams>

The above elements of the current system have the potential, either individually or collectively, to cause confusion, increase costs and to render the process unfair.

In our consultation³ we explained our concerns about the current system. Our policy objectives are to rectify these deficiencies. We acknowledge that any changes to established systems bring with them additional burden initially, however, we believe that the changes we are proposing are necessary steps to bring about a clear and fair system and that, by introducing them incrementally, the burden of change will be manageable. Our aims are that:

1. Schools and colleges (or in some cases learners themselves) should be able to see marked assessments before deciding whether to request a review of marking. This should enable schools, colleges and learners to be more targeted and avoid the unnecessary costs of speculative reviews.
2. The system will be fair to all learners, including those who accept their mark and do not request a review, so that schools and colleges do not feel under pressure to seek speculative reviews.
3. Marking Errors⁴ are identified and corrected in a timely way.
4. Exam boards can put in place review arrangements that go beyond the minimum required by regulation and, if they wish, to differentiate themselves from their competitors on that basis.
5. The costs do not make access to review arrangements prohibitively expensive.
6. When we hold the exam boards to account, we focus on whether they undertake timely, effective reviews of marking rather than simply on their compliance with a specified process.
7. The grounds on which appeals can be made to exam boards are extended to include appeals on the grounds that there was an error in the original mark that was not corrected on review, as well as on the grounds that the exam board did not apply procedures consistently or that procedures were not followed properly and fairly.

³ <https://www.gov.uk/government/consultations/marking-reviews-appeals-grade-boundaries-and-code-of-practice>

⁴ The awarding of a mark for a task which could not reasonably have been awarded given the evidence generated by the Learner, the criteria against which Learners' performance is differentiated and any procedures of the awarding organisation in relation to marking, including in particular where the awarding of a mark is based on (a) an Administrative Error, (b) a failure to apply such criteria and procedures to the evidence generated by the Learner where that failure did not involve the exercise of academic judgment, or (c) an unreasonable exercise of academic judgment

The rules for the current arrangements for reviews of marking, along with the processes exam boards must follow to set grade boundaries, are contained in the Code. There is considerable duplication between the Code and the *General Conditions of Recognition*. When we introduce the new rules we will remove the Code. The impact of this is also assessed here. This document considers the potential impacts of these new rules on exam boards, schools, colleges and learners. The qualifications which are affected by these requirements are GCSEs graded A* to G, GCSEs graded 9 to 1, legacy AS and A levels, and new AS and A levels.

We have consulted with all stakeholders, explained our concerns about the current system and detailed our proposals to bring about a fairer system. We have had ongoing dialogue with all of the exam boards while we were developing our proposals, and as part of the formal consultation process. We have continued to engage with the exam boards as we have refined our proposals. We have also engaged with groups representing schools and colleges and have listened to what they have told us.

When we consulted on our proposals, we issued a Regulatory Impact Assessment, and invited representations on the potential impact our proposals may have on the system. We have considered all of the responses, and as a result we have refined our proposals and the timescales for implementation. We now propose to make some changes from summer 2016, but to delay the implementation of others to 2017 or beyond.

Table 1, below, summarises the impacts of the changes we are making to reviews of marking on schools and colleges as well as exam boards.

Table 1: summary of estimated impacts to changes to reviews of marking

Enhancement	Change compared to the status quo	Impact on exam boards⁵	Impact on schools and learners
Exam boards make sure reviews of marking are undertaken by markers who have been specifically trained and prepared to undertake the review of marking role.	We do not currently expressly require exam boards to train examiners used in the review process for their review role. Exam boards may provide such training although its focus is not prescribed, and might not highlight the difference between initial marking and review.	Some exam boards, if they are not already providing specific training for reviewers, will have to invest time developing their training. The training could be given online or face to face. We have assumed that delivery of the training may take between one and three hours. If there are 5,000 examiners undertaking reviews this could cost between £146,000 and £417,000 annually, across all exam boards.	Improved training will lead to increased confidence in the final result received and improved consistency of approach.
Exam boards should make sure marking reviewers do not review their own marking, including moderation (and where applicable the review of administrative errors).	The current set of rules state that this should be avoided where possible, but this change will represent a stronger requirement.	Exam boards may need to improve systems to track the allocation of markers reviewing items/scripts. They may also need to hire additional markers. We	Schools and learners can be assured that a different marker will review their script, improving confidence in the objectivity of the review and in the final result they receive.

⁵ Where these impacts are costs, some or all of the costs may be passed on to those who purchase the review

		<p>acknowledge that this is an additional burden, but a necessary one given the need for a transparent and fair system that promotes confidence. We believe that the costs and wider impact of this change will be small.</p>	
<p>Exam boards should monitor whether the examiners who are undertaking marking reviews are acting consistently and are changing marks when an error has been made but are not changing marks that were properly given.</p>	<p>There is currently no such requirement.</p>	<p>Depending on how exam boards implement this it could lead to very different costs. If exam boards paid examiners to review a seeded script for every 20 requested reviews the cost would be in the region of £200,000 annually across all exam boards. Using a back reading approach would give a cost of around £164,000. There would also be costs incurred to change IT systems, considered in the section on feedback below. We acknowledge that this is an additional burden, but believe that the change is necessary to bring about the level of consistency required</p>	<p>Learners, schools and colleges may have increased confidence in the result they receive following a review of marking.</p>

<p>The exam board must make available, on request, the reason for their decision to uphold or change a mark on review. The exam board must change a mark where a Marking Error is found on review.</p>	<p>There is currently no express requirement for exam boards to give reasons for their decisions to schools, colleges and learners.</p>	<p>for there to be confidence in the system.</p> <p>Although exam boards already send a standardised letter to learners, they do not have the systems in place at this time to facilitate the systematic return of reasons to schools, colleges and learners. Exam boards have told us that they will need to change their IT systems to make sure they can give reasons for their decisions when asked to do so. These costs are considered in the IT changes system in table 2 below. Additionally, examiners would need to be trained on recording the reason for their decision and this process operationalised. This is included in the training section above. We acknowledge that there will be costs involved to the exam boards in bringing these changes about, however, we believe that it is</p>	<p>Schools, colleges and learners could better understand how the mark scheme has been applied. It could also improve confidence in marking through increased transparency. Over time it could reduce the number of requests for review that are purely speculative.</p>
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	fundamental to the concepts of fairness and transparency for the reasons for a review to be available.	
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As well as improving the rules around reviews of marking we are making a number of changes to other post-results services. The table below sets out those elements which will have more significant impacts on exam boards, schools or learners.

Table 2: Summary of impacts of other significant changes to post results services

Requirement	Status quo	Impact on exam boards	Impacts on schools, colleges and learners
<p>Exam boards must make available marked scripts for GCSEs as well as AS and A levels before any deadline by which requests for review of marking must be made. As currently, exam boards may decide to charge for this service.</p>	<p>Currently marked scripts are only available for AS and A levels prior to the deadline for requesting a review of marking. Exam boards charge between £10.30 and £13.10 for this service.</p>	<p>Exam boards may have a larger number of requests for scripts, which may mean changing their systems. They will be able to cover these costs through charging although we recognise this passes the costs to schools and colleges.</p> <p>By providing access to scripts it may change the number and distribution of requests for reviews of marking. Based on current numbers of requests, one scenario suggests that exam boards may receive around 31,000 requests between them. If costs are roughly equal to price this would cost around £360,000 to process, which would be</p>	<p>Schools, colleges and learners can have increased confidence in the quality of marking through increased transparency.</p> <p>It should improve the efficiency of the system as schools and learners could decide only to ask (and pay) for a review of marking where they believe there is a genuine error, rather than acting speculatively.</p> <p>Teachers may feel obliged to request the return of marked scripts and spend time looking at them. We recognise that this could add further to teacher workload, much of it during school holidays, and both additional costs and</p>

		<p>paid for by schools and colleges who wanted to use this service. Having said this, not all these costs would be additional as some scripts would have been requested after the review deadline closed in any case. We are consulting on when this requirement should be implemented taking into consideration the nature of the exam boards' system changes required to bring about implementation and any associated costs.</p>	<p>teacher willingness (or the ability to direct time) could potentially advantage better resourced schools. On balance however we believe the benefits to the system outweigh any such burden.</p>
<p>Allow exam boards to decide whether or not to accept requests and other post-results services for reviews of marking directly from learners (external learners will continue to be able to make such requests directly).</p>	<p>Under the current system, requests must be received via the school or college (with the exception of external learners). Exam boards do not have discretion to accept such requests directly from school-based learners.</p>	<p>The removal of this restriction allows exam boards to develop their business models in a way they choose. If exam boards decide to allow requests directly from learners investment will be required in invoicing systems. Exam boards will be able to recoup costs via the fee they charge, so are likely only to offer this</p>	<p>Learners may be able to ask for a review of marking where otherwise they might not have been allowed by their school, if exam boards decide to allow this. However, they may be less aware of their chances of the review leading to a change in grade, so may make decisions which do not represent good value for money.</p>

		opportunity where it adds value to their business.	
Review of marking of centre-marked assessments	Currently learners do not always know the marks they have been given by their teacher or that they can request a review of those marks. Exam boards will be required to make sure schools and colleges tell learners their marks for internal assessment as well as communicate that they have processes in place to allow for a review.	Exam boards will have to adapt the agreements they have with schools and colleges and continue to take all reasonable steps to ensure that centre arrangements are properly implemented. We are collecting more information on the impact of the return of marks as part of the consultation, before deciding when to introduce this requirement.	Learners will be more aware of whether they can and should ask for a review. Teachers may be asked to spend more time reviewing the marking of others. Schools and colleges will have to ensure they have review arrangements in place. For subjects in which a school or college has only one teacher the school or college will have to make special arrangements to secure an objective review. Learners will benefit as they will have the opportunity to ask for a review of their assessment regardless of whether it is marked by their teacher, or by the exam board.
Exam boards set and publish reasonable deadlines, subject to any minimum requirements set by Ofqual, by which schools and colleges must request the return of a script,	Exam boards are currently required to operate within specific deadlines set out in the Code of Practice.	This represents a removal of regulation for exam boards, although they will still be expected to act reasonably. Exam boards will be free to set their own deadlines, within	There may be some confusion for schools if exam boards set different deadlines, potentially making administration more difficult. If it leads to either longer deadlines or cheaper

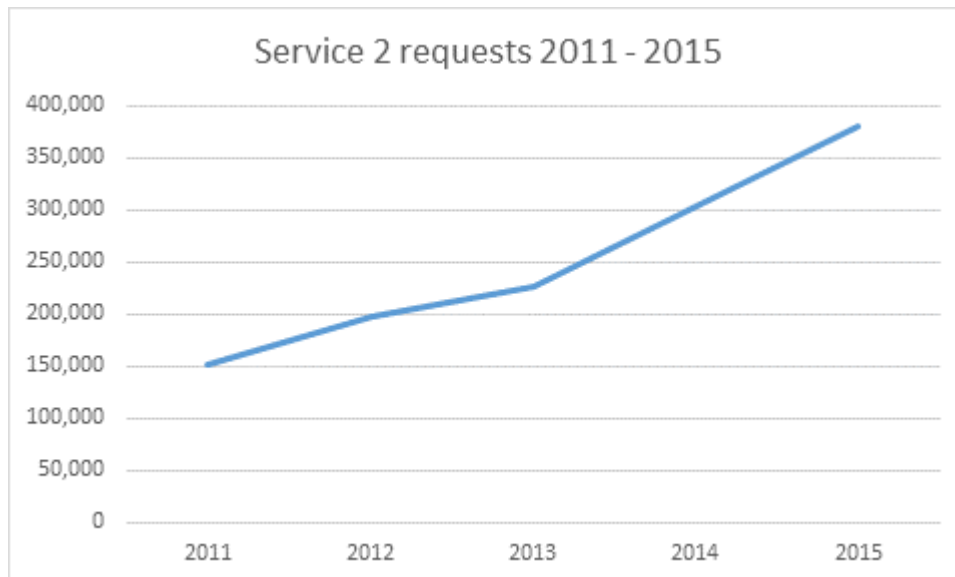
<p>notify the exam board of an apparent administrative error, request a review of marking or submit an appeal.</p>		<p>a framework set by Ofqual. This provides an opportunity to reduce costs through setting their own timetable, or set a deadline which most fits with the needs of schools, colleges and learners.</p>	<p>services for schools, colleges and learners, then this could have benefits. However, exam boards may work together to choose an agreed timetable, which is an approach schools and college might prefer.</p>
<p>Exam boards publish key metrics for their post-results services in a form that we may prescribe.</p>	<p>We currently publish some metrics, based on data provided by the exam boards. However, this requirement extends the metrics which must be published and places the requirement to publish on exam boards.</p>	<p>Exam boards may incur small additional costs as they already collect the data. However, the requirements to publish information about the reasons for decisions, and in a format we prescribe, could add to their costs. We acknowledge that this is an additional burden. However, we believe that the additional burden is necessary to bring about the transparency required of the system.</p>	<p>Schools, colleges and learners will still be able to access additional data about exam boards' performance against key metrics.</p>
<p>Changes to the appeals process. Appeals will be allowed on the grounds of a marking error that was not corrected on review, as well as on procedural grounds.</p>	<p>Currently appeals are restricted to procedural matters.</p>	<p>Extending the grounds for an appeal may result in an increase in the number of appeals exam boards receive. This must be assessed against a more formalised review process. If the number</p>	<p>Schools, colleges and learners will have a clear idea of what the appeals process is for and their likely chances of success. The proposed changes have the potential to add burden upon teachers,</p>

		<p>of appeals received does increase, then it is likely that an exam board's costs will increase, although they will be able to charge a fee for appeals which may off-set or cover their costs.</p> <p>Taking into account the responses to the consultation, we acknowledge that this is a significant change in the system, and as a result are proposing to require the exam boards to pilot this approach in 3 A level subjects to better understand the impact.</p>	<p>schools, colleges and learners, but it will address concerns about the transparency of the system. Appeals may be brought even if the prospects of success are low – as the marking will already have been reviewed. Partly as a result of concerns over burden, we now propose to pilot this approach. The pilot will allow more detailed assessments of the costs and benefits of the new ground of appeal.</p>
<p>Removing the Code of Practice</p>	<p>As well as containing requirements which we need to remove to implement our approach, much of what is in the Code duplicates rules which are set out elsewhere (mainly through our General Conditions), often describing what was required in a prescriptive manner.</p>	<p>Exam boards will be able to choose how to run their processes, and will not have set job roles with specific responsibilities determined by the regulator.</p>	<p>We acknowledge that removing the Code of Practice will result in schools and colleges having to familiarise themselves with new a new framework for reviews and appeals. The proposals however are such as to bring greater clarity and transparency to the system that schools and colleges have sought.</p>

2 The counterfactual

In 2015 there were 380,500 requests for reviews of marking across GCSEs, AS and A levels.

The number of requests has increased significantly year on year from around 150,000 across GCSEs, AS and A levels in 2011 to over 350,000 in 2015.



In the original consultation we set out the concerns of stakeholders about the system. We also showed evidence that approaches differed between exam boards (and within exam boards too). We presented evidence that some reviewers change marks that were properly given. We explained how this creates an unfairness for learners who do not ask for their mark to be reviewed.

There has been an annual increase in requests for reviews mostly at key grade boundaries which has been exacerbated by the practice of replacing one reasonable mark with another. New accountability measures make these qualifications high stakes for schools and colleges. There is a risk that there will be an unmanageable level of requests for review this summer. This could delay the return of timely outcomes for learners whose progression rests on a result. It would also add to the costs incurred by schools and colleges.

As we cannot meaningfully predict the likely volume of requests for review in 2016, for the purposes of monetisation of the costs, we have assumed that the number of the requests will be the same as in 2015

3 Revising reviews of marking

We initially considered three options to improve the current arrangements for reviewing the marking of scripts. We collected information on costs from exam boards to inform our analysis, and conducted our own study into the number of mark changes and the proximity of the reviewed mark to the true score.⁶ We have published the report of our study⁷.

In the consultation stage impact assessment, we assessed the costs of the options we initially considered. Here we provide only the impacts of the changes we will implement, compared to maintaining the status quo.

The cost information provided here should be used with some caution. It can be difficult to accurately cost potential changes to the system. The data we have used are based on the exam boards' estimations of costs.⁸ Where assumptions are made we have conducted sensitivity analysis so that we can be sure that, if costs were significantly higher than initially estimated, the same policy decision would be taken.

In the Joint Council for Qualification's (JCQ) Joint Response, concerns were raised about the exam boards' ability to quantify specific implementation timeframes and associated costs. All of the exam boards made representations that implementation of some of the proposals in 2016 would see them incur significant one-off costs and risks. This was a particular worry in the context of the financial and business impacts of the wider GCSE and GCE reform programme. Our proposals were set out in detail in our consultation document, including the reasons for the changes we proposed to make. We have engaged on an ongoing basis with the exam boards, provided multiple opportunities for them to provide us with information and we set out below in respect of each specific change how and why we have decided our proposals should be implemented.

⁶ In Classical Test theory, a true score is the notional score of a candidate were there no random error in the measurement. The true score is defined as the mean score of an infinite number of observed scores (i.e. marks) from independent administrations of the test. The best approximation to a true score from one particular administration of a test can be obtained from taking the mean from multiple independent measurements of the work. In the research study, we were able to derive a 'true score' for each script because each script was marked multiple times in Model 3 by independent examiners. We could then compare all script marks with the true score for each script.

⁷ <https://www.gov.uk/government/publications/alternative-marking-review-processes-for-exams>

⁸ We asked exam boards for details of the impacts, including cost data at various points throughout the policy development process. This included pre-consultation in February, during the consultation period, as well as a final opportunity before policy decisions were taken in April 2016.

Key assumptions

A number of key assumptions have been made in this paper in order to conduct a meaningful analysis of the options. We recognise that there are limitations to these assumptions, however it is necessary for any modelling to set some parameters as points of reference and we consider them to form a reasonable basis for us to do that.

1. There will be no change in the number of requests received for post results services, either due to continued trends, a change in the process or a change in the number of learners sitting GCSEs, AS or A levels.
2. The fees paid to examiners remain constant.
3. Our new regulations are outcomes focused. The processes which have been assessed here are not the only way of being compliant with the new rules. Exam boards may be able to find cheaper ways of becoming compliant.
4. There will continue to be four exam boards (i.e. the business population required to meet these regulations will be constant)

3.1 Changing marks only when there has been a Marking Error

We plan to introduce new regulations to improve the current process relating to review of marking requests. These changes will require that examiners must only change a mark where there has been a Marking Error. This will help achieve one of our principal objectives: a fairer approach, including for learners who do not request a review of their marking. Over time this may reduce the risk and associated costs to schools and colleges of a significant growth in requests for reviews of marking.

For exam boards the direct cost of this element should be negligible. We do not anticipate it will take examiners longer, or cost exam boards more, to carry out a review of marking in line with our requirements compared to the current arrangements⁹.

Over time it is expected that this requirement could lead to a secondary effect as the behaviour of schools and colleges changes. Because marks should only be changed when a Marking Error has been made, this should lead to a reduction in the number of mark (and grade) changes, which should lead to a change in the number and

⁹Although we haven't asked exam boards for this information directly we did ask them, when we were considering other policy options, pre consultation, whether a different rate would be paid for examiners conducting a clean script re-mark. All exam boards responded to say that they would pay their examiners the same, indicating that rates are not very sensitive to changes in the precise nature of the work.

distribution of requests as there will be less incentive to seek speculative reviews. This secondary impact has not been assessed, as noted in the assumptions.

Because of the operational impact of some of our proposals, we are not rolling out all changes in 2016. We therefore recognise that the full benefits of our approach will not be achieved until all requirements are introduced and embedded.

3.2 Make sure reviews of marking are undertaken by markers who have been specifically trained and prepared to undertake the review of marking role

In our research¹⁰ we found a lack of consistency of approach between reviewers and some confusion about the role of the reviewers. We will require that reviewers must only change a mark where a Marking Error has been made. Requiring exam boards to make sure that the reviews of marking are carried out by those trained specifically in this area will ensure the reviewers are aware of this requirement. We anticipate this will improve the consistency of approach and in due course public confidence in the final mark.

There will be costs associated with introducing this approach. Some training is already undertaken by those involved in reviewing marks, but this is usually with respect to correctly applying the mark scheme as part of original marking, not preparing them specifically to review the marking of others. We have not prescribed the duration or format of the training. We have assumed that there are 5,000¹¹ examiners involved in this process. Using figures from the Office of National Statistics (ONS), we estimate the hourly cost to the exam boards of each examiner is around £27¹². We estimate that, if exam boards need to pay for each examiner to participate in an hour-long training course online, the cost to the system would be £135,000. If the training course lasts three hours it would cost the system £406,000¹³. These costs may be incurred annually by the exam board as they may need to re-train each reviewer every year.

We know from proposals from JCQ that the exam boards have already developed their thinking about how training would be provided to reviewers. In exam boards'

¹⁰ <https://www.gov.uk/government/publications/alternative-marking-review-processes-for-exams>

¹¹ In our report on quality of marking we estimated that there were around 51,000 examiners <https://www.gov.uk/government/publications/quality-of-marking-in-gcses-and-a-levels>. We have assumed that around 10 per cent of all examiners go on to review marking

¹² The provisional results of the 2015 Annual Survey of Hours and Earnings reports that the average teaching professional is paid £22.48. Adjusting for inflation of 0.3 per cent and including on costs of 20 per cent gives a 2016 cost to exam boards of £27.06

¹³ We also conducted sensitivity analysis to consider if the number of examiners was half our best estimate (2,500) or twice that (10,000). Combining with the low scenarios of 2,500 examiners and a one hour course gives an overall low estimate of £68,000. Combining the high scenarios of 10,000 examiners and a three hour training course gives an overall high estimate of £812,000.

responses to the consultation, they indicated that they are able to provide training to reviewers in 2016. They have also indicated that it is likely that training will improve over time. We are therefore confident that the exam boards have a good understanding of what is being proposed, the benefits of it to them and the system, and that any additional burden placed upon them is manageable and not unreasonable.

3.3 Make sure marking reviewers do not review their own marking

Exam boards told us during an audit¹⁴ that they already try to make sure that examiners do not review their own marking. One exam board stated that on some occasions, for reviews of moderation, the only reviewer available is the original moderator. However, we do not have information about the number of occurrences. The Code states at Section 9.7 that:

“The awarding organisations must, wherever possible, ensure that a post-results review of marking or moderation is undertaken by someone other than the original examiner/moderator.”

We do not think we should allow a reviewer or moderator to review their own work. Our proposal represents a strengthening of the current position and brings about the objectivity stakeholders expect.

Exam boards told us in the audit that IT systems are set up to avoid, where possible, the same examiner reviewing the same script. Additional manual checks are also in place. Therefore, we do not anticipate that the exam boards will be required to make any changes to their IT systems to meet this requirement.

For some subjects where there is a small number of entries and not many requests for reviews of marking, exam boards may need to contract an extra examiner to conduct reviews. It is only in rare circumstances that there is a unit or qualification component where there is just one examiner. On these occasions exam boards will have to hire another competent person. We do not know how many extra reviewers would need to be found by the exam boards. The current reforms to GCSEs, AS and A levels mean that a number of the qualifications that have been available, but have had a very low take-up, will no longer be provided. This means that in the future the number of qualifications for which there is just one active examiner will be extremely low.

¹⁴ We carried out an audit of Enquiries about Results and Appeals in 2015/16.

We acknowledge that the proposal brings with it some additional burden, but that the circumstances are such that the burden is necessary to bring about an improved and transparent system.

3.4 Monitor whether the examiners who are undertaking marking reviews are acting consistently and are only changing marks when there has been a Marking Error

Exam boards are currently required to monitor the consistency with which the original markers are applying the mark scheme. The Code does not expressly require them to monitor how well and consistently reviewers are working. Under the new requirements exam boards will have to monitor their reviewers. In the longer term it is expected that this will improve the quality of reviews as markers who are not properly undertaking their role will be identified.

There are a number of different ways that exam boards could monitor their reviewers. We do not prescribe under the proposed new rules how exam boards should undertake this monitoring. It will be for the exam boards to determine the best way for them to meet this requirement. For the purposes of this impact assessment we have analysed two potential methods of monitoring and the potential associated costs. The exam boards may find more cost efficient ways of complying.

Under some arrangements for first-time marking of the scripts, exam boards seed extra scripts or items to assess how examiners perform when marking scripts which others have already marked. If a reviewer reviewed an additional seeded script for every 20 scripts reviewed, that would mean there were an additional 28,250 scripts to be reviewed across the 368,000 GCSE and 197,000 A level review of marking requests. Rates paid to examiners vary significantly between scripts due to the length of the exam, the complexity of marking and the availability of markers. Based on our average marking rates this would equate to around £164,000¹⁵.

Exam boards would have to set up the seeded scripts. Based on half a day (4 hours) of a senior examiner's time¹⁶ for each examination component, and assuming there are 300 components which require seeded items¹⁷, the total cost would be around £44,000.

¹⁵ Marking rates are based on rates paid to examiners for a small sample of units in summer 2014. These figures have been adjusted to represent the exam length of a wider set of units, for which reviews of marking are commonly requested. Additionally, they have been adjusted for inflation to provide 2016 prices.

¹⁶ Using the annual survey of hours and earnings, and assuming senior examiners are paid a similar rate to senior professionals of education establishments: £30.76. Adjusting for inflation of 0.3 per cent and including costs of 20 per cent gives a 2016 cost to exam boards of £37.02.

¹⁷ In 2015 there were 312 units with 500 or more enquiries.

There will be some cases where exam boards identify those who are not undertaking their role as reviewer in a consistent manner. Exam boards have told us that they choose examiners who have performed well during first-time marking to conduct reviews of marking. Combined with the additional training (3.2) it may mean that the seeding rate above can be reduced over time. It may also mean that there are only a small number of cases where work needs to be reviewed again, or new examiners need to be hired. We have not estimated the cost of this.

Exam boards have told us that they would need to change their IT systems, so that the scripts which needed to be monitored were passed to another reviewer automatically. We consider the IT changes which will be needed to implement our requirements as a whole at the end of this section.

An alternative approach would be for another reviewer to check a proportion of the original reviewers' work. This is sometimes called back reading. Exam boards may employ a similar sampling rate, with the second reviewer considering one in twenty of the first examiners' reviewed scripts. Using the same assumptions as above this would impose a total additional annual cost of £164,000.

Based on an average of these two approaches our best estimate is £186,000.

Because of the IT changes required, changes to contracts, and because deadlines and prices have been set, exam boards have told us that they may not be able to undertake live monitoring of their reviewers for summer 2016. We will consider with each exam board what steps they can take to monitor their reviewers in 2016. These will differ between exam boards, depending on where their current processes are. Because of this, it is difficult to estimate what the costs will be in the first year.

We acknowledge that this is a new requirement, but that the imposition of monitoring is an important step to rectify an unsatisfactory position from the Code where a divergent approach is adopted by reviewers within and across exam boards. This is an important change to secure fairness and consistency in the system.

3.5 Making the reasons for the outcomes of a review available and correcting Marking Errors

We consulted on requiring exam boards to provide reasons for the conclusions that reviewers reached. We believe our proposal should help secure a more consistent approach to reviews of marking within and across exam boards; that it will bring greater transparency and accountability; that over time, it will bring about a change in the way in which schools, colleges and learners approach their decisions as to whether to seek a review of marking, or to appeal a review of marking outcome.

Although the Code does not explicitly require exam boards to give schools, colleges or learners reasons for the outcomes of reviews of marking, we believe that our new

rules support existing requirements contained within General Condition A5, which relate to the availability and adequacy of resources and arrangements, and General Condition H5, that requires that results must be based on sufficient evidence. Our new rules specifically require that the reviewer must record the reasons for any determination and any change in mark. We propose that the outcome of the review should be communicated to the school, college or learner, specifying any change in mark and change in result, and that the reasons for those determinations should also be available either at the same time as the outcome or later. The requirement to record and then make available reasons for any determination flows from the thought process the reviewer must follow when reviewing marking, and provides an audit trail that should show that the reviewer and exam board have followed the correct procedure.

We have, however, modified our proposals in light of responses to the consultation around operational challenges of meeting the new requirements in 2016, acknowledging that reviewers already make notes on exam scripts and exam boards currently send a letter to the school, college or learner alongside the outcome. We have recognised that the exam boards may need to make changes to their systems to meet this requirement and with it may incur some additional cost. We have therefore amended our original proposal to allow the exam boards only to provide reasons on request and for those reasons to be requested after the decision has been communicated.

The new rules do not prescribe how the reasons should be captured or communicated. We are allowing the exam boards an opportunity to explore the ways in which they can meet this requirement. We do not believe therefore that this new rule is unnecessarily burdensome. We believe that this new rule will bring about improved transparency, consistency, efficiencies and confidence in reviews of marking. It will also allow exam boards and their reviewers the opportunity to demonstrate their thought processes and judgements in this area which in turn will allow schools, colleges and learners to make informed decisions as to whether to seek appeals or reviews of marking in the future. We believe that this is a proportionate position to take, given that we would expect exam boards to know the reasons behind their decisions on review.

4 Changes to other post results services

In addition to changes to reviews of marking we consulted on other changes to post-results services. Here we have assessed the changes which are more likely to have major implications for exam boards, schools and learners.¹⁸

4.1 Access to scripts

Currently schools and colleges can ask an exam board to return a marked AS or A level script before they decide to request a review of marking. Exam boards charge a fee for this service which ranges between £10.30 and £13.10. We propose to keep this requirement in place and to allow exam boards to charge a fee for the service if they wish.

We plan to require exam boards to extend this same service to GCSEs, although we are consulting on the date from which this requirement would be introduced. Currently marked GCSE scripts can be requested but these do not have to be provided before the date for requesting a review of marking has passed.

In terms of the benefits of this proposal, it is anticipated that this will improve the efficiency in the system as schools, colleges or learners could review the scripts to assess whether an Administrative Error has been made, or whether there is reason to ask for a review of marking. The number of speculative requests for a review of marking should reduce, which should in turn reduce the overall cost of post-results services to school and colleges (and in some cases learners).

Exam boards have told us that to implement this proposal they will need to make changes to their IT systems. We have asked exam boards how much it would cost to implement those IT changes, but they could not provide further information at this time. Given that we do not have sufficient information to complete detailed analysis, we propose to consult further with the exam boards so that we can model the actual costs of the wider implementation of this proposal so we can decide on a reasonable implementation date.

One exam board is already offering access to scripts for some GCSEs ahead of the deadline for other post-results services and although we cannot predict the number of GCSE scripts that may be requested, we can make some assumptions using their data that there may be a strong relationship between the number of reviews of

¹⁸ Other changes are: for GCSE 9-1, Reviews of Moderation (GCSE 14), Appeal of Moderation (GCSE 18), Failure in Assessment Processes (GCSE 23), and Publication of Review Arrangements and Appeals Process (GCSE 17 and 18 respectively). There are separate rules in place for legacy GCSE and legacy A level, and reformed A level, with different section numbering. They are substantially the same, but the references here are simply for illustrative purposes in the GCSE 9 to 1 rules.

marking (service 2 requests) received and the number of scripts which could be requested. Using the information we have received on the number of scripts requested from one exam board, and multiplying across all subjects and exam boards based on the number of requests for reviews of marking, gives a total of 31,000 scripts¹⁹. If exam boards continue to charge a similar fee it could cost schools around £363,000²⁰.

Schools can currently request their scripts after the deadline for requesting a review of marking has passed. It is expected that the number of requests for scripts after the deadline will fall. We do not have any information to say how many of the scripts requested before the deadline would have been requested in any case.

The actual impact on the total cost of post-results services depends on the prices charged, and the reduction in the number of unsuccessful reviews of marking. Exam boards charge between £10.30 to £13.10 for a copy of a script, and a review of marking costs on average £31.40 per script at GCSE.²¹ This means that schools could save money if the number of unsuccessful requests for a review of marking at GCSE was reduced by around a half or more through asking for a copy of the script in advance of making the decision.²² Whilst this may result in a financial saving to those who pay for reviews of marking there may be additional non-financial costs for teachers, parents and others who may spend more time considering the scripts and advising learners on whether to request a review, but they are unlikely to be paid more to reflect this.

As explained above, this analysis is based largely on assumptions, and our further consultation and work with exam boards will assist in reaching decisions about reasonable implementation timelines.

We will however now require exam boards to publish their approach to, and their target times for, returning scripts. We anticipate that this would have minimal burden on exam boards.

4.2 Allow exam boards to accept such requests directly from learners, including those who are not private candidates

The Code prohibits exam boards from accepting requests directly from learners who are not external candidates. Our proposals would allow exam boards to accept

¹⁹ We cannot be sure that this is a good comparison as the sample size is relatively small, and it is not clear how well this service is advertised.

²⁰ Based on a review costing the mid-point of fees for access to scripts currently charged.

²¹ This is a weighted average based on 2015 fees and the number of service 2 requests each exam board received in 2015.

²² On the assumption that costs remain broadly the same.

requests directly from learners if they wish, and require all exam boards to publish their approach to this.

As a result of such a change each exam board will have to make a business decision as to whether to allow learners who are not external candidates to request a review of marking directly. Overall it represents a removal of an unnecessary restriction. We do not have information on whether the exam boards will wish to offer these services to learners in this way, or if they were to be offered, how many learners would take these services up.

Exam boards are likely to choose to offer services to learners where they feel it will add value to their business (in a financial or a non-financial sense) beyond the additional costs that will be incurred through changing their processes, for example how they invoice.

For learners it may mean they have an opportunity to have their script reviewed where they otherwise might not. There is value attached to the freedom granted to the student by allowing them this choice, as well as the value that is attached to receiving the grade their exam merited. As exam boards will still be able to charge a fee for this service there will be costs incurred by the learner (or others) in asking for a review. Learners are likely to have less of an understanding of the probability of receiving a grade change, compared with their teachers (although some may be able to gain good advice from teachers or parents). This may mean that the student is not fully able to assess the value of the service they are buying. This is one of the reasons why we have not required exam boards to offer this service. Instead we are allowing exam boards to have discretion to set out under what circumstances they will take requests directly from learners.

Our new rules require that, where exam boards do not accept requests directly from learners who are not private candidates, they must ensure that the school or college has effective arrangements in place to consider disputes between the learner and the school or college as to whether a request for review or appeal should be made. Similar requirements currently exist within section 9.13 of the Code of Practice and therefore, should exam boards choose not to accept such requests directly, there should be little or no change to current centre arrangements and no additional burden should arise.

4.3 Review of marking of centre marked assessments

Currently, where assessments are marked in schools or colleges, learners do not necessarily know the mark their teacher has given and so are not able to ask for it to be reviewed if they disagree with it (despite the requirement on exam boards to require schools and colleges to have review arrangements in place). We are introducing a requirement for exam boards to build into their agreements obligations on schools and colleges to:

- allow learners to seek a review of the school's marking, that learners know they can do so, that they can have access to information about the review arrangements and that the review is undertaken at a time that meets the exam board's moderation timetable
- give learners the marks of the school-marked assessment in time to enable them to request a review if they wish
- make sure learners have the materials they need to consider whether to request such a review
- undertake the review using a competent marker with no personal interest in the outcome of the review
- correct any Administrative Errors if these are found during the review
- re-mark the task if a marking error was found.

Generally, these requirements are not significantly different to what is in the Code already, where exam boards must make sure that learners are able to ask a centre to review the mark for their assessment, but currently there is no requirement for learners to be told what mark they have been given.

Responses from the exam boards to the consultation on this point raised concerns that the requirements would be disproportionately burdensome.

We believe that the improved transparency could result in more requests for reviews of teacher marking. Depending on the number of learners who ask for a review of marking, this could be significant. We do not have information regarding how many reviews schools can expect. Neither do we have information on the frequency with which learners currently ask for their teacher-marked assessments to be reviewed. Schools' representatives who responded to our consultation responded negatively to the consultation; the largest number of comments suggested that the reason for disagreeing was that it might undermine teachers.

For learners it means that they have the same opportunity to ask for a review of marking whether the assessment is marked by a teacher or by the exam board. We believe that this is an important improvement to the system, acknowledging that it brings with it some additional burden on schools and colleges. We acknowledge the concerns that have been raised with us, however we consider that the additional burden is necessary in order to bring increased confidence in marking and secure overall fairness, for all learners, regardless of the type of assessment.

In light of the potential impact on schools and colleges of telling their students their results we will consult further before deciding when to implement this requirement.

We will undertake further analysis and collect more information to assess the impact of this proposal. We particularly invite information from schools and colleges on the number of requests for reviews they currently receive and the number they may forecast receiving in the future.

4.4 Exam boards set and publish reasonable deadlines and target time periods by which schools and colleges must request the return of a script, notify the exam board of an apparent Administrative Error, request a review of marking and publish information about their performance against those time periods

The current arrangements in the Code set explicit dates and timelines with which all exam boards, schools and colleges must abide. Our new requirement means that exam boards would be free to set their own dates and timelines, subject to the ability of Ofqual to set minimum requirements. In some cases, this would allow exam boards to have a longer turnaround time for reviews of marking. This could cut costs, allowing exam boards to hire fewer examiners and administrators, but use them over a longer period of time. On the other hand, an exam board may set a more intensive timetable which meant they had a shorter time in which to respond to requests, particularly when schools and colleges demanded such an approach. In other cases, exams boards may take the opportunity to allow learners, schools and colleges longer to decide whether to request a review and reduce the time in which they will turn the review around.

We have information which suggests that some exam boards easily meet the currently required turnaround time. This suggests that there may be a move towards lengthening the time schools and colleges have to decide whether to ask for a review or that some exam boards might set more ambitious deadlines for themselves than those currently in place.

If exam boards were to choose different deadlines it may, depending on the size and ability of the school or college, prove problematic to comply. However, allowing different deadlines may lead to positive competition between exam boards, and we would not wish to restrict exam boards' abilities to innovate. Exam boards will be required to publish the dates by which they require requests to be made and their target dates for dealing with requests. At present, from the responses to the consultation, it appears that exam boards will co-ordinate their approach and that schools and colleges would welcome this.

We will also require exam boards to publish data to show the number and the percentage of times in which they achieve their published deadlines, for example with regard to giving access to marked assessments. Some exam boards do this

already, although not always in the same way. Because we will set out the form and timing of their reporting it will help schools, colleges and learners compare the services which exam boards offer, potentially leading to positive competition between them.

4.5 Exam boards publish key performance indicators for their post-results services

We are requiring each exam board to publish key performance indicators. These are:

- the number of reviews of moderation which the exam board has carried out and the number of reviews that have led to a change in the outcome
- the nature of any Moderation Errors which have led to a change in the outcome of moderation
- the number of Administrative Error reviews carried out
- the number of Administrative Errors found and corrected, and the nature of those administrative errors and any steps taken to reduce their number
- the number of Administrative Error reviews which led to a change of mark
- the number of Administrative Error reviews which led to a change of result
- the number of requests for a review of marking it has dealt with, the number of reviews which led to a change of mark and the number of reviews which led to a change of result
- the nature of any Marking Errors which led to a change of mark on a review of marking and any steps taken to reduce Marking Errors
- the number of appeals conducted and the number of those that were successful
- any changes which the exam board has made to its review arrangements following monitoring of moderation and reviews of marking
- the nature of any Marking Errors, Moderation Errors and failures to apply procedures consistently or follow procedures properly and fairly which led to successful appeals

Exam boards would be expected to publish these in such a form and such a time as we prescribe.

We currently publish data showing the number of requests for reviews of marking and their outcomes, based on data provided by exam boards. It is anticipated that exam boards will have little additional work to do to publish this data. Schools, colleges, and to some extent learners will benefit by knowing how exam boards perform against each other, and such transparency should provide an additional incentive to exam boards to reduce the number of Administrative Errors and improve the quality of marking. We may also continue to publish composite data too.

4.6 Appeals

We have decided to consult on piloting our proposal to extend the grounds for appeal. Further consultation will include details of a pilot in a small number of subjects in 2016 to test the proposed change. We will analyse the outcomes of the pilot, and will decide whether our proposals need any changes, before deciding whether and when to extend the approach to qualifications in other subjects.

We have made the decision to pilot our proposals for extending the grounds of appeal because, having considered the responses to the consultation, we recognise that there was notable concern that extending the grounds of appeal for all subjects could increase the number of appeals to an unmanageable level, could increase the complexity of those appeals and unrealistically raise expectations of schools, colleges and learners.

We understand that our proposal will be seen as a significant change, and we will use the pilot to consider the effect our proposed changes might have on the volume of requests, the costs involved and the outcomes.

We will continue to require exam boards to provide for the effective appeal of:

- the outcome of any moderation of a centre's marking of an assessment following a review of moderation
- the result of any assessment in respect of a learner following a review of marking of marked assessment material
- decisions regarding reasonable adjustments and special consideration
- decisions relating to any action to be taken against a learner, school or college following an investigation into malpractice or maladministration.
 - The proposed process for appeals may provide for the exam board to charge a fee for conducting an appeal, specify other requirements

providing they are reasonable, and specify a reasonable time period during which an appeal must be requested.

- The appeals process must also provide for all appeal decisions to be taken by persons who have appropriate competence with no personal interest in the decision being appealed; that all appeal decisions are to be taken by persons with no previous involvement in any marking, moderation, review of marking or review of moderation to which the appeal relates, and with the final decision to involve at least one decision maker who is not an employee of the exam board, a reviewer employed by it or otherwise connected to it. An exam board must report the outcome of an appeal to the school, college or learner.
- In respect of appeals of reviews of marking, for those qualifications which are subject to the pilot, we propose to allow schools that remain concerned about a mark to appeal to an exam board on the grounds that:
 - that a Marking Error occurred that was not corrected on review
 - the exam board did not apply its procedures properly or fairly.²³
- We propose to issue guidance that will assist schools, colleges, learners and exam boards in determining how the new grounds of appeal will operate.
- Our proposals will expand the grounds on which an appeal can be brought. It is difficult to estimate the overall impact that the expanded grounds will have on the volume of appeals that may be made, the resources necessary to administer the new appeals process or whether the expanded grounds will increase confidence that Marking Errors and Moderation Errors are properly identified and corrected. Given the current lack of confidence in the appeals system, widespread stakeholder concerns over quality of marking and existing lack of transparency, we consider the changes to be necessary. It is partly because we cannot fully quantify the impact or the benefits of our proposals that we have decided to propose a pilot. This will allow us to test whether our proposals are disproportionately burdensome in the context of the wider system benefits that we believe they will bring.
- For those qualifications that are not part of the pilot, we propose that the existing arrangements provided by the Code, that the exam board must

²³ Appeals can currently be made on this basis.

provide for the effective appeal of results on the basis that it did not apply its procedures consistently, or that its procedures were not followed properly and fairly, will remain in place.

Exam boards currently charge for appeals, so it is likely that those who appeal will pay for any additional costs in this area.

4.7 Removing the Code of Practice

At the same time as introducing new requirements for post-results services we will be removing the Code. The Code contains the rules for the existing post-results services. The Code also contains requirements in a number of other areas, including exam board personnel, setting question papers, marking, and moderation, issuing results, malpractice and access arrangements and special consideration. As well as containing requirements which we need to remove to implement our approach, much of what is in the Code duplicates rules which are set out elsewhere (mainly through our General Conditions), often describing what was required in an unnecessarily prescriptive manner.

In deciding to withdraw the Code, we reviewed which of the requirements of the Code are covered by our other regulatory requirements. We published a summary of this in December 2015, setting out the similarities and differences between the Code and the requirements in our other regulatory documents. We have rules covering the majority of the requirements in the Code, albeit in less detail. Of the 10 sections in the Code, there are only three which contain requirements that are not sufficiently covered elsewhere.

In particular, we are removing the rules around the specific named roles that exam boards must employ, such as the chief examiner, and the detailed descriptions of what each must do as part of their role, the committees they must be on and the decisions they need to be involved in. This will enable the exam boards to run their business processes in a way they see fit, allowing the most appropriate members of staff to participate in relevant committees and make decisions. This could result in savings for the organisations, and could result in improved quality if the named role is able to spend their time more efficiently.

Although we recognise that removing the Code will remove an established set of procedural rules with which schools and colleges are familiar, the proposed changes will simplify and consolidate and we believe bring little change in familiarisation costs for the exam boards. It is possible that a smaller number of people will have to read the requirements in full as the changes we are making will mean that the rules are less prescriptive, however, we don't have enough evidence to estimate the value of this change.

A separate easy to read document is being created by Ofqual for schools and colleges to ensure that they can easily understand the new rules.

4.8 Changes to IT systems

Overall our new requirements are likely to need relatively significant changes to exam boards' IT systems. They have told us that they will have to amend their systems to provide for reasons to be given following reviews and so marked GCSE assessments can be returned to schools and colleges that want to see them. They may also automate how they monitor reviewers.

Each exam board has its own IT system, with different contractual arrangements and different functionality. This means there could be large differences in costs for different exam boards. When we were considering the initial options for this policy, one exam board told us that to change the IT system to incorporate an approach where a review of marking, and then a clean script re-mark where the review identified the mark as unreasonable, would cost between £77,000 and £100,000. We therefore tested a figure of £77,000 with exam boards, but received only one comment on the estimated cost, which suggested it was an underestimate. However, the exam board did not provide any further information on what the approximate cost would be. Given the lack of further costing information, we have now assumed that it would cost each exam board £100,000 to change their IT systems, £400,000 in total²⁴. We appreciate that this is an assumption based on limited information but given that we have sought but not received more detailed representations on costs, it is a reasonable assumption.

Exam boards identified that there may be additional costs incurred through testing the system. If these tests are not carried out sufficiently there could be risks to the system, discussed below.

4.9 Communication to schools and colleges

Exam boards identified a further additional cost of communication to schools and colleges in their response to our consultation. Exam boards already send out communications to schools and colleges that buy their qualifications. We appreciate that as some of the changes are only being confirmed once the exam series has started, the main communication activities may have concluded. Based on a recent communications activity by Ofqual, we estimate that it would cost the exam board in the region of £10,000 to send a postcard to explain the changes to every school and college in the country.

²⁴ This number only provides an indication of the costs. Exam boards have had two formal opportunities to provide information on the likely costs, and specifically the IT costs of our approach. We have also discussed this with exam boards informally.

5 Risks to the system

As with all regulatory changes, there is an underlying risk that if exam boards and others are not able to comply with the new requirements, or implement new systems or processes without carrying out the necessary checks, some learners and centres may not receive the same quality of service as in the counterfactual.

The highest risks to the system arise where we are asking exam boards to make changes to their IT systems. These kind of changes are well known for being more problematic than first anticipated.

If there was to be a system failure for post results services the biggest impact is likely to fall on those who would not be able to take a university, work or further education place because they did not receive their completed review in time. We are aware that every year many learners use their GCSE results to enter their chosen A level courses, and that sometimes these are dependent on qualifications which have been subject to a review of marking. However, the results of the reviews are regularly received after the start of term time meaning that schools and colleges appear to be able to manage this uncertainty.

For those learners seeking places in the higher education they currently request a priority review. Exam boards must complete the review in time to meet a final deadline otherwise learners may miss out on their university place. In 2015 there were 40,000 priority service 2 requests, of these 5,000 resulted in a changed grade. Assuming that each candidate only submitted one request, and each request which resulted in a grade change led to a university place, if the system failed it would mean that 5,000 learners would not be able to take up a university place²⁵. Compared to a situation where the system has not been changed, and the exam boards had not been delayed in sending a result, it may mean that the candidate would have to take an unplanned gap year, or attend a different university.

We do not have reliable information on the likelihood of this risk occurring. AS and A level scripts are already available ahead of the deadline to submit a request. Also evidence²⁶ shows that exam boards currently exceed the required turnaround times for requests. Exam boards have pointed out that our proposals are being introduced during a period of significant reform where boards will be delivering both legacy and reformed qualifications and in respect of which they have made significant

²⁵ This is a worst case scenario. In reality some students would request a priority review for more than one qualification. It is also possible that some students may be accepted by the university in the intervening period in any case.

²⁶ <https://www.gov.uk/government/statistics/enquiries-about-results-for-gcse-and-a-level-summer-2015-exam-series>

investments. Exam boards have said that any changes requiring system development and testing would create a high degree of risk. We have invited exam boards to provide us with more detailed and specific information but they have said that they would need to invest considerable time and resources to quantify the costs of specific implementation timeframes.

As a regulator we carefully consider the likely impact of our regulations including where they increase risks of financial failure, or where they increase risks and burden in the wider exam system. We have recognised that some of our proposals will require exam boards to undertake substantial system changes. In some cases, we consider that our proposals do not materially change what exam boards either are already doing or which they should be doing. In such circumstances, we consider the burden is limited and justified. For some other proposals, we have determined that they could not reasonably be implemented in 2016 without creating significant costs or risks. As a result, we have proposed phasing in these proposals. In addition, for the proposals that will require the most substantial system changes, we have said that we will undertake further consultation on implementation timelines which will allow us to assess and consider the burden as against the benefits and decide a suitable timeline.

Overall the risks that have been brought to our attention need to be weighed against the risks outlined in the counterfactual. Without changes to the system it is possible that a significant increase in the number of requests could introduce risks to the continued functioning of the current approach. We have also identified unfairness in the current system that must be addressed in the both the interests of individual learners and in the wider public interest.

6 Geographical coverage

Ofqual regulates qualification in England. There are four exam boards directly regulated by Ofqual which will be required to meet the new regulations. However, historically we also regulated CCEA, the exam board in Northern Ireland, and many learners from Northern Ireland and Wales took GCSEs, AS and A levels which were designed for all three nations.

The regulators in Northern Ireland and Wales will decide whether to implement similar regulations.

For the purposes of this impact assessment, we have not included fixed costs to CCEA to implement the regulations. However, because the publicly available data for post results services includes learners from Northern Ireland and Wales the impact on these learners is included within this impact assessment. In the future, learners from Wales and Northern Ireland may continue to take some qualifications which are designed primarily for the English market, so they will benefit from our

requirements relating to post-results services. Additionally, the number of learners in Northern Ireland and Wales is small compared to England, so the inclusion of these extra learners does not have a significant impact on the estimates.

7 Total costs

In line with other impact assessments the table below sets out a summary of the monetised costs and benefits over a standard policy lifetime of 10 years. We have estimated the likely cost of the impact of certain proposals as far as we have been able to so. There are a number of elements of the proposals for which we have not been able to estimate a cost and so the total cost cannot be considered to be comprehensive.

Costs per year (£000s)

Cost / benefit	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
One off IT changes	200	200	0	0	0	0	0	0	0	0
Annual training cost	271	271	271	271	271	271	271	271	271	271
Annual monitoring cost	186	186	186	186	186	186	186	186	186	186
Total	657	657	457	457	457	457	457	457	457	457

Over the 10-year period this gives a total net present value of -£4.3m million, which equates to an equivalent annual net cost to business of £480,000.

These costs should be compared to the annual exam board turnover of circa £780 million²⁷, and an annual expenditure on reviews of marking of around £16 million.

This cost should be weighed against the benefits, not all of which are monetised.

These are:

- increased efficiency, as fewer speculative enquiries will be made
- increased fairness
- increased quality in reviews of marking.

There is a high likelihood that these costs will be passed onto schools and colleges as exam boards are able to charge a fee for these services. Schools and colleges can only buy post-results services from the exam board from which the qualification was originally purchased (and examined).

²⁷ This figure includes non-awarding activities undertaken by Pearson.

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