

ANALYSIS OF CONSULTATION RESPONSES

# Exceptional arrangements for exam grading and assessment in 2020

Consultation on specified general qualifications – GCSEs, AS, A levels, Extended Project Qualifications and the Advanced Extension Award

**ofqual**

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# Introduction

Following the government's decision to cancel exams to help fight the spread of coronavirus (COVID-19), and that students should be provided with calculated grades this summer, we set out exceptional arrangements for awarding GCSEs, AS and A levels, along with the Extended Project Qualification and the Advanced Extension Award in maths, so that as far as possible students are not disadvantaged by these unprecedented circumstances.<sup>1</sup>

Aspects of the arrangements by which students will receive results this summer have already been set out by the government. However, we explained when we published our [information documents](#) that we would consult on some of the implementation decisions we must take, and that we would need to reflect in changes to our regulatory framework.

Our aims are:

- to ensure students can receive grades in these qualifications this summer so they can progress to the next stages of their lives without further disruption
- that the grades will be as valued as those of any other year
- that the approach will be fair

This is the summary of responses to our [consultation](#) that ran between 15 April and 29 April 2020 and which received 12,623 completed responses.

In this consultation we sought views on a number of features of the exceptional arrangements for awarding GCSEs, AS and A levels in 2020 and on our proposal to apply the same arrangements to Extended Project Qualifications and the Advanced Extension Award.

# Background

The coronavirus (COVID-19) pandemic has led to the closure of schools and colleges to all except the children of critical workers and vulnerable children, and to the cancellation of GCSE, AS and A level exams. In line with government policy we are working to enable students nevertheless to receive qualification grades.

We are introducing the exceptional arrangements at speed: to enable schools and colleges to gather and consider the evidence they will submit to the exam boards; so that students will know how their grades will be awarded; and so that the exam boards can build the systems needed to issue results this summer.

Before issuing the consultation, we had already consulted extensively with groups representing teachers, school and college leaders and with the exam boards. We had sought views from groups that represent students. We had also heard from many individual students and parents of students who had expected to take exams this summer about the way the arrangements might affect them, which we took into account when putting forward our proposals for consultation. We have also brought together a panel of assessment and statistical experts to advise on technical issues.

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<sup>1</sup> [Direction](#) issued by Secretary of State for Education 31 March 2020

In summary, as set out by government, the great majority of students who had been entered to take exams this summer will receive a grade calculated by the exam board for each of their subjects. Students who feel that the grade they are awarded does not reflect their ability, or for whom it was not possible to issue a calculated grade, will be able to take exams in the additional exams series which will be scheduled for this autumn or, if they prefer, next summer.

We consulted on a number of areas and summarise the responses below. We will publish separately our decisions.

## Who should receive a calculated grade?

### **Whether students entered for exams in year 10 or below should receive a calculated grade this summer<sup>2</sup>**

On 3 April 2020 we set out, in our [information document](#), an initial view that the exceptional arrangements this summer should only apply to students in year 11 or above, who needed grades to progress. We explained that we intended to consult on this view. Prior to consultation, we received representations from centres, parents and others indicating that the progression of some such students would be disrupted if they were not awarded a grade this summer, and to exclude them would have an unfair impact. We explained in our consultation that we had changed our view, and consulted on a proposal that as well as students in year 11 and above results should be issued for students in year 10 and below who anticipated sitting exams this summer. We sought views on this proposal.

### **The impact of our proposals on private candidates<sup>3</sup>**

In line with our information document, we proposed that exam boards should issue results for private candidates for whom a Head of Centre can confidently submit a centre assessment grade and include the student in their centre's rank order. Other private candidates may have studied with an established provider, such as a distance learning provider that is also an approved exam centre, and might similarly be able to receive a calculated grade. However, other private candidates will have no existing association with an exam centre. We sought feedback on the impact of our proposals on any particular groups of students.

## Standardising centre assessment grades

We explained the aims of our proposed approach to standardising grades and the principles which underpin it, and made proposals to support these.

For example, we set out our proposals to address key questions such as:

- how we should use statistical evidence to identify and adjust overly generous or harsh centre assessment grades

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<sup>2</sup> The Ofqual Board considered our proposals for awarding grades to students in year 10 and below and private candidates at its meeting held on 4 May and the [initial decisions](#) were published on 5 May, that is after this consultation closed. This analysis reports the responses of the consultation and does not take in to account subsequent decisions or actions.

<sup>3</sup> The Joint Council for Qualifications (JCQ) published further [guidance](#) about issuing results for private candidates on 30 April 2020, that is after this consultation closed. This analysis reports the responses of the consultation and does not take in to account subsequent decisions or actions.

- whether evidence of changes in a school or college's past performance should inform our interpretation of this evidence
- whether any issues of bias can be addressed through statistical adjustment

Our overriding aim is to make sure arrangements this summer are as fair as possible for all students. We are alert to concerns that unconscious bias could influence the grades schools and colleges might have expected their students to have achieved in the exams and assessments. Our consultation included an Equality Impact Assessment, and we have separately published a review of the research literature on bias in teacher assessments.<sup>4</sup>

## Appealing calculated grades

We consulted on whether appeals should include an opportunity to review:

- the centre's professional judgements
- the procedures followed by the centre and/or exam board
- the outcomes of the statistical process

We explained in the consultation why we consider that, in the exceptional circumstances of this summer, appeals should only be allowed on the grounds that the centre made a data error when submitting its information; or similarly, that the exam board made a mistake when calculating, assigning or communicating a grade.

## The autumn exam series

We explained our proposals to allow exam boards to run an autumn series for those students who were entered for the cancelled summer series. We are still considering with government how the autumn series should operate, and will set out our proposals in a further consultation soon.

## Putting in place the regulatory requirements

We proposed to suspend temporarily a number of the provisions in our current rules so that the exam boards can deliver the results in line with the exceptional arrangements necessary this year. We also explained that we will need to put some new regulatory arrangements in place to make sure all exam boards work in line with the agreed new arrangements so that, as far as possible, standards and public confidence in the qualifications are maintained. We will consult separately with the exam board on the changes once we have the necessary policy decisions.

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<sup>4</sup> <https://www.gov.uk/government/consultations/exceptional-arrangements-for-exam-grading-and-assessment-in-2020>

## Approach to analysis

The consultation was published on our website and available for responses, using the online form, between 15 and 29 April 2020. The consultation included 42 questions related to our proposals.<sup>5</sup>

We present the responses to the consultation questions in the order in which they were asked. Respondents could choose to answer all or just some of the questions. This means that the total number responding to each question varies and the details are provided for each question.

For most of the questions, respondents could indicate the extent to which they agreed with the proposals, using a 5-point scale (Strongly agree, Agree, Neither agree nor disagree, Disagree and Strongly disagree). At the end of each section of proposals, and in the equalities and regulatory impact assessments, respondents were invited to provide any comments in an open comments box. Questions where respondents were asked to indicate the extent of their agreement are referred to as “closed”, whereas those which asked respondents to provide comments are referred to as “open”.

Not all respondents expressed a preference using the 5-point scale, with some only providing a comment in the open question that followed. Likewise, not all respondents who did express a preference on the scale provided a comment in the open question and, of those who did, not all comments were relevant to the question. For example, in some cases, the comment was simply ‘no’. Many of the completed responses did not answer all the questions asked, focusing their responses on the areas of greatest concern to them.

We have provided tables of the data from each of the closed questions and presented them as pie charts which show the proportions of responses (percentages are rounded to the nearest whole number<sup>6</sup>). In an annex to this document, we have provided additional information about the responses from different respondent groups to each closed question (percentages will vary dependent on the number of responses received from each respondent group for each question). We have commented where there were distinct differences between the respondent groups and have summarised any main themes that were reflected in the responses.

Respondents were invited to self-identify the group they belonged to. The number of responses reported in the tables are based on these unverified self-descriptions. We noted that the number of responses self-identifying as ‘teacher representative group or union’ was far more than could be reasonably expected – 78 responses in total. We presume that some individuals who may be members of the representative group or union have identified themselves in this way, in other words as an organisation rather than an individual. We have not been in a position to verify the status of all respondents identifying themselves in this category. Therefore, we have been careful when commenting on the responses from this group as the data is not sufficiently secure.

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<sup>5</sup> Some responses were submitted by email through a variety of routes. These were taken in to account when considering the analysis of our proposals but are not included in the total number of submissions or the data presented in this document.

<sup>6</sup> This has resulted in some of the figures adding up to percentages out of other than 100. For example, questions 15 and 31 total 101%, and questions 19 and 20 total 99%.

We read all responses in full, including those that did not follow the format of the consultation. Some respondents chose to express their views without specifically answering the questions asked. These responses were considered but were not included in the total number of responses to each question.

While we structure the report by question asked, some of the comments from respondents inevitably straddled 2 or more of the questions. As a result, we recognise that not all views expressed or the extracts we have included fit neatly under individual questions.

Where we have included comments, to illustrate the main themes identified, we have edited some for clarity, brevity and to preserve anonymity but have been careful not to change their meaning.

## Who responded

As noted in the introduction we had 12,623 responses to the online consultation that used the standard response form. In addition, we received 62 responses which were submitted by email. These are not included in the quantitative data we provide below, although we have quoted from them where relevant.

We have given a detailed breakdown of respondent groups in Appendix A against each of the closed questions asked, to support a more detailed understanding of the level of support or disagreement with our proposals.

In light of the large number of responses, we have not listed the details of all of the organisations that responded. The following table is a summary of respondents by types who completed our consultation.

<b>Respondent group</b>	<b>Number of respondents</b>
Organisation	1,484
Awarding body or exam board	13
Local Authority	78
School or college	1,073
Academy chain	81
Private training provider	31
University or higher education institution	19
Employer	8
Teacher representative group or union	78
Subject representative or interest group	29
Other representative or interest group	74
Personal	11,139
Teacher (responding in a personal capacity)	3,849
Student - private, home educated candidate of any age	486

Student - Year 10 or below	510
Student - Year 11 or above	943
Parent or carer	4,325
Other	1,026
<b>TOTAL</b>	<b>12,623</b>

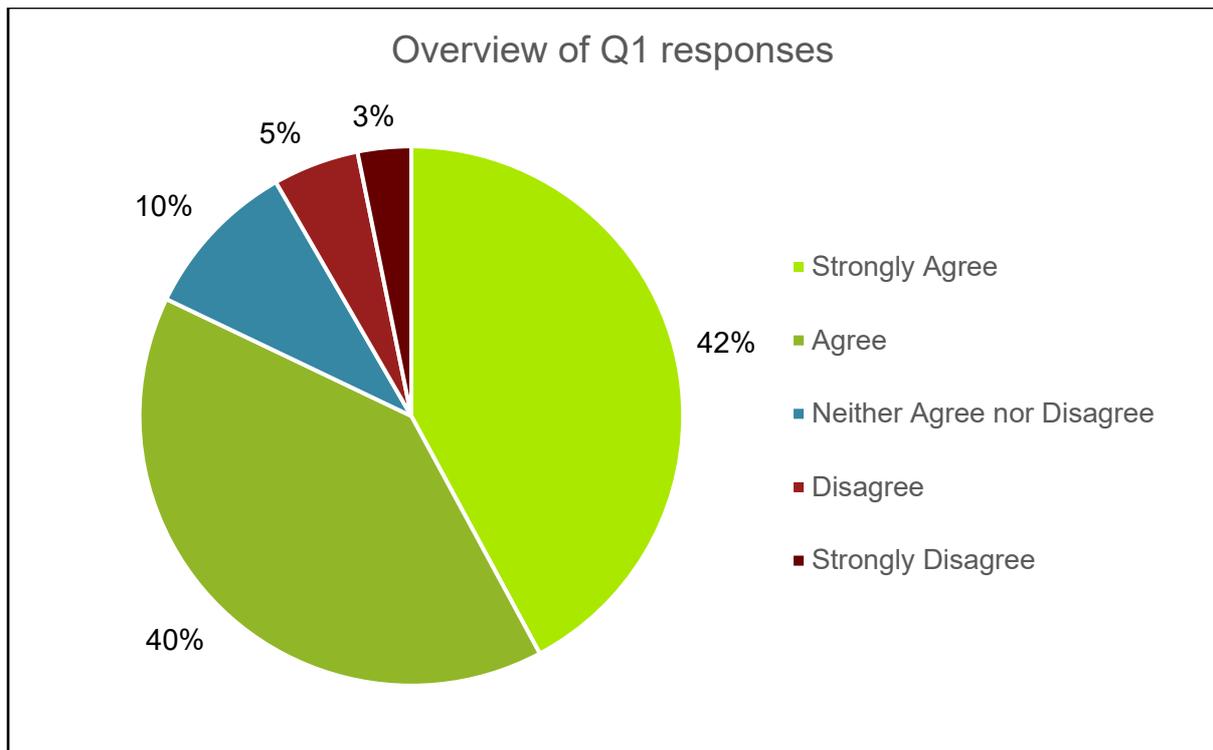
This was a public consultation on the views of those who wished to participate. We were pleased to receive a large number of responses, including many from students, and thank everyone for responding. We recognise that the responses are not necessarily representative of the general public or any specific group.

## Views expressed – consultation response outcomes

In this section we report the views, in broad terms, of those who responded to the consultation document. Responses to the individual consultation questions were as follows.

## Centre assessment grades

**Q1. To what extent do you agree or disagree that we should incorporate the requirement for exam boards to collect information from centres on centre assessment grades and their student rank order, in line with our published information document, into our exceptional regulatory requirements for this year?**



Q1 responses	Count	Percentage
Strongly Agree	4,648	42%
Agree	4,407	40%
Neither Agree nor Disagree	1,054	10%
Disagree	565	5%
Strongly Disagree	350	3%
<b>Q1 total responses</b>		<b>11,024</b>
<i>No response</i>		1,599
<b>Survey total responses</b>		<b>12,623</b>

The majority (82%) of respondents agreed or strongly agreed with the proposal that Ofqual should incorporate the requirement for exam boards to collect information from centres on centre assessment grades and their student rank orders, in line with our published information document, into our exceptional regulatory requirements for this year. Eight per cent of respondents did not support the proposal; their comments

focused on concerns about rank ordering and not the requirement to collect centre assessment grades.

The response patterns were broadly similar across all respondent groups, with the majority of all either agreeing or strongly agreeing with the proposal.

Of the group who identified themselves as 'teacher (responding in a personal capacity)' 89% agreed or strongly agreed with the proposal. This was similar to the responses from senior leadership (SLT) and exams officers, with both groups showing over 90% support.

"I believe that teacher assessment, prior attainment and ranking is the best that can be done in these circumstances." (Teacher – responding in a personal capacity)

"I think that schools will take it very seriously and their rank orders and grades will be pretty close to what students would have achieved" (Teacher – responding in a personal capacity)

The pattern for parents and carers showed 77% of respondents agreeing or strongly agreeing with the proposal and 8% of the same group disagreeing or strongly disagreeing.

"I think this is the best possible under the circumstances. Although there will be pupils who receive an unfairly low grade or an unfairly high grade, most pupils receive a fair prediction. My only concern is that teachers who have a child who is a long way below or a long way above their immediate cohort (class) cannot indicate this clearly on a straight ranking system." (Parent or carer)

Overall, 65% of all students were in favour of the proposal but there was slight disparity between the 3 student groups. For those students in year 10 and below, 78% supported the proposal and only 4% did not; 64% of students in year 11 and above were in support of the proposal with 24% of the same group not in support of it; 57% of those identifying as 'students – private, home educated candidates of any age' were still in favour of the proposal but 22% of the same group were not in favour.

"Requiring centres to submit a grade for each student and the rank order of students at the centre is the fairest possible approach. Teachers should be able to give the most accurate judgements of what grade each student is likely to achieve by using a holistic approach that is not determined entirely by mock results alone, which many students can over or underperform in without it reflecting their actual performance in the real exams. It is important that students' grades are not entirely determined by single assessments such as mocks that may not fully reflect their ability and teachers are best placed to consider all the information holistically." (Student – Year 11 or above)

"Centre assessment grades are a good idea but the basis is flawed. Whilst teachers should predict grades, the ranking is too subjective especially if students are all academically high achieving. Ranking in some schools may be easier but in others it would be almost impossible for teachers to assess how much students could improve or under achieve in final exams to be able to provide an unbiased ranking. These rankings could artificially result in

higher or lower headings for students without any real substance.” (Student – Year 11 or above)

The majority (94%) of schools or colleges (responding as an organisation) agreed with the proposal.

“I am satisfied that in my College at least, we have sufficient and robust data on our students to carry out the formation of the centre assessment grades to a high standard in order to maintain the integrity of the examination system nationally” (School or college)

“The proposal is perfectly sensible and in line with my expectations. The Ranking is particularly useful for both moderation and standardisation” (School or college)

For many large centres the scale of the ranking exercise with a large cohort of students was expected to be challenging for a number of reasons: the number of students to be ranked in core subjects, ranking accurately across classes taught by different teachers, and ranking students that teachers believe are of the same ability in a way that is fair.

“I think that asking schools and colleges to rank students is impossible when there are 200 students or more to be ranked within subjects and I don't believe that anybody has got the necessary overview to be able to distinguish between them particularly at a level when the head of department may have no personal knowledge of individuals. Class teachers will be able to rank their own classes but this cannot be merged with so many students.” (Parent or carer)

“I am happy with the proposal for collection of centre assessed grades. I am more uncomfortable with the ranking of students. It is fairly straight forward to rank order students in a class (as you correctly point out - the class teacher knows the classes they teach very well), but how does this transfer to the ranking of whole year groups (I am thinking of core subjects here). As a Head of Centre, I am happy to be accountable for the grades allocated to students - I am not happy to sign off ranking of students as I think staff will find it very difficult to justify where they put individual students.” (Teacher – responding in a personal capacity)

“Rank order assessment is relatively complex to do remotely, with many staff working from home without all of the evidence that they would need to use to make that decision. This does concern me a little.” (School or college)

“I see the biggest problem is for teachers having to rank the students within each grade. At many schools there may be 4 or 5 teachers (for example) teaching A level maths. The teacher will know their own class/set in great detail and would be able to give them a rank. But how would the 5 different teachers be able to agree rank order for all the pupils?”(Student – Year 11 or above)

“It will be incredibly difficult for core subjects at GCSE to come up with a meaningful rank order. For example, combined science have 3 different teachers per class. How can we have meaningful discussions if we don't teach the other children in other classes to decide if they are a higher or lower

rank than children from other classes.” (Teacher – responding in a personal capacity)

Respondents were concerned that it was not possible to have a tied ranking for students and that this would disadvantage some at the bottom of the ranking.

“I am concerned about the requirement to establish a single rank order without any allowance for tied ranks. For schools - such as mine - where there may be a significant cohort achieving on a level grading, it will likely be unfairly detrimental for those ending up at the bottom of a rank order within any given grade. Their position at the bottom may well not reflect the true nature of their deserved grade. I believe that tied ranks should be permitted, in order to give teachers the freedom to pitch each individual fairly.” (Teacher – responding in a personal capacity)

“[We] recognise the need for teachers to provide ranking of the students in the cohort of their subject. However, centres could find this difficult in most subjects even with relatively small cohorts of one teaching group but this difficulty will be exacerbated by larger cohorts, those where students in a cohort are “bunched” together in terms of their levels of achievement and those where subjects are taught by more than one teacher. In some cases there would be no evidence to justify a teacher putting one pupil above or below another. If there is no evidence base on which to make a decision, on what basis is such a decision being made? Forcing teachers to place one student above or below another in a rank order with no clear evidence surely introduces potential issues of bias.” (Teacher representative group or union)

Several respondents raised concerns about ranking in classes of gifted and talented students and believed that those at the bottom of the rank ordering may not get the grades that they were expecting.

“Rank ordering students in a highly performing super selective school may disadvantage students who are ranked towards the bottom of a class, even though their actual raw scores might be higher than students in other schools.” (Student – Year 10 or below)

“Only bit concerned about rank order process as if student was in top group they may not be ranked high against the others but in a lower set they would be graded higher rank.” (Teacher - responding in a personal capacity)

Ranking in subjects with a tiered entry was raised as a concern and respondents particularly highlighted the difficulties of comparing students with a centre assessment grade of 4 or 5 on the higher tier paper with those with grades 4 or 5 on the foundation tier paper.

“Subjects should be ranked within their entry code, so tiered subjects should have each tier ranked independently. I feel that asking teachers to decide which of two or more students is more likely to attain the grade when those students have been sitting different trial exam papers and may have been in different class groups on a slightly different learning path is unfair and may inadvertently discriminate against students entered for foundation tier.” (Other - Exams officer / manager)

“I'm concerned about how the rank ordering of grades will work in relation to the different entry tiers. For example in Maths we have just over half our

cohort entering higher tier and the rest entering foundation tier. If we have to rank order all students within a grade regardless of entry tier this will prove very difficult to do accurately. We have a huge amount of data to help us rank order within the two tiers of entry but we have very little to compare between the two. For example, the higher students getting grade 5 and the foundation students getting grade 5 would be very difficult to put in one rank order list as they have sat different mock papers and internal assessments. It would be far simpler, and I believe much fairer and more accurate if we submit separate rank orders for higher and foundation.” (Teacher – responding in a personal capacity)

There were a few respondents who were concerned with the ranking of native speakers in modern foreign languages (MFL), and the impact that they will have on the rank ordering of other non-native speakers.

“I am concerned that younger students entered for MFL GCSE qualifications are more likely to be native speakers, who will achieve very high grades, and will therefore be included in a centre's rank order with Year 11 students. The effect will be to suppress the ranking of Year 11 students, resulting in them being awarded a lower grade when the statistical model is applied. This will be happening each year anyway but not in a consistent way that could be predicted by any statistical model.” (Teacher – responding in a personal capacity)

"We encourage Ofqual to pay close attention to other characteristics distinctive to languages qualifications which may pose unforeseen challenges in the proposed centre ranking approach. These are the challenge of giving fair assessment to native speakers and non-native speakers within the same cohort (the benchmark must be the non-native speaker), and the challenge of ranking very small cohorts, or even individual students within a centre. This becomes particularly acute at A level, where the numbers taking languages qualifications are often small, and so cohort performance may differ considerably from year to year. In addition, we are aware that some specifications in lesser taught languages are being sat for the first time this year, which will limit teachers' ability to make comparison with previous cohorts." (Other representative or interest group)

Some respondents objected to year 10 students being included in the rank ordering for the year 11 students.

"Whilst I agree that Year 10 students should have their grades awarded in a similar way, I strongly disagree that they should be included with the year 11 rank order. Year 10 pupils will be entered because they are expected to receive higher grades and this will place some year 11 students therefore in a lower ranking." (Parent or carer)

There were concerns raised about the inclusion of private candidates within a school's rank ordering. Comments considered the impact of the rank order of a centre's own students and the lack of evidence to make an informed declaration about external students.

“Many centres will feel that they are unable to declare as to the accuracy and integrity of external candidates, private tutors or online distance provider. They also feel that they are unable to rank external candidates with their own

internal candidates. So home educated students will be greatly disadvantaged even though they may have fully qualified tutors who are teachers of integrity.” (Parent or carer)

“The arrangements for private candidates concerns me as often the school has little evidence of the standard of the students work.” (Teacher – responding in a personal capacity)

Many of the respondents expressed concern about teacher unconscious and conscious bias being a factor in the ranking of students. Further consideration of bias is included in question 3 below which deals with equality issues.

“Ranking systems only introduce bias - ensure this can be justified with prior evidence.” (Student – Year 11 or above)

“I think that rank orders can be prejudicial, especially for subjects with very small or very large cohorts. This is a relative, rather than an absolute scale and using such data inappropriately will disadvantage individual students.” (Teacher – responding in a personal capacity)

“It is well known that teachers often have a lower perception of SEND [Special Educational Needs and Disabilities] students' abilities (especially dyslexic students who can have difficulties in writing). These students often only fully are able to use and 'level the playing field' with their access arrangements during the actual examinations. In addition, background ability data does not always reflect true potential due to the method of testing this. I feel that extreme caution needs to be used when looking at work to date and teachers should have some guidance as to how to evaluate a SEND students' performance in relation to the grades they will then submit.” (Other)

Several respondents felt that some students would be awarded lower grades than they would have got in an examination.

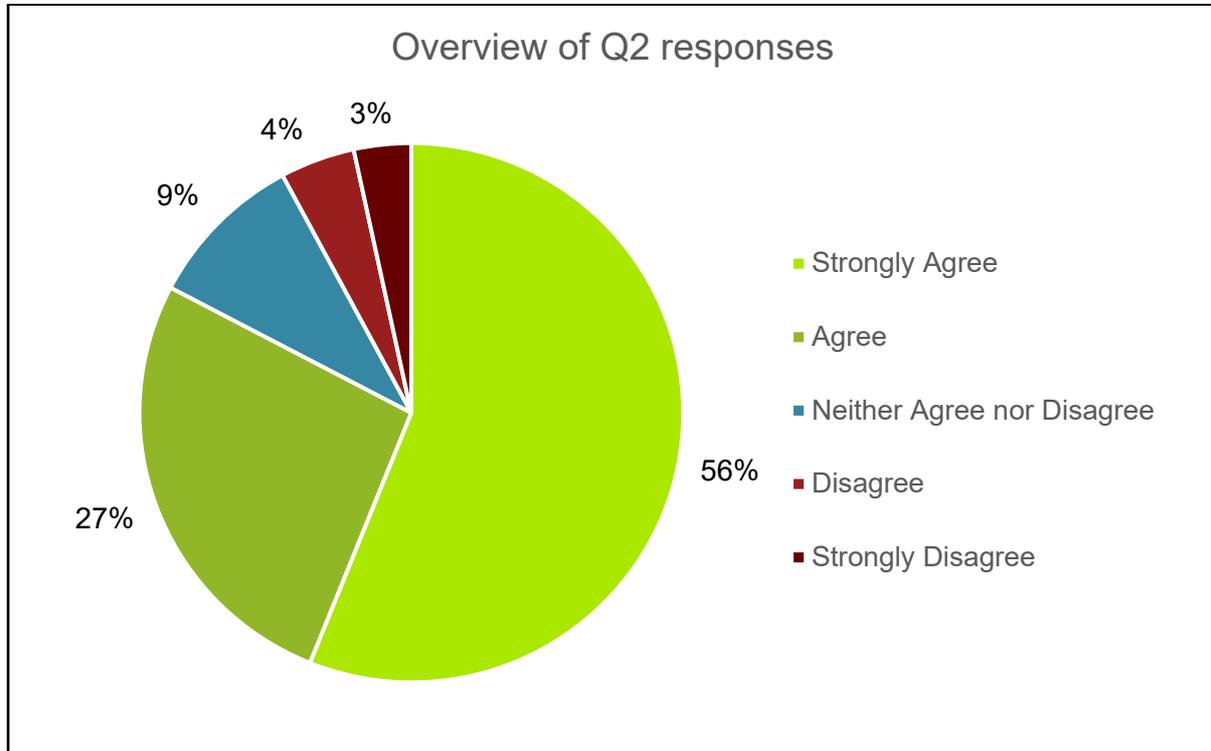
“This situation creates an asymmetry to the risks in the awarding process which does not exist in a normal year. The risk arising from the award of a grade which is lower than that which a student would otherwise have achieved is greater than the risk arising from awarding a grade which is higher than would otherwise have been achieved.” (Other representative or interest group)

“I am concerned that in a small school like ours, rank ordering pupils may result in some individuals receiving a lower grade that they would in the actual exam” (Other - Headteacher)

“Pupils do not tend to 'hit their stride' until the end of the spring term so performance until this point is not reflective of their true ability. Secondly, pupils were unaware that the work they were doing (tests, homework, mocks) would be used in this way at the time they were doing them. This is in complete contrast to their actual exams where they are acutely aware of the measurement they will then be subjected to so your proposal will deliver grades that are way off what would have been achieved.” (Parent or carer)

“Results day always yields some joyful surprises, where some have found that a last minute concerted effort has pushed them past the line of what was thought to be achievable. Hard to measure that.” (Teacher – responding in a personal capacity)

**Q2. To what extent do you agree or disagree that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity?**



Q2 responses	Count	Percentage
Strongly Agree	6,176	56%
Agree	2,929	27%
Neither Agree nor Disagree	1,042	9%
Disagree	490	4%
Strongly Disagree	375	3%
<b>Q2 total responses</b>		<b>11,012</b>
<i>No response</i>		1,611
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents (83%) agreed or strongly agreed that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity.

Overall 95% of respondents identifying as 'organisations' agreed or strongly agreed with our proposal.

“[We] support the proposal that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity. However, this must be one declaration to cover the whole cohort, in all subjects and for all awarding organisations; it would be unreasonable to expect a separate declaration for each awarding organisation used by the centre.” (Teacher representative group or union)

Of the group who identified themselves as ‘teacher (responding in a personal capacity)’ 90% agreed or strongly agreed with the proposal, and this response pattern was similarly seen within senior leadership where 94% agreed or strongly agreed.

In response to the proposal, the majority (79%) of respondents identifying as ‘parent or carer’ either agreed or strongly agreed.

“One would hope that all appointed Heads of Centres (or Deputies) have proven the integrity, honesty and trustworthiness of their submissions, by virtue of their appointment. Random spot checks of submissions would no doubt prove accuracy and precise appraisal.” (Parent or carer)

“May be better to get a declaration from Head Teacher / Head of Centre that each of the teachers submitting grades have declared they are accurate and have been prepared with integrity and they are not out of line with prior performance of student. This would ultimately give Head Teacher / Head of Centre recourse against any teacher if it came to light results had not been submitted accurately and with integrity.” (Parent or carer)

For all of the groups who identified themselves as ‘student’ 61% agreed or strongly agreed – but within this group (34%) of those identifying as ‘student – private, home educated candidate of any age’ disagreed or strongly disagreed.

“I strongly believe there should be a separate ranking system for private candidates within a centre. This would enable more heads of centres to submit a grade for private candidates.” (Student – private, home educated candidate of any age)

Although there was strong agreement that the Head of Centre should make a declaration regarding the accuracy and integrity of the centre assessment grades and the rank ordering, there was some concern about how accurate the data would be.

“While I agree that the Head of Centre should sign to agree that the data produced is accurate and done with integrity, I am not confident that the process can result in data that is highly accurate. Essentially I would be signing to say the data is 'as accurate as possible, given the circumstances and limitations of the process'.” (School or college)

Several respondents requested more guidance about the process for generating centre assessment grades.

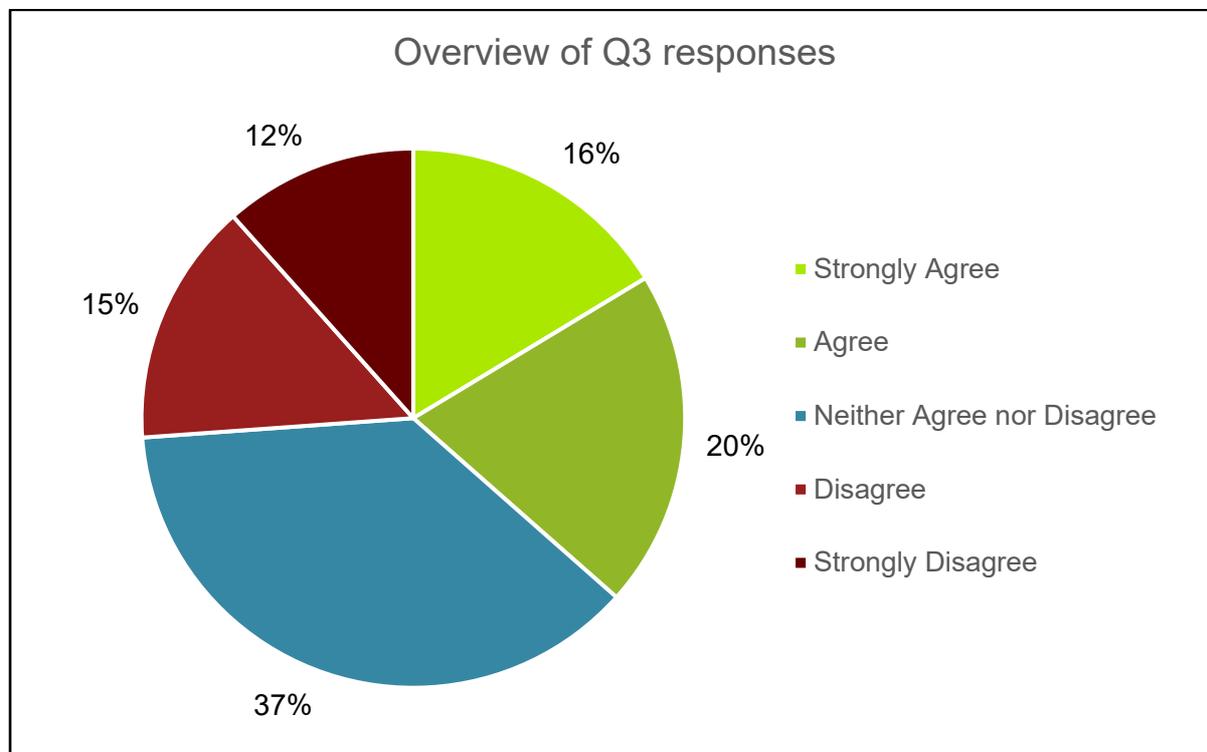
“The guidance from Ofqual to date repeatedly says that the centre assessed grades should be accurate and reliable but there has been no guidance on how this should be done. Without any specific processes to follow or objective criteria to judge against, this is a meaningless requirement and statement for the Head of Centre to declare.” (Teacher – responding in a personal capacity)

Some respondents suggested that in addition to the declaration by the Head of Centre there should be supporting evidence to show how the centre assessment grades and rankings had been made. This supporting evidence was felt to be essential in making a declaration on behalf of a private, home educated student.

“The head of centre's declaration should have to include a bespoke statement of how they assessed the integrity of the grades and rankings submitted and the processes undertaken at teacher, department, faculty, and SLT [senior leadership team] level.” (Other - Exams officer / manager)

“If the Heads of centre cannot make a declaration of integrity for private home schooled students then they should not receive a grade. To issue grades without hard evidence of predicted grades would undermine the value of the exam.” (Parent or carer)

**Q3. To what extent do you agree or disagree that Heads of Centre should not need to make a specific declaration in relation to Equalities Law?**



Q3 responses	Count	Percentage
Strongly Agree	1,706	16%
Agree	2,120	20%
Neither Agree nor Disagree	3,902	37%
Disagree	1,529	15%
Strongly Disagree	1,207	12%
<b>Q3 total responses</b>		<b>10,464</b>
<i>No response</i>		2,159
<b>Survey total responses</b>		<b>12,623</b>

Although respondents showed slightly more support (36%) for the proposal than objection (27%), the largest percentage (37%) of respondents indicated that they neither agreed nor disagreed.

For all groups who responded in a personal capacity, the response patterns were broadly similar, with the majority of each of the groups neither agreeing nor disagreeing with the statement.

The overall response pattern for organisations showed that just under half (49%) strongly agreed or agreed with the statement, and 33% of the same group disagreed

or strongly disagreed. Only academy chains (67%) and employers (80% from 5 responses) showed clear agreement.

"While a separate Equalities Law declaration is not necessary, the Head of Centre should be able to declare that they have taken equality law into consideration as part of their declaration." (Academy chain)

Several comments reflected that requirements of the Equalities Law are embedded within schools, and therefore would have been included as part of the Head of Centre's declaration, so a specific statement would not be necessary.

"If a Head of Centre has given a declaration of accuracy and integrity then they should not have to do an extra declaration of 'Equalities Law' as this should already be incorporated in the initial declaration. OFQUAL should be making this process as simple and transparent as possible." (Teacher – responding in a personal capacity)

"The decision, that Heads of Centre should not need to make a specific declaration in relation to Equalities Law, respects the work done routinely by schools and colleges to monitor and challenge inequality for pupils with protected characteristics. Schools in the public sector are held accountable for the progress of specific pupil groups already through an effective school inspection service and, in most years, by the publication of performance data. In view of this, we agree that this additional declaration is not necessary." (Teacher – responding in a personal capacity)

"[We] accept that it would be unrealistic to expect Heads of Centre to make a declaration in respect of compliance with equalities requirements in the way that is expected in ordinary circumstances. However, the relevant provisions in respect of the Equality Act 2010 and the Public Sector Equality Duty (PSED) continue to apply to Ofqual and the bodies it regulates as well as to schools and colleges. Consequently, there is a clear legal and public policy imperative to ensure that all reasonable and practicable steps are taken to ensure the processes do not result in disadvantage for candidates with protected characteristics" (Teacher representative group or union)

Other respondents considered that a specific Equalities Law declaration was essential in order to ensure that those students with protected characteristics are not disadvantaged.

"An equalities statement is essential as Teachers know the ethnic background of the students or if they have any disabilities, so their personal biases may intrude on their grading." (Parent or carer)

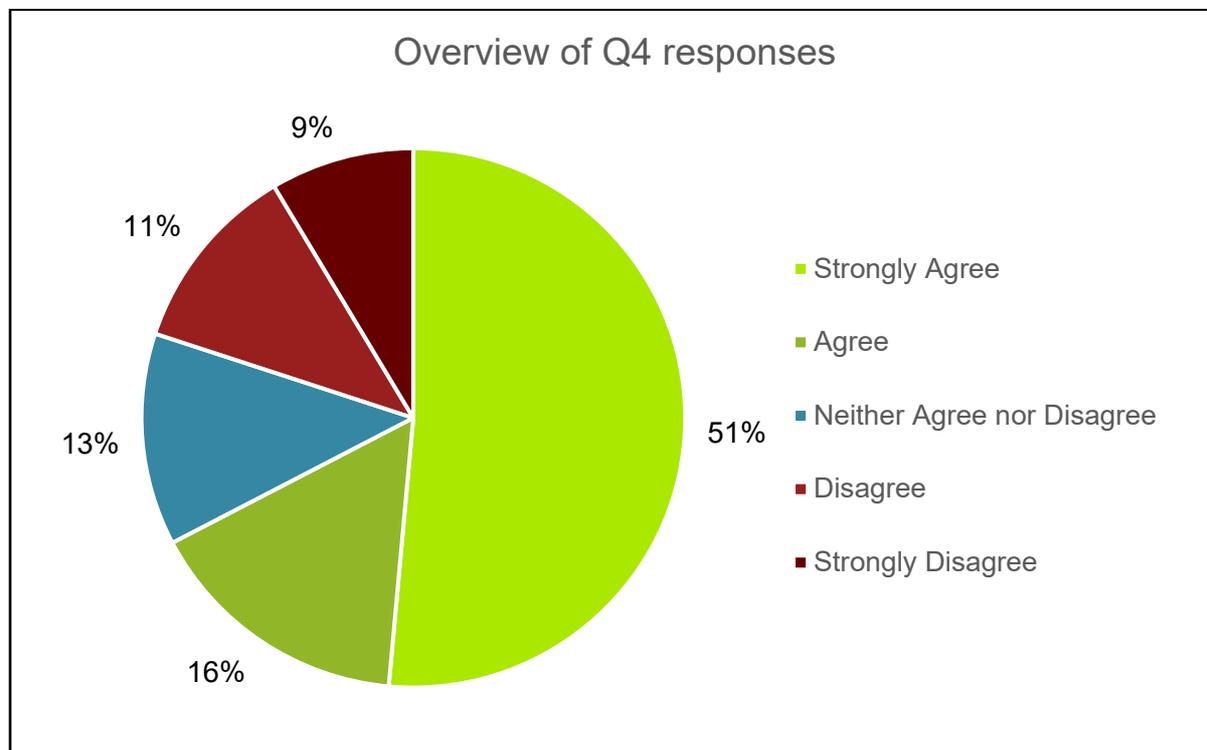
"I also think that there is a good case for Head teachers to have to make a specific declaration in relation to Equalities law. There is a risk that students with SEND [Special Educational Needs and Disabilities] and EAL [English as an Additional Language] will otherwise be disadvantaged by this process." (Teacher – responding in a personal capacity)

"There are two significant issues that arise from Ofqual's proposals. The first is that it does not address any within-school bias in reference to grading and under-represented groups. Ofqual's proposal only seeks to ensure that schools with larger proportions of under-represented groups are not unfairly graded, rather than individuals in schools.

The second issue is that the proposal requires teachers to generate grades for individual students from scratch, without any statistical-based starting point. Ofqual then has the power to override teacher's judgements about grades, which we believe is the wrong order.

To address both issues, [we] recommend that schools should be shown what their ranked order would look like if pupils followed national patterns from recent years based on prior attainment and characteristics." (Other representative or interest group)

**Q4. To what extent do you agree or disagree that students in year 10 and below who had been entered to complete exams this summer should be issued results on the same basis as students in year 11 and above?**



Q4 responses	Count	Percentage
Strongly Agree	6,101	51%
Agree	1,885	16%
Neither Agree nor Disagree	1,509	13%
Disagree	1,350	11%
Strongly Disagree	1,015	9%
<b>Q4 total responses</b>		<b>11,860</b>
<i>No response</i>		763
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents (67%) either strongly agreed or agreed that students in year 10 and below who had been entered to complete exams this summer should be issued results on the same basis as students in year 11 and above.

The response patterns varied across the respondent groups but in the majority of cases there was strong agreement with the proposal.

Of the group who identified themselves as 'student - year 10 or below', 96% agreed or strongly agreed with the proposal.

“I strongly agree that year 10s should receive their well-deserved grades this academic year.” (Student – Year 10 or below)

Likewise, 76% of parents and carers, who were the largest respondent group (4,009 responses), agreed or strongly agreed with the proposal.

“I strongly agree that students in year 10 that were due to take GCSE exams this summer should be treated the same as year 11 students and above. The other proposals considered would have a detrimental impact on the students and this would not be fair to them or the teachers.” (Parent or carer)

For teachers (responding in a personal capacity) 68% supported the proposal. The senior leadership (SLT) respondent group had similar response profile with 63% in favour of the proposal. Conversely, members of both groups had respondents who were not in favour of the proposal, with 24% of teachers and 22% of SLT selecting disagree or strongly disagree as their response.

“I strongly agree that ALL students entered for this summer’s exams should be AWARDED the grades they have earned- particularly Year 10 and below. They have worked hard and deserve to be treated fairly and in the same way as Year 11.” (Teacher – responding in a personal capacity)

“It makes sense. I really think that students in year 9 and 10 need to be treated the same as those in year 11 if they are sitting exams this summer. If they are not then they are potentially being disadvantaged.” (Other - Deputy Headteacher)

“In terms of the phrase “Year 10 or below”, for those students in Year 10, who have been entered for exams in subjects that they will cease to study in Year 11, I believe they should be able to follow this process and be issued with a centre assessed grade. Any student in Year 9 or younger, I believe has opportunities in future years to be assessed in the normal way and should not be offered a centre assessed grade.” (Other - Headteacher)

“I would not include year 10 students. This could lead to an unfair advantage with students taking qualifications in year 11. All students should take their qualifications in year 11.” (Teacher – responding in a personal capacity)

Forty eight per cent of respondents who identified themselves as ‘student - year 11 or above’, supported the proposal but 37% of the same group opposed it.

“I think that Year 10 early entrants should be issued a grade in the same way year 11s would, many of them will feel as if the sacrifices they’ve made were a waste and it’s unfair for them if they are not treated the same way as the year 11s as many of them have worked just as hard.” (Student – Year 11 or above)

“Students in year 10 etc. should sit their exams next summer, as it isn't going to affect their progression into the next year.” (Student – Year 11 or above)

Approximately half (54%) of exams officers agreed with the proposal but 34% of the same group did not.

“With regard to y10 and below, I think those that would have completed the course in y10 and not be studying again as part of their curriculum should be allowed to receive a grade - some schools for example only teach RS [Religious Studies] as a fully taught curriculum subject to y10 and then it is not

part of their y11 curriculum as they would usually have already completed and taken the qualification. I think other candidates where this is not applicable should have the ability to sit the exam in the Autumn series.” (Other - Exams officer / manager)

“Year 10 students should have the opportunity to sit their exams in the autumn term or January season as this gives them time to prepare and feel fully equipped to sit the exam. Completing exams in these seasons removes any additional pressure to sit additional exams in the 2021 exam summer season. Completing additional exams in the summer season would disadvantage the student unfairly at an already stressful time.” (Other - Exams officer / manager)

Approximately half (54%) of schools or colleges (responding as an organisation) were in support of the proposal, and 16% of the same group were not.

“It is so important that students in year 10 and below are issued grades in exactly the same way. To deny them this would seriously compromise their ability to acquire a broad range of qualifications over their examination years.” (School or college)

“There is no valid reason why students in Year 10 and below should be awarded grades this summer. I say this as a head of school who has entered all of Year 10 for English Literature. It would be wrong to award them a calculated grade when there is an obvious opportunity for them all to sit the exam properly next summer.” (School or college)

Many of the respondents felt it would be unfair and discriminatory to treat students in year 10 and below differently to students in year 11.

“I strongly believe that year 10 should be treated in exactly the same way as year 11. They worked for 2 years and were expecting to sit the exam in May so they should not be discriminated against. To say they can sit it next year is simply unjust, disruptive and disrespectful. They deserve their GCSE this year, just like year 11.” (Parent or carer)

“As a year 10 student who has worked hard for the exams I would like get grades in the same way as the year 11s as I have worked equally hard for the qualifications and not getting them will disadvantage me when I do the exams that I will take in year 11. I feel that I am being discriminated against for my age and being younger.” (Student – Year 10 or below)

The mental health and well-being of the students in year 10 and below, was highlighted as a concern in a number of responses.

“As a mental health practitioner, I am particularly interested in the impact on young people of having to complete their studies outside their usual educational settings when every other aspect of their lives is also disrupted. Students working towards qualifications in year 10 and below have already invested a great deal of effort in these subjects and schools have planned their curriculum around this, and I believe that it would be extremely detrimental to these young people to forfeit their qualifications or to have to retake the exams a full year after their course was due to end.” (Parent or carer)

“Year 10 have entered exams under the same rules as Year 11. For them not to be awarded would have a profound effect on the mental health of young people. My staff have witnessed these youngsters in tears when the exams were cancelled. There are logistical issues for centres who planned exam entry in year 10 and were not discouraged from doing so.” (School or college)

Many of the responses reflected the fact that the structure and delivery of the curriculum in some schools is designed in a way that requires GCSEs to be taken in years 9, 10 and 11. Respondents gave a number of explanations for early entry arrangements, including reducing exam stress in year 11, enabling students to take a wider range of optional subjects in year 11, to address timetabling constraints, and so on. They emphasised that in such schools the impact of not awarding a GCSE grade to students in year 10 and below would be substantial and would impact on their future learning.

“Current Year 10s need to get their qualifications this year, they were entered early so that statutory items can be covered in year 11 and timetabling would work too. By not progressing now, students will miss out on their education next year as there would be a conflict as to what they should be studying and when.” (Teacher – responding in a personal capacity)

“[We] welcome the change of view regarding the inclusion of pupils in Year 10 and below in the centre assessment grading process. Even though the number of entries from candidates below Year 11 is now a small proportion of the total, many of our members took pains to point out that these were integral to their own curriculum models and that transition internally would be severely affected if no award was available.” (Teacher representative group or union)

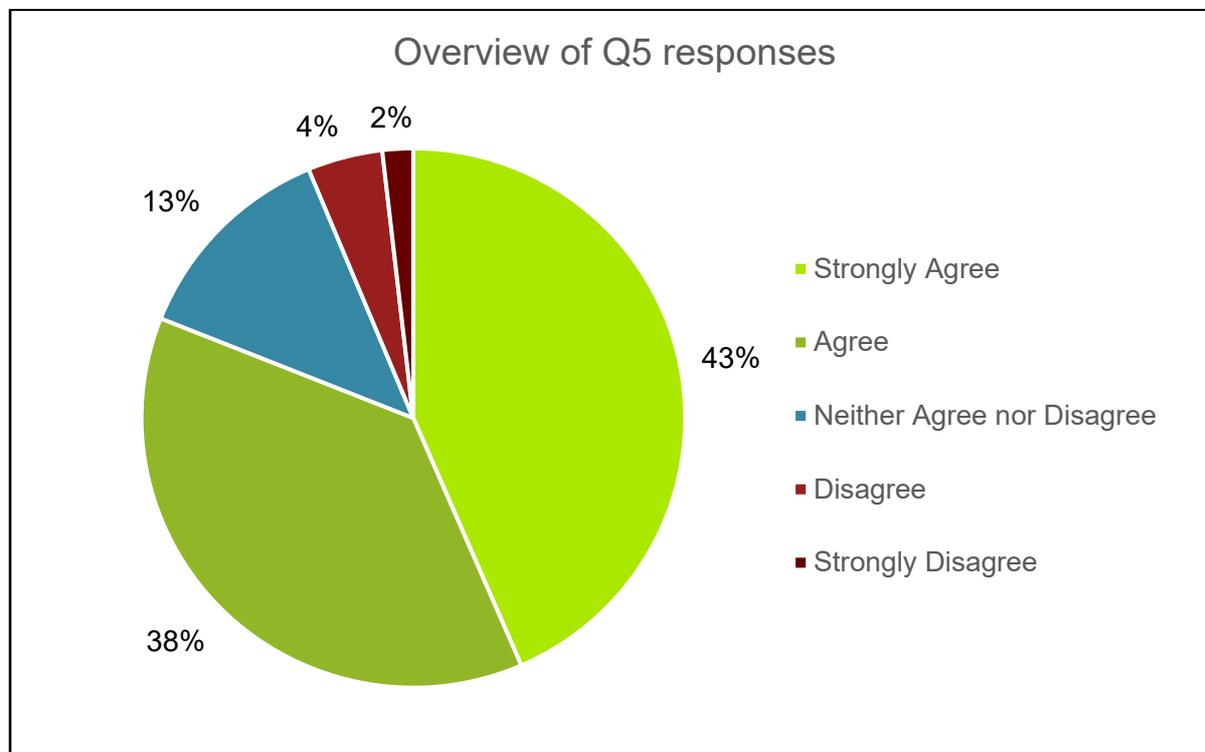
There were a number of comments which discussed the impact on students’ future learning and motivation if they were not awarded a grade this summer, particularly with the current disruptions to teaching and learning.

“I am concerned that if students in year 10 are not awarded grades this year they will need to continue working on these subjects as well as needing to catch up on the GCSE work being missed whilst not in school. This will place a huge amount of pressure on the students and teachers to get everything covered.” (Other – Headteacher)

“As Head of Year 10 I feel it is utterly equitable for year 10s to be awarded grades for exams due to be sat in the summer of 2020. They have worked just as hard as year 11, and potentially face greater consequences to their future education as a result of the school closures than year 11.” (Other – Head of Year 10)

There was no disagreement with the proposal from the exam boards responsible for awarding GCSE qualifications.

**Q5. To what extent do you agree or disagree that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by exam boards as potential malpractice?**



Q5 responses	Count	Percentage
Strongly Agree	4,715	43%
Agree	4,068	38%
Neither Agree nor Disagree	1,375	13%
Disagree	484	4%
Strongly Disagree	198	2%
<b>Q5 total responses</b>		<b>10,840</b>
<i>No response</i>		1,783
<b>Survey total responses</b>		<b>12,623</b>

The majority (81%) of respondents agreed or strongly agreed that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by exam boards as potential malpractice.

All groups showed a similar pattern of response, and agreed or strongly agreed with the statement. Of the group who identified themselves as 'teacher (responding in a personal capacity)', 84% agreed or strongly agreed that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by

exam boards as potential malpractice. Only 7% of the same respondent group disagreed or strongly disagreed.

The largest respondent group, 'parent or carer', showed 77% support.

"Students should have the ability to challenge the schools practice and any allegation of malpractice should be investigated." (Parent or carer)

"I understand that the proposals intend to keep centre assessment judgements and rank order confidential. I agree that it would be malpractice to inappropriately disclose this information." (Parent or carer)

Centres would welcome clear guidance about what constitutes inappropriate disclosure and malpractice, particularly so that this information can be shared with parents and students.

"The stronger the rules are on paper the easier they are for centres to uphold and this is helpful to everyone in order to try and ensure that all centres follow these rules. Any malpractice is serious and it should be made clear what malpractice is and the rules adhered to." (School or college)

"Schools are going to come under huge pressure from parents / students to disclose centre assessment judgements. It would be helpful for schools for this to be made clear to students and their parents that the exam boards consider this to be potential malpractice." (School or college)

"Whilst Heads of Centre will do everything to not disclose judgements, any well organised and honest school will already have shared predicted grades with students which will be based on the suggested evidence. To therefore describe this as malpractice appears to be harsh." (Academy chain)

There were a number of comments from respondents who mentioned the extraordinary way in which teachers and centres are currently working and that mistakes may occur.

"I think that you need to be able to investigate inappropriate disclosure as potential malpractice but would worry that anyone in the centre, let alone a Head of Centre, is working in a completely different way to usual, is managing multiple unprecedented and complex problems and issues with potentially serious consequences for business continuity. If ever mistakes were possible, they would be more likely now than ever. One would hope you would not need to investigate for malpractice but to ensure the system is fair, you have to have that process." (School or college)

"Malpractice' is a challenging issue here. With schools working remotely, the chances of data breaches are higher through human error. It would feel that nationally there would be at least one mistake in this regard as a result of a mistake. However, where schools were found to be sharing / allowing lobbying / openly discussing, then this should definitely be malpractice. It's the line between planned and deliberate and accidental." (Teacher – responding in a personal capacity)

## **Q6. Do you have any comments about our proposals for centre assessment grades?**

Five thousand, one hundred and twenty-nine respondents answered this question in total, providing further detail to the responses given to questions 1 to 5.

Most of the themes for these responses have been included in the previous sections of analyses of questions 1 to 5.

### **The use of mock examinations to inform centre assessment grades.**

Respondents expressed a range of views on the use of mock examinations to inform centre assessment grades.

“Mock exams if taken into consideration at all really ought to be a very low proportion in the calculation as they are frequently far lower than the actual grades and don't offer a reliable judgement to a final grade.” (Teacher – responding in a personal capacity)

“Teacher assessment should be trusted but there shouldn't be an over reliance on mocks where students do not do whole exam series and often do not try in the same way as they do in real exams.” (Teacher – responding in a personal capacity)

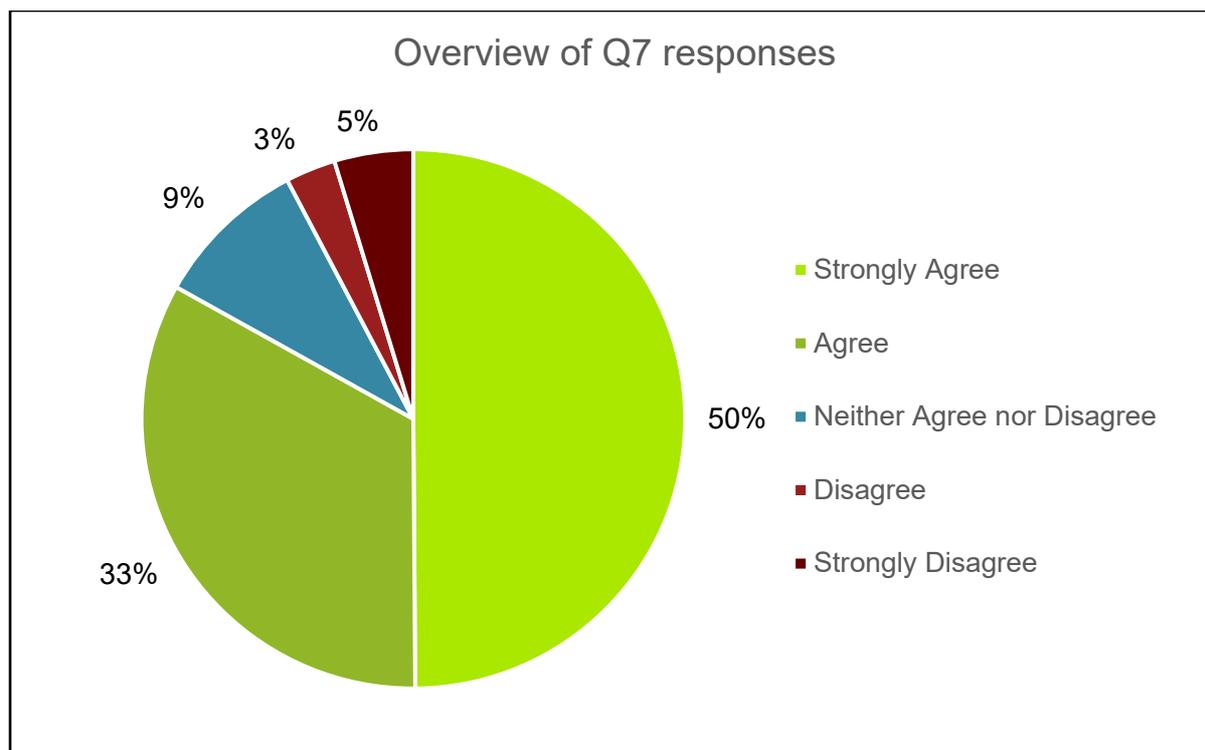
“Increase mocks results by an amount that is recognised as the usual average uplift for those subjects at actual GCSE exam (for course that are not graded on course work).” (Parent or carer)

“Immediately remove the use of mock exam results in this process.” (Parent or carer)

“Data from mock exams shouldn't be used... as a student we were aware that mock exams are just mocks and so many did not put in the effort that they would for the actual A level exam.” (Student – Year 11 or above)

## Issuing results

**Q7. To what extent do you agree or disagree that we should incorporate into the regulatory framework a requirement for all exam boards to issue results in the same way this summer, in accordance with the approach we will finalise after this consultation, and not by any other means?**



Q7 responses	Count	Percentage
Strongly Agree	5,445	50%
Agree	3,629	33%
Neither Agree nor Disagree	1,003	9%
Disagree	326	3%
Strongly Disagree	512	5%
<b>Q7 total responses</b>		<b>10,915</b>
<i>No response</i>		1,708
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents (83%) agreed or strongly agreed that Ofqual should incorporate a requirement into our framework for all exam boards to issue results in the same way this summer, in accordance with the approach we will finalise after this consultation, and not by any other means.

The majority of groups showed a similar response pattern, with 91% of respondents who identified themselves as 'teacher (responding in a personal capacity)' agreeing or strongly agreeing. Similarly 82% of the respondent group who identified themselves as 'parent or carer' agreed or strongly agreed with the proposal.

"Any disparity between exam boards will only add to anxiety."

(Parent or carer)

"A consistent approach is essential, not least because many students are entered for different subjects with different exam boards and they will need a single reliable set of results upon which their move to the next stage of their education can be based. It is also essential that these results have all the credibility of results in every other exam year." (Parent or carer)

The only group that did not fit this response profile was the 'teacher representative group or union' group where there was 82% disagreement or strong disagreement, but this was not reflected in their comments.

Comments discussed the impact of coronavirus (COVID-19) and suggested that social distancing may require that examination results are sent via email or posted to students.

"Results should be issued this summer, but it would be better to deliver them online or by post, rather than face-to-face. It would be very difficult to enforce social distancing with large cohorts of anxious students before, during and after any results day as they are usually run, with students collecting their results from school." (Teacher – responding in a personal capacity)

Some respondents suggested that certificates should be marked in a way to identify how the results had been awarded this summer. Others felt the opposite and said certificates should have nothing to identify this as an exceptional series as this would be confusing in the future for schools, pupils, parents, prospective employers, and colleges.

Some schools and centres were concerned about how to explain results that did not match the students' expectations and felt that there would be some difficult conversations and challenges with students and parents.

"The physical experience of handing over results to students in school, and them knowing that the results they see were effectively "chosen" by the teaching staff in the room, feels difficult and gives the potential for students to blame teachers for grades if they're lower than they had hoped. I don't feel as comfortable going to school to hand out envelopes on results day as I normally would. However, this might be able to be managed within the school, perhaps by having all-postal certificates, or by only non-teaching staff handing over the results." (Teacher – responding in a personal capacity)

## **Q8. Do you have any comments about our proposal for the issuing of results?**

Two thousand, four hundred and forty-eight respondents answered this question in total, providing further detail to the responses given to question 7.

The comments for question 7 changed after the announcement by government on 17 April 2020 which confirmed that, “A and AS level results will be published on 13 August and GCSE results on 20 August, as originally planned. This will enable progression to higher and further education to take place in the normal way. It will also allow students time to decide whether they wish to sit exams in the autumn, and to prepare for those exams if necessary.”<sup>7</sup>

Prior to the announcement, respondents asked that the release date for results should be confirmed as soon as possible to give students peace of mind and allow them to consider their next steps.

“A results date should be announced as soon as possible. The results should be distributed in the same manner as exam results would normally be.” (Other – Exams officer / manager)

“The date of the release of results needs to be established quickly to give pupils peace of mind.” (Teacher – responding in a personal capacity)

After the announcement, there were many responses that requested that the results date should be as suggested in the original communications from government, and that this change had caused additional stress and anxiety for students.

“Keeping the original results day for year 11 is wholly unfair, it doesn't give them enough time to revise and prepare for exams in the autumn should they choose to take them. It is not acceptable to keep them waiting that length of time during this already unsettling time. The government announced results would be available by the end of July. They need longer to prepare for exams should they need appeal or sit exams.” (Parent or carer)

Several respondents reflected that students should not miss out on a traditional results day as it is seen as a rite of passage for many.

“I think having a 'results day' is an important educational rite of passage for both GCSE and A-level students. The opportunity to come into school, get handed an envelope, meet with their teachers etc. would be good for both closure and continuity.” (Teacher – responding in a personal capacity)

The reasons given for wanting the early issue of results ranged from reducing the stress of waiting for results, allowing more time to make appeals once results are issued, providing sufficient time for students to consider next steps, and giving students enough time to prepare for the exam if they were not satisfied that the grades awarded reflected their ability.

“I agree with the issuing of results in the same way as usual this year. However, I believe that if possible, the results should be issued to students before the original date of August 13th. This is because many students, including myself, are very anxious over what we will be awarded as if we do

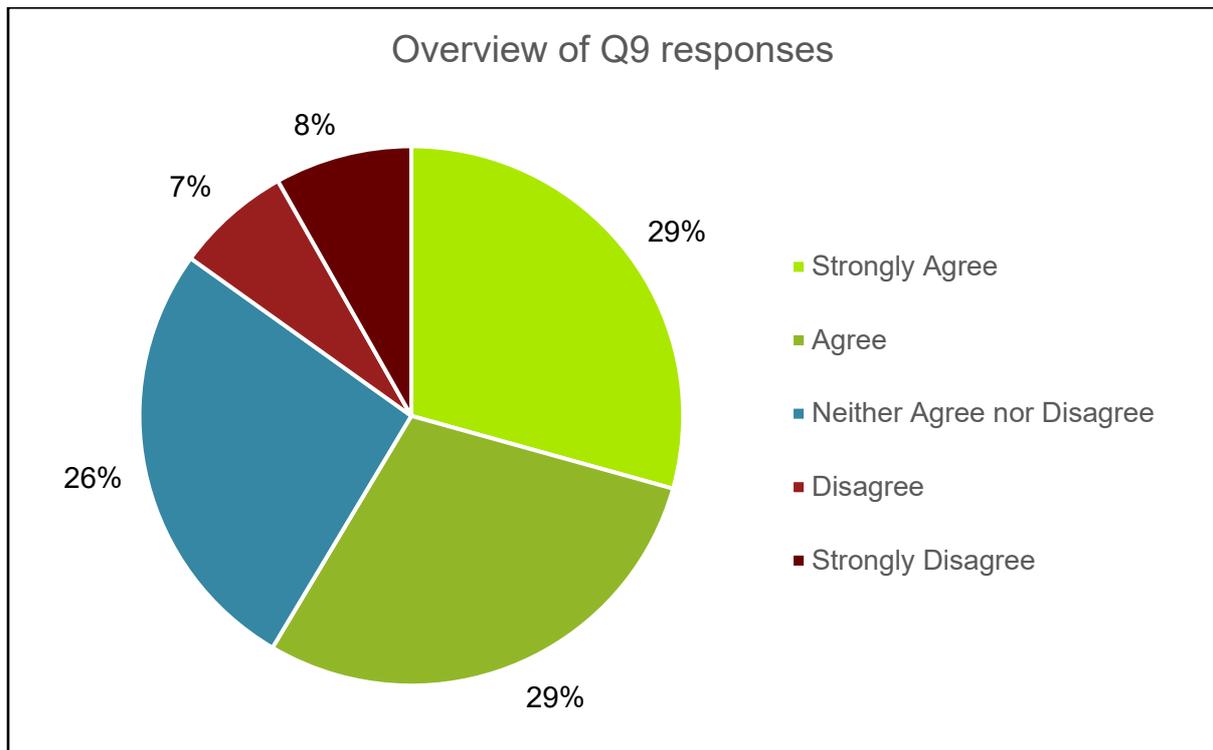
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<sup>7</sup> <https://www.gov.uk/government/publications/coronavirus-covid-19-cancellation-of-gcses-as-and-a-levels-in-2020/coronavirus-covid-19-cancellation-of-gcses-as-and-a-levels-in-2020>

not get our requirements for our next step in education, we will have to sit exams in September-November 2020. This would leave us with significantly less time to prepare for the exams.” (Student – Year 11 or above)

## Impact on students

**Q9. To what extent do you agree or disagree that we should only allow exam boards to issue results for private candidates for whom a Head of Centre considers that centre assessment grades and a place in a rank order can properly be submitted?**



Q9 responses	Count	Percentage
Strongly Agree	3,107	29%
Agree	3,089	29%
Neither Agree nor Disagree	2,795	26%
Disagree	731	7%
Strongly Disagree	864	8%
<b>Q9 total responses</b>		<b>10,586</b>
<i>No response</i>		2,037
<b>Survey total responses</b>		<b>12,623</b>

A majority (58%) of the respondents to this question agreed with our proposal that we should only allow exam boards to issue results for private candidates if the Head

of the Centre at which they were going to sit their exams is confident that that centre assessment grades and a place in a rank order can properly be submitted.

“I agree strongly with all your statements, otherwise you cannot guarantee fairness. The issue of private candidates is thorny but there is no way a Head of Centre can guarantee authenticity of CAGs and rank with a private candidate - it is difficult (perhaps not impossible) if it is a former student or they have some relationship with the school/centre, but it IS impossible if they were to act in the capacity of centre only.” (School or college)

“[We] agree strongly with this proposal. While there may be a small number of private candidates who consequently cannot be awarded a grade this year, this must be balanced with the need for integrity and fairness of results for other candidates. Heads of Centre should have to declare that they can provide evidence to substantiate the grade and ranking of any private candidates they are entering.” (Awarding body or exam board)

A relatively large proportion (26%) of respondents neither agreed nor disagreed with our proposal, whilst 15% disagreed and strongly disagreed.

The breakdown of responses by respondent type shows a degree of variation. Schools and colleges and teachers responding in a personal capacity, for example, had an agreement rate of over 65%, while the agreement figure for private candidates themselves was 25%.

Despite the degree of support for our proposal, the issue of private candidates attracted many comments from respondents. While the majority of these came from those who disagreed with our proposal, the comments span a wide range of views from a variety of different perspectives. In general, however, the overriding concern of those commenting was that private candidates should not be denied the opportunity to receive a grade for their qualifications this summer.

The means by which this should be achieved, however, was a matter of contention for many respondents.

Some respondents – mostly but not exclusively teachers responding in a personal capacity or official responses from centres – were clear that in their opinion many or most private candidates could not legitimately receive centre assessment places and/or a place in the rank order. While these respondents were often sympathetic to the circumstances of private candidates, they usually had concerns around the validity of a centre assessment grade, and also frequently perceived a risk that putting a private candidate into the centre’s rank order would ‘downgrade’ one of the centre’s regular students.

“It will be difficult for some private candidates but there can be no fair way other than examinations of determining a grade for a student who has solely studied at home, or possibly with a private tutor. Those grades would just be works of fantasy.” (Teacher – responding in a personal capacity)

“You need to maintain the integrity of the exams. I think this should mean that all private candidates will be required to sit the exam in the Autumn term.” (Parent or carer)

“As a centre we feel strongly that private candidates CAN be awarded a grade since they are re-sit candidates, but we very strongly believe that they

SHOULD NOT be included within the RANKING for our own current Y11 and Y13.” (School or college)

“There is an issue with Heads of Centre submitting a place in rank order for private candidates. This is because schools will be reluctant to rank an external private candidate alongside their own school students as they would take the view that this risks the downgrading of a grade to one of their own students. I know this to be the case with a school in my area. Heads of Centres that can make objective assessments of private candidates should be able to do so without prejudicing their own students and without prejudicing private candidates. A mechanism should be available to enable Heads of Centres to do this. The circumstances are extraordinary and students should be given the grades that they are capable of attaining.” (Parent or carer)

“Heads should not have to assign a grade to an external candidate whom we do not know nor should we be expected to prove or verify the evidence provided by the candidate was reliable or indeed completed under exam conditions.” (Other – Headteacher)

Other comments, however, indicate that in some centres teachers are facilitating the awarding of centre assessment grades to private candidates, sometimes in conversation with the candidates’ external teachers.

“My department have liaised with an external provider and have seen the Art coursework produced by an external candidate. I have met with the candidate's teachers and trust their ability to validate the work and grade of the candidate.” (Teacher – responding in a personal capacity)

“Our private student was a re-sitter and has been in close contact so is easy to rank - people doing a resit in another location or without history of contact will be disadvantaged.” (Teacher – responding in a personal capacity)

Many respondents who commented identified themselves as private candidates, or as a parent or carer of a private candidate. The majority of these comments fell clearly into one of 2 categories: either students who were resitting qualifications (often for the purposes of progressing to higher education) or students who are home educated.

Although in both cases the primary concern was that private candidates should receive grades this summer, the experiences and perspectives of the respondents differed.

Students who have been home educated tended to have a less well established relationship with a centre. Their comments therefore were aimed more broadly at the difficulty of receiving a centre assessment grade. Many expressed dissatisfaction with the proposal, and suggested that evidence supplied by private tutors or similar (or sent directly by the candidate to the centre or the exam board) should be taken into account in order to allow centre assessment grades to be given.

“I like most private candidates, do not have a relationship with my exam centre. I believe that the examining bodies should award private candidates who do not have a relationship with the private exam centre, the minimum pass grade of 4/C to allow them to progress onto the next stage as we are not included in the centre assessment grades.” (Student – private candidate)

“The needs of home educated students must be included in your decisions. So far, home educated candidates are in no-mans-land, not knowing whether they will get their qualifications or not. The latest version of the proposals puts the onus on the exam centre where private candidates are registered, and makes unreasonable demands of them. If home educated candidates are not empowered to achieve their qualifications alongside their schooled counterparts, they will be hugely disadvantaged and, in many cases, unable to progress to the next stage of their education, training or career.” (Other – Home educator)

“Many centres will feel that they are unable to declare as to the accuracy and integrity of external candidates, private tutors or online distance provider. They also feel that they are unable to rank external candidates with their own internal candidates. So home educated students will be greatly disadvantaged even though they may have fully qualified tutors who are teachers of integrity.” (Parent or carer)

A small number of comments from home educated students and their parents referred to Special Educational Needs or disabilities as a contributing factor to the fact that they are home educated. Their comments are summarised in the Equality Impact Assessment section below.

In the case of candidates who are resitting qualifications, many have a prior relationship with the centre, however comments indicated that despite such a relationship some centres are unwilling to give private candidates a centre assessment grade or a place in the centre’s rank order.

“Private students. I do not accept that a student who has spent 7 years at the same school and is retaking at that school should be considered a private student. The school will know them well.” (Student – private, home educated candidate of any age)

“Private candidates that are resitting are being left out in general, they should still get grades but their centres/old sixth forms aren’t letting them. Resit students should at least get a grade higher than what they got last year.” (Teacher – responding in a personal capacity)

Resitting respondents in particular tended to focus on the consequences of not receiving a grade this summer, as many were resitting their qualifications to enter higher education.

“Private candidates who have taken gap a year to resit and improve their grades should receive their UCAS grade and progress into university, instead of having to take another gap year to sit exams in autumn/summer. This is unfair and puts many private candidates behind their peers and means many candidates will be 2 years behind their age group in university.” (Student – private, home educated candidate of any age)

“Please consider that private candidates such as myself may be resitting in their gap year. Some may not be able to afford, mentally and financially, to take another gap year to sit the cancelled exams next summer, or to delay university again. Perhaps the approach could be different for private candidates who have already achieved a grade and chose to resit? I achieved an A last year and I am resitting to get an A\* in a science subject, couldn’t this

prior achievement be used as evidence?” (Student – private, home educated candidate of any age)

Many of the comments, including some of those already quoted above, offer suggestions or requests for alternative processes for private candidates. Most commonly, these included suggestions that private tutors form part of the process, or that private candidates have some other form of assessment opportunity. A number of respondents also suggested that private candidates should be given a nominal grade to allow for progression.

“I think private tutors should be able to be part of the decision in the case of private candidates, or at least be able to submit a statement on behalf of their student, to be reviewed by the head of centre.” (Student – private, home educated candidate of any age)

“Private candidates who have no prior relationship to exam centre should be given a grade 4/5 to enable them to progress. They have paid a lot of money to be entered for exams and travel great distance to reach a centre. Parent would not bother if they didn't think their child would achieve a grade 4/5. Those who need higher can sit an exam.” (Parent or carer)

“I think private or home-schooled candidates should be able to transfer to centres which may be in a better position to verify the evidence they can produce rather than the ones they are currently registered with, who may have been chosen for geographical reasons and ease, but may not be in a position to validate or investigate fully their evidence. For example, language schools which work with a particular centre but a candidate's current school has been used as a centre rather than the language school's normal centre.” (Teacher – responding in a personal capacity)

“I am very concerned about the impact of this on resit students. I think that resit students should receive the predicted grades that they have already been issued in the UCAS application based on which they have received offers. If the resit students are not given a grade it would mean that they would have to take another year out which would be extremely unfair and could halt their progress and cause undue mental stress.” (Parent or carer)

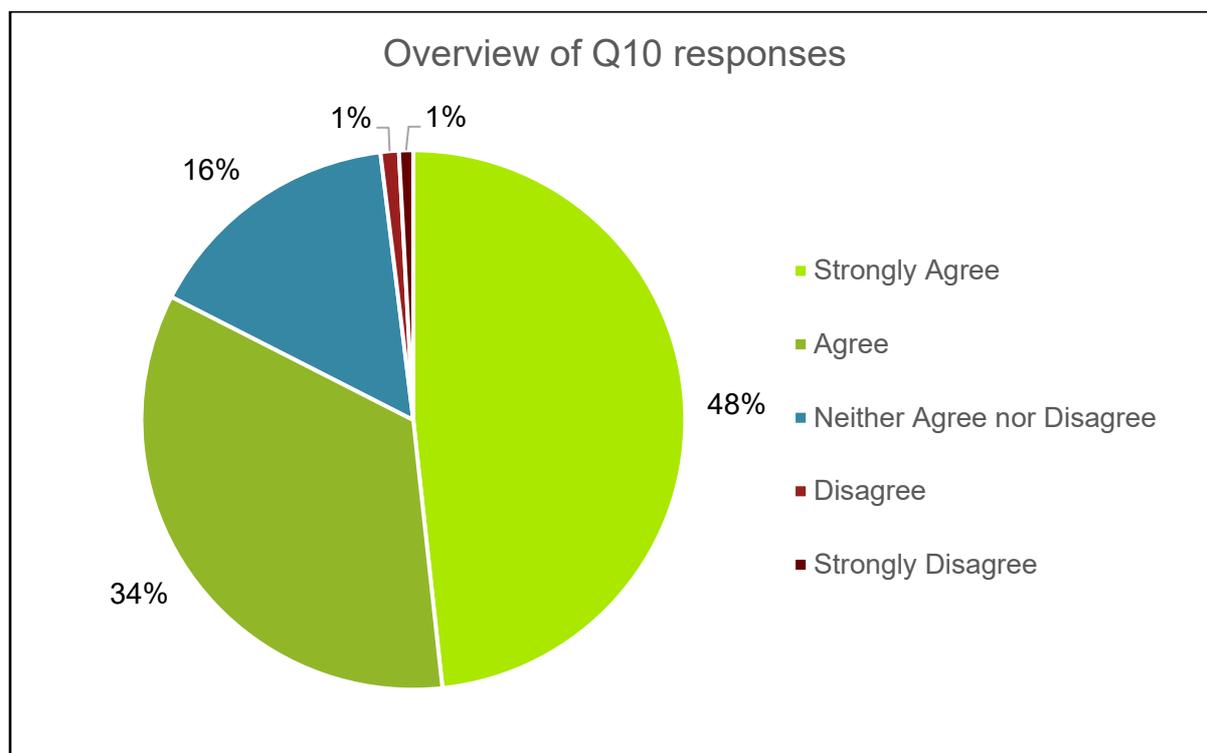
“I feel desperately sad for private candidates. I cannot understand why they cannot sit some sort of exam in exam conditions to allow them to gain a qualification. I also wonder if they couldn't present some sort of portfolio to be able to gain their qualification.” (Parent or carer)

“Centres should calculate grades for private candidates on the basis of the evidence they can provide of their level, including essays or past papers they have completed, their previous grade (in the case of retakes), and any statements from their tutors or distance learning schools. Private candidates should not be entered into the standardisation process, because the previous results of an exam centre where they have not been taught has no bearing on their results.” (Student – private, home educated candidate of any age)

While many respondents neither agreed nor disagreed with this proposal, not many of those who responded in this way chose to leave a comment. There is no clear theme among the comments which were made, although many of them acknowledge the difficulty of the issue.

“This is the area causing me most difficulty. Eg providing a grade for students who have been dual registered, not well enough to provide work to school but planning to sit exams in limited subjects in the summer. Or the ex-student planning an A Level resit ( last year grade C, online tutor now says A grade. Parents believe working at A grade. Want school to submit to secure University place for September.)” (Other – Headteacher)

**Q10. To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to students in the rest of the UK?**



Q10 responses	Count	Percentage
Strongly Agree	5,150	48%
Agree	3,654	34%
Neither Agree nor Disagree	1,655	16%
Disagree	116	1%
Strongly Disagree	90	1%
<b>Q10 total responses</b>		<b>10,665</b>
<i>No response</i>		1,958
<b>Survey total responses</b>		<b>12,623</b>

Just 2% of respondents disagreed or strongly disagreed with our proposal that the arrangements we put in place this summer should extend to students sitting the

same qualifications in the rest of the UK. While a relatively small proportion (16%) said that they neither agree nor disagree with the proposal, over 80% agreed or strongly agreed.

The breakdown of responses by respondent group shows very little variation in these proportions, other than in the 'employer' and 'awarding body or exam board' categories where the very low number of respondents meant that a single 'strongly disagree' response accounted for a large proportion of the total for that category.

We received relatively few comments about this proposal. However, a number of the comments revealed that some respondents misunderstood our proposal, in that we were not proposing arrangements for qualifications which are regulated by other jurisdictions, but for qualifications which we regulate that are taken by learners in other jurisdictions.

Some comments, consequently, questioned the grounds for our proposal.

"Surely it is up to the governing bodies in Scotland, Wales & Northern Ireland to make their own decision about this." (Teacher – responding in a personal capacity)

"I am unclear how a body that covers exclusively English qualifications can make requirements of the devolved areas of the UK. That said it would clearly be beneficial to all if a unified approach was taken across the UK in light of the situation." (Parent or carer)

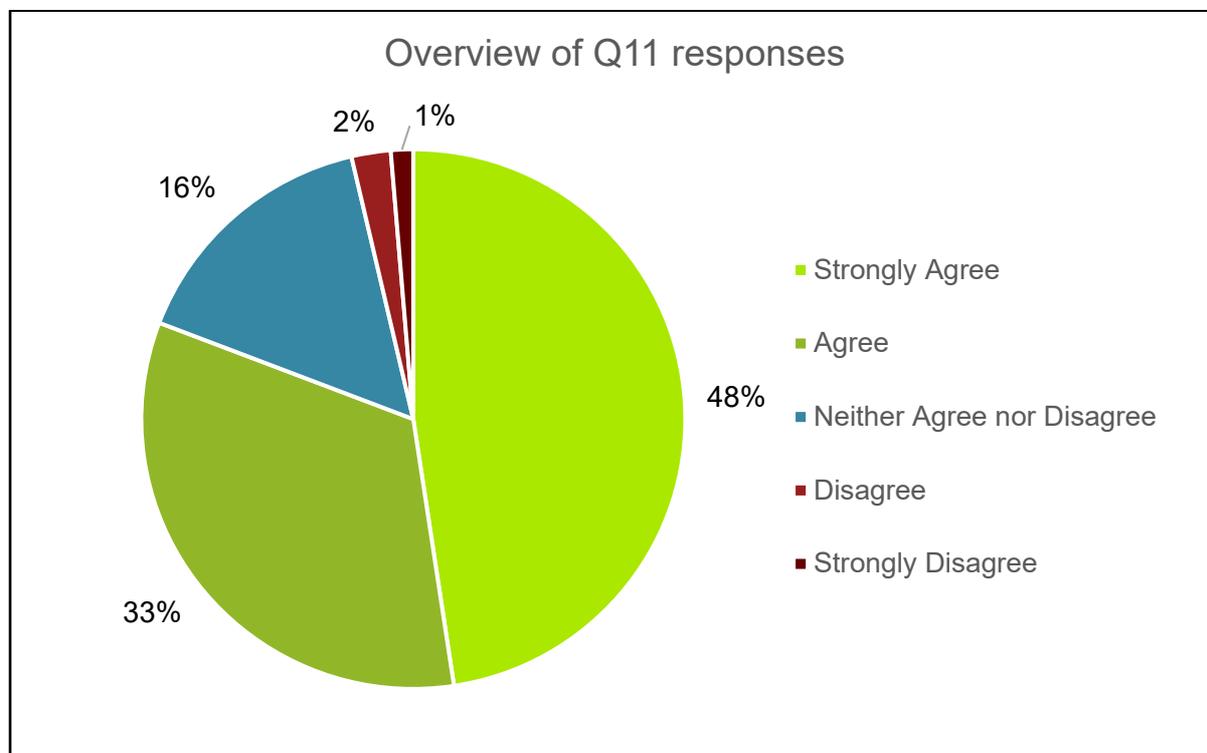
Some of the comments which supported our proposal do so on the basis that arrangements should be the same across the UK. It is likely that many of these comments stem from the same misunderstanding. Many of these frame their support in the context of equality for students entering further or higher education.

"The arrangements surely have got to be the same across the whole of the UK." (Student – Year 11 or above)

"All UK students will be "competing" with their peers UK-wide for jobs/further education places, and it should be a level playing field for all." (Parent or carer)

"If other countries within the UK follow different routes to provide students with grades then students could be considered to be at a disadvantage if competing for university places against each other." (Other – Federation exams manager)

**Q11. To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to all students, wherever they are taking the qualifications?**



Q11 responses	Count	Percentage
Strongly Agree	5,066	48%
Agree	3,533	33%
Neither Agree nor Disagree	1,653	16%
Disagree	248	2%
Strongly Disagree	141	1%
<b>Q11 total responses</b>		<b>10,641</b>
<i>No response</i>		1,982
<b>Survey total responses</b>		<b>12,623</b>

The majority (81%) of respondents agreed or strongly agreed with our proposal that the arrangements we put in place this summer should extend to all students, wherever they are taking the qualifications. Three per cent of respondents expressed disagreement of any sort, with another 16% neither agreeing nor disagreeing.

The breakdown of responses by respondent group shows that no groups significantly departed from the overall response proportions, with the exception of some very small respondent groups where a single response or 2 amounted to a large proportion of the total.

Comments about this question focused on a number of points of view, some of which were diametrically opposed. For example, some respondents suggested that if centres were located in a country that was not under a 'lockdown', then students should take their exams as usual.

“Students in international schools unaffected by covid 19 and lockdown processes should take the exam as usual.” (Teacher - responding in a personal capacity)

Others, however, said that the situation anywhere else in the world was effectively the same as in the UK.

“Students in international centres are in a state of limbo (and their teachers). They are in the same position as the UK.” (Teacher – responding in a personal capacity)

The latter view was held significantly more widely among respondents who chose to make a comment on this issue. Many respondents linked their support for our proposal to a concept of fairness and equality.

“It would be unfair if international students were able to take the examinations whilst domestic students have to follow a different system. Moreover, it is unlikely that many international students could take the exams either so this would be an arrangement that would benefit very few.” (Student – Year 11 or above)

“We are situated in a Crown Dependency, and if this isn't secured then our cohort of students could potentially not get grades.” (School or college)

A small minority of respondents expressed concern over the reliability of centre assessment grades and rank order information generated by centres in other parts of the world.

“I have worked abroad in schools on a number of occasions and would have no faith in the integrity of the information coming out from any of my former schools.” (Teacher – responding in a personal capacity)

“Can you be certain of the integrity of overseas schools?” (Parent or carer)

## **Q12. Do you have any comments about the impact of our proposals on any particular groups of students?**

We received 2,822 comments in response to this question. Many of them related specifically to one or more of the preceding 3 questions, and have been covered in our analysis of those questions (questions 9 to 11).

The remaining comments covered a wide variety of subjects. Many of these overlap with other areas of our consultation. For example, there were numerous comments about the impact of our proposals on groups of students such as those with special educational needs, those from black, Asian and minority ethnic (BAME) backgrounds, and those who may be disadvantaged because of their socio-economic status. Issues such as these are covered in the Equality Impact Assessment section below.

Similarly, a significant number of comments were about candidates currently in year 10 or below who had been entered for exams this summer. This issue has been covered elsewhere in this document. The same applies to comments about an autumn exam series.

Many respondents commented generally on the theme of consistency for all candidates.

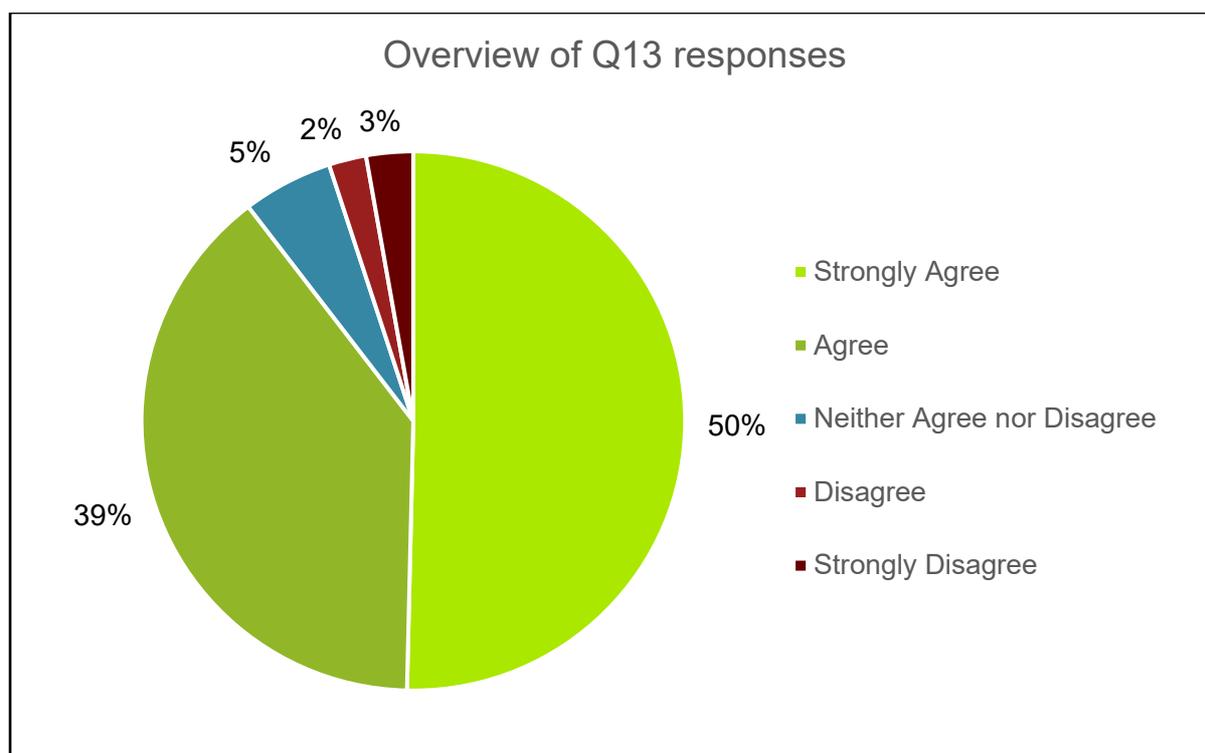
A small number of respondents highlighted the effect of this year's disruption on students who will be taking their exams in 2021.

"The impact of the current pandemic will extend beyond this year. For the current Year 10 students, over a term of direct support and peer learning is being lost. This will have a negative impact on achievement in 2021." (Student – Year 10 or below)

"Concerned about the current year 10 students. They will have effectively missed a term of school, in light of the content in the new GCSEs will this be considered for next year's exam series? We cannot expect them to just catch up!" (Teacher – responding in a personal capacity)

## Statistical standardisation of centre assessment grades

**Q13. To what extent do you agree or disagree with the aims outlined above<sup>8</sup>?**



Q13 responses	Count	Percentage
Strongly Agree	5,493	50%
Agree	4,280	39%
Neither Agree nor Disagree	585	5%
Disagree	243	2%
Strongly Disagree	304	3%
<b>Q13 total responses</b>		<b>10,905</b>
<i>No response</i>		1,718
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents (89%) agreed or strongly agreed with the aims of statistical standardisation. The pattern of responses was similar for all groups of

<sup>8</sup> See page 27-28 for the list of aims relating to this question.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/879627/Exceptional\\_arrangements\\_for\\_exam\\_grading\\_and\\_assessment\\_in\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/879627/Exceptional_arrangements_for_exam_grading_and_assessment_in_2020.pdf)

respondents. When considering the different respondent groups, there was a similar pattern of support for the aims with 95% of teachers responding in a personal capacity and 88% of parents or carers strongly agreeing or agreeing.

“Your aims are good and filled with integrity. I hope that you find a way to implement them for all GCSE students and not just for those students in mainstream school.” (Parent or carer)

“I think the aims of the standardisation approach are appropriate.” (Teacher – responding in a personal capacity)

Some respondents agreed with the aims in principle but then went on to qualify this agreement with further comment.

“While the overall aims are reasonable, provision must be made for schools in exceptional circumstances.” (School or college)

“The aims of standardising are wonderful, but I’m not convinced that it will end up being completely fair to all candidates. This is the part of the process which worries me greatly.” (Other – Assessment specialist)

“I am encouraged by the proposals in this respect. I hope that the detailed methodology for standardisation is sufficiently robust and detailed to make these aims a reality.” (Teacher – responding in a personal capacity)

“I fully endorse the aims. I think that achieving them will be incredibly difficult.” (School or college)

Some respondents focused on particular aims and made specific comments relating to these.

“For aim 2, delete “so far as is possible” so that it reads “to protect all students from being systematically advantaged or disadvantaged, notwithstanding their socio-economic background or whether they have a protected characteristic.” (Student – private, home educated candidate of any age)

“Although I agree in principle with your 5 proposed aims, I don’t understand how aim 2 can be achieved. It states “a common standardisation process, within and across subjects” but for maths, you should not include all year 11 with the GCSE resit students, since they have different starting points and are totally different cohort of students.” (Teacher – responding in a personal capacity)

“I feel aim 3 that the process should be easy to explain, should be removed or made clearly of less importance than the other aims especially aim 4 regarding fairness.” (Student – Year 11 or above)

“We agree with the first aim in principle and note that the direction from the Secretary of State says that the distribution of grades should be similar “so far as is possible”. Therefore we would expect that this is considered in the creation of any tolerances built into the model and that the best case result for the student is the one used on any ‘edge cases’ – those near the cut off points of these tolerances.” (Teacher representative group or union)

“Of the aims proposed, providing candidates with the grades they would have achieved is overwhelmingly the most important.” (Academy chain)

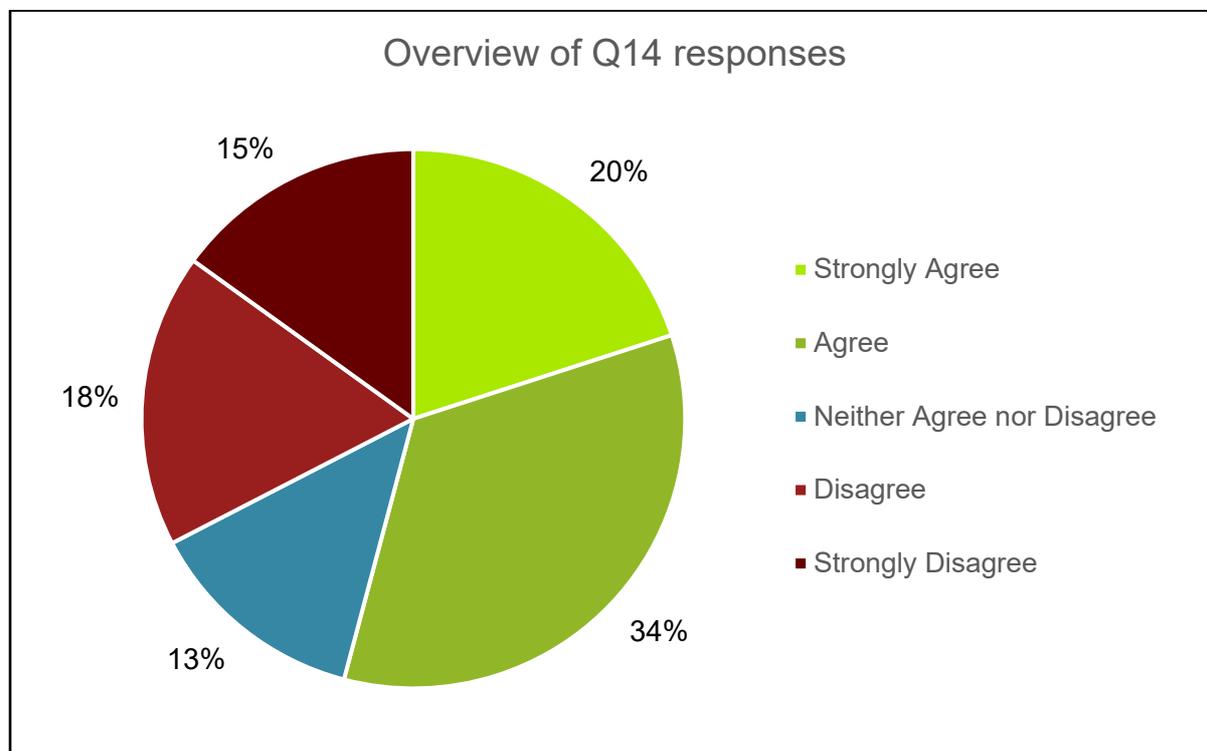
Some respondents disagreed with the aims.

“Disagree with the underlying principles. These aims are about preserving the status quo in a situation which has no historic parallel. This is morally indefensible for the students affected by this.” (Academy chain)

“I do not believe it is possible for you to meet aim 1 “to provide students with the grades that they would most likely have achieved had they been able to complete their assessments in summer 2020” (Parent or carer)

“The aim should be to allocate grades as close to those that would have been given this summer, not to create a system that’s easy to explain.” (Student – Year 11 or above)

**Q14. To what extent do you agree or disagree that using an approach to statistical standardisation which emphasises historical evidence of centre performance given the prior attainment of students is likely to be fairest for all students?**



Q14 responses	Count	Percentage
Strongly Agree	2,157	20%
Agree	3,685	34%
Neither Agree nor Disagree	1,432	13%
Disagree	1,902	18%
Strongly Disagree	1,621	15%
<b>Q14 total responses</b>		<b>10,797</b>
<i>No response</i>		1,826
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents (54%) agreed or strongly agreed that using an approach to statistical standardisation which emphasises historical evidence of centre performance given the prior attainment of students is likely to be fairest for all students. The remaining 46% were reasonably evenly spread across the other categories of response.

Teachers responding in a personal capacity and parents or carers were the largest groups of respondents. Fifty six per cent and 59% respectively of respondents from those groups strongly agreed or agreed with the approach'.

The overall response pattern was similar across the respondent groups with most groups agreeing with the approach rather than disagreeing. Some respondents gave reasons why they agreed.

“I believe this approach is the fairest possible under the current circumstances. There will always be anomalies where cohorts have performed better/worse than in previous years, as well as centres which are taking a particular subject for the first time, but this should be smoothed out by a national standardisation process.” (Other – Exams officer / manager)

“I agree entirely with the consultation argument. Historical centre trends and prior attainment of students seems to me to be the best way to ensure accuracy.” (Teacher – responding in a personal capacity)

“[We] agree that using historical evidence of centre performance given the prior attainment is the fairest approach to statistical standardisation for three main reasons:

a) Using this evidence helps to limit the incidence of teacher or centre bias, and/or an overestimation of centre assessed grades (which could be unintentional).

b) the use of prior attainment relationship to outcomes is a well-established measure in setting standards in UK assessments, so utilising this information in conjunction with centre rank order is a fair balance of evidence maintaining the parity with awarded grades historically at the centre.

c) it allows for a more consistent approach across all centres and across exam boards.” (Awarding body or exam board)

Some respondents were concerned about the impact of the attainment of previous cohorts of students on individual students this summer.

“Would not be fair towards many students as it would not consider individuals on a case by case basis, meaning there is high potential for students to be negatively impacted by this.” (Student – Year 11 or above)

“Historical data may not reflect an accurate picture for some individuals.” (Teacher – responding in a personal capacity)

“I am worried that individuals who would have excelled given the chance to sit exams are going to be unfairly penalised due to poor performance of their predecessors.” (Teacher – responding in a personal capacity)

Some respondents highlighted the impact of statistical standardisation where there might be small amounts of data for a variety of reasons including small exam cohorts for a whole centre or for particular subjects and schools with students with no prior key stage 2 data. In addition, some comments were made about the impact of the reforms of GCSE and A level qualifications over the last 5 years on the data available. Respondents were concerned that if 2019 was the first award of the reformed qualification there would be small amounts of data to support the process. There may also be some impact if cohorts in a centre have changed in size.

“In a small school with a small cohort for each subject, the grades can differ by great amounts each year.” (Parent or carer)

“With small schools experiencing large fluctuations in results each year, it is concerning to hear of Ofqual’s plans to assume that grades will be distributed in the same manner as previous years.” (Student – Year 11 or above)

“Using centre previous performance is not valid for SEND settings as we have varying cohorts each year. With such small numbers taking GCSE exams (around 10 per year), we can have vastly varied results year to year dependent on the individual needs of the students.” (Teacher – responding in a personal capacity)

“Independent schools are unlikely to have any KS2 data and should not be penalised by a perceived lack of historical data.” (Other - Head of Centre)

“These are still relatively new qualifications so you would expect to see a year on year improvement in results as teachers become more familiar with the specification.” (Teacher – responding in a personal capacity)

“A recent change in the qualification has disrupted the performance of many schools as well as the national distribution of grades (especially true for A level Mathematics and Further Mathematics for which 2019 was the first full year of the new qualification).” (Subject representative or interest group)

“Some centres have grown their student cohort for certain qualifications since last year e.g. computer science. This may mean that the cohort may not be typical of previous examination series, presenting challenges for the use of historical data nationally and for specific centres.” (Subject representative or interest group)

Comments were made about new schools or those that had recently been incorporated into an academy chain and the impact that this has on the amount of data available. However, the scale of this issue was distorted due to over 70 identical responses from respondents associated with one centre concerned that the centre was in this situation.

“The consultation document acknowledges that statistical standardisation will need to accommodate centres without historical results like ours, a successful free school which opened in 2015 and rated Outstanding across the board by Ofsted in 2018. We had been expecting a positive P8 score and are seeking assurances that our pupils will not be disadvantaged by the statistical standardisation model not taking into account that our pupils were on course to make above average progress.” (School or college)

“As a parent with Y11 children in a new school, which has an outstanding in all areas from Ofsted, any proposal for using historical data would be extremely unfair on new schools and should not be used.” (Parent or carer)

“I am extremely concerned that adjusting grades based on prior attainment from a school/centre could lead to students being unfairly discriminated against, for example, in new schools with only 1 or 2 years data.” (Teacher – responding in a personal capacity)

A number of respondents made the point that schools or colleges sometimes have one cohort that, in any year, could be considered an anomaly and not reflective of the usual performance of students at that centre.

“All centres have occasional problem years. Some students will be held accountable for a bad performing year maybe the year before them which is incredibly unfair.” (Parent or carer)

“Our school had a blip last year. Over the last 4 years, our results have been either significantly above, in line or for one year below national average (last year). This was anomalous.” (School or college)

“I am very concerned about the historical results being used to determine this year’s results. We, as an FE college, had a dip in results last year. This year we have a new head of A levels and were optimistic that results would be improved based on our students progress grades throughout the year.” (Teacher – responding in a personal capacity)

Some respondents were concerned about the impact on individual students who have made better than the expected progress since key stage 2. They thought these students would be at a disadvantage as a result of statistical standardisation.

“I am concerned about taking predicted results from KS2 SATs predictions. Many students achieve better results than their predictions. This is especially true for practical subjects which can’t be fully measured by these tests.” (Teacher – responding in a personal capacity)

“KS2 data often does not reflect the ability or outcomes of a student. A student might have made rapid progress in Secondary School and have an excellent work ethic which has caused them to be predicted above their target grade based on KS2 data, but they will also now be disadvantaged if this data is used to lower a projected grade by their class teacher.” (Teacher – responding in a personal capacity)

Respondents frequently commented on the impact on the current cohort if their progress indicated that results would be different to those predicted by historical data in their centre. Comments mostly focused on the situation if a cohort was on course to get better results than indicated by previous results.

“Turnaround schools will be significantly affected. Similarly, schools with significant drops in performance this year will go unnoticed.” (Teacher – responding in a personal capacity)

“Relying too heavily on historical data will disadvantage schools on “turnaround” journeys. These are, almost by their nature, schools serving deprived communities and their students could be further disadvantaged by Ofqual’s approach to the use of historical data to standardise grades.” (Teacher representative group or union)

“I suspect this area will cause the most concern for secondary schools. The year to year P8 should absolutely be taken in to account, alongside the three year trend. It is likely schools will submit grades in line with overall progress expectations for this academic year and this should be taken into account.” (Teacher – responding in a personal capacity)

“For schools which have struggled in the past and are predicting a steep improvement in results, it would be devastating to use historical results.” (School or college)

“We feel that, on the whole, a system that places more weight on the professional judgement of education staff will produce a better, fairer indicator of a student’s ability than one which places more weight on the outcomes of previous students at a given centre with, in many cases, different teachers.” (Teacher representative group or union)

“It is a flawed system. Using historical patterns is disingenuous, dangerous and fundamentally unfair; this approach assumes far too many things. As a consequence the winners will be those already advantaged but the current system; and the losers will be those already disadvantaged by the current system.” (Other – CEO of a Trust)

“I think that it would be unfair to follow the schools past results to decide on this cohort, some schools will be looked upon more favourably due to past students, whereas other students will be penalised for past results.” (Other – Parent of a Year 10 student)

“Using historical evidence does not take into account the huge amount of work that schools, departments, teachers and students have done in subjects to make improvements, if there has been some historical underperformance.” (Teacher – responding in a personal capacity)

“It is agreed that this is the most appropriate way of ensuring the integrity of results, including maintaining a national grade distribution. However, [we] would underline again Ofqual’s responsibility to inform the perceptions of centres and teachers, given a disparity between a centre’s estimations and the final results might also cause an increase in appeals, public criticism, and a lack of public confidence in the summer 2020 results.” (Awarding body or exam board)

Some respondents discussed strategies that could be used to allow centres to provide supporting evidence if the data for this year’s cohort indicated a different outcome to historical data.

“Please allow for centre improvements with evidence provided and a supporting statement from the Head.” (Teacher – responding in a personal capacity)

“I would like you to consider where schools know they are going to achieve higher than in previous years that you would accept validation from external support they may have been receiving.” (Parent or carer)

“Requesting evidence for a sample of students and using the moderation technique deployed for coursework would be a much fairer judge of this year’s cohort and a way of scrutinising the validity of predicted grades.” (Teacher – responding in a personal capacity)

“Ofqual should consider whether there is a case for examining further evidence from centres where there are significant changes in the results achieved. Statistical standardisation approaches can certainly do a good job of flagging apparently anomalous or unexpected results. However, they cannot tell us whether these apparently anomalous results are genuine outliers arising from the correct application of the process (of which there will be some in any year) or examples of inaccurate centre assessment.” (Academy chain)

“Centres should be required to provide baseline and tracking data to support their ranking of learners.” (Other – Examiner)

Other comments included questions on how far back historical performance would be considered and whether it would be at centre or subject level.

“I would appreciate transparency on how many years of data you will use for centres in making the calculated grade.” (Teacher – responding in a personal capacity)

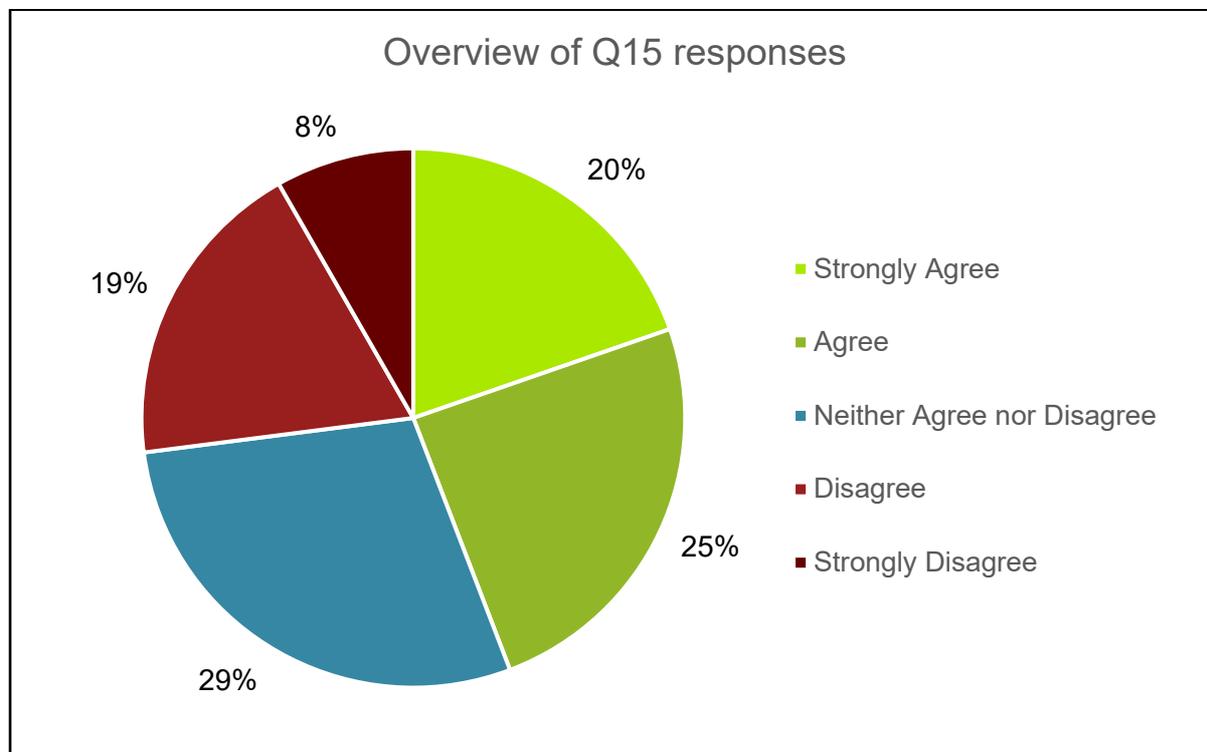
“The decision about how many years to go back is important.” (School or college)

“At a subject level, if a school is under performing but one subject in the school has excelled in recent years, or seen improvement, this somehow needs to be considered.” (Teacher – responding in a personal capacity)

“A centre’s proposed grade distribution in a subject should not be changed only because it is out of line with the previous year’s (or any single prior year’s) results. Ofqual should consider a range of prior years’ performance. However, it is insufficient to consider average performance over time - the range and variance of results is more important than the average. If a centre’s distribution of grades in a subject is not significantly different from that which would be expected given performance in at least one of the last three years, Ofqual should not in general change the centre assessment grades.” (Academy chain)

There were also comments that included queries about how private candidates will be ranked and this is covered in the analysis for question 9.

**Q15. To what extent do you agree that the trajectory of centres' results should NOT be included in the statistical standardisation process?**



Q15 responses	Count	Percentage
Strongly Agree	2,045	20%
Agree	2,555	25%
Neither Agree nor Disagree	2,991	29%
Disagree	1,956	19%
Strongly Disagree	858	8%
<b>Q15 total responses</b>		<b>10,405</b>
<i>No response</i>		2,218
<b>Survey total responses</b>		<b>12,623</b>

Forty five per cent of respondents strongly agreed or agreed that centre trajectory should not be part of the statistical standardisation process. Twenty seven per cent of respondents strongly disagreed or disagreed with this approach.

The majority of respondents, 74%, were teachers responding in a personal capacity, parents or carers and organisational responses from schools and colleges. Within these groups, the response patterns were not the same. For example, 64% of school or college respondents strongly agreed or agreed that centre trajectory should not be part of the statistical standardisation process whereas 33% of parents or carers

strongly agreed or agreed with the proposal. Forty seven per cent of teachers responding in a personal capacity strongly agreed or agreed.

Of the main respondent groups, 32% of teachers responding in a personal capacity and 23% of parents or carers strongly disagreed or disagreed with the proposal.

Some respondents disagreed with the proposal that centre trajectory should not be part of the statistical standardisation process based on the requirement for schools to put into place measures to try to improve outcomes for students. The respondents commented that it would therefore be unfair not to take an upward trajectory into consideration and would not reflect the hard work and effort of staff and students leading up to this summer's qualifications.

“Standardisation by exam boards should take into account the trajectory of school results. I am in a school with improving examination results and we had anticipated further improvement in 2020. I hope this is taken into account as well as looking at historic data. If trajectory is not taken into account, this will significantly harm some pupils.” (School or college)

“Our trajectory is positive and we were predicting since the start of this academic year extremely positive results for this year. If trajectory is not taken into account this will not show the enormous amount of work that both students and staff have put in to achieve the results we deserve.” (Teacher – responding in a personal capacity)

“Disregarding a school's trajectory would be unfair. Our school has a three year trajectory of improved GCSE outcomes measured by A8 and P8. It must be possible to take this data into account.” (School or college)

“I do feel you need to consider the upward trajectory. If a centre or school has been clearly improving year on year, whilst another perhaps has the opposite, it is hard to see how the students in the improving school won't be disadvantaged unless you do this.” (Parent or carer)

“It will be crucial for schools to use their trajectory along-side historical accuracy of final predictions compared to actual final results. Schools that are on an upward trajectory, particularly those serving challenging socio-economic communities, should not be hindered.” (Teacher – responding in a personal capacity)

“Our centre would have both a strong moral and professional objection to the proposal to ignore a centre trajectory as part of the standardisation process. At whole school level, the striving for year on year improvement in results is what we are tasked to achieve for our students. It has been a central thrust of school judgement measures over many years and to ignore it would be to ignore the strident efforts of professionals nationwide who have all sought to improve outcomes for their students. Schools are, annually, required to improve. To ignore those potential improvements would seem morally wrong and an incredibly demotivating factor for teaching staff, students and the wider school community.” (School or college)

“Some schools may have been on a trajectory for rapid improvement. Their previous 3 years results may have been poorer than new leadership and standards will reflect. This will disadvantage some students who would have had significantly improved outcomes this year, reflected in upturned overall

grades but which would be at odds with previous whole school outcomes.”  
(Other – Headteacher)

“A school’s improvement plan can be highly impactful and should be acknowledged when there has been progress made and therefore, trajectories should be included when considering the statistical standardisation process.” (Other representative or interest group)

Some respondents suggested that if a school has a proven past trajectory of improvement, it is reasonable to assume that this will continue.

“I fundamentally disagree with your approach to disregard the trajectory of a centre in standardising results. In a school where results have been improving (or declining) year on year and that trajectory can be seen (in value-added), it is reasonable to assume that direction would continue.” (School or college)

“I disagree that the trajectory of results should not be included because this appears to not take account of the fact that following for example a specification change, results in first year may have been lower than in previous years, but since then they have improved in each subsequent year as we have become more attuned to the new spec, and there is no reason to think that this would not continue in the coming year.” (School or college)

Respondents acknowledged that their centre might be disadvantaged by not taking an upwards trajectory into consideration but realised the difficulties across all centres if trajectory was part of the statistical standardisation approach.

“Even though we would benefit from the upward trajectory being taken into account, I agree that it would be unfair to do so.” (Teacher – responding in a personal capacity)

“I feel strongly that our school will seek to accurately award grades. As such, I do feel that the emphasis should be on the centre-assessed grades. Some of our departments are on an upwards trajectory but I can accept the reasons why this cannot be assumed or incorporated into statistical standardisation methods easily or reliably.” (Teacher – responding in a personal capacity)

“I understand why you do not feel able to take into account the trajectory of improved results but I wanted to record that I feel this is a little unfair on students and staff in rapidly improving schools where huge amounts of work will have been put into improving academic results. However, I appreciate that to accommodate a trajectory of improved results would be to assume that this trajectory is to continue - which is not a very scientific approach to take so I reluctantly agree with this.” (Teacher – responding in a personal capacity)

Some respondents in all groups commented that centre trajectory may be an unreliable measure and made the point that there is evidence that the vast majority of centres do not show a consistent trajectory year on year.

“I think that using the trajectory of centres is potentially unreliable. In my experience, performance is linked to the quality of staffing and this can and does change. For example, an upward trajectory is often linked to an individual member of staff, who may have left the institution.” (Parent or carer)

“It is extremely difficult to take trajectory into account. How can anybody objectively know which claims about trajectory will be accurate and which not?”

To claim to have this knowledge is likely to randomly advantage or disadvantage students in particular schools.” (Academy chain)

“[We] have looked at the issue of centre trajectory closely and we accept Ofqual’s conclusion that there is no statistical way of accommodating changes in centre performance and that, as a consequence, this has the potential of dampening down or boosting the results of exceptional cohorts within a centre.” (Awarding body or exam board)

“Strongly agree as there is not enough historical data for 9-1 GCSE data to inform an accurate trajectory – dips and peaks in previous cohort performance should not affect current cohorts and the individual students in them.” (School or college)

“We believe that there is no objective justification for an approach that seeks to take account of recent trends in centre performance and endorses Ofqual’s proposals in this respect. We are particularly persuaded by Ofqual’s argument that despite protestations to the contrary, performance data suggests that very few centres experience a consistent increasing or decreasing trajectory over time and that centre performance is often subject to significant variance year-on-year.” (Teacher representative group or union)

It was noted by some respondents that centres might appear to be on a downwards trajectory which would have a negative impact on students.

“It is important to ensure that school’s previous trajectory does not influence the centre assessed grades if previous assessment suggests the centre is on a downward trajectory. It is agreed that the trajectory of centres’ results should not be included in the statistical standardisation process.” (Teacher representative group or union)

“[We] are concerned that centres might be identified on a downward trajectory based on unreliable data which could lead to their results being negatively impacted.” (Awarding body or exam board)

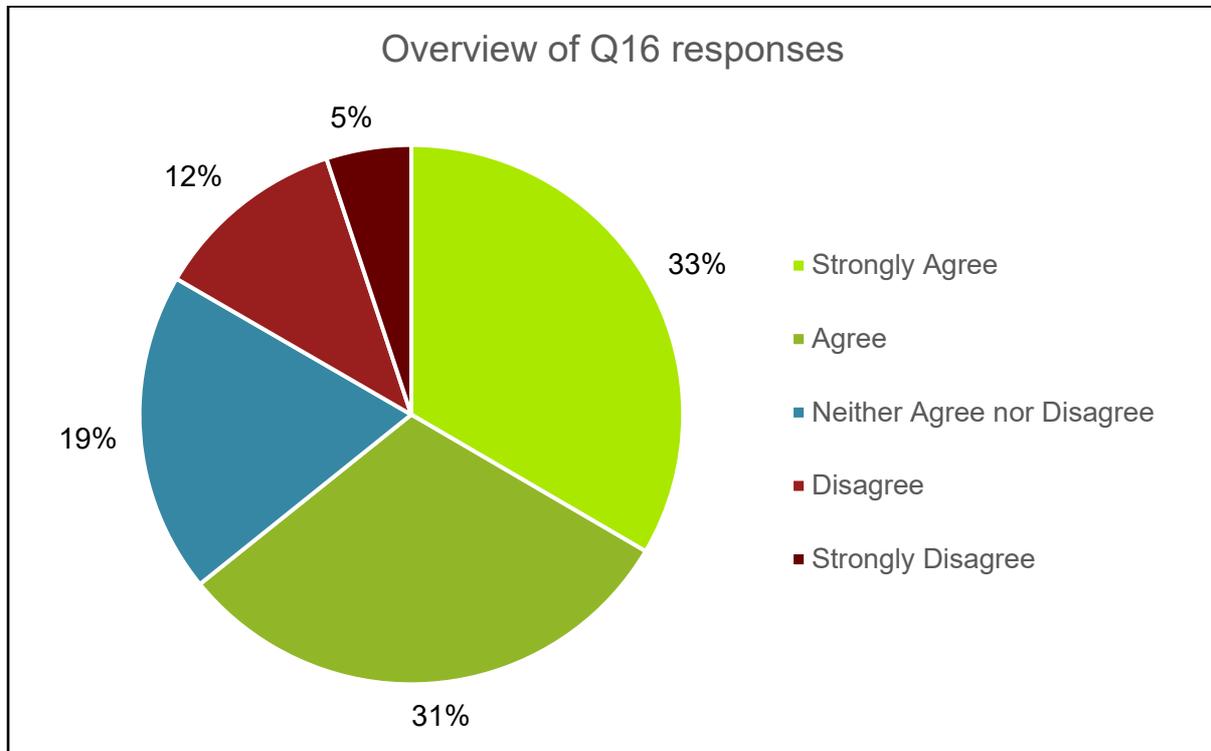
Finally, some respondents suggested that centres could provide extra evidence to support the trajectory that their previous years’ results suggested they are following. This could then be taken into consideration.

“I think evidence submitted by schools indicating trajectory, provided it is secure and compelling, should be considered.” (Local Authority)

“Where there is evidence of an overall trajectory of improvement this should be taken into account, to ensure fairness for schools where there is previous evidence that strategies for improvement have been successful.” (School or college)

“From Ofqual's point of view, we accept that this is a difficult problem. We know that the reliability of internal school assessment systems are very variable and that Ofqual cannot just accept such projections at face value. However, there ought to be a process in place to allow schools to make their case in this respect, even if this leads to follow-up quality assurance processes to ensure that such school arguments have some validity.” (School or college)

**Q16. To what extent do you agree or disagree that the individual rank orders provided by centres should NOT be modified to account for bias regarding different students according to their particular protected characteristics or socio-economic backgrounds?**



Q16 responses	Count	Percentage
Strongly Agree	3,503	33%
Agree	3,216	31%
Neither Agree nor Disagree	2,013	19%
Disagree	1,208	12%
Strongly Disagree	529	5%
<b>Q16 total responses</b>		<b>10,469</b>
<i>No response</i>		2,154
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents, 64%, strongly agreed or agreed with the proposal that the individual rank orders provided by centres should not be modified to account for bias regarding different students according to their particular protected characteristics or socio-economic backgrounds. Seventeen per cent disagreed with this proposal.

When considering the responses by respondent group, 84% of the 'school or college' respondents strongly agreed or agreed whereas 55% of the 'parent or carer' respondents strongly agreed or agreed. When considering the respondent groups for those who strongly disagreed or disagreed with the proposal, the pattern of responses is similar across all groups.

Respondents who agreed with this proposal often acknowledged that these factors should not be ignored but provided reasons for their agreement. These included that the factors should be considered by teachers at centre level and that this modification would not happen if students were able to sit their exams.

"The suggestion that statistical standardisation could modify the centre assessment grades makes a mockery of the whole exam system. If grades or rank order were adjusted to reflect the cultural or socio-economic environment that a school operates in, student achievement would be limited and undervalued." (Other – Governor)

"While acknowledging that equalities issues must rightly be given due consideration, it is impossible to account for which teachers will and will not have tried to eliminate bias in their grading and rankings, or in what regard they might have done so, or to what extent, or how consistently." (Awarding body or exam board)

"There should not be a blanket order to modify our rank orders because of protected characteristics or because a pupil is from a particular socio-economic background. This would not happen if they were sitting the examinations (other than with reasonable adjustments made through the proper process) and it would be very unfair to all students." (School or college)

"The risk of unconscious bias in teacher assessments has been highlighted by many stakeholders. Like Ofqual, we have looked at the potential for identifying and correcting bias through a statistical process after schools and colleges have submitted their assessed grades and rank orders. Our current view is that, with the data that would be available, and considering the many variables that would have to be factored in, this would not be reliable and could even introduce unfairness." (Awarding body or exam board)

"I would hope that socio-economic factors will be taken in to account at centre level and therefore not "double counted". (School or college)

"This year is exceptional, I do not accept that any form of standardisation by previous results or by socio-economic data is "fair" in these exceptional circumstances. Grades should be wholly dependent on school assessments, where Heads of Centres are held responsible for evidenced, reasonable and accurate grading of the school's department teams." (Teacher – responding in a personal capacity)

"Universities already make lower offers to those from certain socio-economic backgrounds and characteristics, so further modification should not be needed." (Parent or carer)

"Fully agree that no effort should be made to standardise according to background - the ethics of this would be untenable." (Other – Head of sixth form)

“We strongly agree that the individual rank orders provided by centres should not be modified to account for bias regarding different students according to their particular protected characteristics or their socio-economic backgrounds, as this would likely have a negative effect on high-attaining students from low socio-economic backgrounds, who may be perceived to not match the demographic group from which they derive from.” (Other representative or interest group)

“Where schools nationally have been unable in the past to even out differences caused by various kinds of disadvantage, it is unreasonable to expect this to be done in this exceptional year by exam boards.” (Academy chain)

Some respondents were not sure that any modification of the rank order would be able to account for bias regarding different students according to their particular protected characteristics or socio-economic backgrounds.

“We are not convinced that the proposed statistical measures to correct for potential bias will be sufficiently robust and defensible to rectify the adverse impact which the statistical standardisation seems likely to have on academically talented students from socio-economically disadvantaged backgrounds. We are not convinced that the proposed statistical standardisation method is responsive and sufficiently granular to meet the needs of academically talented students who are the outliers in their centres.” (University or higher education institution)

“It is impossible to modify in relation to protected characteristics or their socio-economic background that considers the context of the individual school the student attends.” (Teacher – responding in a personal capacity)

“Unless a very detailed standardised framework for adjustment of rankings based on socio-economic and other factors can be developed and rigorously and consistently applied, I do not think taking these details into account can feasibly be part of the process.” (Other – Higher education professional)

“A standardisation process cannot account for the socio-economic background or protected characteristics that may have created a less than ideal environment within which previous assessments were made.” (Other representative or interest group)

Respondents who disagreed with the proposal and were therefore of the opinion that there should be modification to account for bias regarding different students according to their particular protected characteristics or socio-economic backgrounds commented that, without this, students would be disadvantaged and the process would not be fair to them.

“There is a strong body of literature that indicates that those from BAME backgrounds, religious minorities, and lower socio-economic backgrounds would systematically be ranked lower than other students. We urge Ofqual to consider implementing the provision of mitigating circumstances declaration forms that students and parents can submit alongside training to mitigate for unconscious/conscious biases undertaken by all teachers involved in the grade predictions process at each centre.” (Other representative or interest group)

“I believe students with protected characteristics and students’ socio economic background should be taken into account as they are more likely to have an underestimated target grade.” (Student – Year 10 or below)

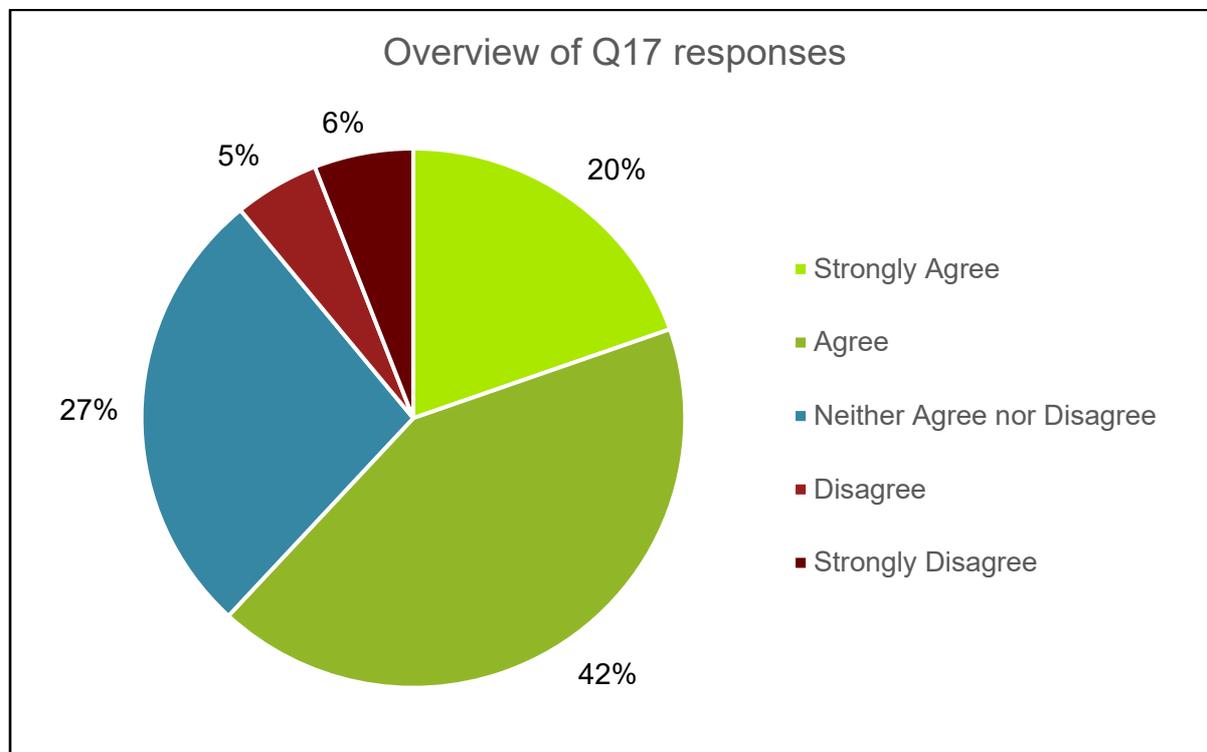
“I agree sociological research into labelling of students with protected characteristics and on basis of socioeconomic position should be utilised in the standardisation process.” (Parent or carer)

“We believe Ofqual should incorporate into its statistical model factors which acknowledge and correct for the bias that previously high achieving young people from deprived backgrounds experience and adjust centre rankings accordingly.” (Other representative or interest group)

“Standardisation should be modified to take into account protected characteristics and socio-economic background.” (Teacher – responding in a personal capacity)

“I strongly think that some adjustments/modifications must be made to address the proven bias innate within teacher assessments regarding race and lower socio-economic status of students. Without these adjustments, the process will knowingly embed a further layer of disadvantage and discrimination, which in turn will exacerbate the attainment gap, whilst invalidating the results overall.” (Parent or carer)

**Q17. To what extent do you agree or disagree that we should incorporate the standardisation approach into our regulatory framework?**



Q17 responses	Count	Percentage
Strongly Agree	1,996	20%
Agree	4,291	42%
Neither Agree nor Disagree	2,756	27%
Disagree	515	5%
Strongly Disagree	599	6%
<b>Q17 total responses</b>		<b>10,157</b>
<i>No response</i>		2,466
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents, 62% strongly agreed or agreed that we should incorporate the standardisation approach into our regulatory framework. Eleven per cent of respondents strongly disagreed or disagreed.

The pattern of responses across the different respondent groups was similar with 64% of schools and colleges and 71% of subject representative or interest groups strongly agreeing or agreeing. There was also a high level of agreement from the biggest respondent groups with agreement from 70% of teachers responding in a personal capacity and 56% of parents or carers.

Few of this biggest group of respondents disagreed with the proposal. Seven per cent of teachers responding in a personal capacity and 9% of parents or carers strongly disagreed or disagreed.

When commenting, some respondents simply confirmed their agreement with the proposal and some offered reasons as to why this should be done.

“Fully agree – this will be important for clarity and accountability.” (School or college)

“To secure the integrity and consistency of awarding across all exam boards, the standardisation approach adopted by Ofqual should be incorporated into the regulatory framework.” (Teacher representative group or union)

“We support the proposed aims of this standardisation process and agree that the approach should be incorporated into the regulatory framework, requiring each exam board to adopt a common approach to standardisation.” (Subject representative or interest group)

‘We agree that the standardisation report should be incorporated into the regulatory framework in order to ensure consistency across the country and to avoid accusations of a postcode lottery on grades.’ (Other representative or interest group)

Where respondents agreed with the proposal, some commented that it should only be for this exceptional year.

“I have put agree for incorporating the standardisation approach into the regulatory framework, but I believe this should only be for this year.” (Teacher – responding in a personal capacity)

Very few respondents commented that the standardisation approach should not be incorporated into our regulatory framework.

‘We do not believe that the standardisation proposals should be incorporated into Ofqual’s regulatory framework, and indeed, the aim of maintaining standards over time should be relaxed this year, with wider consultation with the sector about future years.’ (Teacher representative group or union)

“On balance, because of the timescale by which the data will be gathered, analysed, challenged/confirmed and then published, it does not seem practical to incorporate the standardisation into the regulatory framework with any real meaning.” (Academy chain)

“We stress that a standardisation process should be adopted with severe caution, as this would not allow for individual exceptional circumstances to be accounted. We therefore selected the “strongly disagree” option to answer this question.” (Other representative or interest group)

## **Q18. Do you have any comments about our proposals for the statistical standardisation of centre assessment grades?**

A total of 3,628 comments were received in answer to this question and many of these comments have been considered where they relate to questions 13 to 17.

Some respondents made comments about the overall principle of statistical standardisation.

“Ofqual should consider adopting a process in which decisions about the approach to moderation in a subject are dependent on the actual distribution of centre assessment grades Awarding Bodies receive. Where the national distribution of centre assessed grades in a subject is not unreasonably far from an expected distribution, Ofqual should accept it, adjusting only for centres where there is clear evidence of inaccuracy. Where the proposed distribution is too far from expected to be acceptable, Ofqual should approach standardisation by looking for confirmatory evidence rather than immediately fitting centres to a single pre-determined distribution and should use the widest possible range of data and evidence in doing so.” (Academy chain)

“I disagree with this whole process.” (Parent or carer)

“There are no “perfect” answers and the proposed framework seems as sensible and fair as it could be.” (Teacher – responding in a personal capacity)

“It is very clear that we are in a unique situation and that a light regulatory touch should be adopted. None of these results are going to be used by the DFE for performance tables and Ofsted should not be looking at them to determine an inspection. Therefore, grade intervention should only be used in the most obvious cases of clear inflation by a school or MAT.” (School or college)

“This is an unavoidable part of this year’s process. Inevitably there will be winners and losers but this is true of exams as well.” (Parent or carer)

“My strong disagreement of this process arises out of Aim 2 which does not provide for the satisfactory inclusion of home schooled candidates.” (Other - Parent and home tutor)

“I believe statistical standardisation is definitely preferable to using teacher predictions as the sole evidence due to varying criteria used by different institutions.” (Teacher – responding in a personal capacity)

“Despite my strong support for this approach, I do have some underlying concerns that some students would have performed much better in exam conditions and so achieve higher grades, but have been denied this through no fault of their own. I do, however, understand that this is unavoidable in the current circumstances and that grades can only be awarded on the information available at present.” (Private training provider)

“I disagree with the proposal that more weight should be given to the statistical standardisation compared to teacher assessment. (Parent or carer)

“The starting point should be to assume that the Centre Assessed Grades and rankings submitted are accurate.” (School or college)

Some respondents commented on the need for transparency regarding any statistical standardisation that is carried out.

“Simplicity and transparency should be the watchwords.” (Parent or carer)

“All stakeholders - students, parents, teachers, schools, universities, employers - need greater transparency as to how teacher's predictions will be acted upon this year and what fine-tuning processes Ofqual will be using to ensure that all students receive a fair grade as predicted by their teachers. Will this be published for all to see, for example, standardisation formulas and what will you do for the prediction of stronger Year 11 cohorts this year?”

(Teacher – responding in a personal capacity)

[We] agree with these aims: statistical standardisation needs to provide transparency, deliverability, equality and fairness to the maximum extent possible, while accepting that there is a tension between some of the aims.

(Awarding body or exam board)

“We need total transparency about the process and information needs to be provided to each centre about why and how their results were adapted.”

(Teacher – responding in a personal capacity)

“Following decisions about the statistical model, Ofqual must explain to the sector, including leaders, teachers, students and parents, why the approach selected will be the most accurate in standardising students' grades and recognising any inherent limitations. This transparency will help to maintain confidence in the system.” (Teacher representative group or union)

“The statistical standardisation method needs to be published.” (Teacher – responding in a personal capacity)

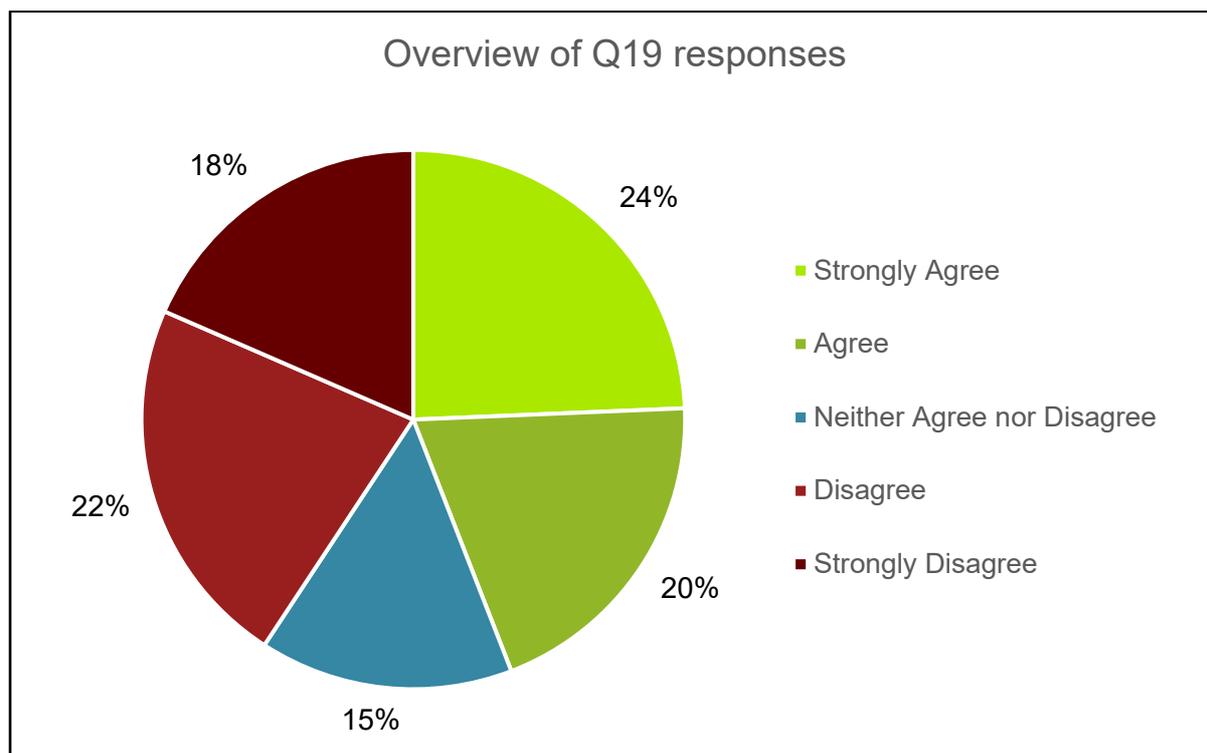
“It is important that there is transparency about how any process has been applied, in order that both centres and pupils can understand its impact.”

(Academy chain)

In addition, there were some answers to this question that did not relate to the approach to statistical standardisation. Those comments have been considered in the appropriate analyses, for example, relating to private candidates and those being home educated, the arrangements for year 10 GCSE entries and possible additional processes that could be considered after the production of centre assessment grades and rank ordering of students.

## Appealing the results

**Q19. To what extent do you agree or disagree that we should not provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre's assessment grades are determined?**



Q19 responses	Count	Percentage
Strongly Agree	2,579	24%
Agree	2,099	20%
Neither Agree nor Disagree	1,601	15%
Disagree	2,369	22%
Strongly Disagree	1,953	18%
<b>Q19 total responses</b>		<b>10,601</b>
<i>No response</i>		2,022
<b>Survey total responses</b>		<b>12,623</b>

Responses to this proposal were fairly evenly split, although slightly more expressed agreement (44%) than disagreement (40%). An analysis of responses by respondent group, however, reveals a range of different viewpoints. Most noticeably, students and their parents or carers were much more likely to disagree with our proposal with

agreement rates of 24% or less, while schools and colleges and academy chains were very likely to agree with agreement rates of 69% and 82% respectively.

This split between centres and teachers on the one hand and students and their parents on the other is a pattern which repeats in the majority of the questions about our proposals for an appeals process.

“Students should have the opportunity to appeal for their centre assessment grade and ranking should they believe their teacher has not made a fair and professional decision as it is their right to appeal for what should be followed in the government’s proposal. It is unfair to not provide such an appeal simply because it is difficult to implement.” (Student – Year 11 or above)

“To protect the integrity of teacher judgements, it is imperative that students and parents shouldn’t be able to appeal the holistic gradings and rankings - it is a contentious issue and knowing the ranking will identify other students in the process, and this should not be allowed. In this unprecedented situation, schools should be protected from parent grievances which will, undoubtedly be emotive.” (School or college)

“Protecting the integrity of the process by which CAGs are decided by Centres is paramount. Therefore it is essential that centres are not open to appeals about their decision making because such an opportunity would lay centres and teachers open to manipulation and protracted pressure from some parents. Knowing that this is a possibility would inevitably lead to some unhelpful caution being applied by centres in regard to the CAGs submitted for certain candidates. This is a critical point in protecting the process.” (Teacher – responding in a personal capacity)

“However a right to challenge the professional judgements of staff and/or centres, as well as creating an exceptional burden for centres, could undermine the premise of these arrangements, which is the reliability of professional judgement which cannot be fairly tested in any event without prescriptive assessment criteria.” (Other representative or interest group)

A number of respondents referred specifically to the pressure that schools and colleges and individual teachers would be under if appeals about professional judgements were allowed.

“Schools are now in a very difficult position and should be protected as much as possible. Appeals should not put schools/ staff in vulnerable positions with students and their parents...” (School or college)

“We agree that the proposals for appealing results look fair and effective. They are central to protecting staff from undue influence and pressure when making predictions and hence they strengthen the potential accuracy of the prediction model which is in the best interests of all pupils, parents, teachers and other stakeholders.” (Teacher – responding in a personal capacity)

“Having put this system in place and emphasised how teacher professional judgement is to be trusted, and ensured confidentiality in the grading and ranking process, it would be wrong to renege on that in any way by allowing any form of appeal or review of the centre's judgement in grading or rank orders or procedures. That will put centres and their staff under undue, additional and unacceptable pressure and absolve the exams boards of much

of their usual function and relevance, and potentially accountability.” (Other – Teacher in a senior leadership role)

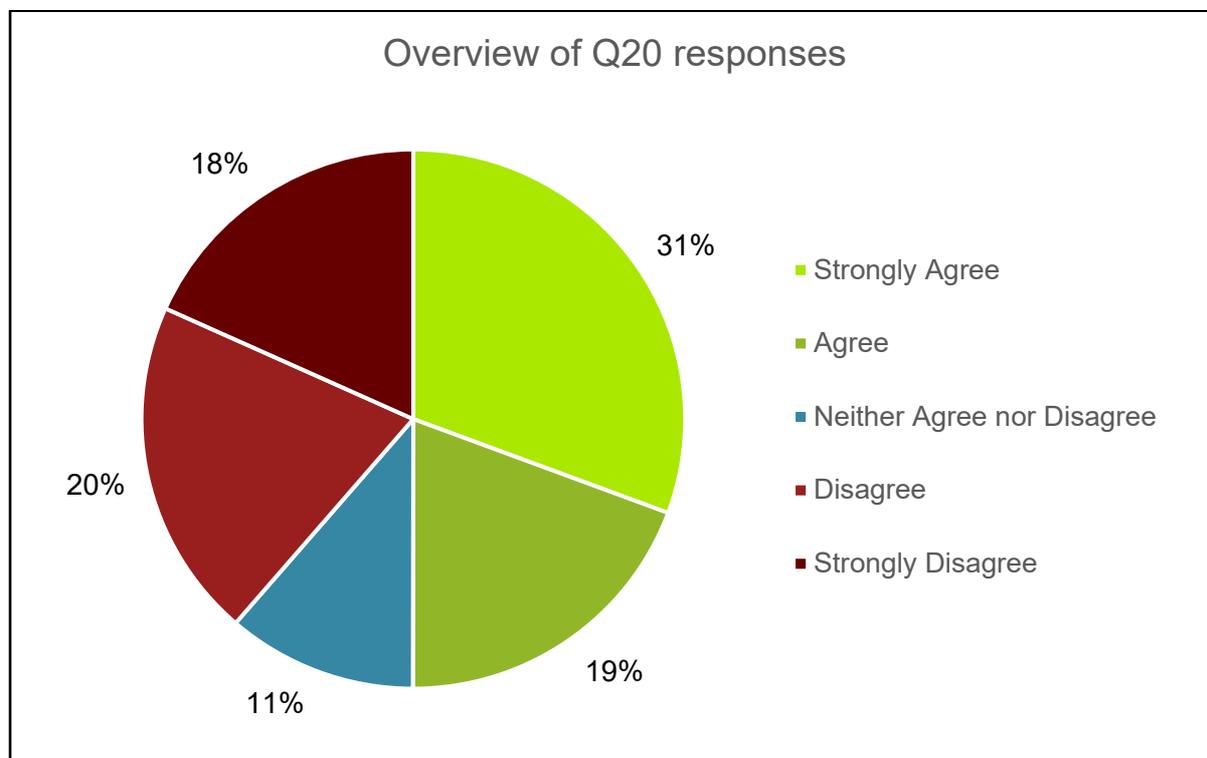
A common reason for opposing our proposal was that teachers, schools or colleges may be subject to conscious or unconscious bias or favouritism regarding individual students, and that an opportunity to appeal a centre’s judgement would be a means to mitigate this.

“Whilst bias may not be a factor on the grand scale an appeals process should be in place to allow for the individual bias of teachers which may occur within a school setting.” (School or college)

“Where in these proposals is protection for students against favouritism (or its opposite) at an individual student / teacher level?” (Parent or carer)

“I feel that there are going to be students from minority backgrounds that will not be predicted grades that reflect their abilities due to unconscious bias from teachers, who may view them differently without even noticing.” (Student – Year 11 or above)

**Q20. To what extent do you agree or disagree that we should not provide for a student to challenge their position in a centre's rank order?**



Q20 responses	Count	Percentage
Strongly Agree	3,279	31%
Agree	2,071	19%
Neither Agree nor Disagree	1,210	11%
Disagree	2,181	20%
Strongly Disagree	1,954	18%
<b>Q20 total responses</b>		<b>10,695</b>
<i>No response</i>		1,928
<b>Survey total responses</b>		<b>12,623</b>

Half of the respondents who answered this question indicated that they agreed or strongly agreed with our proposal that we should not provide for a student to challenge their position in a centre's rank order. Thirty eight per cent disagreed or strongly disagreed.

As with the previous proposal regarding appeals premised on the scrutiny of centres' professional judgements, different respondent groups answered this question in different ways. Again, students and parents and carers had opposing views from schools and colleges and teachers. The agreement rate of schools and colleges was 91%, but for students it was less than 20%.

Comments received about this question indicate that those who disagreed with the proposal did so for a variety of reasons. Some respondents referred to potential bias in judgements, or judgements where evidence suggests a different decision should have been made.

“Definitely need a process for challenging rank order. E.g. if a child in a class can be proven via assessments, tests, mocks etc to have constantly outperformed another and yet due to some reason the second child achieves a higher grade than the order/ suggested grade from the school need to be challenged. (Not saying I think this is a problem in my child's/ schools case).” (Parent or carer)

“We should be able to argue our rank order as some people are disliked by their teacher.” (Student – Year 11 or above)

“Rank Order: Students must be allowed to challenge their rank-order place, so that centres are able to re-verify that the student's position in the rank order is accurate, and it could be something merely like clerical re-marking of exam papers, wherein the head-of department and the head of centre would review the evidence used to provide the student's rank and would re-confirm or alter the student's place in the centre's rank order.” (Student – Year 11 or above)

“Students must be able to appeal their grades, especially if they are altered by the standardisation process and in particular, the rank order. It is unfair to allow appeals only on the matter of process.” (Parent or carer)

Most of the comments which supported our proposal tied their support to the issue of confidentiality, which is covered in more detail under question 5.

“Students should never be allowed access to the grades/rankings provided by a school so teachers cannot be individually challenged for results. This would be totally unfair to the teachers.” (Teacher – responding in a personal capacity)

“Students should NOT know the rank order in which they have been placed so should never be in a position to challenge either the rank order or the provision grade.” (Teacher – responding in a personal capacity)

“Your question about a student appealing their position in their centre's rank order, suggests students will know exactly where they have been ranked by their exam centre. I don't think the rank order should be disclosed to students, so they would have no basis to appeal.” (Other – Parent of a home educated child)

“From my understanding of the proposals, I do not see how a student can challenge their position in a centre's rank order if that data is kept confidential.” (Parent or carer)

“Given the confidentiality of the data prior to results being issued, does this extend to the appeals process. Will parents / students know the rank order as part of the process?” (Teacher – responding in a personal capacity)

Most other comments which supported our proposal did so on the basis of valuing the professional judgement of teachers.

“Unless well out of line, the centre's own rank order should be respected. There will always be candidates who are convinced they should have

achieved higher than they actually have; opening the appeal system up to individual candidates and parents could lead to questioning of teachers' professional judgement or even harassment from parents. The involvement of heads of centre and SLT in validating grade submissions should be sufficient to deter malpractice within a centre." (Other – Exams officer / manager and teacher)

"You have to trust the teachers' professional judgement, which has been checked by heads of department and by the head of centre. Allowing appeals of rank order etc will create a minefield of problems." (Teacher – responding in a personal capacity)

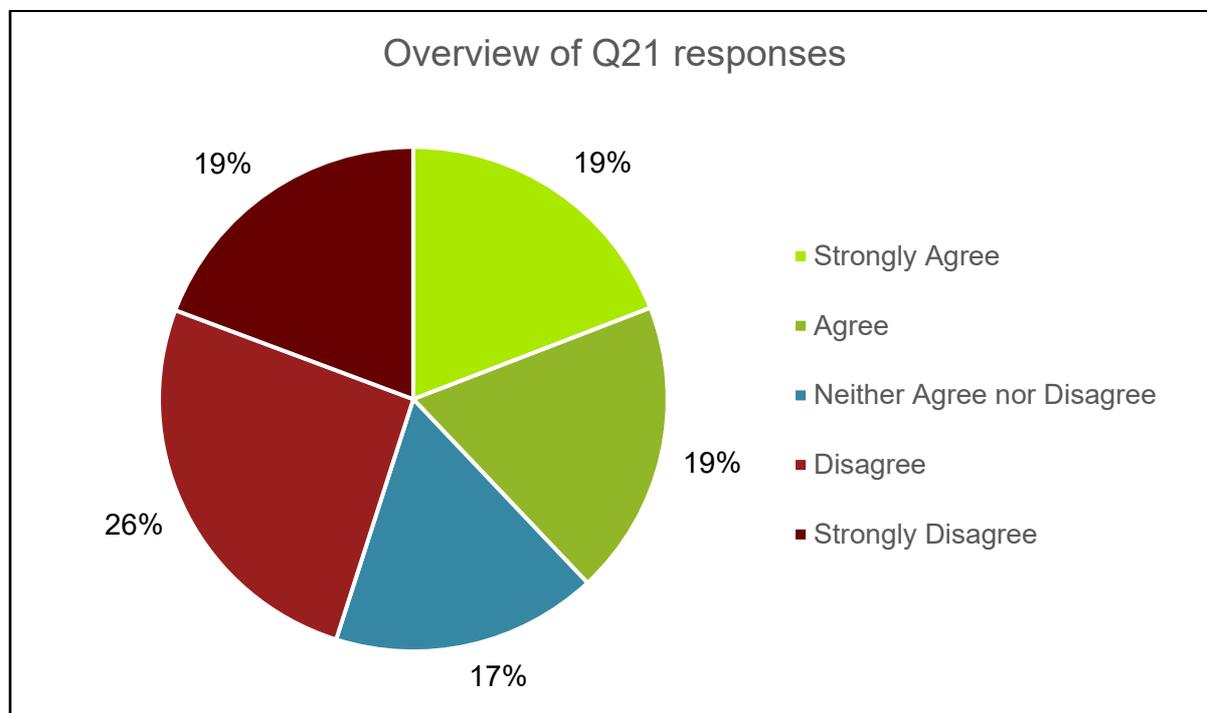
"As a parent, I believe that safeguards are needed to ease the pressure on centre staff (teachers) who are now obliged to make an assessment in place of the exam, and also those who might wish to "game" the emergency system via the appeals process and thus potentially lower the grades of others." (Parent or carer)

"Any such appeal would impact on other students unfairly. The rankings submitted by teachers should, where possible, have been ratified by another teacher and will have been approved by a Head of Centre to give reassurance of their fairness. Interfering with a centre's rankings, when centres will have such varied evidence will be difficult - if not impossible - to do consistently. Support should be given to centres to minimise error in inputting their rankings." (Awarding body or exam board)

One exam board drew a distinction between an appeal challenging the rank order judgements themselves and an appeal on the basis that there may have been an error in the data.

"Having reached a final position on the rank order for a cohort we can appreciate that it would present a range of issues if a centre was then required to deal with student challenges to their placement in the rank order. However, students who believe there may have been an error in the rank ordering data should have a clear route to request the data is checked by the centre (and subsequently by the AO, via a centre request). It will be important to distinguish between a request for a check on the accuracy of the data provided on rank ordering and a challenge to the decisions made by the centre representatives. The need to respond to requests for accuracy checks will require that centres maintain records of the decisions made throughout the grading and rank ordering process so they can check the grade/ position of an individual student in the rank order, was submitted accurately." (Awarding body or exam board)

**Q21. To what extent do you agree or disagree that we should not provide for an appeal in respect of the process or procedure used by a centre?**



Q21 responses	Count	Percentage
Strongly Agree	2,014	19%
Agree	1,991	19%
Neither Agree nor Disagree	1,784	17%
Disagree	2,723	26%
Strongly Disagree	2,031	19%
<b>Q21 total responses</b>		<b>10,543</b>
<i>No response</i>		2,080
<b>Survey total responses</b>		<b>12,623</b>

Responses to this question were again split fairly evenly, with 38% agreeing or strongly agreeing and 45% disagreeing or strongly disagreeing with our proposal. The breakdown of responses by respondent group also follows a similar pattern to the previous 2 proposals, in that very few (11%) students or their parents or carers (16%) support the proposal, but the majority of schools and colleges (65%) and teachers (58%) do.

However, relatively few respondents commented explicitly about this proposal.

Many of the comments that disagreed with our proposal offered only simple statements in support of appeals in respect of the process or procedure used by a centre.

“I am very concerned about the proposal not to allow students to appeal based on the process used by their centre.” (Parent or carer)

Others, however, highlighted issues such as bias or mistakes as reasons for permitting appeals of this type.

“There should be a right of appeal against procedure used by the centre. Otherwise – how do you avoid personal issues/bias, any student should have the right to an appeal of some sort if they feel they have been unfairly judged, however they would need to have substantial evidence for this.” (School or college)

“If a centre has used a procedure which turns out to be biased even if results prepared with integrity and accuracy then there should be a right of appeal. This would be exceptional and would be a high barrier but a blanket ban on appeals for this circumstance should not be in place.” (Parent or carer)

“Centres themselves should welcome an appeals procedure that allows them the opportunity to defend their assessment and rank order processes and procedures, for example against accusations of bias, favouritism or undue influence. Without a full appeals process any perceived feelings of unfairness could result in lasting ill-feeling between students, parents and schools with a potential risk to schools’ reputations.” (Parent or carer)

“I disagree with the absence of an appeal procedure against centre procedure. While recognising the difficulties faced by centres and the exceptional circumstances, there is an element of natural justice that must be maintained. Without such an appeal process, there is no safeguard against centres using completely inappropriate mechanisms to derive grade and rank orders, beyond the signed statement from the head of centre ... the mere existence of such a mechanism may help focus centres on ensuring justifiable procedures are in place.” (Other – CEO of a small trust)

“A meaningful appeals process needs to ensure that results can be scrutinised. If a centre is not able to justify its awarding of a grade, it should not have awarded that grade. Appeals should be allowed based on how the grades were arrived at by individual centres. All centres should be able to provide professional review and justification of the grades they award. To not allow such an appeal undermines the transparency and objectivity of the process.” (School or college)

“However, under Ofqual’s proposed arrangement, the inability to appeal on the basis of centres’ policies and procedures would be unfair and potentially discriminatory. Given the evidence of groups affected by teacher bias, this approach could mean that several pupils from low-income backgrounds, with SEND and from certain ethnic groups could have had their grades suppressed and will have no recourse for appeal.” (Other representative or interest group)

Those that agreed with our proposal, on the other hand, did so on the basis that appeals of this type would be effectively unmanageable, both in terms of volume and burden and in terms of undermining the entire approach to assigning centre assessment grades.

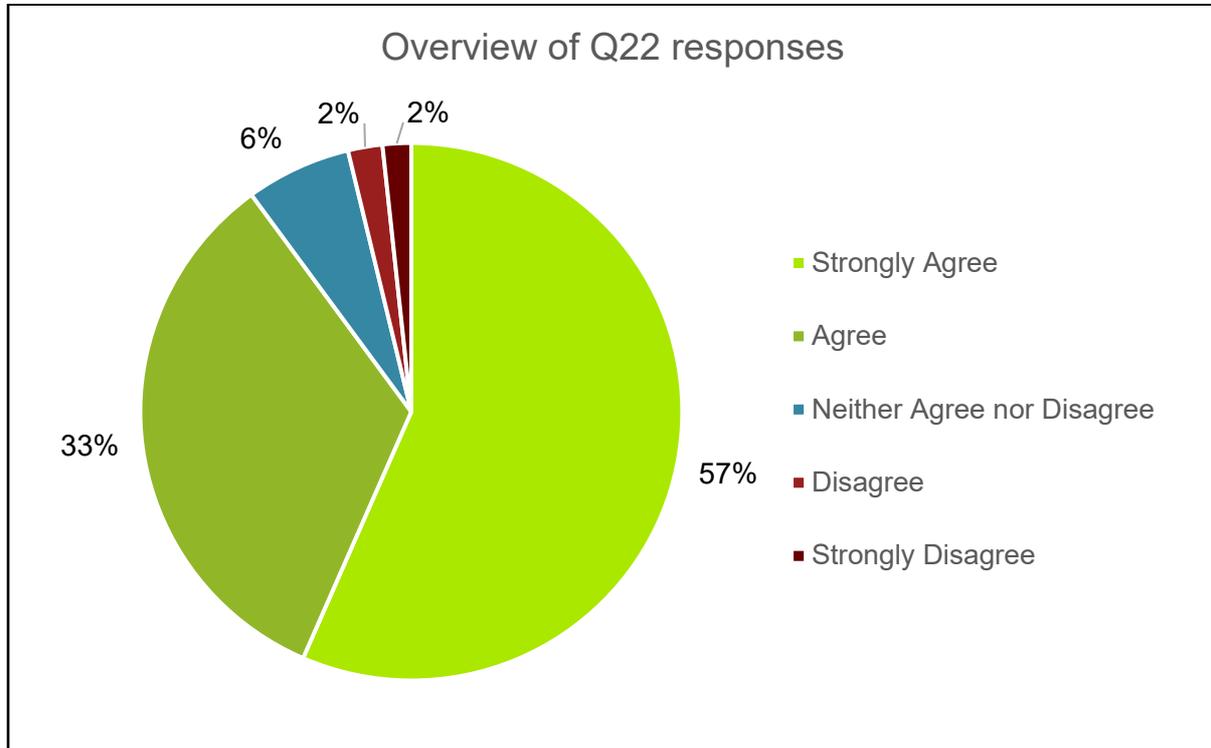
“There should be no grounds for an appeal in respect of the process or procedure used by a centre as these, like the results, should remain confidential unless there is evidence of malpractice which is a much more serious matter.” (Teacher – responding in a personal capacity)

“While acknowledging that some students and parents may be frustrated not to have recourse to such a process, any such process would in reality be impractical, pose severe implementation challenges, and would involve interrogation of procedures that, by definition, will not be standardised across centres.” (Awarding body or exam board)

“Centres will be required to develop their own process and procedures for determining centre assessed grades/rank order. This development will need to take place within short timescales. We are confident that the vast majority of centres will meet this challenge and develop processes and procedures that are efficient and effective. We agree that any forensic scrutiny of these processes and procedures would generally be unhelpful and burdensome.” (Awarding body or exam board)

“A right of appeal against centre approach attacks the very basis of the arrangements, which is reliance on professional judgement and would force disclosure of information to parents and students which could undermine the integrity of the arrangements.” (Other representative or interest group)

**Q22. To what extent do you agree or disagree that we should provide for a centre to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated?**



Q22 responses	Count	Percentage
Strongly Agree	6,017	57%
Agree	3,556	33%
Neither Agree nor Disagree	669	6%
Disagree	219	2%
Strongly Disagree	181	2%
<b>Q22 total responses</b>		<b>10,642</b>
<i>No response</i>		1,981
<b>Survey total responses</b>		<b>12,623</b>

Only 4% of respondents disagreed with our proposal that centres should be allowed to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated.

No respondent group significantly deviated from this pattern of response.

There were not many comments about this proposal. Of the comments that were made, however, a small number questioned how 'wrong data' might be interpreted, and suggested that it could impinge on some of the other grounds for appeal which we have proposed not to allow. For example, if the data is wrong because of the process used by the centre, would that mean that an appeal about wrong data could become a de facto appeal about a centre's processes?

"We suggest an appeal which claims the centre erroneously submitted the wrong data must not be used to appeal the professional judgment or rank order – i.e. checking it out should not require the disclosure of rank order/centre assessment grade to the candidate. We would appreciate Ofqual's assistance in this regard." (School or college)

"However, we believe that much greater clarity is required in relation to what is meant by 'wrong data'. It is not clear if this covers wrong CAGs, wrong historic data, or both. It is important to determine the 'wrong data' that would be covered in the appeals process, as otherwise exam boards could be faced with a lot of appeals about a range of issues that cannot easily be resolved at that point, or may need to be applied to all candidates in all centres." (Awarding body or exam board)

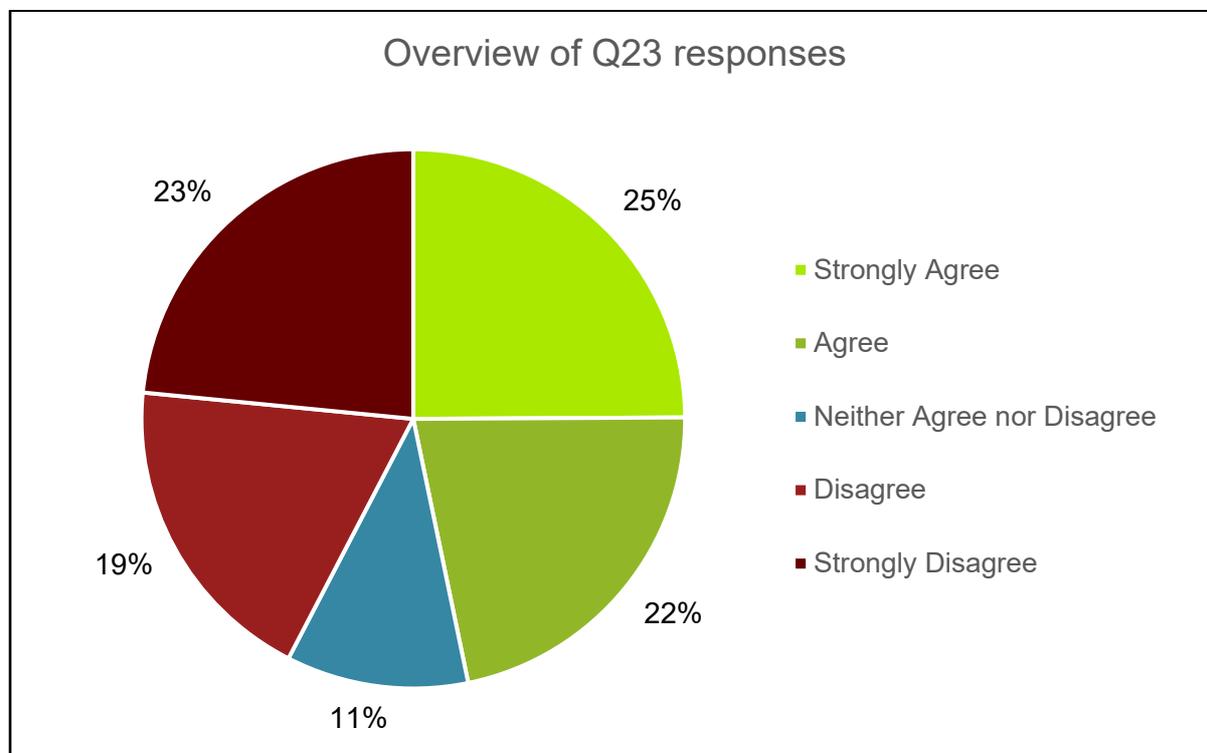
"How far does an appeal based on 'wrong data' extend to the standardisation process?" (Teacher – responding in a personal capacity)

The few comments that explicitly supported our proposal mostly did so without providing detailed reasoning.

"Must have right to appeal as this is a mass data entry system, there may be errors, we should be able to check when asked." (Teacher – responding in a personal capacity)

"[We] agree that appeals should be permissible where there is evidence to suggest a data-processing error has been made by an exam board. We also believe that a centre should be able to appeal to an exam board on the grounds of errors in the data submitted to the board, on the condition that the centre can provide clear and unequivocal evidence of the error." (Awarding body or exam board)

**Q23. To what extent do you agree or disagree that for results issued this summer, exam boards should only consider appeals submitted by centres and not those submitted by individual students?**



Q23 responses	Count	Percentage
Strongly Agree	2,665	25%
Agree	2,337	22%
Neither Agree nor Disagree	1,159	11%
Disagree	2,029	19%
Strongly Disagree	2,507	23%
<b>Q23 total responses</b>		<b>10,697</b>
No response		1,926
<b>Survey total responses</b>		<b>12,623</b>

Responses to this question were fairly evenly split between those in favour of our proposal (47%) and those opposed to it (42%). Again, however, there is a significant difference between students and their parents or carers, among whom only about 23% or less agree, and schools, colleges and teachers, where agreement rates are over 65%.

This question attracted many comments from respondents. A large proportion of these were simple disagreements with our proposal which instead expressed support for students being able to appeal on an individual basis.

“Appeals should be allowed by individual students otherwise there will not be confidence in the process.” (Parent or carer)

“I believe every individual student should be able to appeal their grade, if they wish to do so.” (Student – Year 10 or below)

“I strongly recommend that each individual should be allowed to appeal their grade.” (Other – School governor)

“Everyone should have the right to appeal any part of the process which should be completely transparent.” (Teacher – responding in a personal capacity)

Many comments about this question were closely related to those for the previous 4 questions, which set out our proposals for some of the grounds on which appeals might be allowed. While the focus of such comments is usually on the grounds for appeal, it often appears with an implicit view that individual students should have the right to appeal.

“Candidates must be able to appeal if they feel that:

- The grade they were given was unfair
- Their rank order position was unfair
- The standardisation process affected them unfairly” (Student – private, home educated candidate of any age)

“Students must be able to appeal their grades, especially if they are altered by the standardisation process and in particular, the rank order.” (Parent or carer)

“We believe it is important to have an appeals procedure that allows a student to challenge their centre’s assessment grades and rank order position or allows an appeal in respect of the process or procedure used by a centre. (i) The knowledge that a student or their representative can appeal a centre’s grade and rank decision, or its procedures, will help ensure that centres adopt processes that are robust, evidence based and defensible. Similarly, it will force centres to consider defensible procedures to guard against any potential bias in their submissions. (ii) The presence of a full appeals procedure will help make this year’s exceptional processes comparable to other years’ procedures and will help to establish fairness, transparency and robustness.” (Parent or carer)

Some respondents ask whether it is reasonable that we are proposing to only allow appeals from centres, when it is centres who have decided the centre assessment grades in the first place.

“Secondly, a blanket “no” approach to appeal by students is unfair, students may have good reason and supporting evidence to support their “the grades are wrong” claim - students should have the opportunity to have their evidence submitted and their appeal heard. The appeals via centre only proposal has “segregation of duties” issues - as the teachers were involved in submitting the centre grades in the first place. To illustrate with a classic whistle-blowing example, if I suspect my boss defrauding the company, I surely do not need his permission to report him to the authority!” (Parent or carer)

“Students should be allowed to raise appeal directly, rather than via teachers, who had a part to play in determining their results in the first place.” (Student – Year 11 or above)

A small number of comments also refer to the text of the ministerial direction, which some respondents argue requires us to accept appeals from individual students.

“Your consultation proposals do not meet the terms of the ministerial direction. This requires you to: “It is important that students should have access to a right of appeal if they believe the process was not followed correctly in their case.” The key part of this direction is STUDENTS having access to a right of appeal. You propose that only exam centres can appeal! Do what you were ORDERED to do by the minister!” (Parent or carer)

“Students ought to allow to appeal results directly - this has been promised by G Williamson MP.” (Student – Year 11 or above)

“The proposals to exclude appeals by individual students is unfair and a U turn to the promises made by Gavin Williamson MP, “ ...We recognise that some students may nevertheless feel disappointed that they have not been able to sit their exams. If they do not believe the correct process has been followed in their case, THEY will be able to appeal on that basis....” Students’ ability to appeal has been promised in Parliament, and should not be taken away now.” (Student – Year 11 or above)

Some respondents suggested a middle ground of sorts, whereby individual students might be allowed to appeal but only in certain circumstances, although what these circumstances might be was not always clear.

“I do not feel there should be an absolute ban on appeals from individuals. However, I also know that it going to be very challenging for schools and teachers to be able to make predicted grades and rank order whole year groups while working in lockdown themselves. Therefore, I feel there may be very small numbers of students in extreme circumstances who have the right to appeal. For example, students who have been predominantly working with tutors in outside mainstream classroom provision.” (Teacher - responding in a personal capacity)

“Perhaps students should be able to appeal directly but only very under exceptional circumstances and in the first instance appeals should be managed through their centres. Presumably there will be some form of moderation where it would be possible to scrutinise the materials used by centres to generate grades and rankings in the event of appeals.” (Parent or carer)

“I strongly feel that students/parents should not be able to appeal due to perceived dissatisfaction with grades due to teacher assessment. The process for awarding grades must be final. Appeals should only be considered in VERY exceptional circumstances. If all are offered the opportunity to appeal I fear the floodgates may open. Teachers, schools and Exam Boards will be overwhelmed with demand for explaining and justifying grades and evidence, as they would be if universal appeals were allowed in a 'usual' exam year.” (Teacher - responding in a personal capacity)

Respondents who agreed with our proposal used their comments to make a number of points, including, for example, the manageability of the system, the relationship between centres and students and the professionalism of teachers.

“It would be a logistical nightmare if pupils are allowed to individually appeal results this summer.” (School or college)

“For practical purposes, I strongly believe the process of appeal MUST go through the centre and not through individual students (this could overwhelm the process)” (Teacher – responding in a personal capacity).

“Each grade will be agonised over by more than 1 teacher, and by SLT, each grade will be evidenced. The impact of allowing every student and parent to question this will be huge and lead to a breakdown of trust between students, parents and school. Not to mention the amount of time this will take.” (Teacher – responding in a personal capacity)

“Pupils themselves should not be able to contest these grades as they are predicated on two years' worth of evidence and judgements from teachers that know them on a closer level than any external marker ever could.” (Student – Year 11 or above)

“Appeals should continue to be as they have always been done. As far as I'm aware this is through the centre and not the individual. If the school does not agree with an appeal, it has no credential.” (Parent or carer)

“I do not think that students should be able to appeal grades given. The teachers are best placed to be making these professional decisions and should be protected as much as possible. Centres should be allowed to appeal if they feel that results awarded greatly deviate from those submitted.” (Other – Exams officer / manager)

Some respondents who support our proposal do so on the basis that individual students do not have access to enough information to make an informed appeal.

“However, we think that the centre should be allowed to appeal but the candidate should not. Given that the centre is not in a position under confidentiality to share the submitted centre assessment grades to the candidate it is not possible for the candidate to appeal from an informed starting point.” (Academy chain)

“Strongly agree – students do not have the ‘bigger picture’ or context in which CAGs and SROs are formulated. Centres should pick up anomalies. Students can take exams in the Autumn Series.” (School or college)

“Students will not know the grades centres gave them. It will be chaos if students can appeal these.” (School or college)

Some comments indicate that appeals from individuals should be allowed as that is how the appeals system works in ‘normal’ years.<sup>9</sup>

“I think it is only fair on all of us hardworking students that we have the right of appeal, as any other GCSE candidate has had. Just because we are not being given the opportunity to sit our exam (an aspect that is out of our

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<sup>9</sup> However, these respondents are mistaken as unless the appellant is a private candidate, the exam boards normally expect all appeals to go through a centre.

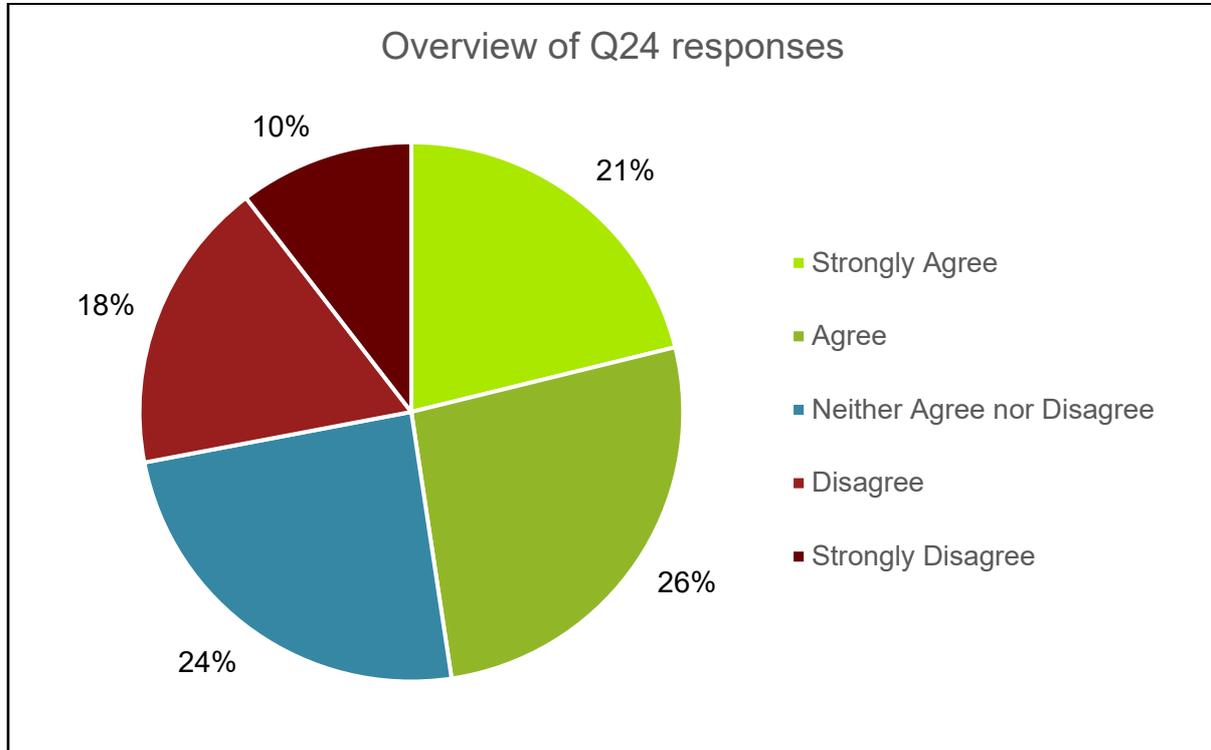
control) - it should not mean that we lose our right of appeal.” (Student – Year 10 or below)

“If individuals or centres cannot appeal, the whole process would be undermined as they can normally do this.” (Teacher – responding in a personal capacity)

Others, however, brought this point up specifically.

“It appears Ofqual are proposing, yet again, only examination centre heads can commence an appeal, rather individual students. This is wrong in any year, but even more wrong in a year when some arbitrary algorithm making standardised adjustments, and a student ranking system is involved. It is absolutely vital that students should be able to lodge their own appeals against grades awarded, and should not be left to an examination centre head being willing to do this.” (Parent or carer)

**Q24. To what extent do you agree or disagree that we should not require an exam board to ensure consent has been obtained from all students who might be affected by the outcome of an appeal before that appeal is considered?**



Q24 responses	Count	Percentage
Strongly Agree	2,186	21%
Agree	2,739	26%
Neither Agree nor Disagree	2,519	24%
Disagree	1,820	18%
Strongly Disagree	1,076	10%
<b>Q24 total responses</b>		<b>10,340</b>
No response		2,283
<b>Survey total responses</b>		<b>12,623</b>

Forty seven per cent of respondents to this question supported our proposal, and 28% opposed it. A relatively high proportion – nearly a quarter of respondents – neither agreed nor disagreed.

An analysis of respondent groups reveals a similar trend to previous questions about the appeals process. The majority of schools and colleges (72%) and teachers (57%) supported our proposal, whereas support from students, parents and carers ranged from 25% to 35%.

There were not many comments from respondents which related to this proposal. Those comments that were made often referred to the proposal which follows this one – that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student.

Judging solely from these comments (which were made by only a fraction of those who responded to this question), whether or not a respondent agrees or disagrees with our proposal appears to have depended on whether or not they expect appeals to be able to negatively affect the grades of other students.

“My agreement that Ofqual ‘should not require an exam board to ensure consent has been obtained from all students who might be affected by the outcome of an appeal before that appeal is considered’ is dependent upon the condition that ‘exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student’” (Teacher – responding in a personal capacity)

“I have indicated that consent should be obtained by a centre as I assume that the grades could go down as well as up. If this is not the case and grades are protected then I don’t believe consent should be required.” (Other – Exams officer / manager)

“Re. obtaining consent from all students whose grade might be affected by an individual’s appeal, this would seem to be nigh on impossible from a logistical perspective, even if all students agreed, which is highly unlikely. Furthermore, assuming the guarantee regarding other student’s grades not going down is genuine, it should not be necessary to obtain all students’ agreements.” (School or college)

“Consent should be sought if a student’s results could be lowered as a result of such an appeal. If, on an exceptional basis this year, students’ results are protected from changing, particularly from being lowered, then consent is less necessary.” (Awarding body or exam board)

“We agree with this, but only if the outcome of the appeal does not affect the final result of any of the students. If the final result can change then all of the students need to be consulted before an appeal.” (School or college)

“It would not be appropriate for an individual candidate to be given an effective veto over any such appeal and exam boards should be prevented from imposing any such requirement. As a corollary of this, requirements should ensure that no candidate is subjected to a reduced grade as a result of an appeal made in respect of a subject cohort.” (Teacher representative group or union)

Some comments, particularly from schools and colleges, indicate that if we were to require exam boards to ensure consent has been obtained, we would effectively prohibit many centres from appealing at all, as gaining consent from an entire cohort may prove impossible.

“Student consent for appeal: I disagree that consent should be obtained, as this would not be possible in practice, but it should be the case that no candidate can have their grade impacted negatively as a result of the appeal.” (School or college)

“Obtaining a cohorts’ consent after the issuing of exam results would be logistically very challenging for centres to do and would add delay to any challenge.” (School or college)

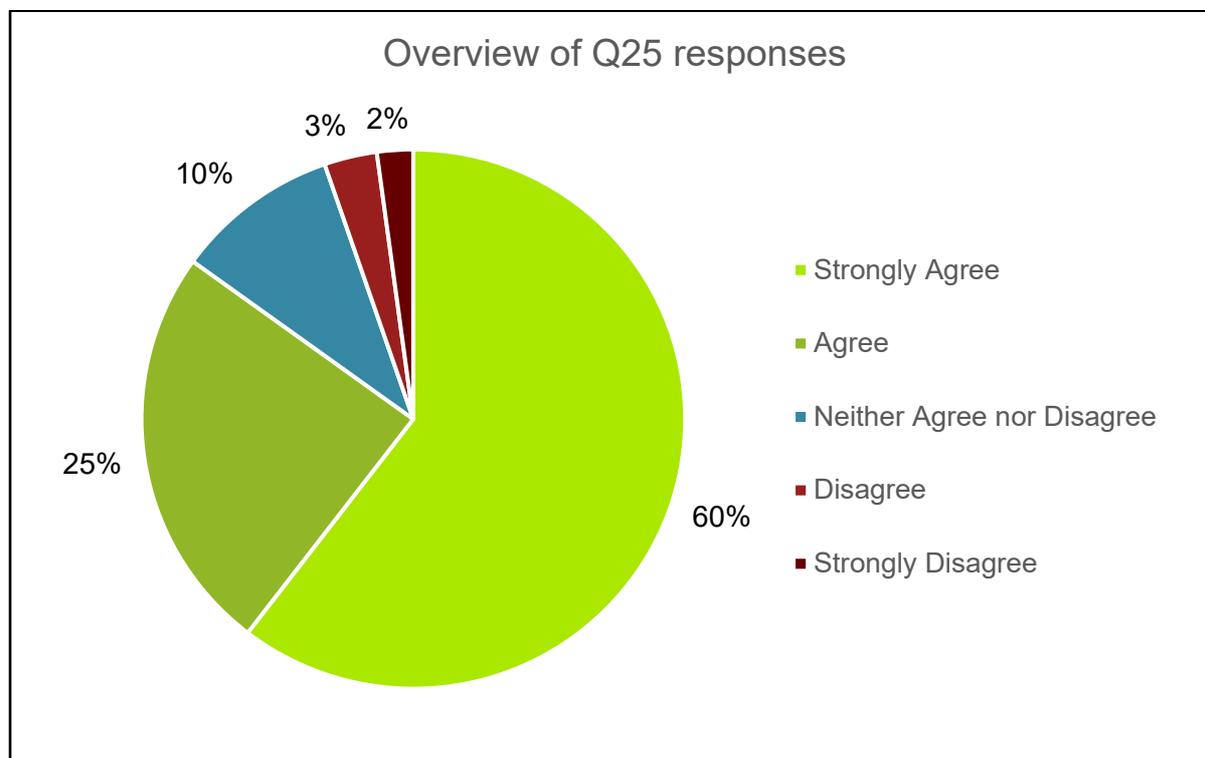
“Obtaining consent from each student will take too long to be practical, and so should not be needed as long as students have not already been issued with the grades that may be adjusted. If they have, students should be given advance notice of the appeal and a chance to speak to their exams officer about it, but should be “opted in” by default.” (Student – Year 11 or above)

“Re appealing when the outcomes might result in students' lower grades, the risks should be spelt out clearly to centres before they make an appeal, but that is then the centre’s responsibility. In any case, it is not necessarily practicable to require them to acquire permission from all who might be affected.” (Subject representative or interest group)

One respondent drew a distinction between gaining consent from students and notifying them of the appeal, suggesting that the latter might be a more proportionate and deliverable requirement.

“I think exam boards should require centres to certify that they have informed all students who may be affected. I think a requirement for consent from all students would unnecessarily narrow the scope for appeals and disadvantage students within the groups and that centres should be able to make a judgement about the right course of action where there is a range of student responses.” (Other representative or interest group)

**Q25. To what extent do you agree or disagree that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student?**



Q25 responses	Count	Percentage
Strongly Agree	6,386	60%
Agree	2,591	25%
Neither Agree nor Disagree	1,032	10%
Disagree	332	3%
Strongly Disagree	227	2%
<b>Q25 total responses</b>		<b>10,568</b>
<i>No response</i>		2,055
<b>Survey total responses</b>		<b>12,623</b>

Eighty five per cent of respondents agreed or strongly agreed with our proposal that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student. This agreement was consistent across the respondent groups. Five per cent of respondents to this question did not support the proposal.

As mentioned in the analysis of responses to question 24, this proposal was closely linked to our proposal about gaining consent for appeals.

None of the respondents who disagreed or strongly disagreed with this proposal gave clear reasons for doing so. However, a small number of responses suggested

that the policy could have unintended consequences, for example in terms of manageability or centres attempting to improperly influence the system.

“We are concerned that the protection of candidate grades could lead to unintended consequences e.g. centres stating that they have made an error and moving some candidates up the ranking knowing that those that would fall down the ranking would have their grades protected. As an alternative solution, exam boards could consider if there is an ‘adverse effect’ if candidates’ grades needed to move downwards, as a result of an appeal, and, as happens now in cases where incorrect results are issued to candidates, the exam board would event notify Ofqual and make a case to protect the grade if it is considered that the candidate(s) would be disadvantaged by a reduced grade, in exceptional circumstances.” (Awarding body or exam board)

“However, the Union is concerned that allowing centre appeals in this way could prompt a significant number of speculative appeals or result in centres being placed under pressure to launch appeals on individual candidates’ behalf. Where an appeal is made on behalf of an individual candidate, it should, therefore, be established that it may result in a reduction in that candidate’s grade.” (Teacher representative group or union)

“Appeals results should be in line with other exam appeals ie results can go down as well as up. If no results go down then all students who don’t pass will appeal.” (Other – Exams officer / manager)

Those who supported the proposal frequently did so on the basis of fairness, or without providing further justification for their answer.

“I think it fair that students who have not been part of an appeal must have their grades protected from being lowered as a consequence of another candidate’s appeal being forwarded by a centre.” (School or college)

“We cannot have a situation where one appeal could change several other students results as the domino effect could be massive and not fair for students to get the results and through no fault of their own then have them changed (especially down) in weeks after exam results.” (Teacher – responding in a personal capacity)

“Although not an ideal situation, I strongly feel that an appeal should not affect other students than the one appealing, as described above. If a student appeals their ranking for example and moves up, other students will be pushed down, and it would be highly unfair for a student to drop their grade for this reason.” (Teacher – responding in a personal capacity)

“I would like to see that if a person has appealed, any other person’s result is not brought down as a result even if it causes unbalance to the standardisation of results.” (Student – Year 11 or above)

“Results of other students should not be marked down due to the appeal of another students. It is not fair for them to be affected.” (Parent or carer)

A small number of responses draw a distinction between changing grades as a result of an appeal and changing grades when an error is discovered, although not all agreed on what should be done. Some said that a clear error, for example in the administration of the process, should result in grade changes for students who were

not the subject of an appeal, while others said that 'no individual candidate should be adversely affected'.

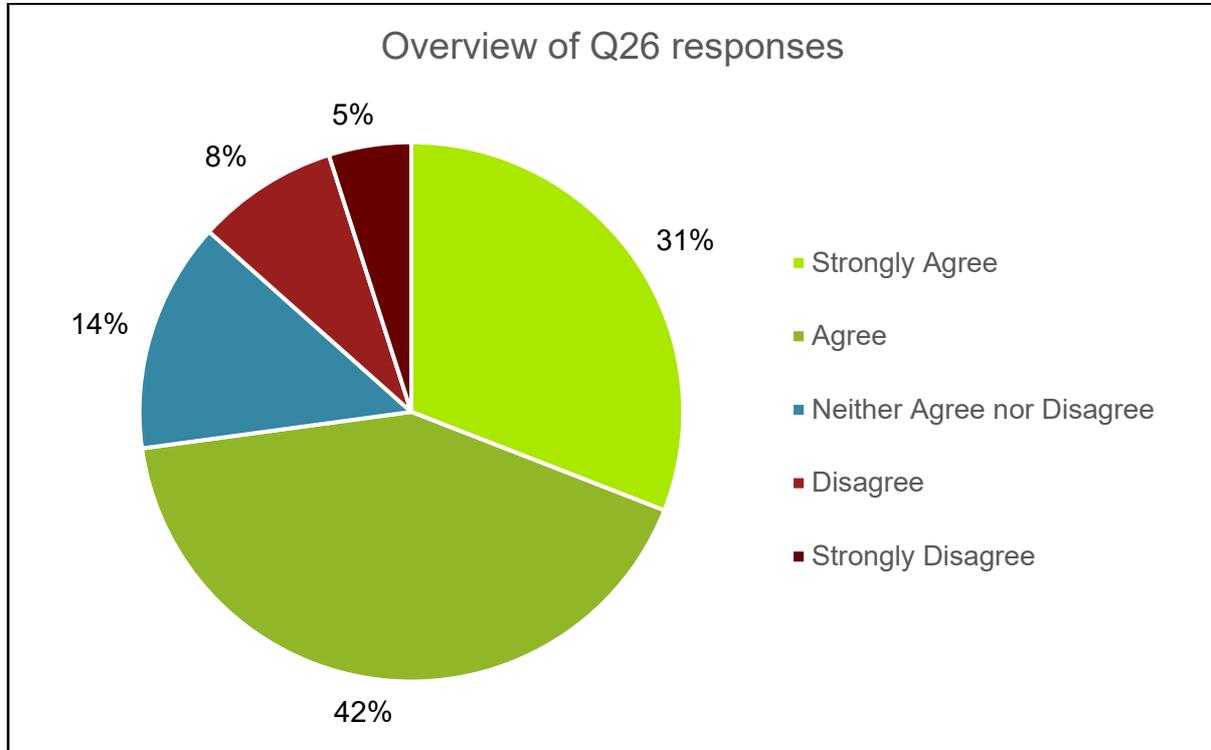
"To clarify my response to the question to what extent might exam boards put down the grades of other students as a result of an appeal submitted on behalf of another student - If it came to light that an obvious, administrative error had been made by an exam board, and provided this happened before students had been notified of their grades, then I consider the grades of all relevant students should be adjusted as needed to correct that error, regardless of whether they were the subject of the appeal or not. An obvious error such as this should never in my opinion deliberately be over-looked."  
(Parent or carer)

"[We] agree with this proposal, while it is recognised that, as now, grades found to have been given erroneously should be corrected." (Awarding body or exam board)

"If, through an appeal, an error is discovered on the exam board's part, then no individual candidate should be adversely affected. However, if candidates' results are improved through the discovery of such an error, then this improvement should proceed. The only person affected by any appeal should be the appellant, whose consent for the appeal has been given." (School or college)

"It would be helpful if clarification was provided on what exam boards will be expected to do in respect of candidate results if, in the course of investigating an appeal, we discovered an error in the general assessment process that affects a number of candidates (most of whom are unlikely to have given consent) as it is not currently sufficiently clear whether we would be required to put grades down or not." (Awarding body or exam board)

**Q26. To what extent do you agree or disagree that exam boards should be permitted to ask persons who were involved in the calculation of results to be involved in the evaluation of appeals in relation to those results?**



Q26 responses	Count	Percentage
Strongly Agree	3,232	31%
Agree	4,373	42%
Neither Agree nor Disagree	1,442	14%
Disagree	882	8%
Strongly Disagree	512	5%
<b>Q26 total responses</b>		<b>10,441</b>
No response		2,182
<b>Survey total responses</b>		<b>12,623</b>

Nearly three quarters (73%) of people who responded to this question were in favour of our proposal, while less than 15% disagreed. No particular respondent group responded in a noticeably different way.

The few comments which were made by respondents who disagreed with the proposal did not explain their reasons beyond highlighting the importance of impartiality and objectivity.

“Appeals should, wherever possible, be conducted independently and by individuals who were not involved in awarding the grade to ensure impartiality and an objective review of the process.” (Teacher – responding in a personal capacity)

“The one point I disagree with is that if calculations need to be re-done - the people involved in the original calculation should not be doing the re-calculation. As people we don't like to admit it when we're wrong.” (Parent or carer)

“We feel that an independent person should be able to review exam board standardisation procedures to protect the integrity of their own processes.” (School or college)

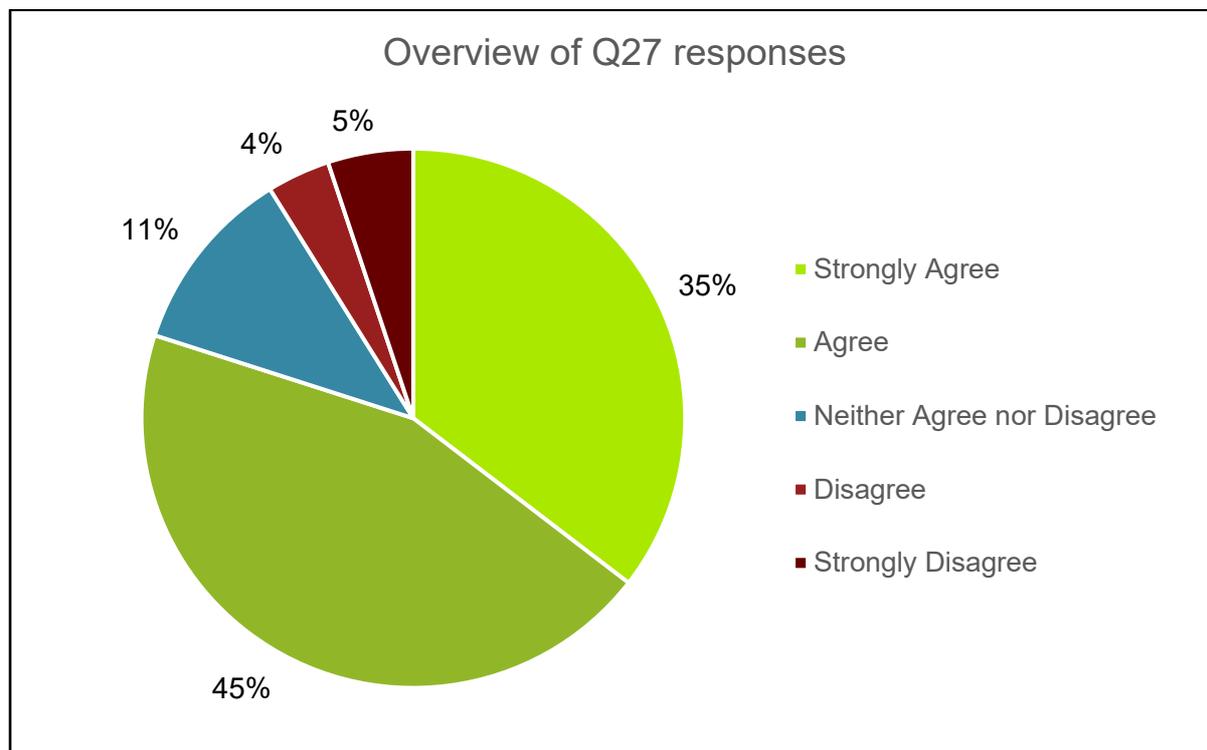
Few comments were made by those who agreed or strongly agreed. Some suggested that the participation of someone who was involved in the calculation of results should be a last resort, and others stressed that the process should also involve people who were not involved in the calculation of results.

“It is right that persons involved in the calculation of the results should be involved in the appeal process. However, the framework should involve independent members to ensure appropriate level of scrutiny.” (Parent or carer)

“Provisions in this respect should make clear that such persons should only participate in arrangements for appeals where it can be demonstrated that best endeavours have first been taken to avoid the need to make use of this permission.” (Teacher representative group or union)

“Our intention will be to minimise the involvement of those who have been involved in the original calculation of results in any appeal (through training staff from other areas of the business to be able to check the process and statistical results), as far as possible. However, we are not yet in a position to confirm the detailed operational process we will implement and how possible it will be to remove the need to use the same people at some stages of the process. We are conscious that there may be cases where the depth of statistical knowledge required to review a case and make a sound decision on the accuracy of the grades produced, may require the expertise of those who have led on the application of the statistical model to generate the original grades.” (Awarding body or exam board)

**Q27. To what extent do you agree or disagree that exam boards should be able to run a simplified appeals process?**



Q27 responses	Count	Percentage
Strongly Agree	3,726	35%
Agree	4,680	45%
Neither Agree nor Disagree	1,175	11%
Disagree	395	4%
Strongly Disagree	534	5%
<b>Q27 total responses</b>		<b>10,510</b>
<i>No response</i>		2,113
<b>Survey total responses</b>		<b>12,623</b>

Eighty per cent of the respondents to this question supported our proposal, and 9% opposed it. Schools and colleges had a slightly higher rate of disagreement than most other groups, with 21% disagreeing or strongly disagreeing.

Those who were in favour of our proposal referred to the expectation of tight turnarounds for students (for example to facilitate progression to higher education), and the pressure being put on centres. Some also referred to fairness and robustness as considerations which need to be upheld alongside simplicity.

“Due to the tight turnaround and the pressures being put on centres, without the opportunity to provide concrete evidence for many grades, the appeals process needs to be simple.” (Teacher – responding in a personal capacity)

“The more straightforward and simplified the better.” (Teacher – responding in a personal capacity)

“There does need to be a robust appeals process, but this needs to be simplified to ensure that it can be completed within as short a timescale as possible to minimise the impact on University admissions for 2020 entry.” (University or higher education institution)

“Appealing results is always a stressful and sometime bewildering experience. As a teacher of 27 years’ experience I can vouch for how difficult it is when you know that a student or a cohort has been awarded the wrong grade. The appeals procedure this year needs to be clear and simple but most of all needs to be fair.” (Teacher – responding in a personal capacity)

“I largely suspect that my daughter’s grades will not be a reflection of her ability, and therefore would seek the fairest, accurate, and simplified appeals process as possible.” (Other – Parent of home educated student as well as a teacher)

One exam board supported our proposal and additionally suggested some specific details of the process.

“[We] strongly agree. Time will be of the essence, particularly if there is to be an autumn series, so a simplified appeals process would be necessary. We would further question what additional safeguard could be provided by an independent decision maker, particularly as they will be unable to deviate from the standardisation process being applied by exam boards and will be unable to ask the centres for further information. To mitigate this concern, however, [we] and other exam boards could be required to tell centres they must submit any evidence they wish to have considered alongside their appeal at the time of the appeal, with no opportunity to submit further evidence (to ensure a timely as well as simplified process).” (Awarding body or exam board)

Those who disagreed with our proposal did so on the basis that the situation this year is anything but simple, and that restricting and simplifying the appeals process is unfair on students.

“Appeals should remain fair and transparent. Simplifying the procedure would undermine the integrity of the grading system and therefore the students’ results.” (Other – Exams officer / manager)

“How on earth can you have a simplified appeals process in a situation which is anything but simple and where there are so many factors to consider.” (Student – Year 11 or above)

“I believe that many parents, students and teachers understood that appeals would be far more involved than the process outlined in the current proposals.” (Teacher – responding in a personal capacity)

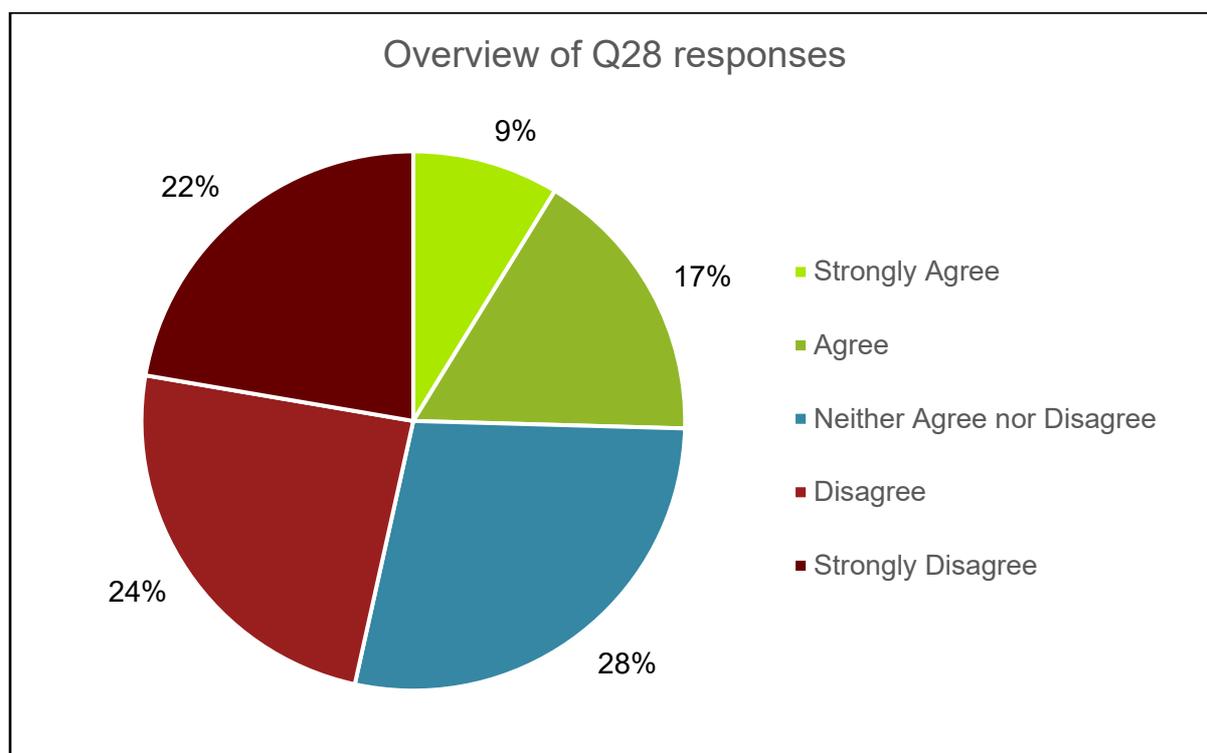
“The proposals at the moment are biased towards simplification and convenience for authorities and away from an individual student's right to be fairly assessed.” (Parent or carer)

“Having exam boards running a very simplified appeals process will cause disgruntlement amongst those appealing as they will not feel they have a fair

hearing, rightly or wrongly ... It is clear that the approach is focused on preventing appeals (although I can understand why).” (Teacher – responding in a personal capacity)

“Exam board appeals process simplified? Disagree – the appeals process should be subject to the same rigour as in previous years to ensure fairness.” (School or college)

**Q28. To what extent do you agree or disagree that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model?**



Q28 responses	Count	Percentage
Strongly Agree	883	9%
Agree	1,692	17%
Neither Agree nor Disagree	2,835	28%
Disagree	2,455	24%
Strongly Disagree	2,256	22%
<b>Q28 total responses</b>		<b>10,121</b>
<i>No response</i>		2,502
<b>Survey total responses</b>		<b>12,623</b>

This question was the only one of the proposals in our consultation about which significantly more respondents expressed disagreement than agreement. Forty six

per cent of respondents opposed our proposal, while 26% were in favour of it. However, the percentage of respondents who said that they neither agreed nor disagreed was higher than in most other questions at 28%.

The breakdown of responses by respondent group shows some variation in how different groups answered this question. Students and parents and carers tended to disagree heavily with this question, with agreement rates of less than 20%. Most other respondent groups had agreement rates in the 30% to 40% range, including teachers, schools and colleges, academy chains and awarding bodies. Higher education institutions had the highest agreement rate by a significant margin, at 71%. Subject representative or interest groups had the second highest agreement rate at 45%.

Most of the comments in relation to this question were from respondents who disagreed with our proposal, and in most cases these comments were simple statements of support for appeals about the outcomes of statistical standardisation in the interests of fairness.

In many cases their disagreement was connected to their views on our proposals for the statistical standardisation process – for example, the proposal that the trajectory of centres' results should NOT be included in the statistical standardisation process. Respondents' specific concerns have been covered under the analyses for the relevant questions (questions 13 to 18).

Many comments refer to very specific situations for centres which lead the respondents to believe that the statistical standardisation process as proposed would lead to incorrect results for their candidates, and therefore think that there should be the means to appeal the statistical standardisation process.

“I do feel that schools should be allowed to appeal the process of statistical standardisation if applied by Ofqual/Exam boards as this is of great concern. My school has had three years or more of poor results, however we have 70% new staff, including all of our SLT and middle leaders, our Y11 students have had 85% new teachers this year, all of whom joined the school with track records of success. Our school is not the same school as it was previously and to be statistically standardised using previous results would be grossly unfair on our students and our staff, who have worked tirelessly to ensure that our students would have achieved superb results this year. Our school is now Ofsted good for the first time and has been transformed.” (School or college)

“Schools which are rapidly improving but have had poor results in the past need an appeal process if the 2020 results are going to be significantly determined by results from 2017 to 2019 when the cohorts may have been very different and the quality of teaching may have been poorer than for the 2020 cohort.” (Academy chain)

“Until we see how the boards interpret historical levels of attainment it's very hard to agree that they should not form the basis of an appeal. Our students' prior attainment is national average but the value added is generally very positive in the students GCSE performance. Obviously some subjects are better than others, but some subjects have a history that we expected to continue this year of remarkable outcomes. We hope this is taken fairly into account. If not we would like to appeal it.” (Teacher – responding in a personal capacity)

“I disagreed with the disallowing of appeals based on the operation of the statistical standardisation model because, as it is currently presented, it would lead to our students being disadvantaged due to historic data for the school. If the model came back with three-quarters of our students having at least one grade reduced, we would feel it is grossly unfair not to be able to appeal.”  
(School or college)

On a similar note, some respondents highlighted in particular a perceived risk to certain groups, such as subjects which have particularly small cohorts in a centre.

“We have concern over the methods for exam board standardising school centre assessment grades for subject with small cohorts, which can vary hugely from year to year, or where there is limited history for a school in a specification. It says that standardisation occurs within subjects across schools and these are related to previous school outcomes. There is a risk that the professional judgement of teachers could be completely wiped out by anomalies at the extremity of a statistical model.” (School or college)

Other respondents based their argument on the fact that they feel they might have strong evidence of the performance of individual candidates or the entire cohort which they could use to appeal the outcomes of the statistical standardisation.

“Whilst we understand the difficulties posed should appeals against the standardisation process be allowed, it would seem to be wrong that there could be no recourse for a cohort of students in a school whose results might end up being completely out of kilter with what had been expected.” (School or college)

“I believe that as a school we should be able to challenge the outcomes of statistical standardisation if the school can provide credible historic data that contradicts the standardised grade (i.e. - if the school can demonstrate that pupil X has achieved grade 5+ in a succession of mock examinations and that data is timestamped within the school MIS, then they should be able to challenge when pupil X's standardised grade is a 4). I recognise that exam boards may lack the manpower and infrastructure to manage such a process and it would need to be carefully managed to avoid abuse.” (Teacher - responding in a personal capacity)

“Schools with coursework/ NEA evidence should be allowed to appeal to the exam boards if the standardisation process dramatically reduces a student's mark or grade. Some students are statistical anomalies and should be allowed to seek the grade they are given by their teacher.” (Teacher responding in a personal capacity)

Although a large number of comments made by respondents related to this question, very few were supportive of the proposal.

“Strongly agree, as a successful appeal would undermine all results this summer.” (Awarding body or exam board)

“[We] strongly agree that no grounds for appeal should be established for centres in circumstances where no error can be identified in respect of the application by exam boards of statistical standardisation but where the results do not align with a centre's expectations. Such an approach would risk significant unfairness as it would, in effect, permit the statistical model

developed by Ofqual to be suspended or amended in some instances, undermining the consistency that the exceptional arrangements seek to secure.” (Teacher representative group or union)

“Schools should not be able to appeal against a statistical model (only the misapplication of the model) as to do so would open the floodgates. It is crucial that the model used is very carefully thought out and has the trust of as many in education as possible.” (Other – SLT)

“I am strongly opposed to allowing appeals in respect of the operation or outcome of the statistical standardisation model. There are doubtless a myriad of approaches that COULD be taken but Ofqual are consulting on what, on balance, is best in the circumstances.” (Other – Independent consultant)

Some comments from respondents who agreed with our proposal predicated their support on a chance to agree the standardisation model used.

“I am happy to forego the right to appeal against the operation of the statistical standardisation model as long as there has been adequate consultation with schools prior to its operation.” (School or college)

“In terms of appeals in respect of the operation or outcome of the statistical standard model, I understand the point about needing to apply the model consistently, but feel there should be a point where the model itself is open to scrutiny to establish whether it will provide a "fair" result.” (Teacher – responding in a personal capacity)

“It is difficult to comment on the accuracy of the statistical standardisation model without knowing exactly how it will work, but if it impacts upon grades in a significant way, then an appeals process needs to be available to question this.” (Other – Exams officer / manager)

“Regarding the question "To what extent do you agree or disagree that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model?" I would agree with this provided that the process is made sufficiently clear to centres so that they can be a position to know that an error has not been made.” (School or college)

“Hard to answer this at this stage – don’t want to appeal on the statistical model. Until the statistical model is published it is difficult to judge the impact it will have.” (Local Authority)

“We agree that this should not be included in the appeals process provided that there is robust testing of the statistical standardisation model.” (University or higher education institution)

This uncertainty about the functioning of the statistical standardisation model was a widespread theme in responses. The quotes above are from respondents who supported our proposal, and in the following quotes, the first 3 respondents answered ‘neither agree nor disagree’ and the second 3 answered either ‘disagree’ or ‘strongly disagree’.

“Regards the statistical model to be used: it is not possible to comment on whether it should or should not be subject to subsequent challenge because,

at present, the methodology to be used is not known.” (Teacher - responding in a personal capacity)

“I have found it difficult to answer the question ‘To what extent do you agree or disagree that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model?’ on the basis that we are not yet clear on what basis that model will be formulated.” (School or college)

“We cannot answer this question properly, nor do we feel anyone can, without knowing the final details of the model. Whilst some principles are being consulted on here, these principles and the final details which come from them are still to be confirmed.” (Teacher representative group or union)

“The statistical standardisation model needs to be shared widely so that it is agreed upon before use. If not there is a risk that it will not be fair to individual students.” (Teacher – responding in a personal capacity)

“It is difficult to comment on an appeal on the basis of the standardisation model when this model has not been published.” (Academy chain)

“If the statistical model is generated behind closed doors and not subject to scrutiny in advance, then it is only fair to allow schools some redress if they feel that it has been applied incorrectly or unfairly disadvantages their students. This is why I feel so strongly that confidence in the model needs to be built in advance.” (Other representative or interest group)

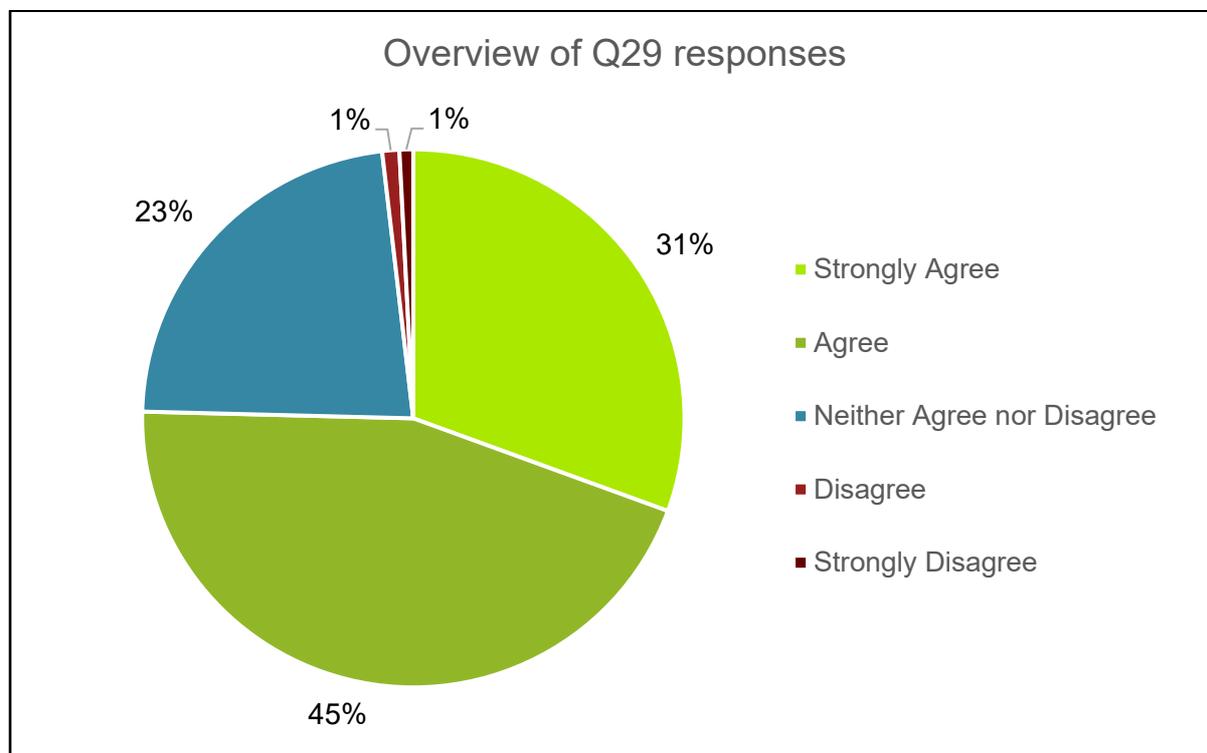
Some respondents included suggestions for alternative approaches, such as permitting reviews or appeals of the outcomes of statistical standardisation if a particular threshold is reached.

“I am concerned that a set of results may be produced for a school, through a standardisation process, which do not match the grades predicted at all, but over which a school has no right of appeal. Perhaps some thresholds could be set where, if the final grades issued after standardisation, are outside confidence limits when compared to the grades issued by the school, some automatic review would be initiated?” (School or college)

“Centres should be able to appeal the standardisation process if it falls out of line of projected results by 3%.” (Teacher responding in a personal capacity)

“If you apply a standardisation model to the school's results, unless you are statistically rock solid with that model - I don't think you can be - you should expect many schools to appeal against changes that you make to pupils' grades. That is not a situation to be desired by Ofqual or by Schools. I propose that you scrap the idea of a standardisation model.” (School or college)

**Q29. To what extent do you agree or disagree with our proposal to make the Exam Procedures Review Service (EPRS) available to centres for results issued this summer?**



Q29 responses	Count	Percentage
Strongly Agree	3,065	31%
Agree	4,488	45%
Neither Agree nor Disagree	2,280	23%
Disagree	102	1%
Strongly Disagree	82	1%
<b>Q29 total responses</b>		<b>10,017</b>
<i>No response</i>		2,606
<b>Survey total responses</b>		<b>12,623</b>

Our proposal was supported by 76% of respondents to this question, while 2% disagreed or strongly disagreed.

Among those who disagreed, only 3 respondents referred to the EPRS in their comments.

“To what extent is the EPRS relevant? Is it necessary to provide this in the circumstances? The other appeals should give pupils a fair process, and including the option of an exam in the Autumn term, the EPRS seems like overkill.” (School or college)

“... centre assessment grades, centre ranking, and standardisation are the key pillars to the proposed grading process for the 2020 student cohort. To exclude these pillars from any appeal process, and from EPRS cannot therefore be adequately justified.” (Parent or carer)

Some comments suggested unfamiliarity with the Examination Procedures Review Service (EPRS).

“I don't know what EPRS is, hence the neutral answer.” (Student – Year 11 or above)

“I think some of your statements are rather confusing and I cannot comment on some of them as I am not sure what they are - 'simplified appeals process' and your proposal to make the EPRS available to centres for results issued this year?” (Parent or carer)

“I do not know what EPRS is - most parents won't.” (Parent or carer)

### **Q30. Do you have any comments about our proposals for appealing results?**

Two thousand, three hundred and fourteen respondents commented on this question.

The majority of comments received in response to this question have been covered in the analyses for questions 19 to 29 above.

However, a number of comments did not directly relate to any of our proposals.

A small number of comments suggested that there should not be any appeals at all. These comments were made on the basis of manageability, or that the existence of an autumn series will fulfil the role of an appeal.

“I think you are going to be knee deep in appeals, so for that reason, support a somewhat cavalier blanket ban approach.” (Other – Tutor)

“If you allow appeals, everyone will appeal, so I'd recommend not allowing them.” (Teacher – responding in a personal capacity)

“If the system is as it is proposed, then I see no point in appeals really.” (School or college)

Many comments referred in general terms, without giving any detail, to the importance of any appeals process being transparent. Fairness and robustness were also sought.

“Process needs to be transparent, simple, safe, robust and protected given that grades are defining an individual's future.” (School or college)

“This is a can of worms; above all it must be simple, fair and transparent.” (Teacher – responding in a personal capacity)

“There needs to be a transparent and fair process allowing for appeals from any party.” (Parent or carer)

“There must definitely be a clear and transparent appeals procedure available because there are various factors that can lead to students' results being miscalculated and misrepresented. Therefore an easy-to-use appeals

procedure available is imperative to ensure just results.” (Student – Year 11 or above)

The issue of the cost of appeals was also raised frequently in comments, with many respondents suggesting that fees be waived this summer.

“Appeals should be free for all exam boards and the procedure should be made clear to all students. Appeal procedures should be fair across all centres.” (Student – Year 11 or above)

“It should be free for students to appeal - cost should not be a barrier.” (Other representative or interest group)

“I don't think there should be any fees for an appeal as this would preclude many pupils from the appeal procedure and favour the independent sector.” (Other – Exams officer / manager)

“In the exceptional circumstances of awarding this summer, [we] believe that no centres should face any additional costs including fees for appeals. We would therefore press Ofqual to prevent exam boards from charging centres a fee for an appeal this year, with any additional costs incurred by exam boards borne centrally by government.” (Teacher representative group or union)

On a similar note, many respondents raised questions about the timelines for the appeals process. This included a number of comments suggesting that schools have a chance to appeal their results before they are released to students.

“The timings of centre appeals that may impact on results should be managed and completed before the issue of the result to students. This will ensure this unusual system will be secure once in the public domain and reduce the possible hugely negative impact on a school of a public mass downgrading of results for example.” (Academy chain)

“If appeals are made then they need to be completed quickly for students embarking university studies as some students have been told they may have to defer a year due to appeals and their results being declared much later on. This is completely unfair.” (Parent or carer)

“Appeals need to be able to be considered during school holidays and before the new academic year starts in September” (Parent or carer)

“We request that the appeals process for schools be completed before the examination results are published to schools.” (School or college)

“There was little mention in the consultation document of the timescale for appeals. It would seem highly desirable that the timescale for appeals should be coordinated with the timescale for the autumn exam series (not merely with the dates of the autumn exams but with their entry deadlines). This will ensure that students who appeal their results, and are still disappointed when they receive the results of their appeals, will still be in time to take exams in the autumn series. To achieve this would seem to require appropriate direction to exam boards.” (Parent or carer)

Another issue which featured in a number of comments was concerns about the impact of data protection legislation on the appeals process. This was closely linked by respondents to what the grounds for appeal might be.

“We need guarantees that the grades and rank orders should not be revealed under GDPR access requests.” (Teacher – responding in a personal capacity)

“Can parents formally e.g. through a Subject Access Request / Freedom of Information request demand to see what grades the school put forward to the examination boards? Can they challenge these / ask the school to justify them / their processes in arriving at them? This would concern us. What safeguards have been put in place to protect schools from such challenges post results?” (School or college)

“You need to ensure that schools are not inundated by FOI or SAR requests as parents try to find out what grade we issued their child and where we ranked them. This information should be declared confidential, including any emails exchanged by staff members as they debate where students belong in the rank order.” (Teacher – responding in a personal capacity)

“I am concerned about associated aspects of confidentiality and data protection - in particular subject access requests. Such requests will be very difficult for centres to respond to effectively and the potential to need to respond to such requests will place pressure on centres to use solely numerical data - for example mock grades - to determine that, whilst easily defensible, may not be accurate or fair when determining rank orders. It would be helpful if Ofqual could work with the relevant government body (ICO?) to set out a position that gives an exemption so that centres do not have to comply with such requests - as for example currently exists with employer references - this will help maintain the integrity of the rank orders and overall grades.” (School or college)

Some comments referred to the existence of an autumn exam series. In almost all cases this was viewed positively as complementing or being an alternative to the appeals process.

“I think the backstop of being able to sit the exams in the Autumn 'is' the individual appeal process, really (other than the cohort-based/statistical appeals against process). This needs to be made crystal clear to parents and students from the get-go - that their means of appealing individual grades is by taking the exams. A hugely important part of the communication from Ofqual/exam boards.” (Teacher – responding in a personal capacity)

“An Autumn series opportunity should cover any unresolvable issues for those students unhappy with results as long as exam boards actually offer the majority of subjects.” (Other – Exams officer / manager)

“If the pupil disagrees with their grade which has been based on previous assessment and course work, the appeal process should be that they sit that exam.” (Parent or carer)

“It may be easier to just ask students to take the exam in the Autumn as opposed to going through an appeals process.” (School or college)

“It is excellent that all students have the option of taking the exam in September if they believe they could improve their results by sitting the exam.” (Parent or carer)

Other comments, however, viewed the autumn exams series less favourably, focusing on the lack of preparation which students taking exams might face.

“The proposal that students appealing will have the opportunity to sit an exam is ridiculous. How and when would this happen? Students would not have received tuition for 6 months and will be poorly prepared. Appeals should be based on teachers’ documentation over a 2 year period for a student.”  
(Teacher – responding in a personal capacity)

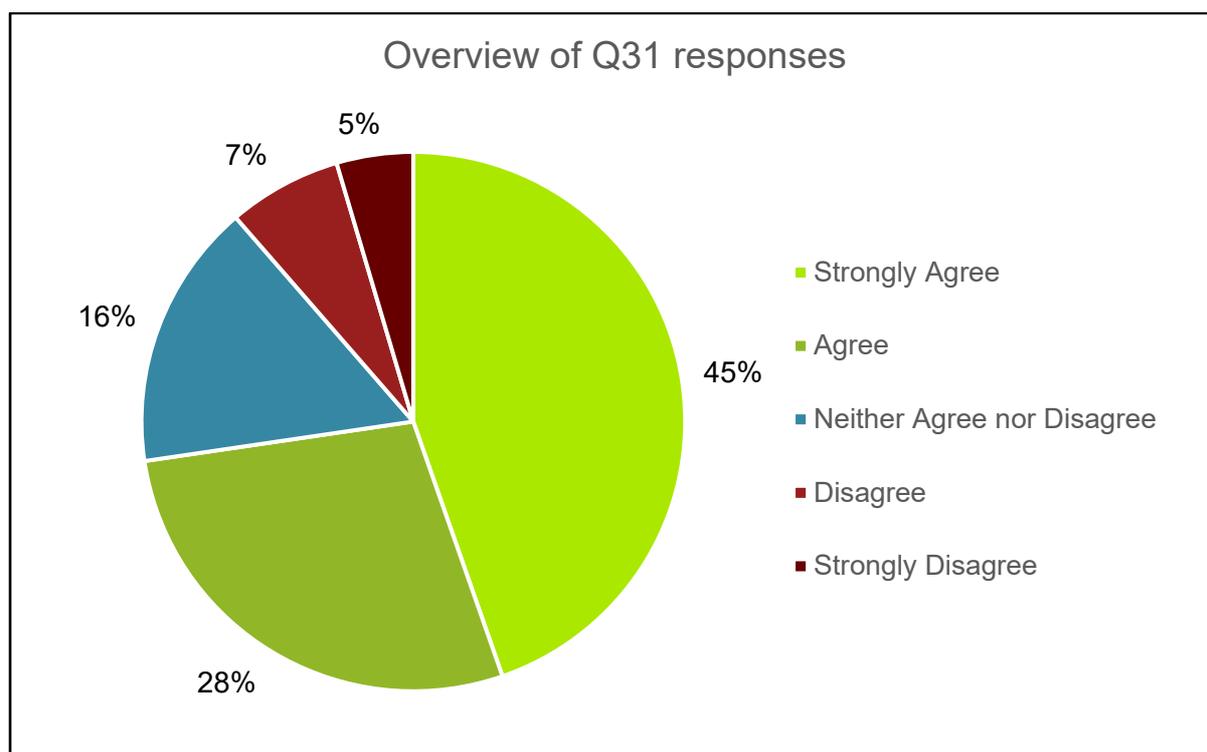
“If there is no Appeal system and the only way a student can improve their grade is to take the exam possibly in Autumn or later, how can the students take the exam if the course had not been finished being taught to them so they do not have all the information and if teachers are not allowed to mark any practice questions between now and the exam, how can they fairly prepare for such an exam? It appears that if the teachers are not allowed to teach specifically Year 13 students between now and the exam how can they possibly take their A Levels fairly? So basically there isn’t a fair appeal system unless teachers teach online or mark practise questions and set work for Year 13 students between now and the Autumn in case they want to take the exam.” (Parent or carer)

“A cornerstone of the rationale for the appeals process seems to be the principle that “where a student considers they were capable of better grades, these students will have the opportunity to take exams in the planned autumn series.” Yet since this consultation was published the ground seems to be moving on this, especially in relation to GCSE. Obviously there are numerous complexities and arguments relating to this issue - but I think the legitimacy of this appeals process depends significantly on the opportunity for redress in an autumn series. And I would dread being the voice of a Centre explaining the appeals process in the absence of such an opportunity.” (School or college)

A small number of comments criticised the nature of some of the questions in this section as being complicated to respond to. We consider issues of accessibility in our Equality Impact Assessment section below.

## An autumn exam series

**Q31. To what extent do you agree or disagree that entries to the autumn series should be limited to those who were entered for the summer series, or those who the exam board believes have made a compelling case about their intention to have entered for the summer series (as well as to students who would normally be permitted to take GCSEs in English language and mathematics in November)?**



Q31 responses	Count	Percentage
Strongly Agree	4,708	45%
Agree	2,948	28%
Neither Agree nor Disagree	1,687	16%
Disagree	714	7%
Strongly Disagree	480	5%
<b>Q31 total responses</b>		<b>10,537</b>
<i>No response</i>		2,086
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents to this question (73%) either strongly agreed or agreed with our proposal that entries for the autumn series should be limited to those

students who were entered for the summer series, or those who the exam board believes have made a compelling case about their intention to have entered for the summer series (as well as to students who would normally be permitted to take GCSEs in English language and mathematics in November).

“We would go further, and support communications that strongly discourage such entry except where thought to be critical to student progression. We recognise the mixed reception likely to be accorded assessments communicated in summer 2020, but large scale examination entry for autumn 2020 would be disruptive for individuals, for centres, and for cohorts, as well as for awarding organisations, distracting students from moving forwards.”  
(Subject representative or interest group)

Twelve per cent of respondents disagreed or strongly disagreed.

“People who wish to sit exams in autumn should be allowed to do so. I don't see any reason that someone should be prohibited from sitting the exams. If anything, I hope the autumn series becomes a permanent feature so that students are able to resit without having to wait an entire year, and put their academic progress and higher education on hold for one year.” (Student – Year 11 or above)

Despite the overall level of support for our proposal, the breakdown of responses by respondent group shows a significant degree of variation. This variation is heavily influenced by a high percentage of neutral responses from certain respondent groups, where they neither agreed nor disagreed with our proposals. For example, 85% of teacher representative groups or unions.

For the 3 respondent groups with the largest number of responses to this question, all had a majority of respondents who supported our proposal. Eighty four per cent teachers responding in a personal capacity, 73% schools and colleges, and 66% parents and carers agreed or strongly agreed. Of the students in year 10 or below and the private, home educated candidates of any age, approximately 25% were not in support.

A number of respondents who agreed or strongly agreed with our proposal said that others should not view the autumn series as an additional exam opportunity.

“We strongly agree with this approach. The autumn exam series should not be used as a test for those that are still taking qualifications and would normally expect to sit in the summer exam period thus giving an advantage to these applicants to higher education institutions in gaining earlier confirmation of a place.” (University or higher education institution)

“The autumn exam should only be open to those who were due to take their exams in the summer of 2020 and were prevented from doing so by the pandemic and not to other students who merely wish to take advantage of this opportunity to 'fast track' their ambitions.” (Parent or carer)

“The autumn exams should only be for those who should have taken exams summer 2020 as this is a unique opportunity in response to the unprecedented events. Nobody should be able to capitalise on the misfortunes of this cohort.” (School or college)

“In fairness to all candidates, the autumn series must include all subjects, but be limited to those entered in the summer. It is not intended to be an

opportunity to gain another qualification, but rather to allow the normal process for this cohort, if they wish to use it.” (Teacher – responding in a personal capacity)

Other respondents who also strongly agreed or agreed with our proposal suggested that the autumn series should be used for year 10 students instead of including them in the process for centre assessment grades.

“We propose that the autumn series be open to pupils below year 11, rather than have the grade awarded in the summer. This would relieve the burden on teachers who already have an enormous task to undertake to ensure that accurate data is submitted.” (School or college)

“I would prefer for all my Year 10 pupils to sit the exams in autumn rather than receive a grade now.” (Teacher – responding in a personal capacity)

“With regards to an autumn exam series, the sooner information can be provided as to when this is planned for, the better as in my case we are hoping to enter students for autumn rather than submit grades (they are in Year 10) but this will depend on when the exams are scheduled for - too late and it will interfere with Year 11 (the subject has been completed and does not continue into Year 11).” (Teacher – responding in a personal capacity)

Many comments made by students, parents, exams officers, teachers, and schools and colleges, focused on access to the autumn series for specific groups of students. There was no clear distinction between those who agreed or disagreed with our proposal, with similar points being presented from both perspectives.

Respondents sought clarity on whether private candidates and year 10 students would be permitted to enter the autumn exams under our proposal, particularly if they had been withdrawn from the summer exams.

“If a candidate was entered for the summer exams and consequently withdrawn, they should be allowed to be re-entered for exams in the autumn. We have private candidates who would have been re-taking this summer but have been withdrawn due to lack of assessment data as they have been self-teaching. This is also applicable to students in Year 10 entered for 'home languages' that are not taught in centre having to be withdrawn but should be re-entered as early as possible.” (Other - Exams officer / manager)

“As a private candidate I have been passed over and disregarded. I am as worthy a candidate as any other GCSE student. I would like to be considered for a deferral of my exam for the autumn exam entry.” (Student – private, home educated candidate of any age)

Likewise, respondents had mixed views about whether the proposal would prevent students (other than private candidates and those in year 10) who had been withdrawn from the summer exams for other reasons, or those classified as late entrants for the summer exams, from entering the autumn series.

“Autumn entry should be made available to any young person who would have been eligible to sit summer series exams. NOT limited to those who were already entered. Vulnerable children can often be entered late. Limiting entry to the autumn exams to those already registered would exclude this late to be entered cohort.” (Other - Local authority officer responding in a personal capacity)

“Agree but ONLY if entry deadline is extended, otherwise this is profoundly unfair on those students/centres that may have been waiting to see whether the candidates have the ability to pass an exam or have the financial means to make their entry. If limits are to be placed on entry dates then this should at least be the date that these changes were announced i.e.15/04/20.” (School or college)

Some respondents sought clarity on our proposal for exam boards to have discretion to accept entries to the autumn series if they believe there is “a compelling case” about the intention to have entered for the summer series.

“As a small centre with a large percentage of candidates with mental health issues and private candidates seeking exam centres to take them, we have quite a few candidates who are outside the entry deadline through no fault of their own. Whilst we can make compelling cases for them, all this is an additional piece of work that falls upon staff working remotely from home at a very difficult time.” (School or college)

“ ... However, we also recognise the difficulty of identifying ‘intention’ and that it might be very difficult for exam boards to ascertain and make judgements on this. During the summer, late entries and entries from all candidates are accepted and we are concerned that if exam boards are required to restrict entries in the autumn there may be candidates who will feel that the Secretary of State’s intentions have not been met. The autumn series will also provide an opportunity to learners or groups of learners, such as private candidates, who may not receive a grade in August.” (Awarding body or exam board)

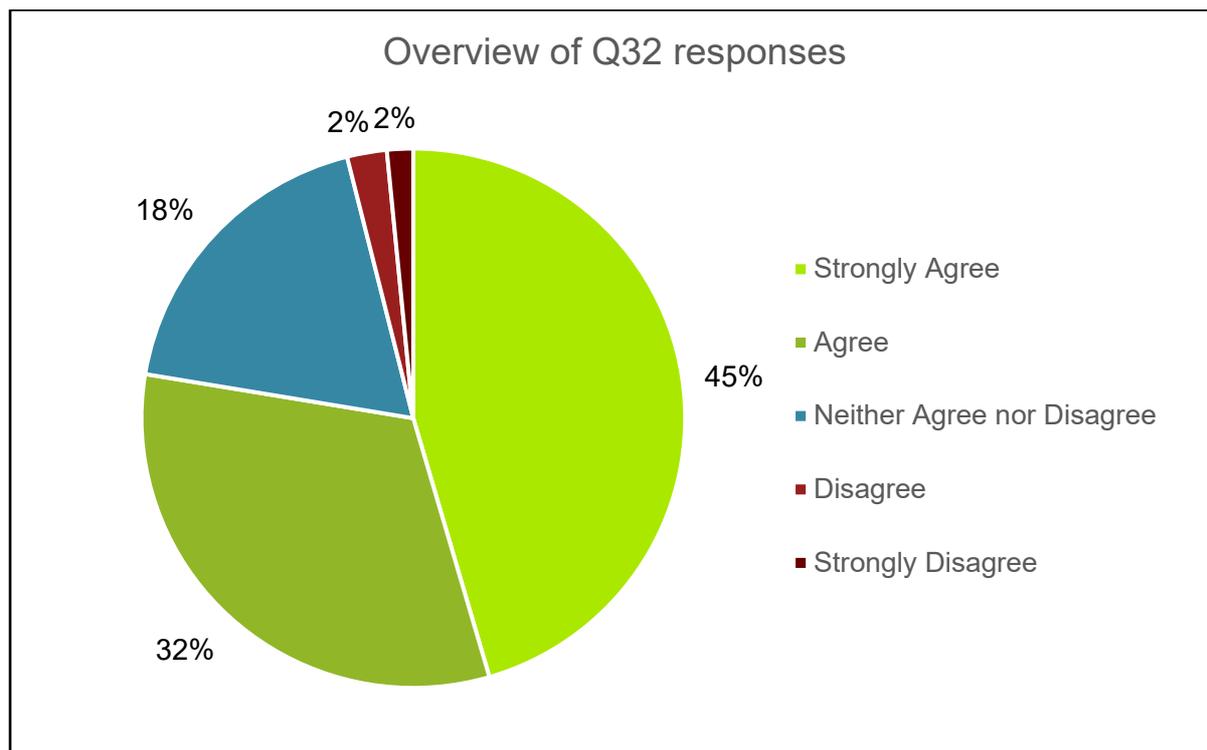
Some of the respondents who did not support our proposal (either disagreeing or providing a neutral response) commented that the exams should be open for everyone and suggested that a higher take-up would make the autumn series more viable for exam boards to run and result in a fuller coverage of the full ability range.

“There might be a stronger business case for running the autumn series exams if more candidates were allowed to participate. There may also be statistical advantage to be gained from a larger number of participating candidates, regarding grade boundaries, for instance.” (Teacher – responding in a personal capacity)

“To limit, through regulation, who can or cannot access the autumn exam series is not consistent with ensuring that no candidate is advantaged or disadvantaged through this process. The flexibility required for the autumn 2020 series may be an exception to previous and future years.” (Academy chain)

To which qualifications will the exceptional regulatory measures apply?

**Q32. To what extent to you agree or disagree that we should apply the same provisions as GCSE, AS and A level qualifications to all Extended Project Qualifications and to the Advanced Extension Award qualifications?**



Q32 responses	Count	Percentage
Strongly Agree	4,676	45%
Agree	3,304	32%
Neither Agree nor Disagree	1,898	18%
Disagree	243	2%
Strongly Disagree	160	2%
<b>Q32 total responses</b>		<b>10,281</b>
<i>No response</i>		2,342
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents (77%) to this question either strongly agreed or agreed with our proposal that we should apply the same provisions as GCSE, AS and A level qualifications to all Extended Project Qualifications (EPQ) and to the Advanced Extension Award (AEA) qualifications.

“For the credibility of this year's results and clear understanding by institutions and employers of what these results mean and how they have been obtained, it seems important that a consistent approach should be taken. All the same arguments apply with regard to students' need to complete in this academic year all the qualifications which they had expected to complete within this timescale.” (Other - Parent or carer and teacher)

Four per cent of respondents to the question either disagreed or strongly disagreed to the proposal, while 18% neither agreed nor disagreed.

“Exceptional regulatory measures should only apply to GCSE, A Level and other nationally defined public examinations. Projects and other routes should have their own arrangements which recognise the distinction.” (Teacher – responding in a personal capacity)

There was strong agreement for our proposals across the various respondent groups with all but one respondent group ('Employer', which had 3 respondents for this question) having a majority of at least 63% who strongly agreed or agreed that we should apply the same principles to EPQ and AEA qualifications. At least 84% of teachers responding in a personal capacity, schools and colleges and academy chains supported the proposal.

Many respondents commented on the need to ensure fairness and consistency across all qualifications that students use for progression, and also to ensure that certain types of qualification are not regarded as being more, or less, valid than others.

“Now is not the time to treat qualifications as different from one another because they have more or less coursework or weighting in different areas. A debate for another year when time pressures and these exceptionally challenging circumstances need to be kept as simple as possible.” (Teacher - responding in a personal capacity)

“These additional qualifications are important differentiators between students applying for highly subscribed courses. Without this the students may not be able to access the courses they have applied for.” (Parent or carer)

“Students studying these additional qualifications would be disadvantaged if they were not included in these extraordinary provisions for calculating grades.” (Other representative or interest group)

“Many people are reliant on EPQs and Advanced Extension Awards for their university offers. At the very least these students have worked hard at these qualifications and should therefore be given the same provisions as the "main qualifications".” (Student – Year 11 or above).

A number of comments identified difficulties for teachers in trying to determine centre assessment grades and rank orders for these qualifications. For the AEA, respondents pointed to the lack of assessment data to support predictions and the small size and unique nature of the cohort.

“The AEA is taken by so few candidates at each centre and experience suggests to me that teachers will not be accurate in predicting the outcome (much less accurate than A-level say) - they sometimes have little evidence and students self-teach. It is only used by the elite universities - I would prefer

this qualification was just dropped.” (Other – Chair of governors and former headteacher)

“AEA now attracts only a small entry (~300 in Summer 2019), and often just 1 in a centre cohort. Student preparation and readiness typically accelerates during the period immediately before assessment, as they synthesise their mathematics learning. Together, these considerations make the production of reliable assessments, and within-centre ranking, problematic. We would suggest that students are best served if AEA is not assessed this summer, and university departments that might have taken AEA outcomes into account then rely on other evidence they have.” (Subject representative or interest group)

Despite the challenges reported by some respondent groups, the majority of comments for the AEA supported its inclusion in the arrangements.

“Insofar as possible, all candidates should be treated the same. Wherever possible we would hope that this be extended to EPQs and Advanced Extension Awards since this is in keeping with the spirit of the decision to award centre calculated grades for the summer 2020 exams series.” (Teacher representative group or union)

“Advanced extension award qualifications should be given like the other qualifications as the students have been working hard for the qualification over the time of the course.” (Student – Year 11 or above)

There were a greater number of comments about the inclusion of the EPQ in the arrangements. Many respondents suggested that it would be possible for these qualifications to be completed and awarded as normal because of the independent nature of the work, or at least to defer final submissions until the autumn term. Others felt that delays would not provide a welcome solution, particularly for students in year 13.

“By providing flexibility over deadlines, EPQs can be completed, submitted late and marked/moderated as normal.” (Teacher – responding in a personal capacity)

“The regulations should only apply to extended projects of those students who are in year 13 all other students should be required to finish their projects and submit by half term in October or at the latest Christmas.” (Other - Subject leader and parent)

“Students who have completed an EPQ put in considerable effort and this qualification is a very good opportunity to develop independent research skills. Therefore, any work undertaken should be recognised and rewarded in the same way as A levels.” (Teacher – responding in a personal capacity)

Respondents commented that the challenges for EPQs stem from the independent nature of the qualification and the variable stages of completeness that students will have reached prior to the closure of schools.

“As a coursework only subject, teachers are advised to only give general feedback and, therefore, assessment data is not collated through the year to the same extent as other subjects. I think there may need to be some provision for teachers to say that they do not have enough material to make the professional judgement and request that the completed work be

resubmitted in the autumn series.” (Teacher – responding in a personal capacity)

“EPQ presents difficulties because it will not be a level playing field. Some centres, like our own, had received final submissions from all candidates before 20th March. They have been marked and internally moderated. We know of other centres where candidates had not completed their work; hence, given the nature of the qualification, a centre-assessed grade is going to be guesswork.” (School or college)

“For qualifications such as the Extended Project Qualification, there should already be a substantial amount of work completed by the student, and arguably enough for a nominated deputy or subject teacher to reach a provisional grade for any particular student. I think it is only fair and accurate to roll out the process to all qualifications where it can be accurately judged.” (Student – Year 11 or above)

### **Q33. Do you have any comments about the qualifications to which the exceptional measures will apply?**

One thousand, two hundred and seventy-four respondents answered this question.

Many of the comments related to the preceding question on our proposal to extend the exceptional measures to include Extended Project Qualifications and Advanced Extension Awards, and have been covered in the analysis of that question. A significant number of comments were about who should be permitted to enter for the autumn exam series, and are covered in the analysis for question 31. Some of the comments also addressed other areas of our consultation and, therefore, have been considered in the appropriate analyses of the relevant questions. For example, comments on centre assessment grades (questions 1 to 6) and impact on students (questions 9 to 12).

#### **Other qualifications**

Some respondents commented on other qualifications that are not covered by this consultation, including unregulated qualifications such as the International GCSE, and those offered in and/or regulated by other jurisdictions. Others commented on vocational and technical qualifications, for which we have published a separate consultation<sup>10</sup>.

#### **The autumn series**

A significant number of comments were about who should be permitted to enter for the autumn exam series, and are covered in the analysis for question 31. Respondents also made comments about the autumn series overall. We have noted the full range of comments and will take these into account in our considerations on the autumn series, though we do not summarise them in detail here as they fall outside the scope of this consultation. We will shortly be consulting separately on the details for the autumn series.

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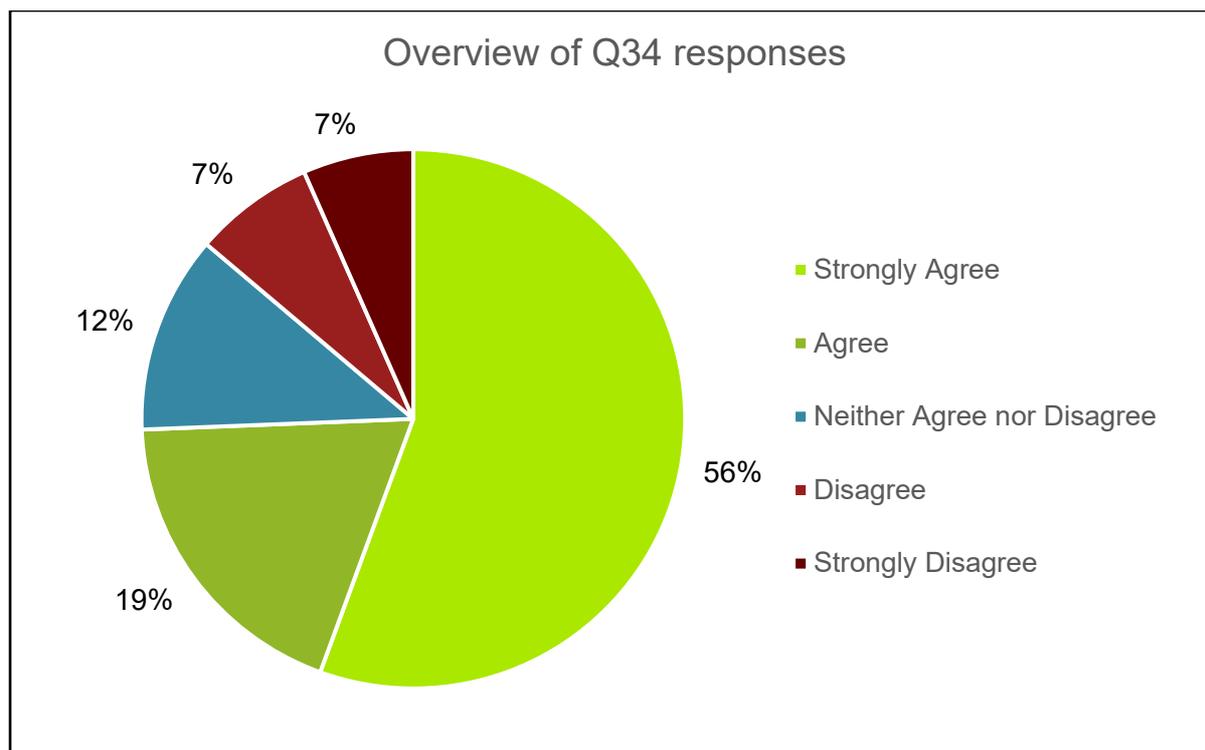
<sup>10</sup> <https://www.gov.uk/government/consultations/exceptional-arrangements-for-assessment-and-grading-in-2020>

### **Future considerations**

Likewise, a few comments extended to the impact of the current situation on students in years 10 and 12 and considerations for the summer 2021 exam series. Similar comments were also made in response to question 12 and in the regulatory impact assessment section. We will take these views into account when we consider summer 2021, but do not summarise those comments in detail here as this is outside the scope of this consultation.

## Building the arrangements into our regulatory framework

**Q34. To what extent do you agree or disagree that we should confirm that exam boards will not be permitted to offer opportunities for students to take exams in May and June 2020?**



Q34 responses	Count	Percentage
Strongly Agree	5,801	56%
Agree	1,963	19%
Neither Agree nor Disagree	1,238	12%
Disagree	751	7%
Strongly Disagree	687	7%
<b>Q34 total responses</b>		<b>10,440</b>
<i>No response</i>		2,183
<b>Survey total responses</b>		<b>12,623</b>

The majority of respondents (75%) to this question either strongly agreed or agreed with our proposal that exam boards should not be permitted to offer opportunities for students to take exams in May and June 2020.

“Exam boards should NOT be permitted to offer opportunities to take exams in May and June 2020 as all students were told in March that exams were cancelled for this summer. This cannot now be backtracked on. Everybody needs to be assessed in the same way to give credibility to the qualification they then obtain.” (School or college)

Fourteen per cent of respondents to the question either disagreed or strongly disagreed with our proposal, while 12% neither agreed nor disagreed.

“I think it has been a massive mistake to cancel exams this summer. There would have been opportunities for schools to host exams in June or July.” (Teacher – responding in a personal capacity)

The response patterns varied across the respondent groups but in the majority of cases, there was strong support for our proposals. Over 90% of schools and colleges, academy chains, and teacher representative groups and unions were in favour. Many respondents in these groups commented on the need for a common approach in order to be fair for all students, as well to provide certainty and confidence in the arrangements that are being put in place.

“Insofar as possible, all candidates should be treated the same. This will be essential to ensure confidence in the outcomes issued to all students and to avoid any two-tier system which may otherwise ensue. Therefore, there should be no opportunity to sit exams this year and each candidate should be awarded centre calculated grades for the summer 2020 exams series.” (Teacher representative group or union)

“It needs to be a consistent approach, it is too late now to even consider some subjects running. All students were at different points when the schools were closed and this decision was made for all. It would be unfair (and act against all ideals of equality and protected characteristics) for some exams to be available. Some students are dealing with enormous pressure at home and to change this decision now would be unacceptable.” (School or college)

“The proposals will make the system workable. It is difficult to see how centres could cope with the exams being offered in May and June 2020 now.” (Academy chain)

“Any option for students to take exams in the summer of 2020 will put huge pressure on centres to accommodate the wishes of families, and therefore increase the risk to staff during any possible phased re-opening of education settings. This option, which could not be made to all students, would therefore introduce significant equality issues.” (School or college)

Likewise, local authorities, and universities and higher education institutions had similar response profiles with over 93% in favour of our proposal.

“We agree that arrangements should be formalised in Ofqual’s regulations. We are of the view that given the exams have been cancelled, in the interests of fairness, there should be no scope for some students to still take them as it is likely only to benefit more advantaged groups of students.” (University or higher education institution)

“It still remains unsafe for large groups to come together and public examinations would not allow for social distancing, therefore to reduce

uncertainty and minimise disruption this is the most sensible solution.” (Local authority)

Over 80% of teachers responding in a personal capacity, exams officers and senior leadership (SLT) supported our proposal that exams should not be permitted to go ahead. Comments from these groups echoed concerns about fairness for students, reflecting on the disruption to their learning and examination preparation, as well as the implications if there were to be a dual approach to awarding grades this summer.

“If students were offered exams in May/June 2020, some would suffer as a result. Students have been told there will be no exams, so some have stopped studying. Also, if they did not take exams but others did, employers may have bias towards/against candidates based on this.” (Teacher – responding in a personal capacity)

“I agree that a blanket approach is required, and no exam boards should be permitted to run exams or assessments. This would undermine the integrity of the current exceptional arrangement and results thereof. It also would contradict the Government's decision to lockdown education across the UK and undermine any decisions made by Ofqual at this time.” (Exams officer / manager)

There was a greater range of responses from student respondent groups and parents or carers. The percentages of those groups in favour ranged from 68% for students in year 11 and above to 55% for private candidates and home educated students, while 64% of parents and carers supported our proposal. Comments were consistent with those of other respondent groups.

“All students have been told that exams were cancelled so have stopped revising. It would be unfair to then say the exams are back on and would provide an unrealistic representation of results if only some people chose to do them.” (Student – Year 11 or above)

“You can't have some exam boards offering exams and not the others. Either the exams take place in the summer somehow or they don't - otherwise you end up with a two tier exam system for results.” (Parent or carer)

“Exam boards should not be allowed to offer some exams in May / June. The students who have access to private tutors, strong parental involvement and secure homes with many advantages would be likely to do far better than disadvantaged children whose lives and education will have been more disrupted. This would only increase the gap between rich and poor children.” (Parent or carer)

“I would not be happy for my at risk daughter to sit in a room with other students this summer.” (Parent or carer)

Approximately 19% of students of all ages (not including private, home educated students) and parents or carers did not support our proposals, together with 10% of teachers. Some of these respondents suggested that students might still be able to take their exams this academic year if they could be held later on in the summer and in suitable facilities to enable social distancing.

“If there is any chance of students taking their formal exams, it should be taken, whether it be done by taking over sports halls and other places with large areas that can allow appropriate social distancing. Schools need to take

on A-level students who have appropriate capabilities as do Universities.”  
(Teacher – responding in a personal capacity)

“This cohort's results will be forever "tainted" and it would be dishonest not to recognise that they will face discrimination because of it in the future. If it is not too late, I would (ask) you to influence the government to change its mind and allow a delayed-start exam season. Statistical adjustments could be made to boundary marks to make results comparable (nationally) to previous years.” (Teacher – responding in a personal capacity)

“If exam boards want to set exams and pupils want to take them and it is safe to do so then why not? It would prevent a lifetime opportunity from being missed. It isn't just about the grades you got but that you won them rather than were given them.” (Parent or carer)

“If it is safe to do so and logistically viable, exam centres should be permitted to offer opportunities for students to take exams in May/June 2020 if students wish to do so OR exam boards should most definitely give an alternative.”  
(Student – Year 11 or above)

Many respondents suggested that exam opportunities could be made available this summer for students who would not otherwise be able to receive a centre assessment grade. While such comments came primarily from those who disagreed or strongly disagreed with our proposals, including from the 28% of private and home educated students, these views were shared more widely and included a number of respondents who otherwise agreed with our proposals.

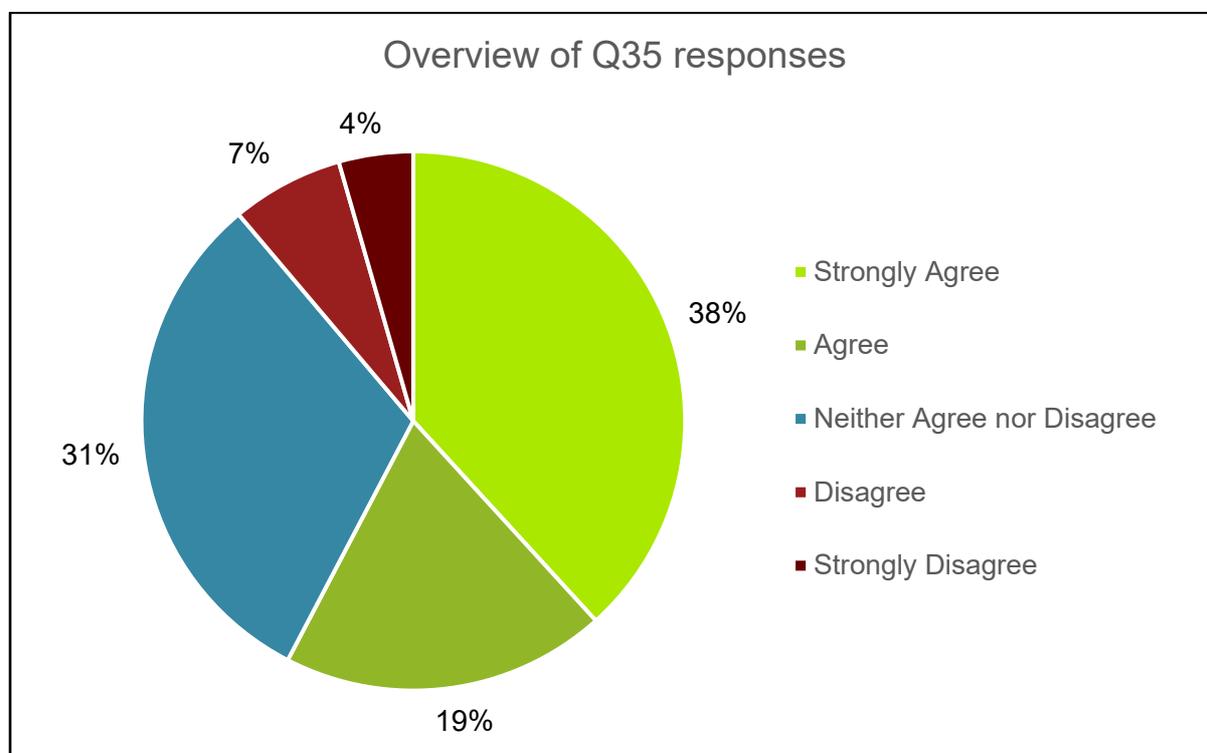
“Given that the number of private candidates must be relatively small, can there be no arrangements made for these students, and only these students, to take their exams online?” (Teacher – responding in a personal capacity)

“For those students who will not be graded, it is essential that they alone are able to sit the exams in summer, not autumn, to ensure they progress with their peers.” (Parent or carer)

“I think that if self-taught private candidates are not to be issued grades, they should have the chance to take their Summer 2020 exams, either online or with an invigilator watching them using video conferencing.” (Other – Home educator)

“Students have already been told the exams will not happen in May or June, so to reinstate this now will cause a lot of panic and pressure for students. I do however think a delayed timetable, even if only for students whose grades cannot be calculated, would have been a sensible way forward. Social distancing would still be possible for the low number of students whose grades can't be calculated if these measures still needed to be put in place.”  
(Parent or carer)

**Q35. To what extent do you agree or disagree with our proposals that exam boards will not be permitted to offer exams for the AEA qualification or to moderate Extended Project Qualifications this summer?**



Q35 responses	Count	Percentage
Strongly Agree	3,773	38%
Agree	1,909	19%
Neither Agree nor Disagree	3,080	31%
Disagree	659	7%
Strongly Disagree	436	4%
<b>Q35 total responses</b>		<b>9,857</b>
<i>No response</i>		2,766
<b>Survey total responses</b>		<b>12,623</b>

A majority (57%) of the respondents to this question either strongly agreed or agreed with our proposal that exam boards should not be permitted to offer exams for the Advanced Extension Award (AEA) qualifications or to moderate Extended Project Qualifications (EPQ) this summer.

“The ship has sailed on these. They have to fit under the same framework as other GCSE/GCE qualifications.” (Teacher – responding in a personal capacity)

Eleven per cent of respondents disagreed or strongly disagreed with our proposal.

“The skills developed and explored in extended projects and advanced extension awards are directly beneficial to university study as they develop critical thinking and independent research. We disagree and strongly encourage the award of these qualifications in the summer examination period.” (University or higher education institution)

A relatively large proportion of respondents (31%) neither agreed nor disagreed with our proposal. Of these respondents, some commented to say that they were not familiar enough with either of the qualifications to respond. This was particularly the case for the AEA, for which there were very few respondent comments at all (less than 0.5% of those who responded to this closed question).

Of those few respondents who did explicitly comment on the AEA, most were in favour of our proposal on the grounds that the AEA should be treated like any other exam.

“AEA is a separate exam paper and no students will be sitting any other exams for any exam boards, so this paper should not be sat in the summer of 2020. If you allow one exam board to set a paper, then you will have all the other boards as well as schools, teachers, students and parents why other papers should not be offered.” (Teacher – responding in a personal capacity)

A small number of respondents did not support our proposal, and commented that the AEA would have sufficiently small numbers that it could be managed safely, or that it could be delayed.

“AEA should still be made available. It is a very small number of students and therefore manageable.” (Teacher – responding in a personal capacity)

For the EPQ, the breakdown of responses by respondent group shows a degree of variation. There was a high level of support for the proposal from teacher representative groups or unions (94%), universities or higher education institutions (83%), and subject representative or interest groups (79%). The percentage of these respondent groups who were not in favour ranged from 6% to 0%.

Over 63% of teachers, senior leadership (SLT) and exams officers strongly agreed or agreed with our proposal that EPQ moderation should not be permitted this summer, while approximately 78% of academy chains, and schools and colleges were also in favour. Comments addressed the challenges of trying to moderate work in the current circumstances, particularly as not all students would have completed their projects before schools closed. They commented on the need to ensure fairness for all students and felt it would be undesirable to have a dual system approach where some students were moderated but not others.

“Given that not all students will have completed their Extended Projects before lockdown it would be manifestly unfair to allow for a moderation process - so that some students get moderated grades based on completed projects, and others get calculated grades based on a statistical method.” (Teacher – responding in a personal capacity)

“Moderation of EPQ isn't suitable as the way it is assessed requires the entire project to be completed and this has not been possible for all centres - it is not possible to moderate incomplete projects due to the way marks are awarded.” (Teacher – responding in a personal capacity)

“If students have completed Extended Projects, then it should be left to centres to submit a centre assessed grade and, on the grounds of equality with other qualifications which include other NEAs, should not be moderated.”  
(School or college)

Some who were in favour or had remained neutral said that many students would have completed their projects before schools closed. They commented that it was important to ensure fairness to those students, also, and wished to find some means to safeguard the grades students had achieved.

“We are a large centre and we have marked all our EPQs as the internal deadline was in March. If exam boards change their grades this is unfair. So there should be provision to have them moderated at a later date under appeal - maybe a small number of moderators could standardise online for appeals over grades awarded for completed EPQs.” (Teacher – responding in a personal capacity)

“Our students have already completed their EPQs and these have been marked already, so these results will be 'real'. However, it is possible that this isn't the case in other Centres. We would like the chance to explain how our grades have been arrived at, as would normally happen during moderation.”  
(School or college)

Other respondents considered that it would be preferable to defer moderation until the autumn, and to only accept completed work for marking this summer.

“Many schools have already delayed the entry of students for the EPQ, who are undertaking it in Year 12 (as we have). It is important that boards have the time and the space to work on awarding grades to the Y11 and 13 students. Where grading can be delayed, it should be e.g. to the November series.”  
(Other – Deputy headteacher)

“We would challenge the worth of any EPQ based on incomplete work. Hence we would prefer grades to be restricted to those centres that have received completed work from candidates, have marked the work and internally moderated. In those circumstances, we would have no problem with external moderation as per usual.” (School or college)

Just under half of parents and carers (49 %) supported our proposals, with students in year 11 and above having a similar response profile (44%). Seventeen per cent of this particular student group, and 14% of parents and carers did not support our proposals, commenting that it was unfair not to properly credit work that had been completed for this additional qualification. They suggested that it should still be possible to submit, mark and moderate the work remotely. In addition, a few of the respondents appeared to have misunderstood our proposals and were concerned that we intended to prevent the EPQ (and AEA) from being awarded at all this summer.

“Students have spent months working on their EPQ outside of their A-Levels, and those that have been handed in should be fairly graded just like normal exams. Students made the choice to do the EPQ to help them in the future and need a grade / certificate as proof for their hard work. It helps them to stand out from their peers, providing disadvantaged students with something to put on their CV which shows their commitment to their studies. Taking this

away from students will be stripping them of their hard work and commitment.” (Student – Year 11 or above)

“I think it will be seen as unfair to students who have worked for these additional qualifications, and who may need the results to progress to the next phase of their education not to have opportunity to achieve grades for these qualifications. There is plenty of time to be sorting out a moderations process now while most teachers are in lock down and working remotely.” (Parent or carer)

“This is a real issue as some university offers are based on the inclusion of EPQ, particularly those from low socio economic backgrounds. There needs to be a fair way of compensating if this qualification is not happening.” (Parent or carer)

“We cannot have a situation where students have worked honestly towards an award, and then do not get it.” (School or college)

### **Q36. Do you have any comments about our proposals for building our arrangements into our regulatory framework?**

One thousand, one hundred and thirty-one respondents answered this question in total.

#### **Building our arrangements into our regulatory framework**

Many of the respondents commenting on our proposals expressed support for building the arrangements into our regulatory framework. This covered a range of respondent groups including academy chains, parent and carers, subject and other representative or interest groups, with a number simply confirming their support. Some respondents provided additional comments about the nature and necessary extent of any updates to the regulatory framework.

“Anything built into the regulatory framework should be necessary to build public confidence and trust, not to hide behind public duties or responsibilities.” (Parent or carer)

“Given the exceptional circumstances, I strongly urge for clear and authoritative direction based on the principles of fairness and equality to be built into the regulatory framework. This ensures exam boards, schools and stakeholders are focused solely and purposefully on generating Centre Assessment Grades with the same goalposts for all students. Leadership in crisis has to be decisive, unambiguous and fair, especially when the trajectories of young peoples' future are at stake.” (Parent or carer)

“In general, existing regulatory provisions are more than adequate to regulate summer 2020 delivery, particularly if process detail is provided in the form of formal communication (for example, RO letter), which has regulatory effect. Where compliance with existing provisions is impossible, the regulators could formally forbear enforcement action. It can be argued, therefore, that revision of the GCR [General Conditions of Recognition] is unnecessary.” (Awarding body or exam board)

“[We] agree, while noting that time is limited and clarity would be appreciated sooner rather than later. We recognise that some general and subject-level

Conditions will change or indeed not be applicable this summer, but we would request clarity about: i) which Conditions will apply, and ii) how they will be interpreted. It is important to establish that clarity now, before the summer series, so that all involved share and apply the same level of risk tolerance in making what are increasingly and loosely being described as “best endeavours” to deliver the exceptional summer series. Without such clarity before the series, there remains a dangerous asymmetry in the regulatory system.” (Awarding body or exam board)

Some respondents commented on the duration of the proposed arrangements. A few of these suggested that our proposals do not go far enough to ensure appropriate provision beyond this academic year.

“Will the original regulatory framework be re-introduced for summer 2021 examinations?” (Teacher – responding in a personal capacity)

“There needs to be a framework that is limited specifically for this strange time. This is unlikely to ever happen again during this century.” (Teacher - responding in a personal capacity)

“Seems sensible given the possibility for future disruption which might make this framework one which might be applied in future.” (Teacher – responding in a personal capacity)

“The arrangements for this year are reactive rather than future looking, which in particular does not assure future students looking to understand their options as to what may happen if the public health restrictions due to Covid-19 are longer term and disrupt the next cohort’s teaching. In particular, the lack of critical examination via an open appeals approach, and the idea that exceptional circumstances require a once-off response, rather than demonstrating an ongoing issue, are key concerns for Ofqual’s approach moving forward.” (Other representative or interest group)

“Will Ofqual review if any of the temporary measures introduced this year are worthy of retention?” (Teacher – responding in a personal capacity)

A few comments from senior leadership and parent or carer respondents expressed concerns about changing the regulatory framework and urged caution.

“Be very cautious before building responses to COVID19 and its impact upon exams into the regulatory framework. There is a spirit of collaboration and consensus in the national interest. Many schools, like mine, are currently working flat-out to produce PPE and to support key workers. We should not rush into anything. There is too much uncertainty. Listen to the profession and in particular to ASCL who have been very balanced, supportive and fair to all parties in their advice.” (Other – Headteacher)

“We would strongly advocate a full review of the impact from this summer’s situation on different groups of children before taking any decision about building these arrangements into the regulatory framework – specifically looking at the impact through the lens of those groups of children, including looked after and previously looked after for whom there is a long standing and historical inequality of achievement.” (Other – Headteacher)

## **The autumn series**

Once again, a number of respondents made comments about the autumn series and about other qualifications, both of which fall outside the scope of this consultation. We will shortly be consulting separately on the details for the autumn series and we have published a separate consultation<sup>11</sup> for vocational, technical and other qualifications.

# Equality Impact Assessment

## **Q.37 Are there other potential equality impacts that we have not explored? If yes, what are they?**

Two thousand and thirty-three respondents answered this question in total.

### **Private candidates**

The impact of our proposals on private candidates was a prevalent theme in responses to this question.

While some respondents focused on the impact on private candidates generally, others noted that a proportion of students who study outside a school or college do so for reasons of SEND or illness. These respondents therefore identified a negative impact on these students if a Head of Centre cannot submit a centre assessment grade or rank order information for them to receive a calculated grade this summer.

“A higher proportion of home-schooled candidates will be SEND and that means they will have to sit exams in the Autumn. This makes it hard for them to move on to university or 6th form college in line with peers, and will further disadvantage them. Also they are likely to be under pressure to continue private tutoring over the summer, at added expense.” (Parent or carer)

“Home schooled students, students in alternative provisions etc where schools do not have enough evidence to assess are at risk of not receiving results, which is unfair and not equitable with their peers. As a higher than usual proportion of these students are SEND/disadvantaged students, there is a risk these groups may be especially impacted.” (Teacher – responding in a personal capacity)

In a few instances, respondents stated that this impact could cause or exacerbate mental-health issues if students cannot receive a calculated grade this summer – which in turn could impact upon students’ ability to sit their exams at a later date.

“Private Candidates should be treated the same as the School Candidates, otherwise private candidates’ progress in life will come to a halt, leading to mental health issues.” (Student – private, home educated candidate of any age)

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<sup>11</sup> <https://www.gov.uk/government/consultations/exceptional-arrangements-for-assessment-and-grading-in-2020>

“The impact of the pandemic on a student's mental health and ability to study has not been taken into consideration for private candidates expected to take exams at a later date.” (Parent or carer)

It was also noted that students who study outside a school or college include disadvantaged students, vulnerable students, foreign nationals and those studying “community” languages. A negative impact was identified for such students if a Head of Centre cannot submit a centre assessment grade or rank order information for them to receive a calculated grade this summer.

“As a charity supplementary school working with young adults who have been disadvantaged in education we have found that if they miss GCSEs in year 11 because of circumstances there is almost no local offer outside of maths and English to take GCSEs late and progress. We work with care leavers, young refugees and young people estranged from family. This is why every year we enter young adults as private candidates. We are hearing now that many schools are saying that they will not provide grades for external candidates.” (Other representative or interest group)

“There are many foreign nationals registered as independent candidates for GCSEs for professional and academic reasons. There is no specific guidance for these cases and many study independently and don't have the evidence centres are asking.” (Student – private, home educated candidate of any age)

“Minority community languages such as Panjabi, Gujarati, Urdu. A large number of students learn these languages in supplementary schools and are entered by State schools. In most cases the schools will be able to get calculated grades from supplementary schools. However, in some cases, it may be hard or impossible to get this information. Also, there could be some other candidates who do not attend any supplementary school and have entered as private candidates. To get appropriate calculated grades for these candidates will be extremely difficult.” (Other – Ex-chief examiner of GCSE Panjabi)

There was a particular concern expressed around the impact on private candidates' potential for progression to higher education, and the potential knock-on effect for the higher education sector.

“So-called ‘private candidates’ undertaking independent study are also disadvantaged by this system. Centre assessment heads are unlikely to have a formal relationship with the candidate and applicants may be given a lower grade or have no choice but to defer. We expect this to have a significant impact on mature learners.” (Other – higher education representative group)

“Our main concern remains the impact on private candidates and the impact on their ability to progress to their choice of higher education institution this year. Additionally, whilst we would want to encourage student choice should they wish to sit an exam in the Autumn series we would not want to have a ‘bumper’ application year in 2021 with a higher number of resitting candidates apply therefore impacting the current year 12 applicants to progress with the same level of choice.” (University or higher education institution)

Respondents also noted that a proportion of private candidates enter for exams while in year 10 or below.

## **Students in year 10 or below**

As noted in response to question 4, many respondents commented generally that it would be unfair not to award grades to students in years 10 and below. Some respondents stated specifically that not to include this group in the revised summer awarding arrangements would discriminate against this group on the basis of their age.

“Year 9 and 10 pupils should be treated in exactly the same way as Year 11 pupils, if they were due to take GCSEs this summer. They should not be discriminated against because of age.” (Parent or carer)

Some respondents commented that SEND students, including those that are home educated, often choose to spread their GCSEs over years 9 to 11. These respondents commented that there would be a negative impact on this group if years 10 and below are not included in the revised awarding arrangements.

“Many home educated are currently home educated due to mental health issues. Making it impossible or very difficult to receive grades may aggravate those issues. Also many spread their exams over several years in order to minimise the stress (and subsequent effect on their mental health) of taking many subjects at once. Hence the refusal to grade students of year 10 and below may disproportionately affect students with mental (or physical) health problems.” (Parent or carer)

“The students who will suffer the most with these new arrangements are those with SEND. The change in expectations is very difficult for some of them to understand. Students in year 9 or 10 who have been working towards GCSEs this year, along with their peers, will not be able to repeat these courses alongside more GCSEs in future years. Students with autism will struggle to understand why they cannot be awarded their grade this year like their peers were last year, and will not accept repeating work they have already done. It is this rigidity of thought that is one of the few 'common' factors for students with autism.” (Other – Teaching assistant working with secondary school students with autism)

“As a result of our cohort, which majority suffer from ASD and anxiety, we endeavour to try to spread the burden on examinations and in doing so if a student has a particular talent may enter them early for an examination. This year a Year 10 student was entered for GCSE Computer Science having studied for two years and completed a project, which could not be used in the Summer of 2021. The student is taking other examinations at the end of year 11, so they are going to be disadvantaged by not having a calculated grade. They will not have sufficient timetable space for further lessons.” (School or college)

A few respondents commented on year 10 students studying GCSE subjects for the purposes of learning a “community” language or for religious reasons, including outside of school. These students were expecting to be awarded a grade in summer 2020, and may be disadvantaged if this does not happen.

“Many religious Jewish boys' schools always take all GCSE exams in Y10, as all students move on to a Talmudical college in Y11. Therefore it is vital for these schools/students that Y10 entries be awarded results on the same basis

as normal Y11 students, as there is no provision for enabling these students to meaningfully sit these exams either in Autumn of 2020 or in Summer of 2021.” (School or college)

“My child is completing her Punjabi GCSE in Yr 10 ahead of her mainstream GCSEs. She will not have the time to complete this accreditation alongside mainstream GCSEs. She has attended a voluntary Sunday school for the last 6 yrs and the last 2 yrs have been dedicated to preparing for her Punjabi GCSE. This is the norm for the Sunday school therefore the blanket year 10 rule is unfit and unfair.” (Parent or carer)

A few respondents commented more broadly about the impact overall on year 10 private candidates, including those in disadvantaged groups.

“As I have mentioned above, our department of over 100 home-schooled children will be negatively affected if you don’t allow 14 year olds to be graded this year as they will not be able to achieve 5+ GCSEs over the two years that we have them in our FE college. These students are already disadvantaged as they have been excluded from mainstream education. The most deprived will be further disadvantaged moving forward as they have not had the home support, high expectations and resources to maintain and continue to build on their knowledge and understanding required for examinations.” (School or college)

“I agree that the Year 10 and under ban should be lifted. Home educated families regularly 'spread out' exams because they have to pay for them and often also the cost of private tuition or online programmes.” (Other – Home educator and parent)

“Please remember that a Home Educated child’s education differs very much to mainstream. We work to our child’s strengths. I base my support to him on this, as does his tutor. As such, we know he would only ever manage one GCSE at a time, ie, one subject. So the reason he is in for his Maths at such an early age is because of this. It is his strongest subject, he needs to now concentrate on English if to stick to his plan of going to college with GCSEs.” (Parent or carer)

Respondents also made some general comments in this section on the impacts on students more generally of not awarding grades to students in years 10 and below – rather than impacts specifically on those with particular protected characteristics or in disadvantaged groups.

### **SEND/reasonable adjustments**

Other specific concerns were raised in relation to learners with SEND.

Respondents raised the concern that some students’ performance during their courses of study may not be reflective of what they might have achieved in this summer’s exams, as reasonable adjustments may not have been in place during their courses of study.

“I am concerned about the impact on children, like my daughter, who have only recently had a diagnosis and support for learning differences. For students who have access arrangements for exams now (eg extra time, readers, laptops, scribes etc), but who didn’t receive access arrangements previously (or have support in class), their work from these previous years is

not a fair reflection of their abilities and should not be included in any ranking to calculate grades.” (Parent or carer)

“Mistakes may have been made with the conduct of mock exams - students not getting the extra time / other access arrangements that they were entitled to. Whilst this shouldn't happen, sometimes it does. It may be that with the correct access arrangements that the student would have achieved a higher grade than the mock result would suggest. These cases will be rare however.” (Teacher – responding in a personal capacity)

There was also a concern about whether students would still be granted their reasonable adjustments if they enter exams in the autumn.

“Our concern here is regarding SEND learners as mentioned previously. Traditionally, their access arrangements expire when they move on to post-16 provision.” (School or college)

A wider concern was expressed around teachers not understanding their SEND students well enough to give a fair centre assessment grade.

“Whilst most teachers at my daughter's school are aware of her dyslexia, a high turnover of staff in some subjects, and a lack of training overall, means there isn't consistent understanding of how learning differences, like dyslexia, can impact students. I am concerned that this could lead to teachers having an unconscious bias in ranking students with learning differences.” (Parent or carer)

“The proposals may be prejudicial to dyslexic students who are slow to process information and therefore would not be so quick in class and may appear to teachers to be less intelligent for this reason.” (Other – On behalf of an A level student)

“A rank order would definitely discriminate against SEND pupils, who may appear less engaged in class, but may be battling other issues.” (Parent or carer)

Conversely, the view was expressed that teachers are best placed to determine a calculated grade for SEND students, and therefore that their centre assessment grades should not be subject to standardisation.

“Children with SEN and EHCPs should not have the grades their teachers award changed. They have been supported by teachers and support workers who know them well and can provide reviews of EHCPs etc to evidence progress.” (Parent or carer)

There were other responses expressing the view that centre assessment grades for SEND students should not be standardised in the same way as other students.

“SEN students are all individuals and therefore it is not easy to compare different cohorts as they often have very varied needs and attainment levels. Prior years' results will not be comparable for SEN schools as cohorts can be very different therefore these should not be included. Baseline data (MidYIS etc) and targets predicted from these for the current cohort would be better used to standardise grades.” (Teacher – responding in a personal capacity)

“When validating grades SEND students do not necessarily follow trajectories and any such system to do so would not be treating these students equally.”  
(Teacher – responding in a personal capacity)

### **Teacher bias**

Respondents expressed a concern that some teachers would not make fair judgements in setting centre assessment grades and rank orders due to bias against or towards particular groups of students.

“We appreciate that the information Ofqual published on 3rd April for exam centres on the submission of predicted grades states ‘Centre assessment grades submitted to exam boards must reflect a fair, reasonable and carefully considered judgement of the most likely grade a student would have achieved’ and ‘Heads of Centre should emphasise the need for judgements to be objective and fair.’ However our view is that this guidance in itself will not address the risk of unconscious or conscious bias by exam centres predicting grades for students.” (Other representative or interest group)

“An over-reliance on predicted grades will penalise BAME and disadvantaged students that are routinely under-predicted. A study by the UCL Institute of Education found that just 16% of applicants achieved the A-level grade points that they were predicted to achieve, based on their best three A-levels. Furthermore, research by the then-Department for Business, Innovation and Skills found that black students were most likely to have their grades under-predicted, and overall only 39% of their predicted grades were accurate, while their white counterparts had the highest, at 53%. The UCL study found that high ability disadvantaged students are particularly likely to have their grades under-predicted, and, once controlled for achievement, pupils from state schools are less likely to be over-predicted than those in independent and grammar schools. The reasons behind this pattern of predictions are complex, but one is likely to be persistent unconscious bias in the classroom.” (Other representative or interest group)

“Ofqual needs to impact the bias/teacher labelling which BAME and socio-economic disadvantaged students will face. This also includes age as shown in the equality impact assessment. A full check and balance should be incorporated when giving grades to ensure equity in the grades given as some students will be unfairly treated due to the lack of any real accountability for teacher bias etc.” (Student – Year 11 or above)

“As a parent of a BAME child I remain very concerned that Ofqual and the Department for Education are not doing enough to address any possible “teacher bias” in this summer’s teacher-assessed A levels and GCSEs. The brief reference to equality in the proposal does not properly address the concerns of parents regarding the huge potential for discrimination, either deliberate or unconscious. This is especially concerning as there is no right of appeal from the teacher’s decision. In view of the above, it is extremely disconcerting to note that Ofqual and the Department for Education does not intend to properly address any possible bias in assessments – despite admitting that there may be some bias in the system.” (Parent or carer)

“According to a social barometer research study conducted by the Equality and Human Rights Commission (EHRC) in 2018 on prejudice in Britain, 44%

of respondents expressed prejudice against Gypsy, Roma and Traveller communities – more than any other protected characteristic group. When we compare this, for example, with the fact that the EHRC found only 5% of the British population expressed prejudice towards black people, there is a concern that existing evidence on teacher bias in assessment of minority ethnic groups may be based on groups who do not experience as significant levels of discrimination. Low expectations of teachers in the performance of Gypsy and Traveller children is common and well documented.” (Other representative or interest group)

“The Teachers Who Care report, published by Become in 2018, highlighted that the majority of teachers had not received good quality initial teacher training in the needs of care-experienced students, and that 87% of respondents had heard at least one colleague express a negative generalisation about children in care. This gives cause for serious concern about the potential for negative teacher bias and low expectations impacting on the awarding of grades for care-experienced students.” (Other representative or interest group)

“Research, by UCU and UCAS for example, shows that teachers often under-predict the performance of high attaining students from disadvantaged backgrounds. This may be down to a lack of familiarity with high attaining students, or down to bias and individual prejudices.” (Other – Work at an Awarding Organisation)

“Arrangements for assessment should not systematically advantage or disadvantage students on the basis of their socio-economic background or their protected characteristics. While we recognise teacher assessment grades take into account a broad range of evidence and not just predicted grades, evidence suggests that higher-attaining students from more disadvantaged backgrounds are more likely to achieve final exam grades that are higher than their predicted grades. Any potential for unconscious bias should be avoided so we can continue to build on recent successes to widen participation in higher education.” (Other representative or interest group)

“We are concerned that centre assessment grades for physics are likely to under-reward girls and students from lower socio-economic groups. There is good evidence that unconscious biases can result in predictions of physics grades being lower for girls – even when it is the same piece of work being graded. This can also be true for less privileged students.” (Subject representative or interest group)

“I hope both male and female students will be treated exactly the same - upon their ability and not their gender. It is known that white male students tend to be treated differently. The same goes for ethnicity.” (Parent or carer)

“You have failed to apply appropriate consideration to the negative conscious bias for SEND students.” (Parent or carer)

“Risk of bias in favour of more extrovert, "outgoing" students as when it comes to ranking students they will be at the forefront of teachers' minds. Quiet, introverted children who may be hard-working / high-achieving but are not vocal in class are at risk of being overlooked and being placed lower in the

rankings by teachers. Risk of bias in favour of teachers' own children or their friends' children." (Parent or carer)

"Certain teachers may like or dislike certain students due to behaviour in class. Their academic skills should be the only thing in question here."  
(Teacher – responding in a personal capacity)

### **Issues with evidence**

It was suggested that, for some groups of students, evidence of their performance during their courses of study would be less likely to correlate to their likely performance in the summer exams, had they gone ahead.

"Boys work differently to girls (statistically speaking). Girls tend to work consistently throughout their time at school whereas boys tend to really pull it together in the last few months/weeks. My son's GCSE results are being calculated based on his November mocks (as well as his Y10 mocks), which only capture where he was at least 6 months before he was due to sit the exams." (Parent or carer)

"It is well known that boys will tend to make more progress between mock exams and other internal assessments and the final exams, and so if a calculated grade based on internal assessments doesn't allow for this we will potentially see a sustained under-performance by boys across the country or in many centres." (School or college)

"SEND students are particularly weak in the early years at school however in my experience they certainly begin to accelerate massively in the years post 15. I have found particularly with students on the autistic spectrum suddenly overtake their standard cohort of students as their socialisation clicks into place and they learn how to deal with their disability. Even the mock examinations for a SEND student quite often do not reflect what they will achieve by GCSE." (Teacher – responding in a personal capacity)

"I think the impact on dyslexic children of being ranked lower due to the progress they have made up until schools closed needs to be explored. These children will likely have made more progress between the schools closing and the scheduled exam dates than children without this disability." (Parent or carer)

"Likely to disadvantage top level students from poorer socioeconomic backgrounds. Use of 'in class' activities, especially homework, would be a poor benchmark as not everyone has an opportunity to complete these in the same conditions." (Student – Year 11 or above)

"FSM and vulnerable students often make very rapid late progress between mocks and the real exams, as intrinsic motivation and focus increases (whereas students from a more affluent background will have had support throughout their schooling career and tend to maintain a more even keel)."  
(Teacher – responding in a personal capacity)

"In our experience, the rate of progress of EAL students accelerates as the year passes, as a consequence of the development of linguistic sophistication and their ability to access tasks. This specific pattern of progress needs to be considered in any estimation of performance. Those on 1 year courses face

being particularly badly affected by any system that fails to take in-year progression like this properly into account.” (School or college)

“Those with extenuating circumstances that may have affected their performance in mock exams and other assessments do not appear to have been considered at all in this process.” (Parent or carer)

“Individual circumstances that will have affected a student during the period that is being used to assign a predicted grade eg: bereavement, serious illness etc. Under normal exam conditions Centres can apply for mitigating circumstances if they believe it is appropriate and students are awarded an uplift.” (Other – Work in education)

There was a particular concern expressed that students should not be disadvantaged by their own – or their centre’s – track record, or lack of a track record.

“Students with lower prior attainment, ESOL, recent arrivals, disadvantaged students are the ones who can be most likely to outperform any trends or predictions. We must ensure that these learners are awarded the grades they are capable of achieving and not disadvantaged by any statistical modelling.” (School or college)

“Historically, in many underprivileged areas, students perform highly despite their prior attainment being relatively low (re: this is the case for many Pupil Premium students and many of our BAME students). I fear that this system will disadvantage a lot of them not taking into consideration their work and effort; especially in the last stages of their preparation towards their final exams.” (Teacher – responding in a personal capacity)

“Historic performance of EAL pupils is not a good indicator of KS4 outcomes. We have a group of students who at aged 11 were recent arrivals to the UK - consequently KS2 performance was extremely low. 5 years later, GCSE performance is expected to be stronger and exceptional in some cases.” (Teacher – responding in a personal capacity)

“If the standardisation process penalises new centres, that may inadvertently bias the process in favour of students from better socio economic backgrounds who are studying at established schools.” (Teacher – responding in a personal capacity)

“We would urge caution in heavily adjusting centre assessed grades which are perceived to be too generous based on historic performance of that school. While this risks affecting all students, it would be felt even more acutely by those coming from less advantaged backgrounds. This matters all the more because those from less advantaged backgrounds are likely to be disproportionately more impacted by inaccurately low grades – they may lack the resources and confidence needed to participate effectively in autumn exam cycles, or to defer their next steps.” (Other representative or interest group)

“Schools with high proportions of fasting Muslim students during the last two years may have expected improved results this year (particularly if their last two years’ results had seen a downturn).” (Teacher – responding in a personal capacity)

It was noted that, for particular groups of students, centres may be less likely to possess sufficient evidence in order to produce a centre assessment grade and rank order information.

“It is likely that pupils with medical needs, who, given the right support, achieve well in formal examinations, will be disadvantaged if assessments are provided by PRUs and they are ranked by their mainstream school. There needs to be consideration of how the guidance applies to both single registered and dual registered pupils in these settings. Consideration also is needed for those pupils who had been very recently referred for support from PRUs and, given time, would have been able to sit the examinations in the specialist centres this year, because we can provide individualised support. Schools will need guidance as we do not have sufficient evidence to submit an assessment. For pupils who attend the hospital schools and where the mainstream school is the examination centre, consideration needs to be made as to how their schools grade and rank those pupils especially where their medical treatment has been long term. Many pupils go on to successfully sit formal examinations and schools will not have the same level of evidence for these pupils.” (School or college)

“We have heard from the sector that Alternative Provision settings and Pupil Referral Units struggle to award predicted grades at all, meaning that these pupils are likely to be further disadvantaged by inaccurate awarded grades. Given that school exclusion is linked with a range of negative outcomes including higher rate of association with knife crime both as victim and perpetrator, decision making this year must not put this vulnerable group at further risk of social exclusion.” (Other representative or interest group)

“We would urge you to explore the impact on specific groups within the looked after cohort, including unaccompanied asylum seeking children (UASC). There will be fewer data sources on which to draw as evidence of historical attainment.” (Other – SLT – Virtual school head)

“[We] believe that the impact of low attendance on teacher assessment could have an equality impact that requires further exploration. As stated in the Equality impact assessment: literature review, Marcenaro-Gutierrez & Vignoles (2015) found that pupils with lower attendance were underrated in teacher assessments when compared to test performance. Research highlights that certain groups with protected characteristics are more likely to have low attendance records. The latest Department for Education data on pupil absence in schools from 2018-2019 found that the absence rates for pupils on Free School Meals (FSM) was almost double the rate of non-FSM pupils (7.5% compared to 4.2%). Travellers of Irish heritage pupils and Gypsy/Roma had the highest overall absence rates at 18.0% and 12.6% respectively compared with an average absence rate of 4.7%. Pupils with a Special Educational Need (SEN) statement or Education, Health and Care plan had an absence rate (8.7%) that was double the rate for pupils with no identified SEN (4.3%). Therefore, these groups are most likely to be affected by the underrating of pupils with low attendance.” (Teacher representative group or union)

“You have not considered the SEND pupil with poor attendance. My son (who has an EHCP for autism and anxiety) has had very low attendance through

the GCSE course which means there is some but not much evidence on which to grade him. Thus any grade he receives may not be reflective of his academic ability, which was continually high through years pre issues with school attendance, and may prevent him from moving on to his preferred choice of 6th form.” (Parent or carer)

### **Late entries**

It was noted that there might be a negative impact on SEND students if exam boards do not accept late entries for this summer’s award.

“Disabled private candidates often enter later. The cost of living for a disabled person is so high especially around the pandemic where most of us have pre-existing health conditions which means being infected causes us to need more at-home care. This means we need to wait to save money to be able to pay for exam entries and they were not made before the 21st of Feb. This is just my situation, there are so many more like it. Scrap this deadline. We shouldn’t have to go through an extenuating circumstances process at such an anxious time.” (Student – private, home educated candidate of any age)

### **Disadvantaged students**

Respondents also identified other issues impacting disadvantaged students.

“Children in care who have moved in year 11 may have been left without exam entries / the exam entry was in process of being transferred between centres.” (Other – Local authority officer responding in a personal capacity)

“That some schools will try to use evidence after the closure date which have privileges most/many do not. E.g. summer term mocks, Easter hols work, etc. I say that when I currently work in an independent school which, like the Sutton Trust results show, has a high uptake of online learning and the resources to enable it to be more successful. It is another way some schools can increase attainment gaps (cf news stories about summer holidays in a tiny number of schools to benefit years 10/12).” (Other – Senior leader and teacher)

“Students with lack of parental support and resources at home are least likely to be able to sit exams in an autumn series, or to show what they can do without support from their teachers. This will particularly be the case with those who are no longer at their secondary school or college. Students whose parents are able to pay for any resit fees and tutors are most likely to get improved grades.” (Teacher – responding in a personal capacity)

“Missing out on months of school will impact all young people but it will hit those from disadvantaged backgrounds harder. Research from the Department for Opportunities showed that 40 per cent of children from low income households do not have a quiet room in which they can study during the school shut down. This compares to just 19 per cent among children in households with high incomes. Research from the Sutton Trust shows huge gaps between rich and poor students in access to IT and online teaching resources. Many of our young people, who are a representative sample of young people from deprived backgrounds across the UK, live in overcrowded accommodation, care for siblings or family members and may have the added stress of having a parent who works as a frontline key worker. From working

with the young people on our programme we know that the summer before starting university offers an opportunity to take on a summer job and save for their first year of university - these jobs are economically essential for low income students and part of their financial planning in a way that their richer peers do not have to consider and will therefore hinder their opportunity to revise for autumn exams. The “summer slide” where children fall behind in their studies over the 6 week summer break is well understood by teachers. We fear that missing out on the structure of school combined with not having somewhere quiet to study during the school closure and lockdown (libraries, and other public places young people from overcrowded households may use, are currently closed) will mean young people from disadvantaged backgrounds will not be best placed to sit an exam in the autumn and so this back-up option will mainly benefit young people from households which afford them space and time to study.” (Other representative or interest group)

### **Consultation document and Equality Impact Assessment literature review**

A few respondents criticised the readability of our consultation document.

“I found the wording of these questions very complicated to respond to.”  
(Parent or carer)

“Have you considered writing this survey in plain English? It makes the survey less accessible and does not allow for the general public to express their opinion.” (Student – private, home educated candidate of any age)

“The double negatives in your question stems and long length of questions may inadvertently make users select the wrong option.” (Teacher – responding in a personal capacity)

“The question phrasing in this consultation document would not be accessible to many parents/carers and pupils, and might create more anxiety rather than reduce it.” (Teacher – responding in a personal capacity)

A few respondents were critical of our Equality Impact Assessment literature review.

“My comments on the Equality impact assessment: literature review are: It is inevitably fairly thin because (as it points out itself) there’s not much robust research evidence in the area. The research literature referred to is mostly pretty old. It often relates to primary age students and so its relevance is questionable, not least because it is drawn sometimes from other countries whose educational system, values and conception of assessment are driven by very different philosophies from that currently prevalent in England. It is mostly not drawn from research into assessment of work produced for high-stakes, terminal, national examinations.” (Other - Parent or carer and retired headteacher)

“Most of your data to justify teacher predicted grades and related socio-economic bias is grossly out of date and not fit for purpose. Equally the UCAS grades are completely different predictions to projected or normal predicted grades and therefore the suppositions and associated correlations are seriously flawed. A UCAS prediction is normally non-accountable in terms of a school's internal data and may have been awarded by a tutor with considerable student/parental pressure. A low UCAS predicted grade means that a student doesn't get an offer which means a tutor is the gate keeper to

offers - it is not in the school's interest to under-predict a UCAS grade; it demotivates students. My view is that your research is flawed and the grade judgements that you receive will be far more indicative of student's realistic grades than you think." (Teacher – responding in a personal capacity)

"The research used in the Equalities Impact Assessment is out of date, focused on countries with a different ethnic profile, does not address under predictions by teachers for Black students and higher ability disadvantaged learners. In addition, and of greater concern, it does not take into consideration the impact of multiple disadvantages for some protected groups 2010 Equalities Act, who will be double/triple disadvantaged by low teacher expectations, racial discrimination that is endemic in some schools; the impact of trends in schools exams that will inevitably maintain the status quo. Having worked in senior roles in local government I am fully aware that Black students and their parents welcome exams as a way of proving how wrong teachers have been about their ability. The impact statement is weak and should have drawn on more recent research such as the Sutton Trust Education Endowment Foundation." (Other – Ex-director of education)

### **Q.38 We would welcome your views on how any potential negative impacts on particular groups of students could be mitigated.**

Two thousand, six hundred and twenty-three respondents answered this question in total.

#### **Private candidates**

Respondents gave a range of views on how private candidates might receive fair calculated grades this summer.

A few suggested that private candidates should not be included in their centre's rank order.

"Home educated students should NOT under any circumstances have to be included in a school or exams centre's rank order, they should be entirely separate. How could it be fair for my child to be ranked against a school that charges 10 or 15,000 a year for a child to attend that school, that is an extraordinary pressure to put that school under, and is unfair on the school, and the home educated child. They should be allowed to just submit a predicted grade, outside of the rank system." (Other – Home educator and teacher)

"Home educated students must be given an assured route for their tutors or teachers at distance learning providers to be able to submit grade recommendations and evidence to the exam boards. Their evidence needs to be considered outside of a ranking system which is set up only for large school cohorts, into which they cannot sensibly be expected to fit." (Parent or carer)

A few respondents suggested that the standardisation model should have a particular focus on private candidates.

“Standardisation MUST account for private candidates. Private candidates are very likely to be placed at the bottom of the centre’s rank order within each grade and therefore unjustly vulnerable to grade adjustments. Therefore private candidates, as well as those with protected characteristics, should have their grades adjusted to reflect these biases.” (Student – private, home educated candidate of any age)

“I would propose that prior centre performance be disregarded for private candidates within the standardisation process.” (School or college)

A few respondents suggested that private candidates could receive centre assessment grades based on other evidence.

“I personally know of 30 students that have evidence from former schools, with predicted grades. Use these predictions to grade them. They are very carefully formulated.” (School or college)

“Private candidates; please allow centre assessment grades/rank to be based on school predicted grades from Year 10 when a student has only been home schooled since September 2019 and has a history of mainstream education.” (Student – private, home educated candidate of any age)

“There should be a mechanism where others (such as exam board exam markers) scrutinise the evidence sent and decide on a grade from the evidence received. Perhaps giving access to all independent students a range of mock examinations which students should attempt, and giving the teaching institutions the same opportunity to mark and rank the students in the same way an exam centre can.” (Private training provider)

“The proposals for exam centres to rank their students cannot be applied to external candidates (e.g. home educated children) but as the numbers of such candidates are relatively small you should be able to develop an alternative process. This would include where possible the submission of a calculated grade by either a professionally qualified tutor who has supported the child's education, or by the parents themselves but backed up with evidence of written work / past papers / online assessments from reputable providers (i.e. a portfolio of work). This could include a tutor declaration. If necessary you could also pilot online supporting assessments with this small number of students with safeguards such as webcams being on during the online assessment (we understand United States SAT exams for college readiness may use this model of online assessment this year).” (Other – Home educator and parent or carer)

A few respondents suggested that centres should work with relevant supplementary bodies in order to be able to generate centre assessment grades for private candidates.

“The Turkish Cultural and Education Consortium is working with mainstream schools towards a model whereby mainstream schools are satisfied that a student’s level in Turkish reaches a certain grade, through submission of evidence, in order that the mainstream school can submit a predicted grade in this subject for the student (NRCSE 21 April 2020). [We] would like to see this model encouraged. It requires mainstream schools and supplementary schools to work together. [We] call on the DfE to recommend to mainstream schools that they should work with their students’ supplementary school(s) if

possible to ascertain a predicted grade. [We] call on Ofqual to provide guidance on any potential issues such as rank ordering in such arrangements.” (Subject representative or interest group)

A few respondents suggested that centres should be compelled to submit centre assessment grades for their private candidates.

“Re private candidates (myself included) - please consider requiring (not asking) schools to create centre assessment grades where sufficient evidence can be provided. If the choice as to whether to calculate the same for private students is discretionary, schools will decline to do so because (inter alia) it saves time and private candidates miss out.” (Student – private, home educated candidate of any age)

“The mental health of my 19 year old daughter over the past month since you announced exams would be cancelled has been horrendous. To now learn it is entirely down to the individual schools whether they enter external students in their rank order assessments or not is completely and utterly unfair.” (Parent or carer)

There was also the suggestion that exam boards should be compelled to provide assessment opportunities for all subjects in the autumn.

“At the moment, the mitigation that the consultation suggests is that students who cannot be graded will be able to take autumn exams - but this is not the case as Ofqual have not compelled Exam Boards to provide an Autumn Exam Series in all subjects, and therefore they should compel them. In the event that some students are not able to receive a grade, these students should not be disadvantaged further and must be allowed to sit their exams in the autumn, as soon as is reasonably possible.” (Other – Home educating parent)

“The need for the autumn exam series to be offered in all subjects /courses that would have appeared in the June 2020 exam timetable. Having to defer sitting (some/all) exams until June 2021 could detriment a group of students relative to their peers during the next phase of their education.” (School or college)

A few respondents suggested that, where qualifications this summer are required for progression, receiving institutions should take a flexible approach.

“In my own circumstance I am due to start a PGCE in Art teaching this September but need to sit GCSE maths to meet its entry requirements as my qualifications are from Ireland and do not match up correctly to the UK qualifications. I think it would be very unfair if the maths requirement should be the reason I miss out on teaching this year. The DfE should lower its maths requirement and look at a case by case / or allow students to start and sit the exam at a later date.” (Student – private, home educated candidate of any age)

“Many providers (College for instance) where the pupils move on to have their own initial assessments. Perhaps those who could be disadvantaged would be allowed to start the course with a caveat to them meeting the required level during those assessments.” (School or college)

## **Students in year 10 or below**

Regarding students in year 10 or below, there was considerable overlap in responses to this question and those to question 37. Many respondents commented that grades should be awarded to students in years 10 and below. Some respondents also noted that this would ensure students with particular protected characteristics are not disadvantaged.

“Year 10 students should be allowed the same arrangements as year 11.”  
(Teacher – responding in a personal capacity)

“Awarding a GCSE Award to years 9 and 10 would ensure that children with SEN are not disadvantaged further.” (Parent or carer)

## **Guidance to centres**

Respondents expressed the view that centres should receive clear guidance on how to produce centre assessment grades and rank orders that are fair and unbiased.

“We will be making a recommendation to the Department for Education that it should issue guidance to schools on the approach which teachers should take to predicting grades and ranking pupils in order to minimise the risk of conscious or unconscious bias. The guidance should include a requirement for schools to provide exam boards and Ofqual with sufficient data on socio-economic background and the protected characteristics of assessed pupils, including by ethnic group, to support analysis to check for systematic advantages or disadvantages.” (Other representative or interest group)

“We believe there would be value in the provision of clear and consistent guidance to centres which is informed by disability experts, so that the derivation of Centre Assessment Grades is applied consistently and fairly for learners with SEN and/or disabilities. The guidance could also include information on how to ensure the consideration given by centres goes beyond the protected characteristics and supports centres to consider a wider range of socio-economic issues.” (Awarding body or exam board)

“More advice that is practical is needed so that schools can be fully assured of how they can address bias.” (Local Authority)

“We believe that ‘eliminating conscious/unconscious bias trainings’ (or something to this effect) should be provided to all teachers at every assessment centre across the country who will be involved in the grade predictions process.” (Other representative or interest group)

In particular, respondents emphasised that guidance to centres should include advice on factoring in the effect of any reasonable adjustments that a student would have been granted in this summer’s exams.

“The process must assume that centres will take account in their judgments of the impact that additional exam support may have had on the performance of those entitled to such support. Clear guidance in this regard may be useful.”  
(Academy chain)

“Centres should be reminded that they should award grades in respect of all existing \*access arrangements\* - some of which may not be identified until AFTER mock exams.” (Other - Exams officer / manager)

“Some clear guidance for teachers on taking access arrangements into account when awarding centre assessed grades would be helpful. There is a risk some teachers may feel they need to 'bump' up a grade for students who would have been entitled to extra time in the summer exams, for example when the student would have used extra time arrangements in previous mock exams and class assessments.” (Other - Exams officer / manager)

### **Input from specialist staff**

Respondents expressed the view that input from relevant specialist staff should form part of a centre's holistic judgement for each student.

“Introduce the absolute requirement for the SEND team / SENDCO to be involved with the head of department to review every grading for a student with an EHCP / Statement of Special Educational Needs, to ensure that no form of negative conscious bias can occur.” (Parent or carer)

“We believe it is vitally important that teachers liaise appropriately with specialist teachers when determining the centre assessment grade and rank order for candidates with approved access arrangements, to ensure they are not disadvantaged during this process.” (Awarding body or exam board)

“We have some concerns that where provision is sub-contracted by specialist settings to mainstream settings, some teachers may underestimate the potential of learners with SEND because of a lack of detailed knowledge of the individual and the way in which their SEND affects their performance. We would like to see a requirement for sub-contracted providers to arrive at a proposed grade for learners with SEND in consultation with the 'home' provider.” (Other representative or interest group)

“To mitigate any potential negative impacts on Children in Care and Care Leavers there should be a requirement on all schools and settings to liaise with the Virtual School for that individual child.” (Other representative or interest group)

### **Taking students' specific circumstances into account**

It was suggested that centre assessment grades – and, ultimately, calculated grades – should take into account the specific circumstances of each student.

“Taking individual circumstances into account for children with disabilities.” (Parent or carer)

“Some students were shielding or in self isolation before the schools closure was announced, in some cases there had been bereavements at home prior to the closure and this had an impact on the work that had been done or submitted up to the closure date, this needs to be taken in to consideration when using work 'as it stands' to generate a grade.” (Teacher – responding in a personal capacity)

“Teachers will have a high workload and it will be very easy to forget that an individual student had for example been in car crash just before mocks, or lost a parent during his studies etc. If part of the submission process includes the prompt such as “Do mitigating circumstances apply to this student? Y/N” it would serve as a reminder to teachers that they are obligated to provide a fair reflection.” (Other – Work in education)

“We also urge Ofqual to ensure that mitigating circumstances procedures are in place at every assessment centre between May and July 2020 so that students and/or parents can declare mitigating circumstances they feel should be taken into consideration when predicting grades. It is paramount that this information is relayed to parents and students in a clear and concise manner so that they are aware of this provision. The availability of mitigating circumstances forms can, we believe, go a long way in minimising any disadvantage, by ensuring the teachers are aware of their student’s personal circumstances.” (Other representative or interest group)

### **Work completed after 20 March**

There were mixed views regarding whether additional work completed after schools and colleges were closed on 20 March should form part of centres’ holistic judgments.

A number of respondents suggested that negative impacts on students would be mitigated by disallowing any work completed after 20 March.

“To make it clear to schools that any work submitted after schools closed should not be used to inform grades. Using this information is likely to disadvantage students from poorer socioeconomic backgrounds whose living conditions may be less conducive to self-study at home and those students for whom the current situation has exacerbated or triggered difficulties with mental health.” (Parent or carer)

“The consideration of work after 20th March seriously disadvantages the most vulnerable students. There will be schools working hard to protect students from leaving care, county lines, neglect, abuse and deprivation. School provides a consistent sanctuary for some of these students. Some students will be in an impossible position without the excuse that they must go to school. Work after the 20th March should not be considered.” (Teacher – responding in a personal capacity)

“We would prefer if Ofqual had used clearer wording that stated that student work from after 20th March, and the subsequent national lockdown, should not be used in coming to these decisions. We are very concerned that any use of such work is likely to create or widen disadvantage within the system, particularly for students from lower socio-economic backgrounds and for SEND students, who may not have had access to the same support during lockdown that they might have in their school or college setting. Furthermore, centres would struggle to confirm the authenticity of such work and any inauthentic work used as evidence would bring into question the validity of results.” (Teacher representative group or union)

A number of respondents presented the alternative view – that negative impacts on students could be mitigated by allowing the consideration of work completed after 20 March.

“Several students, especially those from minority backgrounds or those with mitigating circumstances, who sit their exams tend to study harder nearer the exams, and so achieve much better results in their real exam than mocks or class assessments. Due to this, any work completed/submitted after March/April should be given the same consideration as so to work submitted beforehand.” (Parent or carer)

“Work completed up to the submission date should be permitted to be considered when looking at grades. Students who cram for exams are severely penalised by the lack of exams and should have the opportunity to show their final few weeks’ work.” (Parent or carer)

“I think that where possible students should be allowed to complete final projects for assessment so that they have had the opportunity to obtain the best result possible for that subject.” (Parent or carer)

### **Additional equality impact assessments/reviews**

A number of respondents suggested that centres should perform an equality impact assessment or an equality review on their centre assessment grades and rank orders, with some respondents also suggesting that such a review should also be undertaken externally.

“Remind schools about their duties under the Public Sector Equality Duty of the Equality Act 2010, and provide schools with guidance on how to undertake Equality Impact Assessments before and after final exam grade assessments. Schools should then provide Ofqual with anonymised pupil data on exam assessments, disaggregated by ethnic group and other protected characteristics (including SEN).” (Other representative or interest group)

“We recommend that centres submit their own equality impact assessment including commonly used school metrics of free school meals, SEND provision and English as an additional language alongside students’ grades and rank ordering.” (Subject representative or interest group)

“An Equality Impact Assessment should be carried out by each Centre before calculating the grades and ranking as this would enable the Centre to identify any bias and or disproportionate impact that the exceptional arrangements are likely to have and to take steps to mitigate it. This would reduce the need for statistical standardisation in order to address any disproportionate impact after the grades are calculated by the Centre.” (Other representative or interest group)

“E.g. in a co-ed school I would expect them to look at the mean grade for boys and for girls separately in the mocks in previous years and compare them with the mean grades for final GCSEs / A levels. If there is a real pattern of differential improvement in past years they should make a similar adjustment in the rankings submitted this year.” (Teacher – responding in a personal capacity)

“We also request that exam centres be required to moderate students’ teacher-assessed grades across subjects, cross-referencing for large differences in grades awarded to individual PP+ students across subjects, and for large differences awarded to individual PP+ students across different teachers in the same subjects in order to minimise the potential of bias at the initial stages.” (Other representative or interest group)

There was also the suggestion that Ofqual should conduct an equality-focused evaluation.

“Ofqual should publish a report evaluating the predicted grades process and outcomes for pupils. If the evaluation reveals higher than average disparities for pupils with protected characteristics, these should be investigated

thoroughly, with appropriate remedial action taken. This will be to support pupils who have been adversely impacted and also to inform future learning.” (Other representative or interest group)

“Whilst reforming the policy approach at very short notice has clearly been a necessity, it is imperative to track progress and mitigate against any negative impacts as far as possible. [We] would like to see Ofqual and DfE put evaluation at the heart of these reforms - including clear, published plans to track this cohort of students in the short, medium and long term. Within this approach, steps should be taken to monitor how the system is working in real time and to assess the impact on equality, diversity and inclusion.” (Other representative or interest group)

## **Ranking**

A few respondents suggested that alternative rank order arrangements may mitigate a negative impact on some learners – including the suggestion that adult learners should not form part of a centre’s rank order.

“19+ adult students may be disadvantaged by the ranking with 16-18, consideration should be given to allow the two cohorts to be ranked separately and the age categories standardised separately.” (Teacher – responding in a personal capacity)

“Please re-think the ranking. If a grade is predicted, and a student is capable of achieving that, a rank of 1, and if there is a margin of doubt, a 2. So that the probability of getting the grade can be assessed, and the reliability of that reviewed, compared to past results etc. If multiple students are capable of a particular grade eg A, a 1 or 2. But more than one student should be able to be allocated a certain number or score. This would stop children of equal abilities being penalised by potential bias when being ranked and based purely on their abilities. Especially those students that are more introverted, shy, from BAME backgrounds, where they may be ranked lower, but their grades would have been equal.” (Parent or carer)

## **Centre assessment grades and standardisation**

Some respondents expressed concern about the impact of standardisation on centre assessment grades.

A number of respondents suggested that centres are best placed to give a fair calculated grade to students, and therefore that the standardisation process should not undermine centre assessment grades.

“I think that at the end of the day the teacher knows their student best and is best placed to give an accurate and fair prediction on the ultimate grade. It would bother me if a grade for a student went down because of a standardisation process which, by its very nature, cannot take in to account nuance, different cohorts and individual progress.” (Teacher – responding in a personal capacity)

“I think schools and colleges should be allowed to have at least one iteration of feedback into whether they feel that any statistical model is smoothing out genuine characteristics of their data.” (Teacher – responding in a personal capacity)

Particular concerns were expressed about the potential effect of standardisation on centre assessment grades for SEND students, students taking English as an additional language (EAL students), disadvantaged students, students at improving centres, and small cohorts. Respondents suggested that, in such cases, standardisation should not undermine the centre assessment grades.

“For small special schools where there is a distinct change in the pattern or level of grade for this year this would need to be explored. It may be that these schools could be asked to explain and justify why the grades may be higher for this year compared to others. It might be that particular cohort has a different set of needs and therefore the results are in line with those pupils’ abilities and projected grades. Each yearly cohort of leavers in a special school can be highly different from the last due to these needs. Unlike a mainstream 'neurotypical' cohort where outcomes are broadly in line with previous years (all other variable being equal).” (Teacher – responding in a personal capacity)

“We have many students that have moved from mainstream to alternative provision and they have missed much time at school. For these students a normal statistical model of progress does not fit as once they are settled with us due to the smaller class sizes and intense intervention they make rapid progress. We need to be able to account for this within our teacher assessment and predicted grades so when we submit our grades we need to be able to give a centre context to our learners so that if their grades don't fit the statistical model of the exam boards it can be down to the nature of our centre and not inflated teacher assessment.” (School or college)

“EAL students with no KS2 data - centre assessment grades should be accepted with the Head of Centre's agreement without any other standardisation as these students work outside trajectories, their progress is dependent on many mitigating distal factors which are highly individualised e.g. home language, time in country etc.” (Teacher – responding in a personal capacity)

“Schools should be offered an opportunity in advance to flag if grades will not follow historical trends and offer supporting data to evidence this. This should be prior to grade submission. This is imperative otherwise improving, 'turn-around-schools' will be hugely disadvantaged.” (Teacher – responding in a personal capacity)

There was also a suggestion that standardisation should not impede a potential improvement in Muslim students’ performance this summer.

“Some centres with a high proportion of Muslim students may have recorded lower than expected GCSE and A level results over the past two years owing to examination season coinciding with the Ramadan fasting. Since Ramadan works out earlier in 2020 the fast had been expected to have a lesser effect on examination grades in relevant centres.” (Subject representative or interest group)

## **Appeals**

The view was expressed that the ability to appeal might mitigate some potential negative impacts.

“In the event that pupils are not happy with the outcome of their assessment and awarded grade, they must have a meaningful and timely route of appeal. We appreciate that this requires a difficult balance to be struck and it will be important to monitor the appeals process by protected characteristic to ensure that it operates fairly and meets the requirements of the PSED.” (Other representative or interest group)

“We would like to see an appeal process for students with disabilities where they believe the evidence teachers would have relied on was unfavourable due to barriers to access.” (Other representative or interest group)

“Bias based on race, religion, gender, class, background, sexuality e.g. lgbtq+ should be carefully looked at and pupils of these groups should be able to appeal grades if they believe there has been prejudices made against them.” (Student – Year 11 or above)

“There should be some recourse for a pupil against subjective bias based on anything not perceived as "normal" within the, likely common, mind-set of a particular area or assessment centre.” (Parent or carer)

### **Progression**

Respondents expressed the view that potential negative impacts on students might be mitigated if receiving institutions and employers take a flexible approach in relation to this summer’s cohort.

“Ofqual should consider a possible dialogue with universities on course dates starting later for some students, so that students do not feel forced to go to another university based on given results.” (Other representative or interest group)

“BAME students are very vulnerable to this situation and many have been waiting for university places. All universities should be lenient as due to COVID 19 there will not be as many international students filling up spaces.” (Student – Year 11 or above)

### **Late entries**

A few respondents felt that allowing students to make late entries for this summer’s awards would mitigate a negative impact.

“SEND students with late entries should be allowed to proceed. This will prevent the negative impact on MH [mental health] for those with SEMH [social, emotional and mental health] difficulties.” (School or college)

“There should not be a deadline on candidate registration because it would ordinarily have been possible to register later and some candidates would have planned to do so! ADDITIONALLY, the coronavirus would have impacted some students’ ability to register in late March. Some candidates just planned to register late/wanted more time to finalise whether they would be able to balance other subjects!” (Student – Year 11 or above)

### **Transparency**

A few respondents expressed the view that transparency around how calculated grades are awarded this summer would help to mitigate negative impacts for students.

“Requiring centres to be transparent about the evidence they have used to calculate grades and ranking would help ensure sufficient accountability on the quality of the evidence used. Additionally, there should be transparency about the algorithm used for standardisation of results to help ensure small schools with fluctuating cohorts are not disadvantaged.” (Other representative or interest group)

“Transparency regarding how bias in relation to pupils with SEND will be mitigated will be well received across the sector.” (Other representative or interest group)

“BAME – feedback from some local communities has noted that they are concerned that grade calculation will have a negative impact on their results. Transparent standardisation processes are key to avoiding this kind of negative impact.” (Subject representative or interest group)

### **Costs**

A few respondents suggested that the potential negative financial impact on students could be mitigated through funding or the waiving of fees.

“... the more socio-economically deprived will be even more disadvantaged if we further delay the exams - this is because their wealthier peers will be able to afford private tuition and resources, which schools normally provide to socio-economically deprived students. If schools divert their resources reserved for the Y11 and Y13 students for the next academic year towards those who should have already graduated, we will not be able to do justice to either groups of students. Additional funding and support must therefore be provided for less-able students to prepare for whatever exams they have to resit due to these exceptional arrangements. This can be done through additional funding to schools, or through (but not exclusively through) the Pupil Premium.” (Teacher – responding in a personal capacity)

“Students should be allowed to study for a further period without financial penalty if they are over 19 as a result of not being awarded grades.” (Teacher – responding in a personal capacity)

“No additional fees for private candidates who are unable to obtain results through other assessment means.” (Student - private, home educated candidate of any age)

“Offer free resits to pupil premium or FSM students.” (Other - MAT leader)

### **Recommendations for Ofqual**

There were a number of suggestions that Ofqual should include representatives for particular student groups in its External Advisory Group on Exam Grading.

“A selection of BME governors, who can provide expertise in bias, must also be included on Ofqual’s External Advisory Group.” (Other representative or interest group)

“[Ensure] that Ofqual’s External Advisory Group on Exam Grading includes an expert representative with in-depth knowledge of the supplementary school sector.” (Subject representative or interest group)

“How will Ofqual/DfE engage with young people and seek their views as these exceptional arrangements are implemented? Will Ofqual/DfE consider developing a virtual youth advisory group to help track any issues emerging from the overall approach and to inform any communication and mitigation activities?” (Other representative or interest group)

There was also a suggestion that Ofqual could complete a child rights impact assessment, to complement our Equality Impact Assessment.

“We encourage Ofqual to consider complementing the Equality Impact Assessment with a child rights impact assessment (CRIA). Given that several rights are impacted by the cancellation of exams and exceptional arrangements (including but not limited to Article 2, non-discrimination; Article 3, best interests of the child; Article 12, the right to be heard; Article 28, the right to education; and Article 29, the purpose of education), it would be beneficial to assess this impact and determine how it can be mitigated from a child rights perspective.” (Other representative or interest group)

## Regulatory Impact Assessment

**Q39: Are there additional activities associated with the delivery of the revised approach that we have not identified above? What are they?**

Nine hundred and fourteen respondents answered this question.

### **Centre assessment grades and ranking**

A number of respondents raised questions about the evidence centres should gather and retain in order to support their judgements on centre assessment grades and rank orders, with some expressing a view that evidence must be retained. Many said that guidance on this is needed.

“Guidance needs to be given to schools as to what evidence they need to gather and keep hold of to justify their centre assessment grades. We may not have any physical evidence anymore as mock papers are returned to students.”(Teacher – responding in a personal capacity)

“Would it be possible to provide centres with more specific guidelines as to what evidence they can use to inform the assessed grades and rank ordering? For example, could the assessments be purely based on mock examination data rather than also including performance in homework or other assessments? This way even though the variability in the standard of teachers marking cannot be controlled, at least the variance associated with how the assessments were administered has a higher degree of control.” (Teacher – responding in a personal capacity)

“Will we be asked to submit data/evidence on which grades are based to exam boards? If so, is there a minimum expectation of rigour to be followed in regards to the data? Can you suggest good documentation of the processes followed for allocating grades?” (School or college)

“Instructions on how schools store the grades they have uploaded, so that they are able to keep their own records in case of appeals or errors. For example, should all projected grades and rankings be kept by the examinations officer, in the locked safe where we would normally keep papers? Should schools destroy any papers copies of grades and rankings, so that the risk of a breach is minimised?” (Other - Headteacher)

“Schools should be expected to have evidence in place to support the award and positioning of the rank order.” (Teacher – responding in a personal capacity)

Some respondents commented on the practical challenges of accessing student work to inform centre assessment grades and ranking.

“It is very difficult for teachers to access hard evidence to support grade predictions. Many students have their books at home, some even have their mock assessments. Some schools have trackers and data entry systems, however, this often only tells a small part of the story and mock examinations may have only been completed for certain components of the examination in year 10, or indeed, not at all.” (Teacher – responding in a personal capacity)

“Asking teachers to make judgements and rank pupils often without access to evidence and with the issues that some students have taken their work home, raises a whole host of issues.” (Subject representative or interest group)

“Collecting in all evidence that students may have taken home over the course of the two years. This is time consuming and costly.” (Other - Head of school)

“The impact of non availability of candidate work, especially in Art and design/Fine Art, and other practical work.” (Other - Administrator)

Some respondents commented on teacher experience and capability, and on training that might be required to support teachers in making judgements on centre assessment grades and ranking orders. One suggested a helpline should be available for the reporting of improper conduct.

“I think teachers who are able to issue grades should be reviewed in their capability to do this fairly by people who are not head of centres.” (Student – Year 11 or above)

“We are also concerned that teachers involved in the issuing of the centre assessment grading should feel properly prepared and supported in making their grading decisions.” (University or higher education institution)

“The dismantling of NEAs and moderation processes in most schools with GCSE and AL reforms has taken away processes and training for moderation. I’m an English teacher of 20+ years so I have the knowledge and skills to do this from my past: some staff and subjects do not have this.” (Other - Senior leader and teacher)

“On line training on how standardising is conducted e.g. how to make judgements on validity of evidence. There needs to be a confidential help line for whistle blowers ie teaching staff who feel that there has been improper conduct in the application of professional judgements.” (Teacher – responding in a personal capacity)

“We recommend that teachers undertake training as to how to predict grades on computer simulated student case studies, which can provide instant feedback as to the margins of error. [Exam board] exam marking systems for example provide this for new markers to ensure that their marking falls within the acceptable quality.” (Other representative or interest group)

A few respondents commented on ensuring that personal interests in relation to teachers involved in the centre assessment grade process are appropriately managed in the centre process.

“How will you ensure objectivity from teaching staff- can we simply rely on the integrity of teachers to not be biased towards certain pupils i.e. where there is a personal connection.” (Student – private, home-schooled candidate of any age)

“The risk of having parents who are teachers in the same school as their children knowing or being slightly involved in the grading process.” (Teacher – responding in a personal capacity)

A number of respondents raised questions or made proposals about additional activities that would – or could – be undertaken to moderate or standardise centre assessment grades, before the application of the statistical standardisation model. Proposals included moderation visits, sampling and collaboration across schools to standardise centre assessment grades. Some proposed the submission of additional information or evidence to exam boards, including evidence of student work in certain subjects.

“Please clarify whether schools are expected to do the standardisation of grades through their own statistical modelling before submitting the grades or not. This is so important. Everyone assumes we should, BUT if we do WE will adjust the grades - and the HOW can we sign the centre declaration with integrity? If you are doing the standardisation then fine - we should not do it first. BUT schools need to know that they will not be penalised for NOT doing the standardisation. People are scared to submit results that will be changed, but I don't feel that way. I'd rather you changed them than me - that way the final grade is definitely a step removed from the school and the centre - which protects staff. Please protect teachers.” (Other - Headteacher)

“I would welcome using the Awarding Bodies' administrative systems (e.g. all the examiners / moderators for the Boards) to facilitate a sampling / moderation process, quality-checking the work / assessments against which the students' internal grades have been produced in each centre.” (Teacher – responding in a personal capacity)

“It is critical to reduce the dependency on individual teacher data sets, as these numbers are prone to serious error. Based on our work with [organisation], we believe that it should be possible to conduct automated sampling of student work and to use this data to provide decision-support to educators, as well as to identify bias and malpractice, to support Ofqual's statistical model.” (Other representative and interest group)

“Work Sampling to support the proposed statistical model: Schools could submit a small, manageable sample of student evidence that was used to determine grades. A combination of AI & humans would analyse the grading to detect & track anomalous grades. This could be flagged to human

moderators for review.

Grading support tools: Deploying AI (as a cloud-based platform) to support educators with their initial grading decisions. This would allow educators to access impartial feedback about the quality of student work, according to national averages, before submitting their data. [...]

Capture educator views: In the absence of evidence capturing, it could be critical to capture at least a written statement from educators with a justification of their decision. The simple act of writing down an accountable review of a decision could go a long way in eliminating many forms of cognitive bias. It would also be possible to use this data to capture, extrapolate and evaluate the influences that led to certain decisions and then factor this intelligence back into the statistical model. For example, tracking the influence of behaviour, participation, attendance, engagement, improvement, progression, student background, etc.” (Other representative or interest group)

“I think that there should be a request for schools to provide details of the process followed in order to achieve grades, as this will help to clarify whether external moderation/standardisation is necessary or helpful.” (School or college)

Some respondents commented specifically on the potential for evidence to be submitted, or dialogue between exam boards and centres in certain circumstances, in particular where centre results are not consistent with results in previous years.

“Ofqual should consider whether there is a case for examining further evidence from centres where there are significant changes in the results achieved. [...] It is not unreasonable in principle for Awarding Bodies to be asked to assess the quality of evidence centres have for the grades awarded in cases where the distribution of proposed grades appears unusual. Ofqual could specify what is to count as stronger or weaker evidence and what strength of evidence would be required in order to substantiate outlying judgements.” (School or college)

“There is no mention of any dialogue between schools and exam boards on the marks, rank order, evidence or historical data. I would assume that this means that NO dialogue would take place. However, I think that this needs to be explicitly mentioned in the guidance. Or if there might be dialogue in exceptional circumstances this should be mentioned. Also if the exam boards have discretion to request evidence etc. this should be stated.” (Other - Exams officer / manager and teacher)

### **Involvement of exams staff and examiners**

A few respondents commented on the potential for involvement of examiners in the centre assessment grade process.

“Please think about all those who were ready to be "markers" this summer and find ways to use their expertise if needed to support the system.” (Parent or carer)

“I am an examiner for [exam board]. Could examiners be involved in grading in any way?” (Teacher – responding in a personal capacity)

“Where possible all coursework that has been submitted should be marked by examiners with experience and the results form part of the calculated grade.”  
(Teacher – responding in a personal capacity)

A few respondents suggested how exams staff might be involved in the process.

“Many exam officers and secretaries have been furloughed and some exam centres may be compromised by this. All normal exam officers and secretaries who would normally secure exams should be allowed to return to work, if possible, to avoid others being involved in the process who may not be as unbiased as EOs/Exam secretaries.” (Teacher – responding in a personal capacity)

### **Submission of data to the exam boards**

Respondents commented that centres would need to set up secure systems for data collection. A number of respondents also commented on the process by which centres will submit data to the exam boards, indicating that the process should be clear and consistent, and sufficient time given. Respondents were also keen for information on the process to be communicated as soon as possible.

“Clarification of any tools that will be supplied to schools to enter these grades. Important that it is exam board led (so exam boards send through a clear list of all entries for the subject along with a standardised approach that they want the grades / ranking to be supplied in. Important that all exam boards follow similar (identical?) collation of results.” (Other - Deputy headteacher)

“I hope the timescales for collating and submitting the data are adequate for data collection to be undertaken objectively so as not to compromise the data or outcomes. Having a background as an analyst and researcher I appreciate time is needed to model this data but Heads of Centre, Teachers, Exams officers, Students and parents need to be assured that the underlying data is fit for purpose. To delay results by a week or so to ensure this may be a prudent option in this situation. The exam boards, where possible, use current platforms and systems to collect the data in a consistent manner. Provide pre-populated spreadsheets or data input systems to make the data entry as simple as possible with built in validation for silly obvious errors (tiered grades, combined science grades). Make guidance as accessible as possible through bullet points, grids, checklists to assist and help provide a consistent approach.” (Other - Exams officer / manager)

### **Results and appeals**

A few respondents noted that results may need to be issued remotely if schools remain closed when results are released.

A few respondents indicated that centres should be permitted to submit evidence in support of appeals. A few commented on alignment with UCAS deadlines.

“Appeals process for all students and what they can provide as evidence to get the grades they deserve.” (Student – Year 11 or above)

“When thinking about the appeal process it would be helpful to be mindful of the UCAS advisory deadline, which many Universities use -i.e you will need to

have provided evidence that you have met the academic conditions of offer by 31 August 2020.” (University or higher education institution)

“Evidence-based appeals system: Allowing students to submit verified work as part of an appeals process, which humans/AI could assess to verify the student's claim. If the grade matches, the appeal does not go to an examiner and the original grade stands. If not, an examiner will pick up the appeal and review. This allows a fair and transparent appeals system to be put in place that would not overwhelm Ofqual or the Awarding Organisations.” (Other representative or interest group)

### **Exam board activities**

Exam boards commented on the range of activities they expect to undertake in order to award grades this summer. These include system/IT and process development to support both the collation of data from centres and the process of statistical standardisation; quality assurance and analysis of centre data; familiarisation with new data exchange requirements; development of new processes for the issuing of results and considering appeals; training and communications internally to staff and externally to centres; increased engagement with the Joint Council for Qualifications (JCQ); communication of arrangements (and potentially payment) to examiners; seeking legal advice; identifying the regulatory arrangements that will not apply this summer; cancellation of arrangements such as standardisation and awarding meetings; secure storage of printed assessment materials.

One exam board also referenced the additional activities that would be required in order to deliver an autumn series of exams, including system and process development.

### **Q40. What additional costs do you expect you will incur through implementing this approach?**

One thousand, five hundred and twenty-seven respondents answered this question.

### **Q41. What costs will you save?**

One thousand, three hundred and seventy-seven respondents answered this question.

In response to these questions, many respondents expressed strong views that the priority should be fair outcomes for students rather than considerations of any costs or savings.

Many respondents noted that at this stage it is not possible to confirm details of costs or savings, until there is clarity on fees for awarding grades this summer, on arrangements for withdrawals and refunds, on fees for appeals and fees for the autumn exams.

“We are awaiting information from the exam boards with regard to exam costs for 2020; it is not possible to give any indications of possible savings with regard to exams without this information.” (School or college)

## **Impacts on centres**

### **Fees**

In the context of the position on fees not yet being clear, respondents commented on the potential losses to centres arising from fees in light of the revised awarding arrangements. Some commented specifically about refunds of fees to year 10 students if this group is not awarded a grade, and also to private candidates.

“We have not felt able to charge our parents for the summer 2020 exam fees. The school will therefore lose approx £70k in the summer term 2020 from loss of exam fees alone.” (Other - Head of Centre)

“We will need to refund private candidates who have paid for exams we cannot issue results for (they may not all want to even re-enter in the Autumn) and obviously, where we have paid for the year 10 entries etc for exams that can't be certificated, this is going to be a lot of wasted money - particularly where hundreds of students have been entered.” (Other - Exams officer / manager)

### **Staff resource**

Responses indicated that, in the main, the revised arrangements mean a reprioritisation of staff resource to the centre assessment grade and ranking process, in place of the work that would have been carried out were schools open and exams delivered as normal. Respondents also told us where they expected to incur additional costs in delivering the arrangements. This is set out in detail in the sections below.

Many respondents commented on the work involved in the process of making judgements on centre assessment grades and rank ordering students within grades, and the training required to deliver this. Respondents emphasised the additional burden of conducting this work virtually rather than in person, with some staff unable to work due to illness or family responsibilities related to coronavirus (COVID-19), and in addition to remote teaching of other year groups.

“Additional staff time required for judgements to be made on a centre assessed grade and rank order for each student in each subject when these staff are already both caring for those students still attending school and supporting the continued learning of significant numbers of students at home.

Additional working time for the Head of Centre to review the evidence and decisions made by centre staff.

Additional staff time required to collate and submit the centre assessed grades and rank order required for each awarding organisation in each subject for every student.

If a school has reduced staff capacity due to staff self-isolating, then there may be an increased need for agency staff to support with the continued running of the open school and online learning for schools to allow the appropriate teaching staff to work on centre assessed grades.” (Teacher representative group or union)

“Because our centre is large, with a very broad range of qualification types, the process of deciding CAGs and rank orders has been very time-

consuming and will continue to take up significant management resource for some time to come. It is almost impossible to quantify this as a cost, but it is more the cost of what our management team are now not able to do, that they otherwise would have been doing at this time.” (School or college)

“Additional staff time through the assessment process to complete this work – from SLT and individual teachers. Further training, moderation process.” (Local Authority)

“Admin time in preparing rank orders, collating evidence. Granted we do not have to deal with normal running of an exam season, but this is unprecedented and therefore requires more thought and consideration.” (School or college)

“Very tough on teachers having to provide grades and ranking when they are also doing online teaching whilst looking after their own children and home-schooling them.” (Other - Exams officer / manager)

“Time spent by colleagues throughout the school in calculating grades and meeting with each other to moderate and decide on rank orders etc. Time spent by senior colleagues in monitoring and verifying grades and ensuring these are allocated fairly and without prejudice.” (Teacher – responding in a personal capacity)

“To ensure that the CAG/ranking of students is robust and that students are not unfairly disadvantaged whilst ensuring that the grades and rankings are accurate, a lot of time has already gone into ensuring staff are fully aware of the process, moderation and ranking. Further moderation is then required in line with national distribution. This is ongoing whilst teaching staff and middle/senior leaders are regularly setting work, teaching online lessons and continually working on improving the curriculum for all students. In terms of financial cost, there are some low level costs in ensuring that leaders are provided with the required inset on the process so that this can be cascaded to other members of staff.” (School or college)

A number of respondents highlighted that ranking would be the most burdensome and time-consuming aspect of the process.

“It will be very time-consuming to rank students across the cohort and to effectively communicate with the various teachers who have taught that cohort over the internet.” (Teacher – responding in a personal capacity)

A few respondents indicated an approximate cost for the staff time spent on centre assessment grades and ranking.

“Internal moderation time for staff- done remotely: £10,000

Administrative time in collating and preparing the grades and rankings for upload: £2,000

Headteacher time in signing off and verifying projected grades and rankings: £1,200

Time spent on appeals in the autumn: £5,000

Total approximately: £18,500.” (Other - Headteacher)

Some responses indicated this work would be managed within existing staff costs and resources, and not result in additional costs.

“Any extra work will be balanced out with the reduction of work in exam preparation and delivery.” (School or college)

“No significant additional costs as the training and support for staff will largely replace other work that will not happen related to exam data review.” (School or college)

Some responses indicated that the revised arrangements overall would mean a combination of reprioritisation of existing resources and some additional costs.

“Potentially the time cost of additional data collection, checking, validation and entry. Any additional data systems which may be required by the exam board. Staffing contract hours may need to be amended to adjust for shift in workload outside of the school term. Additional costs in the extra communications with students and parents on the updates as well as answering queries and questions.” (Other – Exams officer / manager)

“A considerable amount of teacher/school leader time. Training teachers, teachers going through the process of grading and ranking (which involves complex discussion and moderation often remotely), SLT standardising, scrutinising and quality assuring data. Also a cost fielding numerous concerns from parents and students every time new information was released to the public (at the same time as it was given to schools) making it stressful to prepare a considered approach before being inundated with queries.” (School or college)

Some respondents commented specifically on the burden of the work involved in gathering and reviewing academic evidence of private candidates in order to make a judgement on a centre assessment grade and include them in rank ordering.

“My staff are engaged with collating evidence from hundreds of private candidates. This involves liaising with candidates and their tutors or other educational establishments (eg. online learning agencies), and the logistics of providing and receiving documentary proof. Once all bodies of evidence are complete, centre staff will then have to conduct a review of all articles to ensure that suggested grades are fair and representative. This is a significant, additional and unexpected amount of work for my small staff to now be undertaking.” (School or college)

“As a centre it will be time cost in abundance. We will have to spend a lot of time on gathering and assessing private candidate work (if you don't do it yourselves), as well as running an additional exam series next academic year.” (Other - Exams officer / manager)

Some respondents gave details of expected additional costs they would incur through the revised grading arrangements. This included payment for expertise to support centre judgements, additional pay to administrative and data staff for overtime, payment for any staff who work during term time to work during holidays. Costs also included some IT and postage costs.

“Staffing costs; logistics - postage of evidence, for instance; potential need to recruit subject expert support for validating submitted grades and reviewing evidence.” (School or college)

“If schools are directed to return in the next few weeks, it will be likely that significant numbers of staff will have to be removed from the classroom in order to complete the grading and ranking process fairly; this would incur supply costs.” (School or college)

“Difficulties where staff are unavailable due to illness to be able to 'consult' on grades and ranking. Costs related to the logistics of compiling the results within departments whilst not being able to meet face to face - and moderate work on an individual basis - ie postage - telephone costs.” (Exams officer / manager)

“Overtime of staff compiling data for calculated grades.” (Teacher - responding a personal capacity)

“Staffing costs if term time only staff have to work during holiday time.” (Other - Exams officer / manager)

In addition to the provision of centre assessment grades and rank orders, respondents commented on other activities or elements of the process that would result in additional burden, and in some cases costs to centres. This included dealing with enquiries from students and parents, dealing with formal subject access requests under data protection legislation, providing pastoral support to students and managing appeals. Some respondents said this would result in additional costs.

“More time spent communicating with parents (as an independent school, this is considerable) and we anticipate this will very much continue once results are released. Again, we would expect to have a great deal of communication at this time, considering reviews of marking etc.” (School or college)

“Potentially significant additional costs of dealing with SARs.” (Academy chain)

“Increased administration costs through appeals direct to centre.” (School or college)

“We are prepared for having to field many questions and potential appeals. This will mean that my Assistant Head will be needed to manage this in the autumn term. I will probably need extra capacity on the leadership team to facilitate this. An Assistant Head teacher costs roughly £30,000 per term.” (School or college)

“Posting out all results if required.” (Teacher - responding in a personal capacity)

“Dependent upon appeals time constraints, may require additional staff in schools over the summer period following results days. Extra administration and teaching staff resource for the appeals and care/wellbeing of students.” (Other - School governor)

A few respondents highlighted specific financial impacts on independent schools.

“As an independent school, our most likely cost is parents not wanting to pay fees for grades that they think are below their own expectations, and this process will (in their eyes) place the responsibility for that on the schools.” (School or college)

“I work at an independent school and some parents are wondering whether to pay for this term. It could bankrupt a number of schools in this position.” (Other - Teacher and Exams officer / manager)

“There are costs for independent schools in terms of lost fee income especially if work done after 20 March cannot count.” (Teacher – responding in a personal capacity)

One respondent highlighted costs specifically at local authority level to support the revised arrangements.

“At a LA level we are likely to incur costs in terms of the re-allocation of resources, time and staff to:

- familiarise school/parent facing staff with the new framework
- to amend business intelligence systems to reflect the changes and
- to support centres/parents with appeals where appropriate.” (Local Authority)

Some respondents commented on the likely additional burden, disruption to timetabling and in some cases additional costs to centres if students in year 10 and below are NOT awarded grades but instead continue these qualifications into the next academic year.

“Significant cost if year 10 are not included in the predictions, we would have 40 staff, circa £2m cost, in the wrong subjects if we have to suddenly change their timetables to repeat a year” (Academy chain)

“We would incur significant costs if Year 10 were unable to be accredited in 2020 as we would need to completely redesign our curriculum model and we would not have the correct numbers of subject specific teachers. We would have to redeploy some teachers to teach outside of their specialism; this would have a detrimental impact on student performance and staff wellbeing.” (Teacher – responding in a personal capacity)

A number of respondents commented that invigilators contracted for summer exams would be paid despite exams being cancelled, meaning that payment of invigilators for autumn exams will be a new, additional cost. It was also highlighted that Disclosure and Barring Service (DBS) clearance and training would need to be renewed for invigilators.

“Our local authority has recommended that we pay our invigilators for the work they would have done this summer, therefore the anticipated costs will not be offset by a saving in invigilation.” (School or college)

“Most schools are having to pay at least some wages to invigilators for the work they would have completed this Summer. We will need invigilators again to supervise the extended Autumn series when we would not usually need them to work. We may also have to pay to update the DBS clearance for those who haven't worked for three months due to not being in over the Summer.” (Other - Exams officer / manager)

A few respondents noted that financial impacts are in the context of loss of revenue to centres, for example for lettings.

“Schools will still have to pay for exam entries and as good employers, for invigilators. This is at a time when school revenue is down significantly due to, for example, lettings.” (Other - Headteacher)

A few respondents commented on the potential for legal costs.

“We fear legal costs relating to parents who wish to challenge the school's awarded grade and their child's rank position.” (School or college)

Some respondents commented on non-monetary impacts, including impacts on staff wellbeing, and on centre reputation.

“I am convinced there will be real costs in looking after the wellbeing and mental health of staff. The solution proposed does put immense pressure on staff as they want to ensure that the results are fair and proper given the work students have put in.” (School or college)

“Time in the summer and increased pressure on staff. I expect that there will also be some damage done in the relationship between schools and their pupil/parent body. They could be seen as judge and executioner.” (Teacher – responding in a personal capacity)

“Dealing with potential reputational damage from unhappy students and parents will have a cost implication.” (School or college)

Many respondents commented on potential costs and burdens to centres associated with the delivery of an autumn exam series. We have noted the full range of comments and will take these into account in our considerations on the autumn series, though we do not summarise them in detail here as they fall outside the scope of this consultation. We will shortly be consulting separately on the details for the autumn series.

### **Centres - savings**

As for costs, any estimated savings were in the context of the position on fees for summer awarding, refunds and withdrawals, fees for appeals and arrangements for fees and delivery of autumn exams yet to be clarified. Respondents highlighted that fees would have a significant impact overall on costs and savings.

Respondents noted that centres will make a saving if they do not pay invigilators. Some noted though they had already invested in recruitment, training and DBS clearance. Respondents commented on other savings to centres as a result of exams not going ahead, including savings on postage, revision sessions, provision of access arrangements, furniture hire, and exam breakfasts.

“Invigilation costs for invigilating exams. However, we have still had to pay for DBS fees and reimburse renewal of portable DBS fees.” (Other - Exams officer / manager)

“Obviously we will save on invigilation costs during this summer. If the exam boards reduce the cost of the actual qualification, there will be savings there. We have not run our extensive Easter revision school and will not run the Whitsun one either. The teachers who run those sessions will not be paid for that time. There are other minor costs too like past papers for students which we produce each year.” (Other – Headteacher)

“Opening up exam halls, paying caretakers, postage, additional revision lessons over Easter etc. Centres would not need to do any additional admin beyond providing grades.” (Other - Adviser and former HMI)

“We shall save postage costs of around £800.00. Invigilation costs will not be needed. A small amount of overtime costs will not be incurred due to clashes etc.” (School or college)

“Access arrangement readers/scribe costs.” (School or college)

Some respondents commented they did not expect any net savings to centres, and also that any additional costs incurred by awarding organisations should not be passed on to centres.

“There will likely be no savings made by schools or colleges in implementing the approach proposed by Ofqual. It is likely that the awarding organisations will accrue savings in light of the cancellation of exams and assessments and centres have an expectation that there will be significant rebates on exam fees for summer 2020. These savings must be passed on to centres in the most appropriate way. [We] believe that there should be an industry wide approach to this, supported by Ofqual, with clear messaging to centres.” (Teacher representative group or union)

“[We] are aware that awarding organisations will also face additional costs to meet the demands of the exceptional arrangements for awarding this summer. Those additional costs must not be passed onto centres either in fees for future years, or in reductions in the rebate to centres this year. Extraordinary costs, related only to implementing the processes and systems for 2020, must be funded from government. These unprecedented costs should include those where awarding organisations believe they have an ethical duty to ensure their senior examiners are not denied crucial income streams due to the cancellation of exams.” (Teacher representative group or union)

### **Impacts on students**

Some respondents commented that timetabling issues may mean that if students in years 10 and below are not awarded grades this summer, they may not be able to continue the GCSE they were due to take in summer 2020 into the next academic year. Some also explained that if such students do not receive awards, it may impact on their progression, not just in autumn 2020, but also in 2021 and beyond as they will not have the full suite of qualifications they had planned and expected to receive.

“Year 10 should be treated the same as year 11 because due to way some school processes are run they could lose out on GCSE’s and be disadvantaged against their peers and therefore negatively impact their future educational and employment opportunities” (Parent or carer)

Some respondents also commented on the financial costs to students of continuing studies into year 11.

“Many of our parents will be unable to finance additional revision lessons if their students who are Year 10 or under are unable to get awarded a grade

this Summer. It's important for this demographic to obtain a result and move on with their studies.” (School or college)

“If my child in Year 10 is unable to sit Panjabi GCSE she will have to continue to attend Sunday School which is both a cost in time and financial.” (Parent or carer)

Some respondents commented on charges made to private candidates by centres for making judgements on centre assessment grades, and on charges for changing entries to centres that will review evidence of private candidates.

“Centres are exploiting private candidates. I can't get grades at all as I have no tutor but others with tutors are being charged upwards of 400 pounds. My centre that has withdrawn me hasn't even refunded me.” (Student – private, home educated candidate of any age)

“Private candidate students are changing entries to centres that will allow submission of evidence - we have been quoted £550 to do this.” (Parent or carer)

“I appreciate that exam centres or Boards will be within their rights to request payment for their time in considering evidence or online invigilating/ marking work from private candidates and that this may require additional scrutiny from the Board. Within reason, this is something my family would consider, especially if it doesn't amount to much more than we would spend travelling to the exam centre.” (Other - Home educating parent of a student - Year 10 or below)

“We understand that exam centres may levy additional charges on home educated students. This will be an issue for many home educating families who almost always have reduced their income from work in order to spend time supporting their child's education and it would be really helpful if such additional charges for external candidates are banned or refunded in some way”. (Other - Home educator and parent)

“Exam centres may try to charge external candidates for the extra admin time. This should be funded through the DfE, rather than a fee to candidates.” (Other - Home educator and parent)

Respondents commented on a range of potential financial impacts on private candidates who do not receive a grade, particularly in relation to loss of fees and ongoing costs of tuition and learning resources.

“My exam centre has said that they will not offer refunds to any external (private) candidates who withdraw after the 20th April. This is before the consultation is completed, so parents are having to decide whether to keep their child registered in the hope that they will receive a grade or take their child out and not lose their money (approximately £100 per subject).” (Parent or carer)

“If private student grades are not awarded this summer, then in our instance we will have to pay for further education as he is already turning 18 in July.” (Other - Parent of home educated student)

“As a home educator I have spent hundreds of pounds on curriculum and resources for my daughter. I have paid external markers to mark her work

and exam papers and give her feedback. I have paid admin fees to the exam centre and I have paid for the exams. It seems that she will have nothing official to show for this. As the exam centre do not 'know' her, she will be disregarded by this process and not rewarded for her hard work.” (Parent or carer)

“I’ve already spent £540 to pay for my summer A level retakes. On top of that I’ve been paying from September to March overall £2000 towards tuition altogether. If I need to start revising for the autumn exams I would start that up again- probably an extra £1500 depending on how many lessons I need. But if the autumn exams also don’t take place and I need to sit the exams in summer 2021- even more money.” (Student – private, home educated candidate of any age)

“Continued tutoring until the Autumn if you continue to ignore external candidates. This would be about £2000.” (Parent or carer)

Respondents also commented on the financial impacts in relation to the progression and future career of private candidates who do not receive a grade.

“No result means 1 additional year of no salary for my daughter which will follow her through her career amounting to 1 year of her final salary which for a GP at current value will be around £70,000” (Parent or carer)

“In the case of my son, he stands to lose a fully sponsored university place that he had been offered, because one of his A levels was as a private candidate and for another, his past grades were too low and so he had been working huge hours ready for summer to pull it up to the required level”. (Parent or carer)

“Private students applying for medical and dental Schools have UKCAT exam that will be expired in a year. Putting exams in autumn means private student need to take this exam for the third time and they will lose their offers. Lots of efforts, money paid by private students to improve their future will be jeopardised” (Parent or carer)

A number of respondents commented on the wellbeing of all students as a non-monetary cost.

“The significant human cost of my son managing the increased uncertainty, anxiety and stress created by all these exam unknowns for the next 4 months. This is a huge health cost to somebody who is already struggling with mental health challenges and is actively being treated for anxiety and depression.” (Parent or carer)

“Personal costs in terms of mental well-being both of students and families.” (Other - Exams officer / manager)

“We would ask that Ofqual also highlight more widely the potential mental health impact of this approach both for students and teachers. Students who may under-achieve as a result and will need to be given more pastoral support and/or practical support to enable them to sit the Autumn exam series. This will impact on the teachers who may need to be more actively available over the Summer and in some cases, provide distance teaching to prepare students.” (Other representative or interest group)

A few students commented that they would make small savings on travel costs by not having to travel to an exam centre.

Many respondents commented on potential costs to students associated with taking exams in the autumn, including costs of additional resources, payments for tutors, independent school fees and travel costs. We have noted the full range of comments and will take these into account in our considerations on the autumn series, though we do not summarise them in detail here as they fall outside the scope of this consultation. We will shortly be consulting separately on the details for the autumn series.

### **Impacts on private training providers**

Respondents commented on impacts on private training providers of the arrangements for awarding grades to private candidates.

“Our business is being asked to predict grades for private candidates at exam centres. This is being done for all private candidates by a range of tutors as well. Some are charging, some are not. These costs are not being evenly distributed and will directly impact on their (and our) reputations which will have long term economic consequences.” (Private training provider)

“I would project that, should private candidates continue to be prejudiced against as they currently are, my private income will be reduced by 25%. Private candidates will no longer feel they have the option to study independently; they will be forced to work with tuition from a centre.” (Private training provider)

### **Impact on examiners**

A number of respondents commented on the loss of income to examiners this year. A few commented that some form of payment should be made, and the risk to availability of markers in 2021 if this does not happen.

“Impact on Examiners and Reviewers - this was income a number of us were depending on. Without an Autumn series, this puts some of us at a significant income deficit.” (Teacher – responding in a personal capacity)

“As a senior examiner I will lose a substantial amount of income since exam boards are not supporting senior examiners during this crisis. Examiners are neither self-employed nor can be furloughed, so we are told. The cancellation of a summer series will mean the loss of irrecoverable income.” (Other - Senior examiner)

“Many teachers are exam markers and rely heavily on this income. Therefore, they should receive some sort of payment for retention purposes. My concern is that by refusing to pay anything may lead to a shortage of examiners next year.” (School or college)

“Payment to examiners who have signed contracts but will not mark, so that we have examiners next year.” (School or college)

## **Impacts on exam boards**

Five exam boards<sup>12</sup> provided responses on costs and savings. Four commented that they expected to incur additional costs as a result of the additional activities set out in response to question 39, but did not provide details of these costs. One exam board commented that it was currently calculating this. The responses indicated that existing staff resource is being reprioritised meaning some activities will not lead to additional costs. Responses highlighted in particular the potential for additional costs associated with system/IT development, as well as costs of providing support to centres in the process of making judgements and submitting data on centre assessment grades and rank orders, and additional customer service support.

“The circumstances we are currently in are unusual and we have had to significantly reprioritise and divert efforts to those activities needed to deliver student grades this summer. Our primary focus during this time must be on supporting teachers and students and securing absolute public confidence in the processes we are putting in place. Our plans are subject to constant revision on an almost daily basis and as we progress, we continue to identify more that needs to be done. The costs attached to these activities are not easy to identify although we continue to monitor them. There will be costs associated with the build of a new IT platform to capture the data from centres on centre assessment grades and their student rank, collate, analyse and issue results. The requirements gathering and solution design activities are underway but the costs are not yet known.” (Awarding body or exam board)

Exam boards commented on potential costs related to appeals, and also on the potential costs associated with the delivery of an autumn series, noting that this series could be costly, and that the extent to which these costs are recouped will be dependent on the number of entries.

Exam boards commented on expected savings of the revised awarding arrangements. This includes savings related to the despatch of exam papers, marking, and costs associated with reviews of marking, moderation and appeals. One exam board noted that it had already incurred significant costs for setting and printing exam papers.

“There will be cost savings based on the proposed arrangements for the summer series, the majority of which relate to the marking and moderation processes and payments to assessors involved in these activities. [We] are currently considering payments to protect some income of examiners to ensure the exam system can continue to function effectively in the future. It is not certain at this stage whether the savings made will negate the costs of this exceptional year.” (Awarding body or exam board)

“[We] are currently calculating this. In the meantime, [we] have stated publicly that [we] would never want to gain financially from this summer’s

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<sup>12</sup> There are four awarding organisations, normally referred to as exam boards, that award GCSEs, AS and A levels in England: AQA, OCR, Pearson and WJEC Eduqas. These exam boards also offer the Extended Project Qualification. The Extended Project Qualification is also awarded by the awarding organisations ASDAN and City and Guilds. The Advanced Extended Award is offered by AQA. For simplicity, we refer to all 6 bodies throughout this document as exam boards.

extraordinary circumstances, and if the agreed arrangements for this summer's grading lead to any savings for the organisation, [we] will look to pass these back to centres." (Awarding body or exam board)

#### **Q42. We would welcome your views on any suggestions for alternative approaches that could reduce burden.**

One thousand, one hundred and thirty-seven respondents answered this question.

Respondents made many comments proposing how burden and costs might be reduced, along with general suggestions for improving the grading process.

##### **Fees**

Respondents expressed a range of views about action that might be taken on fees. A number of respondents expressed a view that it will be less costly for the exam boards to award grades this summer than usual. Many considered it important that exam boards are transparent about the costs and savings of 2020 awarding arrangements, and that any savings are returned to centres.

"We hope that Ofqual will apply suitable pressure on exam boards to refund a realistic amount of the examination fees already remitted -either as a refund or as remission on fees in the 20-21 year." (Academy chain)

"We would anticipate that exam boards will be spending significantly less money to administer these results and therefore would look to see Ofqual calling for exam boards to refund to centres a proportion of the money already paid towards taking exams." (Other representative or interest group)

"[Our] members have expressed concerns about fees and believe there should be a mechanism to refund or apply credit because, in their view, the series will cost awarding organisations less to run. We believe this is probably the case, but there are already considerable costs to awarding organisations given the need to build new systems, and many costs have already been incurred in constructing the papers for the summer series. [...] [We] believe Ofqual should require the awarding organisations to report on their costs and determine appropriate refund rates across the sector. We accept that this will not be clear for some time." (Teacher representative group or union)

"Hopefully the awarding organisations will pass on any cost savings directly to centres. The awarding board withdrawal deadlines should also be extended to the grade submission deadline so centres can get refunds if required." (Other – Exams officer / manager)

##### **Arrangements for private candidates**

Respondents made a range of proposals for how grades might be awarded to private candidates who do not have a relationship with an exam centre, in order to avoid potential negative financial and personal impacts to this group. These were similar to the comments made in relation to question 9, and included submission of evidence by private tutors, submission of samples of work or

portfolios, the use of examiners or other subject professionals in making judgements on grades and awarding predicted grades or a minimum pass grade.

### **Centre assessment grades and ranking**

Many respondents made proposals for reducing burden in the process of centre assessment grades and ranking. A few respondents suggested that the process could be 'front loaded', with data being provided to centres by the exam boards before they make judgements on centre assessment grades.

"There might be some room for a front-loaded approach to the moderation process in order to reduce the level of anxiety on schools. What I mean by this is to present the 'cold' results to centres based on KS2 predictions and results trajectory, and then ask the centre for their view on that and how they think the true picture differs. It may even be possible to publish the model so that the centre can run various scenarios. This then gives the school some time to prepare a response for students and parents. By doing it the other way around - i.e. teachers submit their grades and then DfE come back with the 'true' picture, you create a level of mystery around the process that could erode trust." (Other - Teacher and senior assessment professional)

Under question 39 respondents commented that additional guidance is needed. A number of respondents commented further here, in response to our question seeking views on how burden could be reduced. They proposed that clarity is needed on how to approach centre assessment grades and ranking, and the evidence that should be considered. Respondents expressed a view that guidance should be directive and not ambiguous, and also suggested that early clarity on the process to be followed will avoid centres conducting unnecessary work. Some responded that guidance should set out an explicit position on consideration of work completed after 20 March.

"I would welcome guidance on how we could (rather than should) decide on the grades. I appreciate that schools vary tremendously, but at the moment I face having to instruct my staff on how to decide on the grades with no formal process in place. At present, I am thinking of instructing my data manager to create a SIMs sheet showing GCSE results, Baseline, target grades and all reported grades, and then asking staff to add their final grade having looked at this. I also intend to pull up the value added reports for each student for the last 3 years, and instruct HoDs to interrogate exam board data for past cohorts to glean clues as to how this cohort might have been graded. I have no idea whether this is a sensible strategy. It will take a lot of work, and I might be better off just telling them to give their best guess. I have no idea as there is no guidance, no matter how rough it might be." (Teacher – responding in a personal capacity)

"Be dictatorial and explicit...most problems occur where there is any degree of ambiguity or ability to manoeuvre within the parameters given! Get it right the first time so that we don't have to come back and revisit things over and over." (Other – Teacher / SENCO / chair of governors / parent)

“Guidance or examples of approaches that schools/centres could take to run this process fairly including their own moderation may also be welcome.” (Subject representative or interest group)

“Early clarity on accepted evidence bases will avoid unnecessary work by centres in preparation for this in the summer.” (School or college)

Some welcomed that there is no requirement in the process to submit evidence to support grades.

“It is right that schools and students should not be asked to provide physical evidence of work.” (Teacher – responding in a personal capacity)

A number of respondents suggested how ranking could be done differently, or a different approach used that may reduce burden and make this process manageable for centres, in particular for ranking large cohorts and in tiered subjects. Suggestions included using ‘fine grading’ instead of ranking, permitting ranking ties and permitting separate ranking of tiers. A few respondents also suggested that for large cohorts, particularly in further education colleges, ranking should be for each class group not the whole centre. Some indicated that removing the ranking requirement would help reduce the burden on centres.

“Teacher assessment to award grades is very straightforward and can be achieved much more efficiently than completing a rank order for which there is no training or experience. This is going to be an immensely time consuming and fraught process; particularly in subjects which have very large entries. There will be such a desire to get it absolutely right because of the implications of a statistical standardisation that fine details will be pored over and with cohorts of over 200 students this is an immense task. It would be much more straightforward for teachers to award grades and this would reduce the burden considerably.” (School or college)

“Removing ranking from cohorts over 150 learners would reduce logistical burden on large institutions.” (School or college)

Some respondents said that submission of additional information to exam boards, alongside centre assessment grades and rank orders, would reduce anxiety and costs and burden once results are released.

“The ability to provide advance information to Exam Boards on the cohort, the rationale behind grading, and information about qualifications which are new to the centre would reduce anxiety and reduce inevitable costs during the post results process.” (School or college)

“I would welcome the opportunity to send a commentary of the process and evidence base used to derive our centre's grades as well as the internal moderation. This would allow us to submit quite detailed statistical support for our decision making which should make it easy for exam boards to understand how we arrived at our grades and, if necessary, challenge specific subject areas. If every centre did this it would make it easier for exam boards to understand the thinking behind the process used at each centre. I personally would find it easier to challenge a centre's results if I knew the method and data they had used and I thought they had been too lenient or harsh (along with using data from the previous three years and looking at trends etc).” (Teacher – responding in a personal capacity)

A number of comments related to the submission of data to the exam boards, emphasising the importance of simplicity, clarity and consistency of process to minimise burden on centres. Respondents also emphasised the importance of the exam boards communicating details of this process, and the deadlines, as soon as possible. It was also suggested that exam boards could, on receipt, confirm to centres that the data submitted is complete and in the right format.

“Initial checks to be performed by exam boards to say 'Yes, all results are in and in the right format' or 'There are 4 missing grades for GCSE English' etc.” (Other - Deputy headteacher)

Some teachers suggested they should receive additional pay to reflect the additional work they are undertaking and the costs they incurred from home working.

“Allow extra funding to all schools to allow for time to perform the assessments. Pay all secondary school teachers an extra £1000 tax free each to compensate.” (Teacher – responding in a personal capacity)

### **Information for students and parents**

Some respondents commented that Ofqual could reduce burden on centres by producing clear written communications and guidance for parents and students, particularly to support the issuing of results and to clarify arrangements for appeals. It was noted that such information would also be useful to further education and higher education.

“On the release of GCSE results a simple letter is written by the DfE and given out to all students outlining how the approach has been taken. This way, schools do not have to draft something themselves and parents will be more likely to accept the results based on something deemed "government official"” (Teacher – responding in a personal capacity)

“A re-emphasis upon the fact that these are robust professional judgments made by educationalists in both schools and exam boards and that in the main the grades should be trusted, that they are based upon evidence in school and not about what could have been.” (School or college)

“Parent/carer and students need to be considered in the communication of these changes to reduce the need for time for centres to translate meaning, which could lead to variation across schools. This is especially applicable to families in positions of socioeconomic disadvantage. [...] If an appeals process were to go ahead for example, the process would need clear communication which would be understood by families needing to use them.” (Teacher – responding in a personal capacity)

“A concise summary document distributed to students along with their award certificates in 2020 would be valuable to students, FE and HE institutions and future employers. While the aims of the exceptional arrangements are to award grades fairly and ensure the current cohort of students can progress appropriately, in a few months or years this detail will be forgotten while an employer or HEI admissions tutor may remember that there were exceptional arrangements in place. Guidance provided to students at the time they receive their results would help them answer any questions they may face.” (Subject representative or interest group)

A few respondents also commented that it would be helpful for centres to have advance notice of decisions before they are published, so that centres can prepare for dealing with parents and students.

Some respondents commented that there should be an exemption for Subject Access Requests in relation to centre assessment grades and ranking in order to minimise the risk of legal challenge and to reduce burden on centres.

### **Results and appeals**

A number of respondents commented on arrangements for issuing results. Many provided views on the timing of results, similar to those made in response to question 8. These comments are not summarised here as a decision on the date on which results are released to students is a matter for government and outside the scope of this consultation.

A few respondents said that it would be helpful for centres to have access to results earlier than usual, in particular if results are to be posted to students.

“Thinking ahead, if we were unable to hold a results collection day we would need to post results to candidates. This year a greater gap between restricted release and issue to students would be greatly appreciated.”  
(Other - Exams officer / manager)

Some respondents expressed a view that exam boards should discuss changes to centre assessment grades with centres before results are issued to students, and that doing so could reduce the volume of appeals. A few respondents, including some representing higher education, commented more generally on how burden in relation to appeals could be minimised.

“If centre submitted suggested grades significantly fall outside the statistical model grades - then take it up with the centre BEFORE results are issued. Get the centre to justify how grades have been generated to decide whether this year's cohort should be adjusted or whether there is an argument that the centre submitted grades should feature more heavily. This should at least reduce the appeal procedure.” (School or college)

“Set up a panels of adjudicators like employment tribunals or parking appeals. Essentially keep it out of the courts and streamline the process.”  
(Parent or carer)

“An appeals process that is transparent and inclusive and effectively executed by the awarding organisations. The limited nature of the appeals process makes it all the more important that Ofqual ensures at the outset that its statistical model does not unfairly impact any group of students, as they may have no recourse after the event. If appeals are not dealt effectively and fairly by the awarding organisations the burden of dealing with students who feel distressed and unfairly treated will fall to the higher education sector to deal with.” (University or higher education institution)

“The appeal process should be as quick and conclusive as possible, and ideally be completed by 31<sup>st</sup> August. This is particularly important for medical and dental students, because of the additional pressures around regulated numbers and early starts to courses. We would like further clarification as to whether the results of the appeals process will have an impact on the overall grades, as the appeal is in relation to the

standardisation as opposed to the individual mark issued by the teacher. This would cause significant disruption to the process and impede the ability of admissions departments to conduct their usual processes. If appeals are not dealt effectively and fairly by the awarding organisations the burden of supporting students who feel distressed and unfairly treated will fall to the higher education sector.” (Other – higher education representative organisation)

### **Support for the proposed approach and suggestions about exams**

Some respondents commented they would like exams to be reinstated, with social distancing arranged. Others were keen that we do not now change the arrangements already communicated. These comments are similar to views already summarised in question 34 and are therefore not repeated here.

Some respondents acknowledged the difficult circumstances of summer 2020 and made comments in support of the proposed arrangements for grading, and could not identify a better approach.

“On the whole as you can see from my responses this has been well thought out and I have every confidence in my staff to predict accurate grades for my students and I do not think that this will be a difficult task. I hope that exam boards will ask for evidence in cases of students achieving higher grades than their target grades would suggest. Schools will certainly be able to provide evidence in these cases.” (School or college)

“We believe that the proposals form the fairest and most consistent approach to assessing the student progress and apply a fair grading given the unprecedented circumstances we all find ourselves in.” (Other - Head of college)

“I think the proposals to enable centres to present a ranking and teacher assessment will represent a significant workload but there isn't really an alternative. It is positive to not make centres present lots of evidence to support these judgements so as long as any appeals process adopts a similar approach this is a reasonable expectation given the circumstance.” (Teacher – responding in a personal capacity)

“I don't think any aspect of this process places much burden on schools. With the caveat re how standardisation model is applied, I think the proposals are as sensible and manageable as possible.” (Teacher – responding in a personal capacity)

“I appreciate the thought that has already gone in to how children can be given their results in a fair and equitable way.” (Parent or carer)

“In all, I think the procedures for awarding and protecting the 2020 outcomes is well-conceived. I appreciate the faith that is being put in teachers and leaders to administer the process ethically and robustly.” (Teacher – responding in a personal capacity)

### **Exam board views**

One exam board commented on the cumulatively burdensome impact of awarding arrangements for 2020. Another exam board commented that the arrangements

are appropriate, and also that it would be helpful if other regulatory activity could be deprioritised.

“It is important to note the cumulatively burdensome regulatory impact of these extraordinary plans for the summer series, an as-yet-unplanned autumn series, and changes that will probably be needed for the 2021 summer series.” (Awarding body or exam board)

“Considering the unprecedented situation, we are all facing we consider the approach being taken is appropriate. We understand that the scope of the autumn series is yet to be determined, but we hope that burden can be reduced for that series, wherever possible. Additionally, we realise that arrangements for the 2021 series also need to be considered, and we would appreciate if burden and manageability can be considered in that context. Finally, we would appreciate if any non-essential regulatory work can be de-prioritised.” (Awarding body or exam board)

### **Awarding grades to students in year 10 and below**

In response to question 40 some respondents highlighted the costs and burdens that some centres and students would likely incur if students in year 10 and below did not receive grades this summer.

A small number of respondents commented that students in years 10 and below should not be awarded grades. Reasons for this varied, with the issue of potential burden being raised by a parent respondent.

“The only factor which I think should be allowed, to reduce the burden is to not award grades for year 10 students who were to take exams early.”  
(Parent or carer)

### **Progression to further and higher education**

Some respondents commented that students should be awarded their predicted grades, particularly those who are relying on A level grades to progress to higher education. In addition to the specific comments reported above in relation to private candidates, some respondents expressed general views that action should be taken to ensure all students can progress.

“Why not simply use UCAS predicted grades for the A Level exams? These predictions were submitted in good faith before the January 15th deadline. If these grades are not good enough, then it does ask the question as to why not? UCAS grades should be carefully calculated and predicted based on work done, previous assessments and the skills and experience of the teachers. Surely these are the most honest way of assessing A Level candidates, as they were submitted before the Covid 19 virus was known about?” (Teacher – responding in a personal capacity)

“Most children would be happy with predicted grades. This would seem fair. Get grades off school award them.” (Parent or carer)

“There needs to be liaison with higher and further education providers as to supporting students who do not have the necessary grades to move on through teacher assessment but are re-sitting the exams in Autumn.”  
(Other - Member of Ofqual’s Access Consultation Forum and modifier)

“Possibly ask Universities to be more lenient when it comes to accepting students into their institution and/or review the offers they have sent out and possibly lower them to reassure these students and help to go online and apply for the loan.” (Student – Year 11 or above)

A few respondents on behalf of a university or higher education institution provided a view on impacts on students hoping to progress to higher education.

“It is important that students need to be clear that in normal circumstances, the vast majority of Universities tend to start their courses in September/early October. Therefore the student cannot overturn a University decision post the start of the course and request that they are admitted. Nor, can a student defer a conditional place on the premise that they will taking their exams in the September series (UCAS have details of this). It is our recommendation that in cases where applicants have a summer calculated grade and an Autumn exam grade, both certificates are supplied and that both outcomes for Summer and September results stand, rather than combined, or only the best grade shown. The University would prefer to treat those taking the Autumn exam series as re-sits in the admissions process.” (University or higher education institution)

### **Use of summer 2020 data and approach to future awarding**

Some respondents shared views on how the arrangements from this year could inform future changes. Some encouraged us to consider whether aspects of the arrangements being used for summer 2020 might be carried forward into new permanent arrangements for awarding qualifications. Other suggestions included formalising and standardising arrangements for mock exams, and reinstating the process by which centres provide predicted grades to the exam boards ahead of the exam series.

“This seemingly unique situation in which we find ourselves should be used, once this initial period is over, for genuine reflection with regard to the whole examination structure and processes. It is potentially a watershed moment in which we can ensure we have a system that actually provides our students with the best possible opportunities for their future. We do not have to continue with a system just because it is the one we already use. Despite potentially inconclusive evidence, we should consider the nature of the exams, the stresses placed on students, the potential use of teacher assessment which we are heavily relying on for the cohort to create the best possible system.” (Teacher – responding in a personal capacity)

“Re-instate forecast/predicted grade submission to exam boards at the time of exam entry. [...]Mock exams - update regulatory requirement that they must be conducted in exam conditions including access arrangements and results submitted to the exam board. Exam boards to timetable when mock exam should take place to standardised approach - first mock from 3rd week in January in yr10, second mock from 2nd week in November of Yr11.” (Other – Exams officer / manager)

Some also expressed views on how the data gathered from centres offered a unique opportunity for analysis.

“A thorough analysis of the aggregated grades submitted by schools would be very useful for statistical analysis to inform evidence based policy. There will never be an opportunity to thoroughly scrutinise such a large amount of data and to analyse the extent of factors such as unconscious bias, regional variations and teacher expectations in relation to race and class.” (Academy chain)

“There is a system and school opportunity to use this teacher data to assess unconscious bias i.e. gender, race, social disadvantage etc.” (Other - Regional Executive Principal)

A number of respondents commented on the impact to students currently in years 10 and 12 who are due to take exams in summer 2021 and who have missed teaching due to school closures. Similar comments were also made in response to questions 12 and 33. We will take these views into account when we consider summer 2021, but do not summarise those comments in detail here as this is outside the scope of this consultation.

# Appendix A – breakdown of the responses for each question by respondent group<sup>13</sup>

**Q1. To what extent do you agree or disagree that we should incorporate the requirement for exam boards to collect information from centres on centre assessment grades and their student rank order, in line with our published information document, into our exceptional regulatory requirements for this year?**

Q1	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	905	65%	390	28%	49	4%	20	1%	29	2%	1,393
Awarding body or exam board	6	50%	3	25%	2	17%	0	0%	1	8%	12
Local Authority	57	77%	16	22%	0	0%	0	0%	1	1%	74
School or college	681	66%	285	28%	34	3%	15	1%	16	2%	1,031
Academy chain	45	60%	27	36%	1	1%	0	0%	2	3%	75
Private training provider	12	46%	8	31%	3	12%	1	4%	2	8%	26
University or higher education institution	5	28%	13	72%	0	0%	0	0%	0	0%	18
Employer	2	33%	2	33%	2	33%	0	0%	0	0%	6
Teacher representative group or union	68	88%	5	6%	1	1%	1	1%	2	3%	77
Subject representative or interest group	10	50%	6	30%	2	10%	1	5%	1	5%	20
Other representative or interest group	19	35%	25	46%	4	7%	2	4%	4	7%	54
<b>Personal</b>	<b>3,743</b>	<b>39%</b>	<b>4,017</b>	<b>42%</b>	<b>1,005</b>	<b>10%</b>	<b>545</b>	<b>6%</b>	<b>321</b>	<b>3%</b>	<b>9,631</b>
Teacher (responding in a personal capacity)	1,651	45%	1,630	44%	203	5%	146	4%	62	2%	3,692
Student - private, home educated candidate of any age	77	18%	162	39%	92	22%	49	12%	40	10%	420
Student - Year 10 or below	142	42%	121	36%	59	18%	7	2%	8	2%	337
Student - Year 11 or above	199	23%	359	41%	109	13%	144	17%	59	7%	870
Parent or carer	1,259	37%	1,379	40%	486	14%	150	4%	134	4%	3,408
Other*	415	46%	366	40%	56	6%	49	5%	18	2%	904

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	75	48%	67	43%	6	4%	5	3%	2	1%	155
Exams officer / manager	185	53%	139	40%	14	4%	8	2%	1	0%	347

No response 1,599

**Q2. To what extent do you agree or disagree that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity?**

Q2	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	1,118	80%	208	15%	29	2%	20	2%	20	1%	1,395
Awarding body or exam board	8	67%	1	8%	1	8%	1	8%	1	8%	12
Local Authority	63	86%	8	11%	1	1%	0	0%	1	1%	73
School or college	856	83%	142	14%	14	1%	10	1%	10	1%	1,032
Academy chain	58	78%	12	16%	2	3%	2	3%	0	0%	74
Private training provider	10	37%	8	30%	2	7%	4	15%	3	11%	27
University or higher education institution	10	56%	8	44%	0	0%	0	0%	0	0%	18
Employer	4	67%	0	0%	2	33%	0	0%	0	0%	6
Teacher representative group or union	68	88%	6	8%	1	1%	0	0%	2	3%	77
Subject representative or interest group	13	59%	8	36%	1	5%	0	0%	0	0%	22
Other representative or interest group	28	52%	15	28%	5	9%	3	6%	3	6%	54
<b>Personal</b>	<b>5,058</b>	<b>53%</b>	<b>2,721</b>	<b>28%</b>	<b>1,013</b>	<b>11%</b>	<b>470</b>	<b>5%</b>	<b>355</b>	<b>4%</b>	<b>9,617</b>
Teacher (responding in a personal capacity)	2,358	64%	961	26%	213	6%	123	3%	42	1%	3,697
Student - private, home educated candidate of any age	77	18%	112	27%	90	21%	67	16%	76	18%	422
Student - Year 10 or below	109	34%	104	32%	83	26%	22	7%	6	2%	324
Student - Year 11 or above	340	39%	252	29%	118	14%	91	10%	71	8%	872
Parent or carer	1,550	46%	1,111	33%	457	13%	136	4%	137	4%	3,391
Other*	624	68%	181	20%	52	6%	31	3%	23	3%	911

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	120	77%	27	17%	5	3%	3	2%	1	1%	156
Exams officer / manager	282	81%	51	15%	9	3%	8	2%	0	0%	350

No response 1,611

<sup>13</sup> Respondents to the consultation self-identified the group they belonged to. The number of responses reported in the tables are based on these unverified self-descriptions.

**Q3. To what extent do you agree or disagree that Heads of Centre should not need to make a specific declaration in relation to Equalities Law?**

Q3	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	383	28%	284	21%	237	17%	99	7%	357	26%	1,360
Awarding body or exam board	1	8%	3	25%	2	17%	1	8%	5	42%	12
Local Authority	14	19%	10	14%	5	7%	5	7%	39	53%	73
School or college	310	31%	216	22%	196	20%	63	6%	219	22%	1,004
Academy chain	30	42%	18	25%	14	19%	6	8%	4	6%	72
Private training provider	7	27%	6	23%	5	19%	4	15%	4	15%	26
University or higher education institution	0	0%	10	56%	3	17%	5	28%	0	0%	18
Employer	3	60%	1	20%	1	20%	0	0%	0	0%	5
Teacher representative group or union	4	5%	6	8%	1	1%	0	0%	66	86%	77
Subject representative or interest group	4	18%	6	27%	4	18%	6	27%	2	9%	22
Other representative or interest group	10	20%	8	16%	6	12%	9	18%	18	35%	51
Personal	1,323	15%	1,836	20%	3,665	40%	1,430	16%	850	9%	9,104
Teacher (responding in a personal capacity)	626	18%	812	23%	1,318	37%	534	15%	240	7%	3,530
Student - private, home educated candidate of any age	28	7%	64	16%	158	39%	88	22%	64	16%	402
Student - Year 10 or below	35	12%	56	19%	153	52%	31	11%	20	7%	295
Student - Year 11 or above	61	7%	133	16%	329	39%	179	21%	140	17%	842
Parent or carer	405	13%	572	18%	1,416	45%	469	15%	304	10%	3,166
Other*	168	19%	199	23%	291	33%	129	15%	82	9%	869

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	36	24%	33	22%	47	31%	27	18%	10	7%	153
Exams officer / manager	63	19%	100	30%	113	34%	44	13%	15	4%	335

No response 2,159

**Q4. To what extent do you agree or disagree that students in year 10 and below who had been entered to complete exams this summer should be issued results on the same basis as students in year 11 and above?**

Q4	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	474	34%	255	18%	454	33%	112	8%	91	7%	1,386
Awarding body or exam board	4	33%	1	8%	7	58%	0	0%	0	0%	12
Local Authority	9	13%	16	23%	42	60%	1	1%	2	3%	70
School or college	358	35%	194	19%	310	30%	94	9%	71	7%	1,027
Academy chain	40	53%	9	12%	11	15%	9	12%	6	8%	75
Private training provider	9	33%	4	15%	7	26%	3	11%	4	15%	27
University or higher education institution	2	13%	7	47%	5	33%	1	7%	0	0%	15
Employer	4	80%	0	0%	0	0%	0	0%	1	20%	5
Teacher representative group or union	6	8%	6	8%	62	81%	2	3%	1	1%	77
Subject representative or interest group	13	57%	7	30%	2	9%	0	0%	1	4%	23
Other representative or interest group	29	53%	11	20%	8	15%	2	4%	5	9%	55
Personal	5,627	54%	1,630	16%	1,055	10%	1,238	12%	924	9%	10,474
Teacher (responding in a personal capacity)	1,801	48%	736	20%	300	8%	534	14%	369	10%	3,740
Student - private, home educated candidate of any age	92	23%	95	23%	107	26%	64	16%	48	12%	406
Student - Year 10 or below	455	93%	15	3%	6	1%	5	1%	10	2%	491
Student - Year 11 or above	245	28%	174	20%	135	15%	174	20%	146	17%	874
Parent or carer	2,652	66%	410	10%	389	10%	315	8%	243	6%	4,009
Other*	382	40%	200	21%	118	12%	146	15%	108	11%	954

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	63	40%	36	23%	23	15%	21	13%	14	9%	157
Exams officer / manager	106	31%	78	23%	43	12%	70	20%	49	14%	346

No response 763

**Q5. To what extent do you agree or disagree that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by exam boards as potential malpractice?**

Q5	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	595	43%	649	47%	81	6%	35	3%	18	1%	1,378
Awarding body or exam board	3	25%	7	58%	1	8%	0	0%	1	8%	12
Local Authority	22	30%	47	64%	3	4%	0	0%	1	1%	73
School or college	466	45%	467	46%	57	6%	25	2%	10	1%	1,025
Academy chain	37	51%	28	38%	5	7%	2	3%	1	1%	73
Private training provider	14	54%	6	23%	2	8%	4	15%	0	0%	26
University or higher education institution	7	41%	8	47%	1	6%	1	6%	0	0%	17
Employer	3	60%	1	20%	1	20%	0	0%	0	0%	5
Teacher representative group or union	8	10%	64	83%	2	3%	0	0%	3	4%	77
Subject representative or interest group	12	57%	4	19%	3	14%	1	5%	1	5%	21
Other representative or interest group	23	47%	17	35%	6	12%	2	4%	1	2%	49
<b>Personal</b>	<b>4,120</b>	<b>44%</b>	<b>3,419</b>	<b>36%</b>	<b>1,294</b>	<b>14%</b>	<b>449</b>	<b>5%</b>	<b>180</b>	<b>2%</b>	<b>9,462</b>
Teacher (responding in a personal capacity)	1,697	46%	1,398	38%	329	9%	192	5%	59	2%	3,675
Student - private, home educated candidate of any age	151	37%	124	30%	79	19%	35	8%	23	6%	412
Student - Year 10 or below	110	35%	99	32%	91	29%	9	3%	1	0%	310
Student - Year 11 or above	362	42%	277	32%	101	12%	74	9%	49	6%	863
Parent or carer	1,321	40%	1,206	37%	610	18%	124	4%	39	1%	3,300
Other*	479	53%	315	35%	84	9%	15	2%	9	1%	902

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	81	52%	66	42%	7	4%	2	1%	1	1%	157
Exams officer / manager	216	62%	111	32%	17	5%	3	1%	1	0%	348

No response 1,783

**Q7. To what extent do you agree or disagree that we should incorporate into the regulatory framework a requirement for all exam boards to issue results in the same way this summer, in accordance with the approach we will finalise after this consultation, and not by any other means?**

Q7	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	697	51%	299	22%	47	3%	31	2%	295	22%	1,369
Awarding body or exam board	1	8%	5	42%	1	8%	1	8%	4	33%	12
Local Authority	26	35%	12	16%	0	0%	0	0%	36	49%	74
School or college	563	56%	213	21%	32	3%	19	2%	187	18%	1,014
Academy chain	43	59%	21	29%	3	4%	3	4%	3	4%	73
Private training provider	13	48%	9	33%	3	11%	1	4%	1	4%	27
University or higher education institution	11	69%	5	31%	0	0%	0	0%	0	0%	16
Employer	2	40%	1	20%	1	20%	0	0%	1	20%	5
Teacher representative group or union	9	12%	3	4%	2	3%	1	1%	62	81%	77
Subject representative or interest group	11	52%	7	33%	1	5%	2	10%	0	0%	21
Other representative or interest group	18	36%	23	46%	4	8%	4	8%	1	2%	50
<b>Personal</b>	<b>4,748</b>	<b>50%</b>	<b>3,330</b>	<b>35%</b>	<b>956</b>	<b>10%</b>	<b>295</b>	<b>3%</b>	<b>217</b>	<b>2%</b>	<b>9,546</b>
Teacher (responding in a personal capacity)	2,087	57%	1,264	34%	205	6%	65	2%	43	1%	3,664
Student - private, home educated candidate of any age	127	31%	153	38%	87	21%	24	6%	15	4%	406
Student - Year 10 or below	127	41%	113	36%	56	18%	9	3%	5	2%	310
Student - Year 11 or above	309	36%	308	36%	130	15%	70	8%	43	5%	860
Parent or carer	1,553	46%	1,235	36%	422	12%	100	3%	98	3%	3,408
Other*	545	61%	257	29%	56	6%	27	3%	13	1%	898

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	97	63%	50	32%	4	3%	3	2%	1	1%	155
Exams officer / manager	241	70%	83	24%	11	3%	9	3%	1	0%	345

No response 1,708

**Q9. To what extent do you agree or disagree that we should only allow exam boards to issue results for private candidates for whom a Head of Centre considers that centre assessment grades and a place in a rank order can properly be submitted?**

Q9	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	498	37%	330	24%	431	32%	52	4%	47	3%	1,358
Awarding body or exam board	3	25%	2	17%	5	42%	0	0%	2	17%	12
Local Authority	16	22%	17	23%	39	53%	0	0%	2	3%	74
School or college	407	41%	245	25%	299	30%	34	3%	14	1%	999
Academy chain	33	45%	27	36%	10	14%	3	4%	1	1%	74
Private training provider	11	39%	3	11%	2	7%	3	11%	9	32%	28
University or higher education institution	3	18%	10	59%	2	12%	2	12%	0	0%	17
Employer	1	20%	1	20%	1	20%	0	0%	2	40%	5
Teacher representative group or union	5	6%	5	6%	63	82%	0	0%	4	5%	77
Subject representative or interest group	9	41%	6	27%	4	18%	2	9%	1	5%	22
Other representative or interest group	10	20%	14	28%	6	12%	8	16%	12	24%	50
Personal	2,609	28%	2,759	30%	2,364	26%	679	7%	817	9%	9,228
Teacher (responding in a personal capacity)	1,232	35%	1,244	35%	782	22%	195	5%	95	3%	3,548
Student - private, home educated candidate of any age	56	12%	59	13%	46	10%	70	15%	221	49%	452
Student - Year 10 or below	60	21%	63	22%	116	40%	28	10%	24	8%	291
Student - Year 11 or above	205	24%	225	27%	226	27%	110	13%	76	9%	842
Parent or carer	687	22%	922	29%	1,059	33%	207	6%	311	10%	3,186
Other*	369	41%	246	27%	135	15%	69	8%	90	10%	909

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	64	42%	59	39%	20	13%	6	4%	2	1%	151
Exams officer / manager	192	56%	88	26%	34	10%	18	5%	11	3%	343

No response 2,037

**Q10. To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to students in the rest of the UK?**

Q10	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	854	63%	311	23%	164	12%	11	1%	5	0%	1,345
Awarding body or exam board	8	67%	1	8%	2	17%	0	0%	1	8%	12
Local Authority	58	77%	15	20%	2	3%	0	0%	0	0%	75
School or college	620	62%	236	24%	130	13%	7	1%	1	0%	994
Academy chain	42	58%	19	26%	11	15%	0	0%	0	0%	72
Private training provider	15	56%	8	30%	3	11%	1	4%	0	0%	27
University or higher education institution	10	59%	7	41%	0	0%	0	0%	0	0%	17
Employer	2	50%	0	0%	1	25%	0	0%	1	25%	4
Teacher representative group or union	68	88%	3	4%	5	6%	1	1%	0	0%	77
Subject representative or interest group	11	50%	7	32%	3	14%	1	5%	0	0%	22
Other representative or interest group	20	44%	15	33%	7	16%	1	2%	2	4%	45
Personal	4,296	46%	3,343	36%	1,491	16%	105	1%	85	1%	9,320
Teacher (responding in a personal capacity)	1,746	49%	1,306	36%	471	13%	37	1%	21	1%	3,581
Student - private, home educated candidate of any age	174	41%	142	34%	90	21%	9	2%	7	2%	422
Student - Year 10 or below	147	48%	95	31%	62	20%	1	0%	4	1%	309
Student - Year 11 or above	349	41%	292	35%	162	19%	26	3%	15	2%	844
Parent or carer	1,439	44%	1,216	37%	581	18%	22	1%	28	1%	3,286
Other*	441	50%	292	33%	125	14%	10	1%	10	1%	878

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	80	53%	48	32%	20	13%	1	1%	1	1%	150
Exams officer / manager	197	58%	105	31%	37	11%	1	0%	0	0%	340

No response 1,958

**Q11. To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to all students, wherever they are taking the qualifications?**

Q11	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	825	62%	332	25%	151	11%	22	2%	11	1%	1,341
Awarding body or exam board	7	58%	1	8%	3	25%	0	0%	1	8%	12
Local Authority	57	77%	13	18%	3	4%	0	0%	1	1%	74
School or college	594	60%	256	26%	121	12%	16	2%	3	0%	990
Academy chain	43	60%	21	29%	7	10%	1	1%	0	0%	72
Private training provider	16	67%	5	21%	3	13%	0	0%	0	0%	24
University or higher education institution	8	47%	9	53%	0	0%	0	0%	0	0%	17
Employer	2	40%	1	20%	1	20%	0	0%	1	20%	5
Teacher representative group or union	68	88%	3	4%	5	6%	1	1%	0	0%	77
Subject representative or interest group	11	46%	7	29%	2	8%	3	13%	1	4%	24
Other representative or interest group	19	41%	16	35%	6	13%	1	2%	4	9%	46
<b>Personal</b>	<b>4,241</b>	<b>46%</b>	<b>3,201</b>	<b>34%</b>	<b>1,502</b>	<b>16%</b>	<b>226</b>	<b>2%</b>	<b>130</b>	<b>1%</b>	<b>9,300</b>
Teacher (responding in a personal capacity)	1,676	47%	1,303	37%	483	14%	70	2%	30	1%	3,562
Student - private, home educated candidate of any age	205	49%	108	26%	72	17%	16	4%	14	3%	415
Student - Year 10 or below	164	53%	79	26%	55	18%	6	2%	4	1%	308
Student - Year 11 or above	315	37%	278	33%	164	19%	61	7%	26	3%	844
Parent or carer	1,463	44%	1,142	35%	581	18%	56	2%	47	1%	3,289
Other*	418	47%	291	33%	147	17%	17	2%	9	1%	882

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	73	48%	54	36%	21	14%	2	1%	1	1%	151
Exams officer / manager	182	53%	100	29%	55	16%	5	1%	0	0%	342

No response 1,982

**Q13. To what extent do you agree or disagree with the aims outlined above<sup>14</sup>?**

Q13	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	779	56%	408	29%	37	3%	22	2%	140	10%	1,386
Awarding body or exam board	5	45%	3	27%	1	9%	0	0%	2	18%	11
Local Authority	55	74%	18	24%	0	0%	0	0%	1	1%	74
School or college	600	59%	294	29%	21	2%	14	1%	93	9%	1,022
Academy chain	42	56%	28	37%	2	3%	0	0%	3	4%	75
Private training provider	15	54%	9	32%	2	7%	2	7%	0	0%	28
University or higher education institution	8	44%	10	56%	0	0%	0	0%	0	0%	18
Employer	3	60%	0	0%	1	20%	1	20%	0	0%	5
Teacher representative group or union	24	31%	11	14%	2	3%	1	1%	39	51%	77
Subject representative or interest group	10	42%	10	42%	2	8%	1	4%	1	4%	24
Other representative or interest group	17	33%	25	48%	6	12%	3	6%	1	2%	52
<b>Personal</b>	<b>4,714</b>	<b>50%</b>	<b>3,872</b>	<b>41%</b>	<b>548</b>	<b>6%</b>	<b>221</b>	<b>2%</b>	<b>164</b>	<b>2%</b>	<b>9,519</b>
Teacher (responding in a personal capacity)	1,990	54%	1,491	41%	94	3%	61	2%	34	1%	3,670
Student - private, home educated candidate of any age	128	31%	197	48%	54	13%	21	5%	12	3%	412
Student - Year 10 or below	159	54%	101	34%	34	11%	3	1%	0	0%	297
Student - Year 11 or above	337	39%	375	44%	72	8%	48	6%	27	3%	859
Parent or carer	1,629	48%	1,362	40%	246	7%	73	2%	78	2%	3,388
Other*	471	53%	346	39%	48	5%	15	2%	13	1%	893

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	83	53%	61	39%	9	6%	4	3%	0	0%	157
Exams officer / manager	204	60%	124	36%	10	3%	1	0%	1	0%	340

No response 1,718

<sup>14</sup> See page 27-28 for the list of aims relating to this question.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/879627/Exceptional arrangements for exam grading and assessment in 2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/879627/Exceptional_arrangements_for_exam_grading_and_assessment_in_2020.pdf)

**Q14. To what extent do you agree or disagree that using an approach to statistical standardisation which emphasises historical evidence of centre performance given the prior attainment of students is likely to be fairest for all students?**

Q14	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	232	17%	388	28%	124	9%	181	13%	462	33%	1,387
Awarding body or exam board	1	9%	4	36%	1	9%	0	0%	5	45%	11
Local Authority	7	10%	15	21%	7	10%	5	7%	39	53%	73
School or college	199	19%	292	28%	83	8%	135	13%	319	31%	1,028
Academy chain	10	14%	26	35%	7	9%	13	18%	18	24%	74
Private training provider	5	19%	5	19%	5	19%	5	19%	6	23%	26
University or higher education institution	2	12%	9	53%	1	6%	4	24%	1	6%	17
Employer	1	20%	2	40%	1	20%	1	20%	0	0%	5
Teacher representative group or union	1	1%	6	8%	5	6%	3	4%	62	81%	77
Subject representative or interest group	3	14%	8	36%	4	18%	4	18%	3	14%	22
Other representative or interest group	3	6%	21	39%	10	19%	11	20%	9	17%	54
<b>Personal</b>	<b>1,925</b>	<b>20%</b>	<b>3,297</b>	<b>35%</b>	<b>1,308</b>	<b>14%</b>	<b>1,721</b>	<b>18%</b>	<b>1,159</b>	<b>12%</b>	<b>9,410</b>
Teacher (responding in a personal capacity)	691	19%	1,347	37%	406	11%	769	21%	442	12%	3,655
Student - private, home educated candidate of any age	55	13%	113	27%	88	21%	85	21%	70	17%	411
Student - Year 10 or below	92	32%	83	29%	58	20%	37	13%	17	6%	287
Student - Year 11 or above	136	16%	217	25%	81	9%	227	26%	205	24%	866
Parent or carer	767	23%	1,179	36%	556	17%	459	14%	343	10%	3,304
Other*	184	21%	358	40%	119	13%	144	16%	82	9%	887

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	26	17%	66	42%	15	10%	27	17%	23	15%	157
Exams officer / manager	89	26%	159	47%	39	11%	41	12%	12	4%	340

No response 1,826

**Q15. To what extent do you agree or disagree that the trajectory of centres' results should NOT be included in the statistical standardisation process?**

Q15	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	549	40%	333	24%	179	13%	189	14%	130	9%	1,380
Awarding body or exam board	4	36%	5	45%	2	18%	0	0%	0	0%	11
Local Authority	49	66%	14	19%	3	4%	4	5%	4	5%	74
School or college	399	39%	256	25%	118	12%	143	14%	107	10%	1,023
Academy chain	18	25%	18	25%	14	19%	17	23%	6	8%	73
Private training provider	3	12%	9	35%	5	19%	5	19%	4	15%	26
University or higher education institution	2	11%	7	39%	4	22%	4	22%	1	6%	18
Employer	2	40%	1	20%	1	20%	1	20%	0	0%	5
Teacher representative group or union	64	83%	5	6%	5	6%	2	3%	1	1%	77
Subject representative or interest group	3	13%	7	30%	9	39%	2	9%	2	9%	23
Other representative or interest group	5	10%	11	22%	18	36%	11	22%	5	10%	50
<b>Personal</b>	<b>1,496</b>	<b>17%</b>	<b>2,222</b>	<b>25%</b>	<b>2,812</b>	<b>31%</b>	<b>1,767</b>	<b>20%</b>	<b>728</b>	<b>8%</b>	<b>9,025</b>
Teacher (responding in a personal capacity)	661	18%	1,044	29%	746	21%	831	23%	308	9%	3,590
Student - private, home educated candidate of any age	66	17%	85	22%	135	35%	72	19%	27	7%	385
Student - Year 10 or below	28	10%	37	14%	156	57%	32	12%	20	7%	273
Student - Year 11 or above	167	20%	196	23%	191	23%	187	22%	104	12%	845
Parent or carer	396	13%	628	20%	1,361	44%	487	16%	212	7%	3,084
Other*	178	21%	232	27%	223	26%	158	19%	57	7%	848

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	39	26%	41	27%	17	11%	39	26%	15	10%	151
Exams officer / manager	68	21%	94	29%	92	29%	56	17%	11	3%	321

No response 2,218

**Q16. To what extent do you agree or disagree that the individual rank orders provided by centres should NOT be modified to account for bias regarding different students according to their particular protected characteristics or their socio-economic backgrounds?**

Q16	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	769	56%	359	26%	101	7%	109	8%	36	3%	1,374
Awarding body or exam board	4	36%	5	45%	2	18%	0	0%	0	0%	11
Local Authority	52	70%	15	20%	1	1%	4	5%	2	3%	74
School or college	581	57%	276	27%	73	7%	69	7%	15	1%	1,014
Academy chain	44	59%	20	27%	2	3%	7	9%	1	1%	74
Private training provider	4	15%	8	31%	8	31%	2	8%	4	15%	26
University or higher education institution	2	11%	9	50%	1	6%	5	28%	1	6%	18
Employer	3	60%	1	20%	1	20%	0	0%	0	0%	5
Teacher representative group or union	67	86%	5	6%	4	5%	1	1%	1	1%	78
Subject representative or interest group	6	27%	7	32%	2	9%	7	32%	0	0%	22
Other representative or interest group	6	12%	13	25%	7	13%	14	27%	12	23%	52
<b>Personal</b>	<b>2,734</b>	<b>30%</b>	<b>2,857</b>	<b>31%</b>	<b>1,912</b>	<b>21%</b>	<b>1,099</b>	<b>12%</b>	<b>493</b>	<b>5%</b>	<b>9,095</b>
Teacher (responding in a personal capacity)	1,212	34%	1,344	37%	506	14%	412	11%	125	3%	3,599
Student - private, home educated candidate of any age	79	20%	84	21%	103	26%	73	19%	55	14%	394
Student - Year 10 or below	77	28%	60	22%	99	35%	31	11%	12	4%	279
Student - Year 11 or above	261	31%	179	21%	152	18%	158	18%	105	12%	855
Parent or carer	814	26%	893	29%	910	29%	342	11%	159	5%	3,118
Other*	291	34%	297	35%	142	17%	83	10%	37	4%	850
*Within 'Other' the following sub groups were identified											
SLT	51	34%	62	41%	14	9%	23	15%	2	1%	152
Exams officer / manager	133	41%	125	39%	47	15%	18	6%	1	0%	324

No response 2,154

**Q17. To what extent do you agree or disagree that we should incorporate the standardisation approach into our regulatory framework?**

Q17	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	356	26%	458	34%	170	13%	39	3%	321	24%	1,344
Awarding body or exam board	1	9%	4	36%	1	9%	0	0%	5	45%	11
Local Authority	15	21%	19	26%	1	1%	0	0%	38	52%	73
School or college	282	28%	356	36%	129	13%	29	3%	201	20%	997
Academy chain	21	29%	29	40%	11	15%	6	8%	6	8%	73
Private training provider	4	17%	11	46%	6	25%	0	0%	3	13%	24
University or higher education institution	5	28%	10	56%	3	17%	0	0%	0	0%	18
Employer	2	50%	0	0%	1	25%	0	0%	1	25%	4
Teacher representative group or union	3	4%	7	9%	3	4%	1	1%	63	82%	77
Subject representative or interest group	8	38%	7	33%	5	24%	0	0%	1	5%	21
Other representative or interest group	15	35%	15	35%	10	23%	0	0%	3	7%	43
<b>Personal</b>	<b>1,640</b>	<b>19%</b>	<b>3,833</b>	<b>43%</b>	<b>2,586</b>	<b>29%</b>	<b>476</b>	<b>5%</b>	<b>278</b>	<b>3%</b>	<b>8,813</b>
Teacher (responding in a personal capacity)	737	21%	1,728	49%	793	23%	166	5%	67	2%	3,491
Student - private, home educated candidate of any age	43	11%	126	33%	155	41%	39	10%	14	4%	377
Student - Year 10 or below	42	16%	96	36%	116	44%	7	3%	5	2%	266
Student - Year 11 or above	105	13%	314	38%	261	32%	85	10%	57	7%	822
Parent or carer	499	17%	1,171	39%	1,080	36%	155	5%	118	4%	3,023
Other*	214	26%	398	48%	181	22%	24	3%	17	2%	834
*Within 'Other' the following sub groups were identified											
SLT	37	25%	79	53%	29	19%	5	3%	0	0%	150
Exams officer / manager	95	30%	170	53%	52	16%	3	1%	0	0%	320

No response 2,466

**Q19. To what extent do you agree or disagree that we should not provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre's assessment grades are determined?**

Q19	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	591	43%	289	21%	303	22%	84	6%	106	8%	1,373
Awarding body or exam board	3	27%	4	36%	3	27%	0	0%	1	9%	11
Local Authority	17	23%	16	22%	32	43%	5	7%	4	5%	74
School or college	492	48%	217	21%	197	19%	57	6%	55	5%	1,018
Academy chain	43	59%	17	23%	3	4%	6	8%	4	5%	73
Private training provider	6	23%	6	23%	1	4%	6	23%	7	27%	26
University or higher education institution	4	24%	9	53%	1	6%	3	18%	0	0%	17
Employer	0	0%	1	25%	1	25%	0	0%	2	50%	4
Teacher representative group or union	8	10%	3	4%	61	79%	0	0%	5	6%	77
Subject representative or interest group	8	38%	5	24%	1	5%	2	10%	5	24%	21
Other representative or interest group	10	19%	11	21%	3	6%	5	10%	23	44%	52
<b>Personal</b>	<b>1,988</b>	<b>22%</b>	<b>1,810</b>	<b>20%</b>	<b>1,298</b>	<b>14%</b>	<b>2,285</b>	<b>25%</b>	<b>1,847</b>	<b>20%</b>	<b>9,228</b>
Teacher (responding in a personal capacity)	1,230	34%	987	28%	387	11%	692	19%	291	8%	3,587
Student - private, home educated candidate of any age	34	8%	29	7%	56	14%	107	26%	181	44%	407
Student - Year 10 or below	34	12%	33	12%	73	26%	77	28%	61	22%	278
Student - Year 11 or above	70	8%	71	8%	104	12%	212	25%	402	47%	859
Parent or carer	300	9%	476	15%	599	19%	1,037	32%	813	25%	3,225
Other*	320	37%	214	25%	79	9%	160	18%	99	11%	872

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	73	48%	38	25%	7	5%	27	18%	8	5%	153
Exams officer / manager	161	47%	96	28%	28	8%	46	13%	10	3%	341

No response 2,022

**Q20. To what extent do you agree or disagree that we should not provide for a student to challenge their position in a centre's rank order?**

Q20	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	966	70%	243	18%	52	4%	49	4%	65	5%	1,375
Awarding body or exam board	7	64%	2	18%	1	9%	0	0%	1	9%	11
Local Authority	50	68%	17	23%	0	0%	4	5%	3	4%	74
School or college	761	74%	177	17%	36	4%	26	3%	22	2%	1,022
Academy chain	52	70%	16	22%	0	0%	5	7%	1	1%	74
Private training provider	7	26%	4	15%	4	15%	4	15%	8	30%	27
University or higher education institution	3	18%	9	53%	3	18%	2	12%	0	0%	17
Employer	0	0%	1	25%	1	25%	0	0%	2	50%	4
Teacher representative group or union	67	87%	3	4%	2	3%	1	1%	4	5%	77
Subject representative or interest group	8	38%	5	24%	1	5%	2	10%	5	24%	21
Other representative or interest group	11	23%	9	19%	4	8%	5	10%	19	40%	48
<b>Personal</b>	<b>2,313</b>	<b>25%</b>	<b>1,828</b>	<b>20%</b>	<b>1,158</b>	<b>12%</b>	<b>2,132</b>	<b>23%</b>	<b>1,889</b>	<b>20%</b>	<b>9,320</b>
Teacher (responding in a personal capacity)	1,587	44%	1,034	29%	317	9%	498	14%	186	5%	3,622
Student - private, home educated candidate of any age	18	4%	44	11%	58	14%	91	22%	201	49%	412
Student - Year 10 or below	25	9%	30	10%	69	24%	88	30%	77	27%	289
Student - Year 11 or above	55	6%	71	8%	66	8%	223	26%	452	52%	867
Parent or carer	267	8%	438	13%	565	17%	1,105	34%	876	27%	3,251
Other*	361	41%	211	24%	83	9%	127	14%	97	11%	879

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	84	55%	40	26%	6	4%	17	11%	5	3%	152
Exams officer / manager	185	54%	97	28%	23	7%	31	9%	5	1%	341

No response 1,928

**Q21. To what extent do you agree or disagree that we should not provide for an appeal in respect of the process or procedure used by a centre?**

Q21	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	536	39%	282	21%	339	25%	127	9%	83	6%	1,367
Awarding body or exam board	3	27%	4	36%	3	27%	0	0%	1	9%	11
Local Authority	17	23%	15	20%	33	45%	4	5%	5	7%	74
School or college	451	44%	210	21%	227	22%	97	10%	32	3%	1,017
Academy chain	41	57%	16	22%	5	7%	8	11%	2	3%	72
Private training provider	4	16%	8	32%	0	0%	3	12%	10	40%	25
University or higher education institution	1	6%	8	47%	4	24%	3	18%	1	6%	17
Employer	0	0%	0	0%	1	25%	1	25%	2	50%	4
Teacher representative group or union	6	8%	4	5%	60	78%	2	3%	5	6%	77
Subject representative or interest group	5	24%	7	33%	3	14%	2	10%	4	19%	21
Other representative or interest group	8	16%	10	20%	3	6%	7	14%	21	43%	49
<b>Personal</b>	<b>1,478</b>	<b>16%</b>	<b>1,709</b>	<b>19%</b>	<b>1,445</b>	<b>16%</b>	<b>2,596</b>	<b>28%</b>	<b>1,948</b>	<b>21%</b>	<b>9,176</b>
Teacher (responding in a personal capacity)	1,000	28%	1,060	30%	493	14%	762	21%	251	7%	3,566
Student - private, home educated candidate of any age	10	3%	24	6%	58	15%	116	29%	192	48%	400
Student - Year 10 or below	17	6%	35	13%	77	28%	83	30%	67	24%	279
Student - Year 11 or above	22	3%	58	7%	97	11%	243	29%	430	51%	850
Parent or carer	188	6%	324	10%	617	19%	1,188	37%	890	28%	3,207
Other*	241	28%	208	24%	103	12%	204	23%	118	14%	874

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	62	41%	34	22%	14	9%	33	22%	9	6%	152
Exams officer / manager	119	35%	106	31%	40	12%	62	18%	12	4%	339

No response 2,080

**Q22. To what extent do you agree or disagree that we should provide for a centre to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated?**

Q22	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	1,061	77%	265	19%	32	2%	14	1%	9	1%	1,381
Awarding body or exam board	6	55%	4	36%	1	9%	0	0%	0	0%	11
Local Authority	61	82%	11	15%	0	0%	0	0%	2	3%	74
School or college	799	78%	191	19%	24	2%	10	1%	3	0%	1,027
Academy chain	55	77%	16	23%	0	0%	0	0%	0	0%	71
Private training provider	13	50%	10	38%	1	4%	1	4%	1	4%	26
University or higher education institution	3	18%	10	59%	2	12%	1	6%	1	6%	17
Employer	3	60%	0	0%	1	20%	0	0%	1	20%	5
Teacher representative group or union	73	95%	3	4%	1	1%	0	0%	0	0%	77
Subject representative or interest group	15	68%	6	27%	1	5%	0	0%	0	0%	22
Other representative or interest group	33	65%	14	27%	1	2%	2	4%	1	2%	51
<b>Personal</b>	<b>4,956</b>	<b>54%</b>	<b>3,291</b>	<b>36%</b>	<b>637</b>	<b>7%</b>	<b>205</b>	<b>2%</b>	<b>172</b>	<b>2%</b>	<b>9,261</b>
Teacher (responding in a personal capacity)	1,976	55%	1,376	38%	155	4%	61	2%	36	1%	3,604
Student - private, home educated candidate of any age	218	55%	124	31%	38	10%	6	2%	13	3%	399
Student - Year 10 or below	131	47%	94	34%	44	16%	6	2%	4	1%	279
Student - Year 11 or above	555	64%	235	27%	41	5%	11	1%	19	2%	861
Parent or carer	1,606	50%	1,134	35%	320	10%	97	3%	79	2%	3,236
Other*	470	53%	328	37%	39	4%	24	3%	21	2%	882

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	93	61%	53	35%	3	2%	2	1%	1	1%	152
Exams officer / manager	172	50%	143	42%	14	4%	9	3%	5	1%	343

No response 1,981

**Q23. To what extent do you agree or disagree that for results issued this summer, exam boards should only consider appeals submitted by centres and not those submitted by individual students?**

Q23	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	541	39%	290	21%	114	8%	97	7%	332	24%	1,374
Awarding body or exam board	2	18%	3	27%	3	27%	0	0%	3	27%	11
Local Authority	15	20%	17	23%	4	5%	2	3%	36	49%	74
School or college	449	44%	213	21%	91	9%	72	7%	191	19%	1,016
Academy chain	40	54%	20	27%	6	8%	5	7%	3	4%	74
Private training provider	5	19%	5	19%	2	8%	2	8%	12	46%	26
University or higher education institution	2	12%	12	71%	1	6%	2	12%	0	0%	17
Employer	1	25%	0	0%	1	25%	0	0%	2	50%	4
Teacher representative group or union	6	8%	4	5%	1	1%	0	0%	66	86%	77
Subject representative or interest group	8	35%	6	26%	1	4%	4	17%	4	17%	23
Other representative or interest group	13	25%	10	19%	4	8%	10	19%	15	29%	52
<b>Personal</b>	<b>2,124</b>	<b>23%</b>	<b>2,047</b>	<b>22%</b>	<b>1,045</b>	<b>11%</b>	<b>1,932</b>	<b>21%</b>	<b>2,175</b>	<b>23%</b>	<b>9,323</b>
Teacher (responding in a personal capacity)	1,319	36%	1,166	32%	371	10%	527	15%	232	6%	3,615
Student - private, home educated candidate of any age	12	3%	20	5%	42	10%	78	19%	258	63%	410
Student - Year 10 or below	31	11%	37	13%	52	18%	82	28%	86	30%	288
Student - Year 11 or above	49	6%	72	8%	65	8%	204	24%	467	54%	857
Parent or carer	341	10%	538	16%	445	14%	929	28%	1,014	31%	3,267
Other*	372	42%	214	24%	70	8%	112	13%	118	13%	886
*Within 'Other' the following sub groups were identified											
SLT	72	47%	40	26%	17	11%	20	13%	5	3%	154
Exams officer / manager	214	62%	84	24%	20	6%	18	5%	8	2%	344

No response 1,926

**Q24. To what extent do you agree or disagree that we should not require an exam board to ensure consent has been obtained from all students who might be affected by the outcome of an appeal before that appeal is considered?**

Q24	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	627	47%	344	26%	187	14%	122	9%	68	5%	1,348
Awarding body or exam board	2	18%	2	18%	4	36%	2	18%	1	9%	11
Local Authority	38	52%	17	23%	8	11%	7	10%	3	4%	73
School or college	457	46%	263	26%	145	14%	90	9%	47	5%	1,002
Academy chain	33	45%	26	35%	7	9%	6	8%	2	3%	74
Private training provider	7	27%	6	23%	8	31%	2	8%	3	12%	26
University or higher education institution	2	13%	9	56%	2	13%	3	19%	0	0%	16
Employer	3	60%	0	0%	1	20%	0	0%	1	20%	5
Teacher representative group or union	65	84%	6	8%	3	4%	0	0%	3	4%	77
Subject representative or interest group	7	33%	6	29%	2	10%	4	19%	2	10%	21
Other representative or interest group	13	30%	9	21%	7	16%	8	19%	6	14%	43
<b>Personal</b>	<b>1,559</b>	<b>17%</b>	<b>2,395</b>	<b>27%</b>	<b>2,332</b>	<b>26%</b>	<b>1,698</b>	<b>19%</b>	<b>1,008</b>	<b>11%</b>	<b>8,992</b>
Teacher (responding in a personal capacity)	825	23%	1,187	34%	737	21%	564	16%	221	6%	3,534
Student - private, home educated candidate of any age	40	10%	59	15%	130	34%	77	20%	80	21%	386
Student - Year 10 or below	34	13%	51	19%	97	36%	52	19%	36	13%	270
Student - Year 11 or above	110	13%	146	17%	216	26%	180	21%	190	23%	842
Parent or carer	359	12%	705	23%	989	32%	653	21%	395	13%	3,101
Other*	191	22%	247	29%	163	19%	172	20%	86	10%	859
*Within 'Other' the following sub groups were identified											
SLT	45	30%	41	27%	27	18%	33	22%	4	3%	150
Exams officer / manager	77	23%	100	30%	48	14%	78	23%	35	10%	338

No response 2,283

**Q25. To what extent do you agree or disagree that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student?**

Q25	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	1,063	78%	223	16%	54	4%	17	1%	8	1%	1,365
Awarding body or exam board	5	45%	4	36%	1	9%	1	9%	0	0%	11
Local Authority	59	81%	11	15%	3	4%	0	0%	0	0%	73
School or college	814	80%	156	15%	30	3%	6	1%	6	1%	1,012
Academy chain	54	74%	15	21%	3	4%	1	1%	0	0%	73
Private training provider	15	58%	7	27%	2	8%	2	8%	0	0%	26
University or higher education institution	5	31%	7	44%	3	19%	1	6%	0	0%	16
Employer	3	60%	0	0%	1	20%	0	0%	1	20%	5
Teacher representative group or union	71	92%	3	4%	2	3%	1	1%	0	0%	77
Subject representative or interest group	12	55%	7	32%	2	9%	0	0%	1	5%	22
Other representative or interest group	25	50%	13	26%	7	14%	5	10%	0	0%	50
Personal	5,323	58%	2,368	26%	978	11%	315	3%	219	2%	9,203
Teacher (responding in a personal capacity)	2,409	67%	876	24%	201	6%	75	2%	39	1%	3,600
Student - private, home educated candidate of any age	175	45%	101	26%	78	20%	22	6%	16	4%	392
Student - Year 10 or below	135	49%	55	20%	56	20%	15	5%	17	6%	278
Student - Year 11 or above	560	65%	147	17%	79	9%	37	4%	32	4%	855
Parent or carer	1,521	47%	971	30%	485	15%	136	4%	91	3%	3,204
Other*	523	60%	218	25%	79	9%	30	3%	24	3%	874

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	100	66%	40	26%	6	4%	5	3%	1	1%	152
Exams officer / manager	231	67%	81	24%	20	6%	5	1%	6	2%	343

No response 2,055

**Q26. To what extent do you agree or disagree that exam boards should be permitted to ask persons who were involved in the calculation of results to be involved in the evaluation of appeals in relation to those results?**

Q26	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	649	48%	435	32%	113	8%	106	8%	56	4%	1,359
Awarding body or exam board	8	73%	1	9%	1	9%	0	0%	1	9%	11
Local Authority	49	67%	19	26%	3	4%	1	1%	1	1%	73
School or college	471	47%	332	33%	87	9%	82	8%	35	3%	1,007
Academy chain	27	36%	31	42%	5	7%	9	12%	2	3%	74
Private training provider	7	27%	12	46%	1	4%	1	4%	5	19%	26
University or higher education institution	1	6%	10	59%	2	12%	4	24%	0	0%	17
Employer	1	20%	1	20%	1	20%	0	0%	2	40%	5
Teacher representative group or union	65	84%	3	4%	6	8%	1	1%	2	3%	77
Subject representative or interest group	8	38%	6	29%	4	19%	2	10%	1	5%	21
Other representative or interest group	12	25%	20	42%	3	6%	6	13%	7	15%	48
Personal	2,583	28%	3,938	43%	1,329	15%	776	9%	456	5%	9,082
Teacher (responding in a personal capacity)	1,079	30%	1,705	48%	392	11%	262	7%	118	3%	3,556
Student - private, home educated candidate of any age	96	25%	139	36%	79	20%	42	11%	33	8%	389
Student - Year 10 or below	80	29%	99	36%	67	25%	17	6%	9	3%	272
Student - Year 11 or above	241	29%	318	38%	132	16%	86	10%	65	8%	842
Parent or carer	863	27%	1,270	40%	548	17%	280	9%	190	6%	3,151
Other*	224	26%	407	47%	111	13%	89	10%	41	5%	872

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	41	27%	66	44%	19	13%	15	10%	9	6%	150
Exams officer / manager	86	25%	171	50%	38	11%	34	10%	13	4%	342

No response 2,182

**Q27. To what extent do you agree or disagree that exam boards should be able to run a simplified appeals process?**

Q27	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	445	33%	506	37%	74	5%	31	2%	303	22%	1,359
Awarding body or exam board	4	36%	1	9%	1	9%	0	0%	5	45%	11
Local Authority	19	26%	17	23%	1	1%	0	0%	36	49%	73
School or college	351	35%	394	39%	53	5%	22	2%	190	19%	1,010
Academy chain	29	39%	35	47%	5	7%	1	1%	4	5%	74
Private training provider	12	46%	8	31%	2	8%	3	12%	1	4%	26
University or higher education institution	2	12%	14	82%	0	0%	1	6%	0	0%	17
Employer	1	20%	2	40%	1	20%	0	0%	1	20%	5
Teacher representative group or union	5	7%	6	8%	1	1%	1	1%	63	83%	76
Subject representative or interest group	8	36%	8	36%	2	9%	2	9%	2	9%	22
Other representative or interest group	14	31%	21	47%	8	18%	1	2%	1	2%	45
<b>Personal</b>	<b>3,281</b>	<b>36%</b>	<b>4,174</b>	<b>46%</b>	<b>1,101</b>	<b>12%</b>	<b>364</b>	<b>4%</b>	<b>231</b>	<b>3%</b>	<b>9,151</b>
Teacher (responding in a personal capacity)	1,237	35%	1,800	50%	343	10%	138	4%	53	1%	3,571
Student - private, home educated candidate of any age	151	38%	166	42%	61	15%	9	2%	7	2%	394
Student - Year 10 or below	72	26%	116	42%	72	26%	8	3%	8	3%	276
Student - Year 11 or above	309	37%	294	35%	134	16%	56	7%	52	6%	845
Parent or carer	1,149	36%	1,442	45%	397	12%	113	4%	97	3%	3,198
Other*	363	42%	356	41%	94	11%	40	5%	14	2%	867
<b>*Within 'Other' the following sub groups were identified</b>	<b>Strongly agree</b>		<b>Agree</b>		<b>Neither agree nor disagree</b>		<b>Disagree</b>		<b>Strongly disagree</b>		<b>Total responses</b>
SLT	53	36%	78	52%	13	9%	4	3%	1	1%	149
Exams officer / manager	168	49%	130	38%	30	9%	11	3%	3	1%	342

No response 2,113

**Q28. To what extent do you agree or disagree that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model?**

Q28	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	166	12%	249	18%	127	9%	245	18%	571	42%	1,358
Awarding body or exam board	3	27%	1	9%	1	9%	1	9%	5	45%	11
Local Authority	6	8%	11	15%	1	1%	14	19%	41	56%	73
School or college	134	13%	183	18%	97	10%	191	19%	403	40%	1,008
Academy chain	8	11%	17	23%	7	9%	14	19%	29	39%	75
Private training provider	3	12%	8	32%	4	16%	4	16%	6	24%	25
University or higher education institution	3	18%	9	53%	3	18%	2	12%	0	0%	17
Employer	0	0%	1	25%	1	25%	0	0%	2	50%	4
Teacher representative group or union	1	1%	2	3%	4	5%	2	3%	67	88%	76
Subject representative or interest group	4	18%	6	27%	4	18%	4	18%	4	18%	22
Other representative or interest group	4	9%	11	23%	5	11%	13	28%	14	30%	47
<b>Personal</b>	<b>717</b>	<b>8%</b>	<b>1,443</b>	<b>16%</b>	<b>2,708</b>	<b>31%</b>	<b>2,210</b>	<b>25%</b>	<b>1,685</b>	<b>19%</b>	<b>8,763</b>
Teacher (responding in a personal capacity)	377	11%	721	21%	942	27%	934	27%	495	14%	3,469
Student - private, home educated candidate of any age	11	3%	31	8%	120	32%	96	26%	116	31%	374
Student - Year 10 or below	17	7%	31	12%	106	42%	58	23%	43	17%	255
Student - Year 11 or above	26	3%	63	8%	175	21%	200	24%	368	44%	832
Parent or carer	164	5%	407	14%	1,146	38%	748	25%	529	18%	2,994
Other*	122	15%	190	23%	219	26%	174	21%	134	16%	839
<b>*Within 'Other' the following sub groups were identified</b>	<b>Strongly agree</b>		<b>Agree</b>		<b>Neither agree nor disagree</b>		<b>Disagree</b>		<b>Strongly disagree</b>		<b>Total responses</b>
SLT	14	9%	33	22%	28	19%	38	26%	36	24%	149
Exams officer / manager	64	20%	88	27%	99	30%	50	15%	24	7%	325

No response 2,502

**Q29. To what extent do you agree or disagree with our proposal to make the Exam Procedures Review Service (EPRS) available to centres for results issued this summer?**

Q29	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	619	47%	506	38%	180	14%	9	1%	7	1%	1,321
Awarding body or exam board	3	27%	3	27%	5	45%	0	0%	0	0%	11
Local Authority	45	61%	22	30%	7	9%	0	0%	0	0%	74
School or college	440	45%	396	41%	131	13%	6	1%	3	0%	976
Academy chain	34	46%	31	42%	8	11%	1	1%	0	0%	74
Private training provider	9	36%	10	40%	3	12%	1	4%	2	8%	25
University or higher education institution	2	12%	10	59%	5	29%	0	0%	0	0%	17
Employer	1	25%	1	25%	1	25%	0	0%	1	25%	4
Teacher representative group or union	65	84%	7	9%	5	6%	0	0%	0	0%	77
Subject representative or interest group	10	48%	9	43%	2	10%	0	0%	0	0%	21
Other representative or interest group	10	24%	17	40%	13	31%	1	2%	1	2%	42
<b>Personal</b>	<b>2,446</b>	<b>28%</b>	<b>3,982</b>	<b>46%</b>	<b>2,100</b>	<b>24%</b>	<b>93</b>	<b>1%</b>	<b>75</b>	<b>1%</b>	<b>8,696</b>
Teacher (responding in a personal capacity)	975	28%	1,722	50%	679	20%	39	1%	19	1%	3,434
Student - private, home educated candidate of any age	105	28%	153	41%	98	26%	6	2%	8	2%	370
Student - Year 10 or below	67	26%	89	34%	95	37%	6	2%	3	1%	260
Student - Year 11 or above	271	34%	300	37%	208	26%	16	2%	13	2%	808
Parent or carer	798	27%	1,310	44%	839	28%	17	1%	24	1%	2,988
Other*	230	28%	408	49%	181	22%	9	1%	8	1%	836

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	48	32%	77	52%	22	15%	2	1%	0	0%	149
Exams officer / manager	90	27%	165	50%	63	19%	6	2%	5	2%	329

No response 2,606

**Q31. To what extent do you agree or disagree that entries to the autumn series should be limited to those who were entered for the summer series, or those who the exam board believes have made a compelling case about their intention to have entered for the summer series (as well as to students who would normally be permitted to take GCSEs in English language and mathematics in November)?**

Q31	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	609	45%	318	24%	346	26%	43	3%	31	2%	1,347
Awarding body or exam board	1	10%	1	10%	6	60%	0	0%	2	20%	10
Local Authority	17	25%	11	16%	36	52%	2	3%	3	4%	69
School or college	507	50%	229	23%	226	22%	31	3%	13	1%	1,006
Academy chain	40	54%	22	30%	9	12%	2	3%	1	1%	74
Private training provider	12	46%	7	27%	1	4%	1	4%	5	19%	26
University or higher education institution	5	29%	12	71%	0	0%	0	0%	0	0%	17
Employer	2	40%	1	20%	2	40%	0	0%	0	0%	5
Teacher representative group or union	4	6%	6	8%	60	85%	1	1%	0	0%	71
Subject representative or interest group	11	48%	7	30%	2	9%	2	9%	1	4%	23
Other representative or interest group	10	22%	22	48%	4	9%	4	9%	6	13%	46
<b>Personal</b>	<b>4,099</b>	<b>45%</b>	<b>2,630</b>	<b>29%</b>	<b>1,341</b>	<b>15%</b>	<b>671</b>	<b>7%</b>	<b>449</b>	<b>5%</b>	<b>9,190</b>
Teacher (responding in a personal capacity)	1,943	54%	1,062	30%	303	8%	178	5%	114	3%	3,600
Student - private, home educated candidate of any age	147	36%	95	23%	68	17%	39	9%	63	15%	412
Student - Year 10 or below	72	25%	65	23%	82	28%	48	17%	21	7%	288
Student - Year 11 or above	338	41%	206	25%	139	17%	81	10%	69	8%	833
Parent or carer	1,093	35%	977	31%	668	21%	274	9%	149	5%	3,161
Other*	506	56%	225	25%	81	9%	51	6%	33	4%	896

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	85	54%	57	36%	9	6%	5	3%	1	1%	157
Exams officer / manager	253	73%	63	18%	8	2%	17	5%	7	2%	348

No response 2,086

**Q32. To what extent do you agree or disagree that we should apply the same provisions as GCSE, AS and A level qualifications to all Extended Project Qualifications and to the Advanced Extension Award qualification?**

Q32	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	853	64%	319	24%	137	10%	12	1%	9	1%	1,330
Awarding body or exam board	5	50%	3	30%	1	10%	0	0%	1	10%	10
Local Authority	56	81%	11	16%	1	1%	0	0%	1	1%	69
School or college	648	65%	227	23%	108	11%	10	1%	3	0%	996
Academy chain	44	60%	24	33%	5	7%	0	0%	0	0%	73
Private training provider	11	41%	11	41%	4	15%	0	0%	1	4%	27
University or higher education institution	7	41%	10	59%	0	0%	0	0%	0	0%	17
Employer	1	33%	0	0%	1	33%	0	0%	1	33%	3
Teacher representative group or union	62	89%	6	9%	2	3%	0	0%	0	0%	70
Subject representative or interest group	7	37%	5	26%	5	26%	1	5%	1	5%	19
Other representative or interest group	12	26%	22	48%	10	22%	1	2%	1	2%	46
<b>Personal</b>	<b>3,823</b>	<b>43%</b>	<b>2,985</b>	<b>33%</b>	<b>1,761</b>	<b>20%</b>	<b>231</b>	<b>3%</b>	<b>151</b>	<b>2%</b>	<b>8,951</b>
Teacher (responding in a personal capacity)	1,826	52%	1,127	32%	461	13%	83	2%	29	1%	3,526
Student - private, home educated candidate of any age	114	30%	123	33%	105	28%	17	5%	17	5%	376
Student - Year 10 or below	97	35%	82	30%	89	32%	2	1%	6	2%	276
Student - Year 11 or above	299	36%	233	28%	189	23%	53	6%	46	6%	820
Parent or carer	1,103	36%	1,139	37%	762	25%	52	2%	38	1%	3,094
Other*	384	45%	281	33%	155	18%	24	3%	15	2%	859

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	71	47%	55	36%	20	13%	3	2%	2	1%	151
Exams officer / manager	158	48%	100	30%	54	16%	15	5%	4	1%	331

No response 2,342

**Q34. To what extent do you agree or disagree that we should confirm that exam boards will not be permitted to offer opportunities for students to take exams in May and June 2020?**

Q34	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	1,009	75%	212	16%	69	5%	33	2%	31	2%	1,354
Awarding body or exam board	6	60%	1	10%	2	20%	0	0%	1	10%	10
Local Authority	60	82%	8	11%	2	3%	2	3%	1	1%	73
School or college	765	76%	148	15%	54	5%	20	2%	19	2%	1,006
Academy chain	58	81%	9	13%	0	0%	5	7%	0	0%	72
Private training provider	11	41%	7	26%	4	15%	2	7%	3	11%	27
University or higher education institution	4	24%	12	71%	1	6%	0	0%	0	0%	17
Employer	2	40%	0	0%	2	40%	0	0%	1	20%	5
Teacher representative group or union	64	90%	5	7%	0	0%	1	1%	1	1%	71
Subject representative or interest group	14	64%	5	23%	2	9%	0	0%	1	5%	22
Other representative or interest group	25	49%	17	33%	2	4%	3	6%	4	8%	51
<b>Personal</b>	<b>4,792</b>	<b>53%</b>	<b>1,751</b>	<b>19%</b>	<b>1,169</b>	<b>13%</b>	<b>718</b>	<b>8%</b>	<b>656</b>	<b>7%</b>	<b>9,086</b>
Teacher (responding in a personal capacity)	2,204	62%	692	19%	306	9%	221	6%	133	4%	3,556
Student - private, home educated candidate of any age	166	43%	48	12%	64	17%	51	13%	57	15%	386
Student - Year 10 or below	109	40%	44	16%	69	25%	24	9%	28	10%	274
Student - Year 11 or above	459	55%	107	13%	105	13%	78	9%	88	11%	837
Parent or carer	1,330	42%	700	22%	526	17%	296	9%	304	10%	3,156
Other*	524	60%	160	18%	99	11%	48	5%	46	5%	877

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	106	70%	24	16%	13	9%	5	3%	3	2%	151
Exams officer / manager	241	71%	54	16%	18	5%	13	4%	13	4%	339

No response 2,183

**Q35. To what extent do you agree or disagree with our proposals that exam boards will not be permitted to offer exams for the AEA qualification or to moderate Extended Project Qualifications this summer?**

Q35	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
Organisation	770	60%	238	18%	204	16%	39	3%	43	3%	1,294
Awarding body or exam board	6	60%	2	20%	1	10%	0	0%	1	10%	10
Local Authority	51	74%	8	12%	6	9%	2	3%	2	3%	69
School or college	574	59%	177	18%	162	17%	28	3%	26	3%	967
Academy chain	41	59%	14	20%	7	10%	4	6%	4	6%	70
Private training provider	4	17%	7	30%	7	30%	1	4%	4	17%	23
University or higher education institution	3	18%	11	65%	2	12%	0	0%	1	6%	17
Employer	1	33%	0	0%	1	33%	0	0%	1	33%	3
Teacher representative group or union	62	87%	5	7%	2	3%	1	1%	1	1%	71
Subject representative or interest group	10	53%	5	26%	4	21%	0	0%	0	0%	19
Other representative or interest group	18	40%	9	20%	12	27%	3	7%	3	7%	45
Personal	3,003	35%	1,671	20%	2,876	34%	620	7%	393	5%	8,563
Teacher (responding in a personal capacity)	1,483	43%	696	20%	922	27%	203	6%	106	3%	3,410
Student - private, home educated candidate of any age	73	21%	51	14%	170	48%	34	10%	24	7%	352
Student - Year 10 or below	57	22%	40	15%	126	48%	23	9%	14	5%	260
Student - Year 11 or above	214	27%	134	17%	311	39%	80	10%	55	7%	794
Parent or carer	834	29%	577	20%	1,112	38%	225	8%	167	6%	2,915
Other*	342	41%	173	21%	235	28%	55	7%	27	3%	832

*Within 'Other' the following sub groups were identified	Strongly agree		Agree		Neither agree nor disagree		Disagree		Strongly disagree		Total responses
SLT	65	43%	33	22%	38	25%	9	6%	5	3%	150
Exams officer / manager	157	49%	62	19%	71	22%	22	7%	8	3%	320

No response 2,766



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