

Arrangements for summer 2020 exam series

Findings from the consultation



June 2020

Contents

1	Introduction	3
2	Introduce aims to underpin the statistical standardisation model for the issuing of grades for the summer 2020 exam series.....	8
3	Introduce a specific appeals process for the summer 2020 exam series.....	54
4	Integrated Impact Assessment.....	87
5	Additional comments	99

1 Introduction

This report presents a summary of the responses received to our public consultation on the arrangements for the summer 2020 exam series. This consultation ran between Tuesday 28 April and Wednesday 13 May 2020.

You can read a summary of these findings in the decisions report on our [website](#).

1.1 Background

On 18 March 2020, to help fight the spread of coronavirus (COVID-19), The Education Minister for Wales announced the closure of schools¹ and the cancellation of the 2020 summer exam series².

As a result, on 6 April 2020, the Education Minister for Wales issued us with a Direction³ under Section 53 of the Qualifications Wales Act 2015 to have regard to Welsh Government Policy regarding the cancellation of exams and the subsequent determination of grades. The direction requires us to ensure that a fair and robust approach to issuing grades to these learners is adopted.

In response to these policy decisions, for each learner entered for GCSEs, AS levels, A levels and the Skills Challenge Certificate, centres are required to submit a centre assessment grade and rank order to WJEC, the awarding body. This information should be provided where the centre has enough information to make an informed judgement.

We have published a guidance document for centres⁴ that outlines how centres should approach this and what types of evidence they could consider. Centres have been advised that the centre assessment grade should reflect the grade they think the learner was most likely to achieve had they completed their assessments this summer.

We have proposed that the data being submitted by centres will be standardised using a statistical model. This model is still being developed but it is anticipated that it will draw on a range of evidence including how a centre has performed in the past and how learners within this year's cohort have performed in previous assessments. A calculated grade, based on the centre assessment data and the outcome of the standardisation process, will then be issued to learners in August 2020.

¹ Welsh Government (2020) *Statement from Minister for Education, Kirsty Williams on school closures in Wales* <https://media.service.gov.wales/news/school-closures>

² Welsh Government (2020) *Written statement on summer examinations 2020* <https://gov.wales/written-statement-written-statement-summer-examinations-2020>

³ Welsh Government (2020) *GCSE, AS and A level cancellations: letter* <https://gov.wales/gcse-and-level-cancellations-letter>

⁴ Qualifications Wales (2020) *Summer 2020 grades for GCSEs, AS and A levels and Skills Challenge Certificate (SCC): Information for centres on the submission of Centre Assessment Grades*. <https://www.qualificationswales.org/english/publications/information-for-centres-on-the-submission-of-centre-assessment-grades/>

As the process for awarding grades will be different this year, it has been necessary to review the appeals process to ensure that an appropriate avenue of recourse is available to review the outcomes.

1.2 About the consultation

In this consultation, we sought views on a series of aims that will underpin the development of the statistical standardisation model and the features of the proposed appeals process. The consultation document included our Integrated Impact Assessment⁵ of these proposals, which we also sought views on. The full consultation document and a summarised version aimed at young people are available on our [website](#).

Respondents could submit their views in one of three ways:

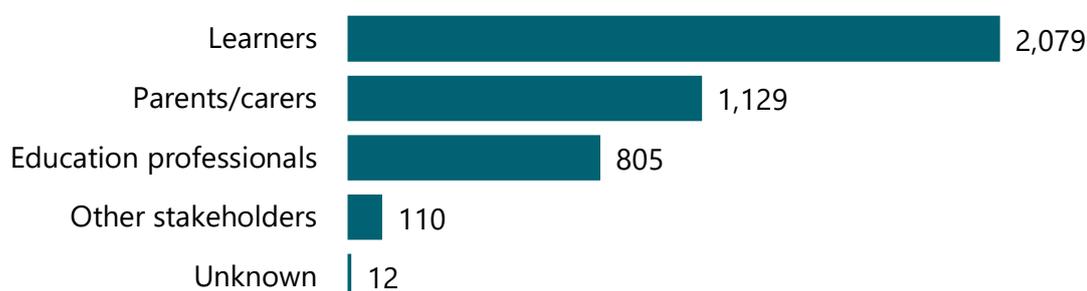
1. Completing the main online survey;
2. Completing an adapted version of the online survey aimed at young people;
3. Submitting their views to a dedicated email address.

We received 4,057 responses to the consultation, comprising:

1. 3,134 responses through the main online survey;
2. 915 responses through the online survey aimed at young people;
3. Eight responses submitted in an alternative format via the dedicated email address.

The online surveys were accessed a further 2,825 times. To ensure analysis of meaningful data, only responses that had indicated the extent to which they agreed with at least two of our proposals or had left at least one written comment were accepted. These additional responses did not meet this threshold so were discounted. The majority of these responses had only answered the first question asking respondents to describe the capacity in which they were responding.

Figure 1: Respondents by type



Note: Some respondents identified themselves as more than one type of respondent (e.g. parent and teacher). Therefore, the sum of the categories in figure 1 is greater than the total number of respondents.

⁵ The Integrated Impact Assessment included a Regulatory Impact Assessment, Equalities Impact Assessment and Welsh Language Impact Assessment.

1.3 The consultation questions

At the beginning of both the main online survey and the online survey aimed at young people, respondents were asked to identify the capacity in which they were responding. They were also given an opportunity to state whether they would like their response to remain confidential.

Both versions of the online survey included the same twelve core consultation questions, worded in a way that was considered most appropriate for the intended audience. Each of these questions asked respondents to indicate the extent to which they agreed with the proposal using a five-point scale (*these are referred to as closed questions*). Respondents were then asked to explain their views in an open comments box (*these are referred to as open questions*).

The main online survey also included four closed questions and six open questions to gather respondents' views on our Integrated Impact Assessment. For the closed questions in this section, respondents were asked to indicate if they had identified any additional impacts of our proposals on regulatory requirements, equal opportunities or the Welsh Language, whether they be positive or negative. The open questions asked respondents to provide comments on any additional steps we could take to mitigate the impacts we identified in the Integrated Impact Assessment, or to provide detail on what they perceived to be additional impacts that we had not identified. These questions were not included in the survey aimed at young people.

At the end of the main online survey, respondents were provided with an opportunity to leave contact details if they were happy to be contacted about their response. All the appropriate safeguards were put in place to manage this information.

The questions are presented in this report in the order in which they were asked.

1.4 Approach to analysing the consultation responses

All 4,057 responses have been reviewed as part of this analysis. For ease of reporting, the views of respondents who did not respond using one of the online surveys have been included within the commentary to the most appropriate question.

The closed questions were summarised into statistics on the proportion of respondents who indicated that they strongly agreed, agreed, partly agreed and partly disagreed, disagreed, strongly disagreed or were unsure about our proposals. These statistics are presented for each question in this report.

A thematic analysis was undertaken of the responses to the open questions. Thematic analysis involves categorising information provided by the respondents into overarching themes. These themes have been used to guide the commentary to each question in this report.

Thematic analysis of the responses was completed in the following stages:

1. A sample of 50 responses to each question was selected for this initial phase. The sample of responses consisted of the 50 written comments to each question that had the most words in the week prior to the consultation closing. It was felt that this sample would provide a good overview of the most common themes for each question.
2. Two reviewers read each response and worked together to develop a framework which identified the key themes to each question. This process allowed for uncertainties or misperceptions to be clarified to ensure a common understanding of the responses.
3. All responses to the open questions were then analysed in turn. An evidence log, in the form of a spreadsheet, was used to assign the appropriate key themes to each response. This enabled reviewers to identify the prominence of each theme within the responses. The framework of key themes was not fixed so it could be modified and developed further at this stage; if a response did not fit into one of the themes identified during the initial phase, a new theme was generated.

1.5 About this report

Section 2 of this report presents the analysis of the findings to the questions about the proposed aims to underpin the statistical standardisation model; Section 3 presents the findings to the questions about the proposed appeals process for this summer and Section 4 summarises response to the questions on our Integrated Impact Assessment.

Each of these sections present the findings to each question in turn. For each question, responses to the closed question are presented in a bar chart and then discussed in text. The total number of responses to each question varied. The number of responses to each question is noted at the start of that question. On occasion, the percentages presented in the graphs do not add up to 100%. This is because some percentages have been rounded up or down to the nearest 0.1% for presentational purposes.

The analysis of the open questions is then discussed, broken down by themes that identified reasons why respondents supported the proposal and then themes that related to respondents' concerns about the proposal. The report broadly presents the themes arising for each question in order of how often respondents made a comment that could be attributed to this theme. In some instances, where two themes are similar, the order has been adjusted to aid readability of this report.

In response to most questions, the number of comments expressing concerns about the proposal outweighed the number of comments highlighting support for the proposal. This is to be expected in such a consultation where it is natural for respondents to want to express their concerns about a proposal, more than their reasons for supporting it. Additionally, the open questions specifically prompted respondents to comment if they had disagreed or strongly disagreed or had suggestions as to how the proposals could be developed. It is therefore advised that readers reflect on both the responses to the closed questions and the open questions when considering these findings.

The report concludes with a short section outlining some of the comments received that were out of scope of the consultation remit itself.

The purpose of this report is to present a summary of respondents' views. The themes and points presented are drawn from their comments and do not necessarily represent the views of the report authors or Qualifications Wales. Additionally, the report does not evaluate whether the comments made by respondents are accurate.

1.6 Glossary

The following acronyms have been used throughout this report.

Acronym	
ALN	Additional Learning Needs
BAME	Black, Asian and minority ethnic
EAL	English as an Additional Language
FE college	Further Education college
NEA	Non-Examination Assessment
PRU	Pupil Referral Unit
PSED	Public Sector Equality Duty

Centre assessment data is used throughout the report to refer to both centre assessment grades and rank order.

2 Introduce aims to underpin the statistical standardisation model for the issuing of grades for the summer 2020 exam series

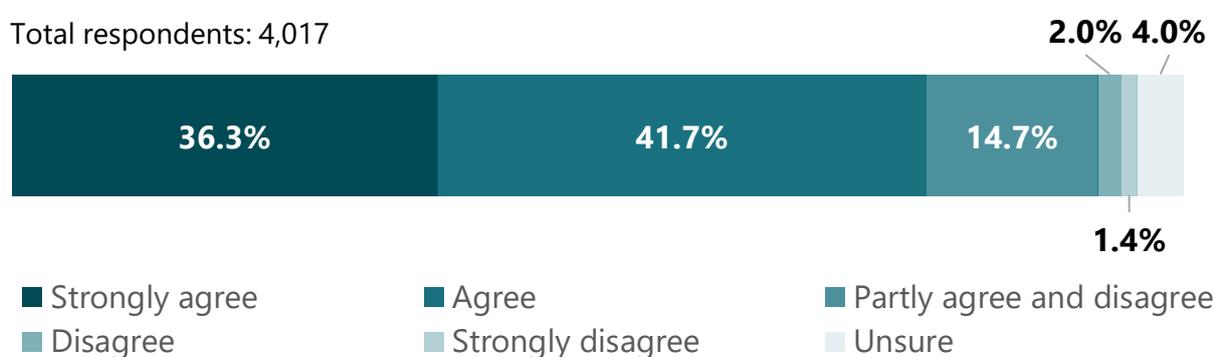
Aim 1: Learners for whom a qualification-level centre assessment grade and rank order are submitted will receive a grade.

For Aim 1, respondents were asked to consider whether learners should receive a grade if a centre is able to submit a centre assessment grade and rank order for the respective qualification. A key consideration for this proposal was that, as a consequence, private candidates who do not have an existing relationship with a centre may not receive a grade because the centre does not have enough evidence to inform a judgement.

2.1 To what extent do you agree with this proposal?

Figure 2

Total respondents: 4,017



Of the 4,017 respondents who answered this question, 78.0% agreed or strongly agreed. Just 3.4% of respondents disagreed or strongly disagreed with the proposal.

1,149 respondents provided written comments to explain their response. Many respondents focused their comments on the benefits and considerations of using teachers' professional judgements as a core part of the process for calculating grades this summer. These views are outlined below.

2.2 Support for the proposal

2.2.1 A fair approach

Respondents who supported the proposal often reported that the approach was fair, particularly given the circumstances surrounding the cancellation of exams this summer and the need to calculate grades for learners in a different way to usual.

The most common reason why respondents supported the proposed approach was because it will enable nearly all learners to receive a grade in the qualifications that they entered.

Respondents gave a range of reasons outlining why they felt this was important, including that:

1. learners deserve to be rewarded for the hard work that they put into studying for their qualifications prior to the school closures in March 2020;
2. it will support learners' progression onto the next stage of their learning or into employment, without the delay of a postponed exam series;
3. it will ensure this year's cohort of learners are not disadvantaged compared to learners in other cohorts;
4. grades are needed to enable learners to complete university or job application forms in the forthcoming academic year;
5. not awarding grades would be detrimental to learners' wellbeing and their attitudes towards future learning.

Pupils have been studying hard for their qualifications and due to no fault of their own have been placed in this unprecedented position. It would be immoral not to give them a grade. Their mental health and well-being would be negatively impacted upon. They would lose confidence with the educational system, their teachers and may become disaffected towards lifelong learning.

Respondents also felt that the proposed approach is fair because it relies on the professional judgement of teachers, who they felt were best placed to provide the information required for learners to receive a grade. The reasons given for this included that:

1. they have access to a wide range of information including prior attainment and achievements in non-examination assessment (NEA) and classwork this year, which should provide a good evidence base to make a holistic judgement of how a learner was likely to perform in their exams this summer;
2. they know each learner, their potential and any extenuating circumstances that may mean a learner deserves a grade that could not be determined by a statistical model alone;
3. they understand the qualification requirements well enough to predict a learner's likely performance against the assessment criteria.

I believe that educational professionals have collated a range of evidence and data of their learners to determine their progress and ultimately support students where necessary. With such information, centre assessment grades should result in a qualification being awarded based on the progression identified by the professional persons.

A few respondents noted that they welcome the trust that has been placed in teachers to complete this process.

Further reasons provided to explain why respondents felt the proposed approach is fair included that:

1. putting learners into a rank order means it will be possible to identify which learners were most likely to secure a certain grade so that they are not downgraded at the expense of another learner who was less secure within that grade;

2. the statistical standardisation model will help to identify and mitigate potential bias in professional judgements.

Some respondents felt that although the approach was not necessarily ideal, in the absence of an exam series, it was the best option. Other respondents simply noted that they felt it was a fair approach and provided little or no elaboration.

2.2.2 Private Candidates

Respondents that specifically agreed with the proposed approach for private candidates recognised that the approach may cause concern but agreed that grades can only be awarded where a centre is confident in the grades and rank orders that they are submitting for candidates. Respondents also felt that the proposal will ensure that centres do not feel pressured into providing grades for individuals where they feel unable to make such an informed professional judgement.

[Respondent] welcomes the recognition within the consultation document that centres should only award grades to 'private candidates' where they are confident that they are able to make accurate judgements about their abilities. This is important as it will help to ensure that teachers are not put in the difficult position of having to award grades to individuals for whom they have insufficient evidence to be able to make an informed professional judgement.

2.3 Concerns about the proposal

The majority of respondents discussed their concerns about how accurately they felt teachers would be able to estimate what grade learners were most likely to achieve this summer had they completed their assessments. Some respondents expressed concerns that some private candidates may not receive a grade this summer.

2.3.1 Progression in learning during the summer term may not be recognised in the centre assessment data

Respondents felt that because many learners progress in their learning during the summer term, centre assessment grades may under-estimate what a learner would have achieved had they completed their assessments this summer. Respondents noted that learners can make progress in the summer term because they:

1. increase the amount of effort that they put into studying as their exams approach;
2. complete their learning programme and have a more rounded understanding of the subject being assessed;
3. mature later in the academic year and begin to focus on their studies more;
4. reduce the number of subjects they are studying to enable them to focus on improving their attainment in their priority subjects;
5. participate in targeted interventions to help them prepare for exams.

I believe the hard work put in by students on the lead up to exams will be ignored. As all students know, nobody puts in as much revision for schoolwork during the year than compared to how much work they put in before exams. I'm worried that this hard work won't be considered and that students will only be given a grade from work previously done. I know many students who were perhaps not working at the level they wanted to in class but were working extremely hard at home and were preparing to work hard ready for exams.

Whilst many respondents who discussed a learner's progression in the summer term did not appear to have noted that teachers have been advised to consider this in their judgements, some respondents were unconvinced that teachers would be able to accurately account for such progression because it would differ for each learner.

2.3.2 Some learners perform better in final exams than in other forms of assessment

Respondents expressed their disappointment that learners would not be able to sit exams this summer, which they saw as a missed opportunity for learners prove to themselves, and others, what they are capable of. Some respondents noted that some learners do better in exams than NEA or classwork, and as a result, could be disadvantaged by this approach. There was some concern that this may particularly affect boys.

It was also noted that there are always some learners who exceed expectations in exams. As teachers will be unable to identify these individuals, it was considered likely that some learners will be disadvantaged this summer.

2.3.3 Concerns about the evidence being used by centres to inform their judgements

Some respondents raised concerns about the use of different types of evidence to inform the centre assessment data. A few respondents felt unclear as to what evidence centres would be using to inform their judgements and requested further guidance on this.

Mock exams and classwork

There was particular concern that results of internal assessments would not be an accurate indication of likely exam performance this summer. Respondents noted that as outcomes of internal assessments, such as mock exams, are not intended to be used for the purpose of calculating final grades, many learners spend less time preparing for them than they do for their final exams. Respondents suggested that this is often because they balance preparing for these assessments with other tasks, such as completing NEA in other subjects or applying to university, but also because they do not hold the same value for learners. It was also noted that mock exams often take place before all teaching and learning has been completed, and some learners use them to practice their exam technique or learn what topic areas they need to focus on in their revision for the final exams. As a result, respondents felt it was reasonable to expect that learners' performance in final exams would exceed their performance in internal assessments.

Assessments are used to help students identify what they struggle with and therefore over the year building up and improving those skills for the summer exams. Additionally, when students sat those assessments, they would have been unaware that they would have gone towards the final GCSE grade. Therefore, gives students a disadvantage compared to if they were to sit the real exam with months of preparation beforehand.

It was suggested that the guidance for centres should clearly encourage teachers to reflect on how much learners generally improve on their mock exam results and take this into account when arriving at their centre assessment grades. It was also suggested that centres could conduct oral assessments or set past papers for learners to complete at home and then use this as evidence of their current ability.

Another point raised was that as a result of poor performance in mock exams, some learners have worked with a private tutor. There were concerns that teachers would not be able to take this into consideration when deciding on their centre assessment grades, and as such, these learners' grades might be lower than what they would have achieved in the final exam. It was suggested that in these instances, centres should be required to liaise with the private tutor and to take their comments into account when making their judgement.

It was also noted that mock exams are not standardised across centres. Examples given of differing practices included that:

1. not all centres conduct mock exams;
2. some learners may have sat a mock exam that was more challenging than learners at a different centre;
3. some teachers mark mock exams more generously than final exams to boost the confidence of their learners, whilst other teachers mark according to the assessment criteria used in final exams to encourage their learners to boost their efforts;
4. some centres undertake mock exams in formal exam conditions, whilst other centres conduct them in classroom situations.

Performance in mock examinations need to be disregarded as there is no standardisation in allowances made in marking. Some centres mark up to boost pupil morale, some mark down to encourage pupil effort for the 'real thing'.

As a result, the evidence being used to inform the centre assessment data will differ, which respondents considered to be problematic.

Due to the concerns outlined in this section, respondents cautioned that if mock exam outcomes and classwork are used as a basis for centre assessment grades, the outcomes this summer may be open to challenge and lack credibility.

Non-Examination Assessment (NEA)

Respondents expressed mixed views about the extent to which NEA that learners have completed this year should inform the centre assessment data. Respondents noted that in some subjects, learner's NEA was submitted to WJEC prior to the school closures, but as it

has not been marked or moderated, teachers are unable to take the results into account. Respondents felt that as NEA is often completed in controlled conditions, the results would have been a useful indicator of performance in exams.

In subjects where the NEA has been marked internally, some respondents felt that centres should use these results as the basis for their judgements as they are likely to provide a better indicator of performance than mock exams or classwork. Other respondents cautioned against using the NEA results because:

1. learners may have improved on their NEA outcome in their final exams as they would have been able to focus more without the distraction of university applications, mock exams or NEA in other subjects;
2. for some subjects, NEA outcomes are higher than exam outcomes, and as a result, if the centre assessment data is based on NEA performance, it may be skewed;
3. some learners excel in NEA but struggle more in exams;
4. not all learners will have completed their NEA.

It was requested that the extent to which teachers should use learners' performance in NEA to inform their judgements is clarified in the guidance documents to ensure consistency across centres.

A lack of appropriate evidence

Respondents queried how grades would be determined for learners who had been absent for a prolonged period of time, for reasons such as ill health, and for whom centres may therefore lack knowledge and evidence of their learning. Similarly, it was queried whether centres would be encouraged to consider how individual circumstances could have impacted on a learner's performance to date and whether a learner's work ethic should be considered.

2.3.4 Concerns about the accuracy of centre assessment data

Teacher bias

Respondents were concerned that because the process will not be anonymous and teachers have a pre-existing relationship with their learners, the centre assessment data could be subject to bias, either conscious or unconscious. As an example, there were concerns that teachers may favour learners who work harder in lessons or who they have developed a more positive relationship with.

We can only trust that all teachers remain objective, awarding pupils what they believe they would have attained had they been able to sit the exam and not allowing relationships with these pupils, built up sometimes over half a decade or more, to cloud judgement or result in any bias.

Respondents made a number of suggestions for how they felt potential bias could be mitigated, which included:

1. requiring centres to provide evidence of their internal standardisation procedure that clearly demonstrates how judgements have not been overly influenced by one person;
2. providing further advice or training materials for teachers on avoiding both conscious and unconscious bias in decision-making.

Linked to the suggestion that the centre assessment data should be internally moderated to ensure no one teacher has too much influence, a query was raised about how judgements would be moderated in centres where there is only one teacher in a department. It was suggested that the Guidance for Centres should be updated with specific advice on how outcomes could be best ratified in these instances.

A few concerns were also raised that teachers may unconsciously have lower expectations of certain groups of learners, such as those with a visual or hearing impairment, which could impact on their judgement. To avoid repetition in this report, these issues are explored in depth in the summary of responses to Aim 4.

Teacher knowledge

Respondents were concerned that some teachers may lack the required knowledge and experience to be able to provide accurate judgements, either because they are new to teaching the specification, have limited contact time with the learners, teach a large cohort or have only been teaching certain learners for a reasonably short period of time. The latter point was most often raised in relation to AS learners or learners who were completing a qualification at a new centre over the course of one year. It was also raised in relation to GCSE subjects such as Religious Studies, where teachers in some centres only have one hour a fortnight contact time with learners.

Instances were also discussed where certain learners have had a number of different teachers over the course of their qualification study (either within a centre or as a result of transferring between centres) or were currently being taught by a supply teacher. Respondents queried whether teachers would have the appropriate insight to provide a suitable grade and rank order in these situations.

Similarly, it was noted that teachers in some alternative settings, such as Pupil Referral Units (PRUs), have limited contact with their learners, and specific guidance for how these settings should form a judgement was requested.

Respondents also raised concerns about whether all teachers would have the appropriate experience of working with learners with additional learning needs (ALN) to be able to accurately predict what they were most likely to achieve in the final exams. In these instances, it was suggested that centres should involve the relevant specialist support staff in the decision-making process.

Respondents also queried how teachers would be able to account for work learners have completed at home throughout the year, such as revision or extended learning.

It was noted that some learners thrive when studying independently at home, and queries were raised about a teacher's ability to be aware of this, and to therefore take it into account.

Consistency across centres

A few concerns were raised about how consistently each centre will approach the process of awarding each learner with a centre assessment grade and rank order. It was felt that some centres may be more generous than others, and as a result, some learners may be advantaged, and others may be disadvantaged. To help ensure consistency across centres, respondents made a number of suggestions, including:

1. subjecting each centre's judgements to moderation or verification by an external organisation, such as Estyn, or engaging an examiner to review a sample of learner work;
2. challenging centres that have clearly submitted incorrect information early on;
3. engaging the local authorities and regional education consortia to support and challenge centres as they are making their judgments;
4. ensuring that the guidance for centres clearly states what evidence they should use and how strongly this should inform their judgements;
5. using previous data to identify which centres have previously inaccurately marked NEA and asking them for further assurances about how they have arrived at their centre assessment grades.

2.3.5 Concerns about the rank ordering process

Concerns about the process itself

A number of respondents raised concerns about the rank order process, with some reporting that centres should provide a grade for each learner but should not be required to put them into a rank order.

Some respondents were particularly concerned about how fair the process would be to learners who happened to be ranked lower than their peers, when in reality, they were of a very similar ability, particularly if it resulted in them being awarded a lower grade. It was suggested that in these instances, allowing centres to submit tied ranks, where learners are grouped together, would be helpful.

Similarly, respondents felt that it was unfair to rank learners who had been entered for different tiers on the same continuum because each tier covers different topics so teachers would not be comparing 'like with like'. It was suggested that in subjects which offer entry at different tiers, a separate rank order should be submitted for each tier.

Queries were raised about how a rank order will identify the differences in ability between learners. It was felt that because the rank order will appear as a list, it will be natural to

assume that each learner is equally spaced in ability from the one above and below them. It was felt that this would be a particular issue in centres or subjects with low entry numbers. It was suggested that teachers should be required to provide an indicative mark alongside the rank order so that it is easier to determine the difference in ability between learners that are ranked near each other.

My only comment would be that a simple rank order is a slightly blunt instrument - in so far as every learner will be considered to be equally spaced from the one above and the one below them. Under conventional arrangements, where marks are given, groups of learners could be seen to be closely achieving at or near the same level or somewhat distanced from the ones ranked above or below. Would it not be helpful for teachers to give a predicted mark alongside the predicted grade and rank so that it would be clearer how close or not an individual learner is to those ranked alongside them?

It was considered unrealistic to expect teachers to have enough knowledge about each individual learner to rank order them accurately, especially in large centres. Some respondents noted that the research included in Ofqual's Equality Impact Assessment and referred to in Qualifications Wales' consultation as justification for the proposed approach, was misleading in this regard because it gave no indication of rank ordering reliability in a large centre.

There were also concerns that as rank ordering requires learners to be compared against each other, rather than against an assessment criterion, this part of the process could be particularly vulnerable to bias, especially where learners are of a very similar ability. Some respondents reported that the prospect of learners being ranked in this way was adversely affecting the wellbeing of learners.

A few education professionals reported that they would appreciate further guidance on the rank-ordering process as they were unsure what was expected of them and how they should arrive at their judgements.

Intra-centre concerns

Respondents queried how centres would rank order learners across different classes. In most instances, it was noted that each class will have been taught by a different teacher and as such, it could prove difficult for teachers to agree an overall rank order when they do not know exactly how each learner compares to another.

Rank order is not always straightforward. Where a subject is taught across several classes by numerous teachers, how can the year group be accurately ranked, given that teachers only know their own pupils and not those in other classes. How they can they distinguish between them to accurately rank?

A few respondents were particularly concerned about the process for rank ordering learners in the Skills Challenge Certificate where it is not uncommon for learners to be taught each challenge by a different teacher, and different challenges contribute a different amount to the final grade. It was felt that these complexities will make this process very challenging for

this qualification, especially in Further Education (FE) colleges. It was suggested that in this instance, a rank order for each class should be considered.

Concerns were also raised that some learners may be disadvantaged because they have been in a teaching set that is lower than their ability. There was a concern that if learners are ranked according to their teaching set, learners who have improved since the teaching sets were established may lose out. As a result, it was suggested that centres are encouraged to rank learners across teaching groups.

There were particular concerns that learners in large centres may be disadvantaged as more learners would be competing for each grade, which they felt could see some move into an adjacent grade unfairly. It was suggested that as a result, learners should be grouped, rather than ranked individually.

Respondents also queried how learners should be ranked if, for example, learners in both Year 10 and Year 11 have been entered to sit the same qualification (such as GCSE English Literature). There was uncertainty over whether to rank them together or separately. A preference was noted that separately would be simpler and account for factors such as maturity. It was suggested that this would also prevent issues where Year 11 could be disadvantaged if only higher ability Year 10 learners were entered in a centre and prevented some Year 11s from getting a higher place in the rank order.

Similar queries were raised about whether learners that are resitting a qualification should be ranked alongside learners who are taking the qualification for the first time. It was felt that including these learners in one rank order would be particularly challenging for centres, particularly as those who are resitting are often of a very similar ability.

Particular concerns were also raised about how the process would work in an FE college where learners who are resitting a qualification are often of a very similar ability. It was felt that this, combined with the fact that in some settings learners are taught by different teachers across different campuses, will make it very difficult for them to be ranked accurately. It was suggested that it would be more meaningful for centres to state whether a learner was strong, average or weak within each grade.

Inter-centre concerns

Respondents also raised concerns about how consistently learners would be ranked across different centres, and how the process would take account of the possibility that a learner ranked first in one centre may have just scored the top grade, whilst another centre will have a number of learners that would have more comfortably achieved the top grade. There were concerns that the ability of other learners within a centre could determine the grade for an individual, which could have been different had they been registered through another centre. These comments were often linked to queries about how grade boundaries would be decided upon and how clear it would be from each centre's submission how comfortably a learner was expected to achieve that grade.

Some schools contain more higher achievers than others, meaning that in one school a student could be ranked first, then in another they only be in the middle.

I'm afraid that this may make some students disadvantaged due to the different students they get compared to depending on schools during the rank ordering process.

2.3.6 Concerns about the use of prior attainment data

Respondents also commented on the use of prior attainment data as part of the evidence base for calculating grades this summer. As it was not often clear whether respondents were referring to the use of prior attainment data to help inform the centre assessment data or as part of the proposed statistical standardisation model, and to avoid repetition in this report, respondents views on this are explored in the commentary on Aims 3 and 5.

2.3.7 Alternative arrangements need to be sought for private candidates

Some respondents felt strongly that alternative arrangements must be sought for candidates who do not have an existing relationship with a centre to ensure that these learners are not disadvantaged and unable to progress. It was suggested that many respondents may not have reflected on the aspect of the proposal that noted that not all learners will receive a grade because it was not directly relevant to them. A few respondents who did raise concerns were therefore worried that their views may not be strongly represented in the findings. They cautioned that although concerns may have only been raised by a few respondents, they must be given due care and attention.

A few respondents felt that a number of private candidates are likely to be beyond compulsory school age and thus not eligible for public funding. It was felt that not awarding grades to these learners could therefore put a financial strain on them and their families, which could be a barrier to them receiving their qualifications in the future. Respondents also noted that the demographic of private candidates is likely to be diverse and include learners with characteristics that are protected under Equalities legislation or learners with ALN. It was felt that these groups of learners should be identified so that the impact on them can be carefully considered.

Specific concerns were raised in relation to learners who are resitting A level qualifications as a private candidate because in many instances, their centre has limited evidence of their progress over the past year. This will make it difficult for centres to provide centre assessment data, and as a result, learners may not be able to progress onto their chosen university courses.

Suggestions given to help overcome the issues in awarding grades to private candidates included:

1. facilitating an exam for these candidates whilst adhering to social distancing guidelines;

2. encouraging centres to work with private tutors to develop a body of evidence that will enable that centre to make a judgement about the learner's likely performance in exams this summer;
3. enabling private candidates to provide evidence of their work directly to WJEC for consideration;
4. encouraging centres to work directly with private candidates to produce a portfolio of work which can be assessed in line with other learners at that centre.

2.3.8 Additional comments

Some respondents expressed concerns about the impact of learners receiving a grade that is different to what they would have received had they completed their assessments. These impacts included not being able to access further or higher education courses in September or being admitted onto a course that is too difficult. It was highlighted that this could adversely affect the wellbeing of learners and affect confidence in the qualification system.

As the proposal noted that all learners for whom centre assessment data is submitted will receive a grade, respondents queried how the process will take account of learners who were likely to be awarded a 'U' had they sat their exams. It was noted that this is not always considered to be a grade.

A query was also raised as to what safeguards are in place to ensure that centres do submit centre assessment data for all eligible learners. This was linked to a concern that a learner could be in the position of not receiving a grade due to a submission error by the centre.

Other comments that were raised by respondents included:

1. The wording of the aim should be amended to note that each learner should receive a 'fair' grade, rather than just a grade.
2. Awarding qualifications based on centre assessment data could stimulate debates about the future of exams. Whilst some felt that the use of centre assessment data was more likely to represent a learner's true ability than exams, others cautioned that extensive research would be needed to support any future decision.
3. There were mixed views on whether centre assessment data should be shared with learners. Whilst some respondents noted that to ensure integrity of professional judgements, it is important that learners are not told their centre assessment grade and position in the rank order, others felt that sharing this with learners would make the process more transparent and enable learners to challenge their centres if they think the judgements are incorrect. It was suggested that where learners are unhappy with the judgement made by their centre, they should be able to submit their own work to WJEC as evidence of their ability in a subject.
4. There is a need to check that centre assessment grades are reflective of outcomes in each subject in previous years. This was linked to a concern that some subjects may be more harshly graded than others. It was suggested that there may be a need for some subject-specific guidance to mitigate against this.
5. Whether there were issues around getting consent from learners to use their prior attainment in class and in internal and external assessments for this purpose.

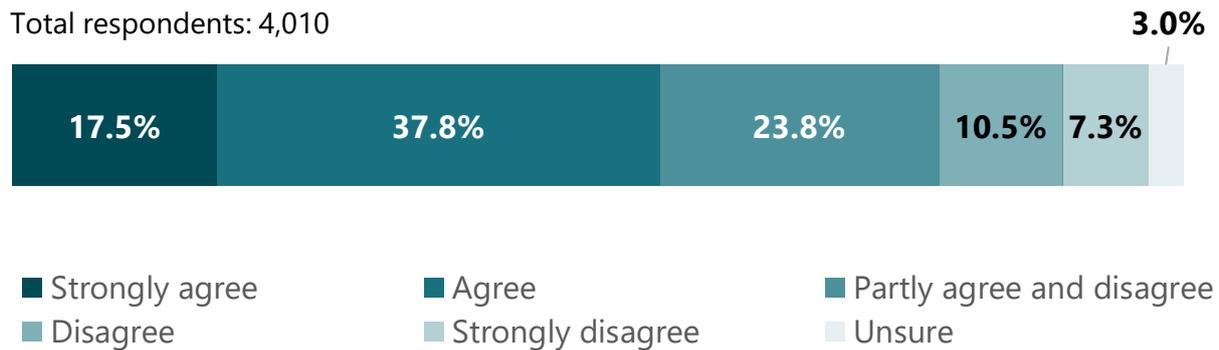
6. It is vital that teachers are properly supported throughout the process of providing centre assessment data, especially newly qualified teachers who have less experience of predicting outcomes or knowledge about how much learners can develop in the summer term.

Aim 2: National outcomes for summer 2020 will be broadly similar to those in previous years to reduce the risk of unfairness for learners over time.

For Aim 2, respondents were asked to provide their views on whether national outcomes for summer 2020 should be broadly similar to outcomes in previous years.

2.4 To what extent do you agree with this proposal?

Figure 3



4,010 respondents answered this question. As shown in figure 3, 55.3% of these respondents agreed or strongly agreed, whilst 17.8% disagreed or strongly disagreed with the proposal. 1,539 respondents provided written comments to explain their response.

A number of the written comments indicated that some respondents had misunderstood the question. Firstly, many respondents discussed their views on whether outcomes should be broadly similar for each centre, rather than at a national level. As this consideration relates more to Aim 3, to avoid repetition, these comments have been integrated into the discussion in the next aim. Similarly, some respondents discussed the use of an individual learner's prior attainment in qualifications or units already sat. To avoid repetition, these comments are explored in relation to Aim 5.

Some respondents interpreted the question as asking them to provide a view on whether or not broadly similar outcomes would be possible this summer, often not accounting for any standardisation. An overview of these comments has been included at the end of the discussion on this aim.

It is important to consider the ways in which it appears this question has been misunderstood when considering the levels of agreement presented in figure 3. Written comments suggested that respondents generally had more concerns about the impact of ensuring broadly similar outcomes at a centre level, than at a national level.

2.5 Support for the proposal

2.5.1 Fairness

Respondents noted that striving for broadly similar national outcomes was fair because it would ensure results are consistent with other years, and therefore would not disadvantage any cohort of learners. It was felt that this would help ensure that learners due to sit exams this summer will have equal opportunities to previous and future learners. As an example, it was noted that they will be able to compete fairly for university courses and jobs.

Respondents also noted that learners had completed nearly all the learning for these qualifications prior to school closures in March 2020. They felt that it was therefore fair that the qualification outcomes are consistent with previous years to help ensure that the hard work learners have put into their studies to date is fairly rewarded.

A few respondents noted that aiming for 'broadly similar' results was positive because it would allow for improvements where the evidence justified this.

2.5.2 Credibility

Respondents felt that consistent national outcomes are important in maintaining public confidence in the qualifications and ensuring that they are recognised and valued by universities and employers. Some respondents noted that it is important to avoid perceptions that qualifications awarded this year are less valuable than those awarded in other years or that they are an unreliable indicator of achievement.

If grade profiles were to change substantially, it was felt that qualifications awarded this year may not be perceived as 'real' qualifications, which could affect the ability of this year's cohort of learners to compete for university places or jobs in the future.

If the grades don't follow a similar pattern to that of previous years and years to come the grades will be very difficult to analyse by universities/employers. They will essentially become worthless.

Some respondents noted that because outcomes will largely be based on centre assessment data, there is already a risk that they are perceived as less valuable by some, and it is therefore vital that similar grade profiles are maintained.

2.6 Concerns about the proposal

2.6.1 Qualification outcomes should allow for generosity this year

Although agreeing that national outcomes should be broadly similar, some respondents noted that determining a fair and appropriate grade for each individual learner is much more difficult than getting the national level distribution correct. They therefore suggested that national outcomes may need to be slightly higher this year so that individual learners, particularly those who are performing around the grade boundaries, are not disadvantaged or unfairly rewarded.

It was also noted that it is difficult to predict how a learner will perform in an exam. Every year there are some learners who unexpectedly perform poorly in their exams and receive a final grade that is lower than their predictions. As teachers will not be able to identify which learners this may apply to, centre assessment grades will not be able to fairly account for this. It was therefore felt that national outcomes should be slightly higher this year because there will be no learners who unexpectedly underperform.

Whilst I appreciate that it would seem highly convenient if grades awarded this year showed a significant spike in performance, it is also potentially detrimental to learners to force the grades awarded to fit into a pattern. WJEC and other exam boards claim students should not suffer because of this process, and therefore teachers should not have to predict a pupil's failure where it is more likely/equally as likely for them to perform well in exam conditions.

Similarly, it was noted that centres are unlikely to predict a learner a 'U' grade as they are unlikely to have entered a learner for an exam if they thought this was the likely outcome. As a result, they felt it was reasonable to expect that outcomes at this level will be inflated. Another emerging theme was that there are a number of learners who are performing in accordance with two different grades, and that their final grade would largely depend on how they performed on the day of the exam. As these learners have not had the opportunity to prove that they are performing at the higher grade, it was suggested that any learner in this situation should be given the benefit of the doubt. This would result in slightly increased outcomes.

Linked to the proposed appeals process, it was suggested that results should be awarded with a degree of generosity as learners cannot appeal this grade themselves and if it is lower than they were expecting, they could lose a university place or job offer. It was also suggested that to avoid disappointment and enable progression, all A level learners should receive at least the predicted grades on their university applications.

It was also suggested that a slight increase in results would not undermine public confidence in the qualification system because the way in which qualifications are being awarded this year is different from previous years, and the qualifications learners receive will always be regarded as 'different'. As a result, they felt that slightly higher results would be accepted by most.

2.6.2 National outcomes should not be compared to other years

Respondents did not feel that it is reasonable to compare this year's cohort against other cohorts as we are in a unique situation and grades are being awarded differently. They also noted that this year's learners have been disappointed that they are unable to finish their course or sit their exams, and felt that as a result, we should be prioritising the wellbeing of these learners, rather than striving for broadly similar results.

I am concerned after reading the consultation that too much pressure is being put on fairness for pupils in previous and future years, rather than recognising that 2020 learners will be suffering the most. It would have been good to see more emphasis placed on

protecting the welfare and self-esteem of 2020 pupils who have had to cope with such a difficult situation that no other year has had to cope with. This over-emphasis on ensuring fairness to other years is strange.

Some respondents noted that Welsh Government have regularly referred to their wellbeing agenda throughout the pandemic, and were concerned that standardising results to be broadly similar to previous years when learners haven't had the opportunity to sit exams, could be failing to acknowledge this agenda.

Respondents also considered it unfair to standardise outcomes based on the performance of other cohorts. Respondents noted that every learner is an individual and felt that the process of standardising outcomes to ensure broadly similar results fails to account for this. They felt that it is important that a learner's grades are a fair reflection of their own ability and have not been manipulated to fit a trend based on the performance of other learners.

It was also considered important to recognise that there will always be exceptions to a trend and every effort should be taken to explore whether that could have been the case this year. It was suggested that one such reason for a change could be that the strength of cohorts can vary. Although the majority of comments on this theme related to centre-level variation (and are discussed in Aim 3), there was also some suggestion that the strength of the national cohort could vary. It was suggested that if this year's cohort were a stronger cohort than previously, some learners were likely to receive calculated grades lower than they would have achieved had they sat the exams.

It was also suggested that the ability of this year's Year 11 cohort may vary from previous cohorts because they were the first year group to experience the Foundation Phase. Respondents also noted that schools are currently adjusting their teaching methods to prepare for the new curriculum to be implemented in September 2022. It was suggested that this could also have had an impact on national outcomes, but respondents provided little explanation of the type of impact that could be expected.

There were also some concerns that if centre assessment grades are deemed to have been inflated, and as a result, are adjusted to ensure broadly similar outcomes at a national level, centres who have been fair in their marking may be disadvantaged as their judgements may be brought down in line with centres who have marked too generously. These respondents did not appear to have recognised that the model will also consider historical results of learners in the centre to account for this.

A few respondents took the opportunity to note that they do not think the approach to ensuring broadly similar outcomes every year is fair because it limits the extent to which centres can improve. It was suggested that this can have an effect on how well centres can fulfil recommendations for improvement from Estyn or the regional education consortia.

To overcome concerns about standardising outcomes, respondents made a few suggestions, including:

1. learners should be assessed on their performance against assessment criteria, rather than on the statistical likelihood of them achieving a certain grade;
2. prior attainment data, such as the outcomes from National tests in Key Stage 2 or 3 or previous qualifications, should feature heavily in the standardisation model to identify if this year's cohort is stronger than previous ones;
3. the standardisation model should make use of data to identify any cohort variance in terms of sex, eligibility for Free Schools Meals or ethnicity;
4. branding this year's results as predicted grades to avoid any attempts to compare to previous years, which would remove the need for standardisation.

It was also suggested that the approach to standardising outcomes should be consistent across UK jurisdictions to ensure learners in Wales are not disadvantaged compared to their counterparts.

A few respondents noted that they disagreed with the proposal because they did not think that outcomes were standardised in other years.

2.6.3 It is reasonable for outcomes to improve for new specifications

Respondents noted that as some GCSE, AS and A level specifications are relatively new, it is expected that outcomes would improve this year. This is because teachers have become more confident in teaching the specification, adapted their teaching practices based on feedback from previous exam series' and have been able to make use of newly developed resources and past papers to support their teaching.

2.6.4 Lack of clarity

A few respondents noted that they were unsure and requested further clarity on what is meant by terms such as 'broadly similar' and 'previous years'.

A few respondents felt that further detail on the proposed standardisation model and how it will be developed and tested is required to help them make an informed opinion.

Other requests for clarity included confirming whether the aim relates to national, regional, or centre-level outcomes, and informing parents about how they can access previous year's data to assure themselves that outcomes are broadly similar on results day.

2.7 Alternative interpretation of proposal

As noted in the introduction to this aim, some respondents understood the question to be asking whether they thought the proposed approach to awarding qualifications this summer would result in broadly similar outcomes or not.

Respondents who felt that outcomes would remain broadly similar provided the following reasons for their opinion:

1. the majority of the learning for these qualifications had occurred in the same conditions as in previous years and with the same teachers;
2. there is little variation in general cohort ability normally and no reason to believe this year would be any different;
3. teachers will be considering a range of evidence and have experience in estimating grades for their learners so their judgements should be a fair reflection of ability.

Respondents who felt that outcomes would not be broadly similar tended to suggest that outcomes would be lower this year because:

1. learners are being assessed on different variables that do not consider factors such as intensive revision in the summer term or work completed with a private tutor;
2. learners are not sitting an exam so are unable to show their full potential or how they have improved from their mock exams;
3. learners have not completed the course material or revision, and have completed some work at home during a global pandemic;
4. NEA has not been marked in most subjects so cannot contribute towards the final grade;
5. some learners may be disadvantaged by teacher bias.

Some respondents noted that they did not think outcomes would be similar due to the current situation, but did not provide any further explanation to suggest whether they thought they would be better or worse. A few respondents noted that it is not possible to determine whether results would have been broadly similar because they will not know what grade they would have got had they completed their assessments.

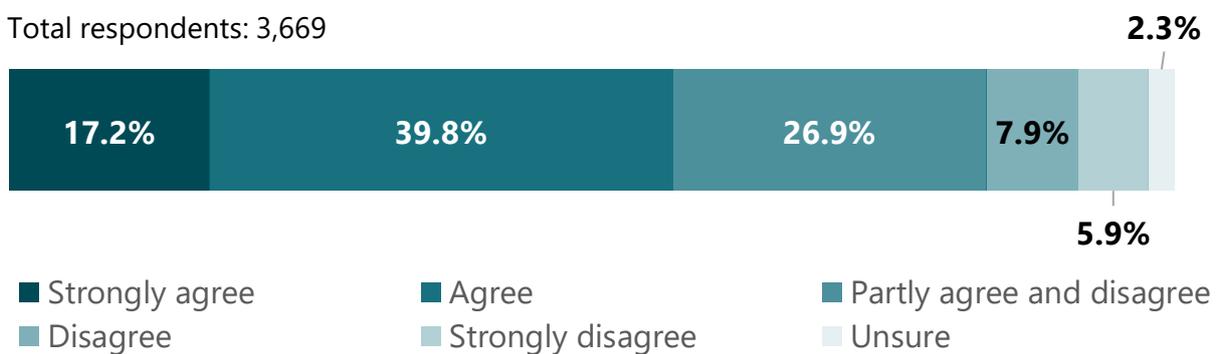
Aim 3: A statistical standardisation model which uses historical evidence of centre performance and the prior attainment of learners, along with the centre assessment data, is likely to be the fairest approach and produce more accurate calculated grades.

For Aim 3, respondents were asked to provide their views on whether a statistical standardisation model which uses historical evidence of centre performance and the prior attainment of learners, along with centre assessment data, is likely to be the fairest approach and produce the most accurate calculated grades.

2.8 To what extent do you agree with this proposal?

Figure 4

Total respondents: 3,669



Of the 3,669 respondents who answered this question, 57.0% strongly agreed or agreed whilst 13.8% of respondents disagreed or strongly disagreed with the proposal. 1,478 respondents provided written comments to explain their response.

2.9 Support for the proposal

2.9.1 Fairness

A number of respondents felt that the proposed approach was either fair, or the fairest approach that could be implemented in the circumstances but provided little elaboration of their reasoning for this. Some respondents agreed that generally the approach was fair but provided some caveats, which have been outlined in section below.

Of those respondents that explained their reasons for agreeing, the most common theme was that the proposed model considers a range of evidence that will provide a rounded picture of each learner’s potential achievement this summer.

Reflecting comments outlined in Aim 1, some noted that it is a reasonable approach because it will help ensure nearly all learners get a credible grade and can therefore progress onto the next stage of their learning or into employment.

2.9.2 Benefits of the proposed statistical standardisation model

Respondents felt that it is vital that a statistical standardisation model is used to ensure that fair qualification grades are awarded to all learners in Wales. Some respondents specifically agreed that this can only be attained using the types of data outlined in the proposal.

It is essential that a robust standardisation process is implemented so that fair qualification grades are awarded to learners across Wales. The only reliable way to achieve this aim is to standardise the centre assessment grades submitted by teachers considering historical evidence of centre performance and the prior attainment of learners, where such evidence is available.

Some respondents noted what they saw as specific benefits of the proposed standardisation model, including that it will:

1. help to ensure consistency across centres as well as across departments within centres. Some respondents felt that mitigating against this was particularly important due to the pressure that some teachers face from senior leaders to achieve certain grades or the natural tendency for teachers to be generous in the allocation of estimated grades.

There is natural tendency to want your pupils to do well and many teachers face pressure to get good results. This will lead to some overstating their results so you will have to limit results to be fair.

2. protect teachers from personal challenge by learners or their parents who are unhappy with the outcome;
3. provide a robust way of checking the centre assessment grades for accuracy and reliability, which will mitigate against the risk of teacher bias or lack of knowledge and help ensure that learners receive a fair outcome;
4. help ensure that learners are not penalised for not having the opportunity to complete assessments this year by making sure that the centre assessment data is based on likely exam outcomes, rather than performance at the time of school closures.

Some respondents were particularly concerned about the potential for the centre assessment data to be affected by bias against certain groups of learners, including those from lower socio-economic backgrounds. These respondents noted that they were pleased that a statistical standardisation model was being employed as they felt it would be able to identify such bias and make any reasonable adjustments.

It was also noted that a type of standardisation occurs every year and it was therefore only right that a similar approach is adopted this year.

2.9.3 Merits of the data that will likely contribute to the statistical standardisation model

Some respondents noted that they specifically agreed with the use of certain types of data that will likely contribute to the statistical standardisation model this summer:

1. *Centre assessment data* – those that specifically agreed that centre assessment data should be included in the model reiterated the perceived benefits of this type of data explored in Aim 1.
2. *Prior attainment data* – respondents that specifically agreed with the use of prior attainment data felt that it would provide a good indicator of likely performance in this summer's exams because the assessment would have taken place in exam conditions, and it is likely that learners would have prepared more for these exams than for internal assessments. Further discussion on the perceived benefits of prior attainment data is in Aim 5.
3. *Centre historical data* – it was felt that for the majority of centres, variation in outcomes each year is small and historical results for learners in the centre can therefore provide a good indication of what outcomes in that centre would have been this year. It was felt that if a centre has consistently over- or under- estimated grades, comparisons with centre historical data could identify this, especially when used in combination with prior attainment data.

2.10 Concerns with this proposal

2.10.1 Concerns about the use of centre historical data

The aspect of the standardisation model that elicited most concerns was the use of centre historical data. Amongst the respondents who raised concerns there was a general sense that a learner's outcomes should be based on their prior and current performance, and not that of previous cohort of learners within their centre.

Cohort variation in a centre

The most commonly stated concern was that the strength of a cohort within a centre can significantly vary year on year. This was noted to be particularly important for small centres, optional subjects at GCSE and many A levels, where the performance of each individual learner can significantly impact on overall outcomes. It was reported that some subjects with very low numbers of learners, such as music, might not have enough data to reliably identify trends for that subject in their centre.

We also have very different cohorts of pupils opting for some subjects from year to year, this is particularly evident in GCSE Music but is also true of some AS and A-level courses with small numbers of candidates. It is important to avoid expecting a normal distribution curve for school results, but to look at each individual pupil.

Respondents noted that in alternative settings, such as PRUs, Adult Community Learning or special schools, the differences in cohorts across the years can be particularly marked. It was noted that learners with ALN may be particularly affected if cohort variation is not

considered for these settings. As a result, it was suggested that an alternative standardisation model may be needed for these settings, which looks at different types of evidence.

A number of respondents noted that their centre was expecting much improved results this year. Some of these respondents provided examples of how their current Year 11 cohort had performed in exams in either Year 10 or November of Year 11 as evidence of improved standards in their centre, and others provided examples of when their centre or department had experienced significant improvements in previous years. These respondents felt that not allowing for such an improvement this year could be unfair for some learners.

A few respondents noted that learners had received additional tuition outside of their centre and as a result, were expecting to outperform their centre's average performance in recent years. These respondents did not feel it was fair for their results to be dependent on what previous cohorts had achieved.

Changes in teaching practice or leadership in a centre

Some respondents noted that their centre was expecting significantly improved results this year due to changes in teaching practices. The changes discussed included:

1. introducing a three-year Key Stage 4;
2. developing new teaching resources based on feedback from the exam board in previous exam series';,
3. changing their approach to NEA;
4. developing better targeted interventions;
5. a change in teaching personnel, such as a new head of department.

Respondents were concerned that the anticipated improvements as a result of these changes may now not be realised.

Some respondents noted that their centre had been identified as needing to improve by either the regional education consortia, Estyn or Welsh Government, and as a result, had undergone significant changes, including appointing a new headteacher or working more in collaboration with other centres. It was noted that with such external support or changes in leadership, it is reasonable to expect that a centre could make significant improvements in a relatively short space of time.

It is therefore important to distinguish the difference between centres that provide over inflated grades, and those centres which were on track for a significant improvement in results [...] For schools who have been making excellent progress this year there is a risk that hard-working students will be significantly disadvantaged by not sitting public examinations through no fault of their own.

Respondents were concerned that such rapid improvements would not be detected by either centre historical data or prior attainment data, and as a result, their learners may not receive the grades that they deserve.

Other reasons given as to why some centres were expecting improved outcomes this summer included that their centre had recently moved into a new building which had helped to motivate learners by providing them with new and engaging learning opportunities, or that their centre had recently merged with another centre and as a result had been able to share resources and expertise.

Changes in qualification entries within a centre

Some respondents felt that it is important to consider the profile of learners that have been entered for each qualification in each centre this summer. Respondents identified that the following variations in entry patterns could have an impact on centre level results:

1. changes in entry requirements for some subjects so that learners who were not expected to achieve at least a grade C in a certain qualification have been entered for an alternative one;
2. changes in entry practices as a result of Welsh Government reforms to performance measures in recent years means that the ability of the cohort entering each summer has varied. Some centres noted that they now enter their less able learners early so were expecting higher proportions of their learners entering this summer to achieve at least a 'C' grade. Conversely, centres who do not enter learners early were concerned that they may be disadvantaged because other centres enter their more able learners early and as a result, they perceived that a certain percentage of the higher grades for this year had already been awarded;
3. the number of private candidates who enter through a centre varies each year.

Other comments on the use of centre historical data

Respondents felt that using centre historical data could disadvantage learners who attend poorer performing schools because they perceived that the number of learners able to attain high grades would be smaller than in higher performing schools. There were concerns that this could be a barrier to social mobility as these learners may not be able to progress into further or higher education, which could impact their opportunities in later life.

Respondents were also concerned that centres anticipating a downward trend in outcomes this summer could inflate their centre assessment grades without being challenged. Clarity was requested on how these centres could be identified.

A few respondents requested clarity on how grades will be calculated in the following situations:

1. new centres or those that have recently merged and have a different demographic in their cohort;
2. centres that have historically seen a significant fluctuation in results each year, either as a whole or within some of their departments;
3. learners who have recently moved centres or who have been taught through one centre but entered for their exams through another centre.

Suggestions for the use of centre historical data

It was suggested that not seeking a way in which anticipated changes in centre performance can be accounted for is unfair on learners and demotivating for those who have worked hard to engender such a change.

To overcome some of these concerns, it was suggested that centres should be able to submit supporting evidence to justify their grades before they are adjusted by the standardisation model. It was suggested that this evidence could include their monitoring data, self-evaluation reports or Estyn reports. Respondents felt that this evidence could be reviewed by examiners who are not marking exam papers this summer and funded by the entry fees that centres and/or learners have already paid.

Where schools are reporting a likely grade distribution that is significantly different to that produced by any statistically modelled outcome, then those schools could be asked to provide the evidence base prior to the awarding of grades. This would remove the need for an appeal by the centre after the results had been released and may, therefore, have a positive impact on the wellbeing of learners in those cases.

Alternative suggestions included:

1. allowing a tolerance of up to 15% on results at a centre-level to account for changes in cohort strength and the impact of new teaching practices or changes in leadership;
2. exploring trends in centre performance over at least three or five years;
3. prioritising centre assessment grades (and in some cases prior attainment data) in the standardisation model;
4. allowing outcomes to be slightly higher than in other years to account for the unique situation;
5. using prior attainment data for the current cohort to identify variation in strength of the cohort.

2.10.2 Concerns about centre assessment data

A number of respondents took the opportunity to express their concerns about the evidence that teachers may use to inform their centre assessment data. To avoid repetition and help build a full picture of the concerns with each type of evidence, these comments have all been reflected in the commentary on Aim 1.

2.10.3 Concerns about the use of prior attainment data

Some respondents understood prior attainment data to include learner's outcomes on mock exams or class tests. As these comments have already been explored in the commentary on Aim 1, they have not been replicated here. Additionally, to avoid repetition with Aim 5, respondents' views on the use of prior attainment in previous qualifications or units of qualifications are explored under that aim. This section will therefore focus on comments relating to the use of National Test Data or Teacher Assessment Grades submitted to Welsh

Government in Key Stage 2 and Key Stage 3 and general comments made about using any form of attainment data from a previous year.

Concerns about using National Test Data to predict GCSE outcomes

Respondents felt that Key Stage 2 National Test Data, and Key Stage 3 National Test Data and Teacher Assessment grades, all of which are collected by Welsh Government, are likely to be poor predictors of GCSE outcomes because they are diagnostic tests that only assess a limited range of range of skills. It was also noted that most learners do not prepare for these tests or consider them to be important.

The national tests were not designed for this. They are formative in nature and test a key but limited range of skills in comparison to GCSEs. They were not intended – unlike GCSEs – [to] be prepared or revised for and do not therefore assess a pupil's capacity to study and prepare.

It was noted that as a minimum, these tests would only be able to indicate possible performance in numeracy and reading. As a result, respondents suggested that they are likely to be particularly poor predictors of performance in creative or practical subjects. It was also noted that this data will not be available for all learners as some will have joined schools or colleges in Wales since the tests were completed, and not all centres complete them at each opportunity. Similarly, independent schools are unlikely to have this information for their learners.

Additional concerns included that the results of these assessments are not externally verified. It was suggested that whilst Key Stage 2 tests often overestimate a learner's potential, Key Stage 3 outcomes may underestimate potential as it was felt that some centre's may aim to keep the outcomes low so that they can demonstrate a higher level of improvement in Key Stage 4. Respondents felt that this can be evidenced by the fact that many learners achieve beyond their predictions from the end of Key Stage 3.

Internally produced data which has not been externally verified (e.g. working at levels, end of key stage data) is subject to professional judgement, but sadly it is also prone to manipulation. Where this data has been historically used to benchmark school performance, it is often 'massaged' to ensure that results remain within an 'acceptable' range. There are also instances where pupils' achievements may be downplayed in order to ensure that FFT [Fischer Family Trust] predictions are more achievable. If the validity and reliability of such data cannot be guaranteed, it should not be part of any standardisation model.

Respondents also noted that some learners adapt well to the rigours of studying for GCSEs, whilst other learners take time to adjust. As a result, the outcomes from these tests may not reliably predict GCSE outcomes, particularly in unit assessments in Year 10. It was suggested that unless it can be reliably proven that this data can accurately predict GCSE outcomes, it cannot be used with confidence.

It was felt that using National Test Data to standardise centre assessment grades would undermine education professionals because their judgements were being adjusted based on data that they considered to be less rigorous.

General concerns about using attainment data from a previous year of study

Respondents discussed a number of reasons why attainment data from a previous year of study may not be a reliable predictor of the likely attainment in assessments that learners were due to complete this summer. The comments provided by respondents suggested that many of those who raised these concerns understood the proposal to be that an individual's outcomes would be based on their own prior attainment, rather than the prior attainment of the cohort as a whole.

The reasons given by respondents to explain why prior attainment data may not reliably predict likely outcomes this summer included that:

1. some learners mature later than other learners so prior attainment data may underestimate their potential this summer;
2. changes in teaching practices and personnel in a centre can help learners improve more rapidly than anticipated;
3. learners with ALN may not have had the appropriate support in place in previous assessments;
4. learners who speak English as an Additional language (EAL) often progress quickly as their command of the language improves and can make more rapid improvements than prior attainment data would predict;
5. some learners were affected by ill health or personal circumstances in previous assessments, which they were expecting to overcome this year;
6. learners in alternative settings, such as PRUs, may have disengaged in a mainstream school setting and underachieved on previous assessments, but are more suited to their current setting and have therefore improved their performance.

As a result of these concerns, some respondents asserted that only outcomes in units already awarded and that contribute to the qualification being graded this summer should be included. Others felt that prior attainment data from one year ago would be appropriate.

2.10.4 Unavailable data

Some concerns were raised about how the model would account for instances where little historical data is available.

These concerns were primarily raised in relation to qualifications that have only been awarded once or twice before. It was noted that WJEC GCSE qualifications have recently undergone reform and that no more than three years of prior attainment data would be available. It was felt that less than three years of data would make any statistical standardisation model unreliable as it would not be able to identify trends.

Additionally, it was noted that some centres were due to enter learners in subjects for the first time this year so no prior attainment data for those subjects will be available at a centre level.

It was also noted that some learners have joined centres in Wales in recent years and as such, there is little prior attainment data available for them. It was noted that this would affect some centres and some groups of learners more than others. Groups of learners identified as being particularly affected included adult learners, Gypsy Roma Traveller learners and refugee learners. Clarity on how these learners' grades would be calculated was requested.

2.10.5 Concerns about standardisation

Respondents expressed their concerns about using a statistical standardisation model in the process for calculating grades this summer. Respondents felt that such a model fails to treat learners as individuals, instead grouping them together to suit a statistical norm. It was felt that whilst this approach can predict outcomes for the majority, there will be some learners who will be advantaged and others who will be disadvantaged. It was suggested that because the qualifications being awarded are high-stakes and have a significant impact on an individual's future, the risk of learners being awarded grades lower than what they would have achieved in exams is too high. As a result, it was asserted that both national and centre outcomes may have to differ to other years to ensure fairness.

Some respondents noted that their centre has previously used prior attainment data and centre historical data to predict qualification outcomes for their learners. They found that it was always incorrect for some learners, and as such, were unconvinced by this approach.

Respondents were also concerned that employing a statistical standardisation model may encourage teachers to inflate their centre assessment grades because they are overly worried about them being unfairly lowered by the model.

2.10.6 Trust in teacher judgement

Due to their concerns about standardisation using prior attainment or centre historical data, some respondents felt that it was important to trust teacher judgements. These respondents noted that teachers know their learners well and are able to consider the learner's attitude to learning, how a learner has responded to a targeted intervention programme, and any personal circumstances that may have affected their prior performance when making their judgements. It was also noted that teachers are experienced in understanding how different learners perform in different types of assessments and can account for this in their judgements.

In relation to speculation that some centres may inflate their centre assessment grades, respondents highlighted that because school performance measures are not going to be published this year, teachers have little incentive to inflate their outcomes. It was noted that for many teachers inflating GCSE outcomes would have negative consequences as they would not want to be teaching learners who are not capable at A level.

Respondents felt that the research referred to in the consultation document that suggested teachers are generous in their predictions on university application forms lacks relevance because this is a different task that will be approached differently. It was also noted that as more universities are making unconditional offers, some learners lose motivation, so their final A level outcomes are lower than predicted. It was suggested that such research unnecessarily brings into question the professionalism of teachers to provide a centre assessment grade, thus undermining the process.

Some respondents noted that centre assessment data would be the only type of evidence that would take account of each individual learner's characteristics and achievements, rather than the attainment of other cohorts or other learners within their cohort. As such they suggested that either the centre assessment data is given higher weighting in the standardisation model, or that standardisation should be omitted from the process, and learners are awarded their centre assessment grades. In some instances, it was suggested that the standardisation model could be used to identify anomalies in centre assessment data, but that these are discussed with a centre, rather than the model affecting the outcomes.

2.10.7 Need for more detail

Some respondents were unsure or disagreed with the proposal because they needed more detail on the statistical standardisation model to make an informed opinion. It was noted that the model must be transparent and clearly explained for all to understand.

Aspects of the model that respondents specifically requested further information on included:

1. how the rank orders submitted by centres will interact with the model;
2. what weighting will be given to each form of evidence and as a result, the extent to which centre assessment grades may be changed;
3. clarity on what prior attainment data will be included for each qualification type and how well it has been proven to predict qualification outcomes;
4. how the model will ensure rigour for data sets where entry numbers are small or centres are relatively new;
5. what data will be considered to identify changes in a centre cohort, such as number of learners eligible for free school meals, number of learners with ALN or the number of learners who are considered to be more able and talented;
6. how the model will account for gaps in data where a centre has a high mobility rate or where not all learners in that cohort are entered for a certain qualification;
7. how the model would account for variation in outcomes in a qualification. As an example, it was noted that GCSE English Language outcomes have fluctuated significantly for some centres in recent years.

To ensure transparency, it was also suggested that detail is published on what alternative models were considered and why they were discounted. It was also suggested that Qualifications Wales and WJEC should involve teachers and learners in the decision on what model to employ.

Other comments

Many of the written comments suggested that respondents had considered the benefits and merits of each of the types of evidence that could be used in a statistical standardisation model separately. Only a few respondents indicated that they had considered how the information could be used together to provide a stronger evidence base, for example, how prior attainment data could be used to identify a stronger than usual cohort in a centre.

2.11 Additional suggestions provided by respondents

Respondents provided a number of suggestions for how their concerns could be mitigated. Where these suggestions linked directly to a specific concern, they have been outlined in the text above.

In addition, a number of respondents expressed their views on which form of evidence should be prioritised in the statistical standardisation model. Although views were varied, there was a general sense that respondents felt higher priority should be given to evidence that relates to the individual, namely the centre assessment data and learner's prior attainment data.

Another suggestion was that if learners are not happy with the grade that they are awarded following standardisation, they should be able to sit an exam in the Autumn term. It was noted that this would enable them to progress onto the next stage of learning or into employment in a timelier manner and would be consistent with the approach being adopted in England.

Another suggestion was that teachers should receive the results earlier than usual to allow them to challenge outcomes that they think are unfair before results are released to learners. It was suggested that this will help limit the number of appeals.

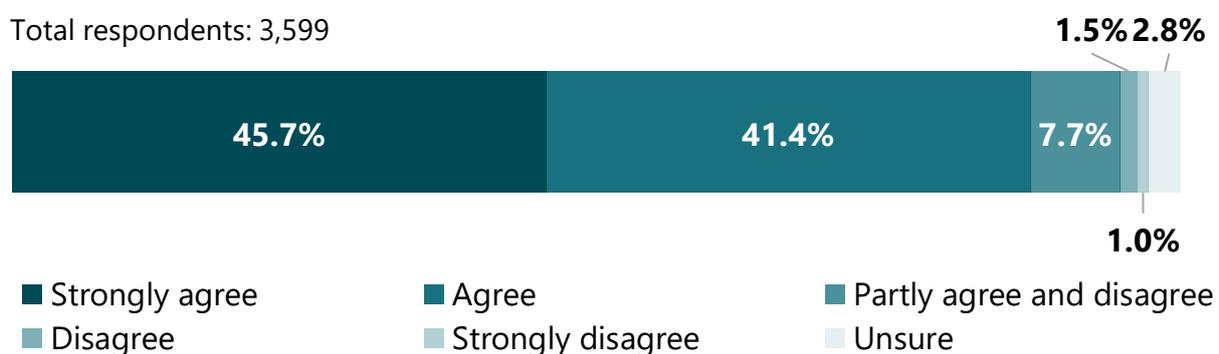
Aim 4: As far as possible, the process for awarding grades in summer 2020 will not disadvantage groups of learners, including those with protected characteristics, relative to previous years.

For aim 4, respondents were asked to provide their views on whether we should ensure that, as far as possible, the approach for awarding grades in summer 2020 does not disadvantage groups of learners, including those with characteristics protected under the Equality Act 2010.

2.12 To what extent do you agree with this proposal?

Figure 5

Total respondents: 3,599



Of the 3,599 respondents who answered this question, 87.1% either agreed or strongly agreed and only 2.5% of respondents disagreed or strongly disagreed with the proposal. 712 respondents provided written comments to explain their response.

2.13 Support for the proposal

There was widespread agreement with this aim with respondents pleased that potential disadvantage has been recognised and hopeful that the aim will be achievable. Some respondents felt that it was an obvious aim and questioned how it could be disagreed with.

2.13.1 No learner should be disadvantaged

Some respondents felt that this aim was important to ensure that no learners are disadvantaged by the approach to awarding qualifications in summer 2020, both as individuals and as groups of learners. They noted that it was important to take circumstances and demographics into account to ensure fairness for all. Some respondents focused their comments on ensuring that this year’s cohort of learners are not disadvantaged by the pandemic when compared to other cohorts, whilst others commented on the importance of ensuring that groups of learners within this year’s cohort are not disadvantaged when compared to other learners in the same year group.

Reflecting comments made in aim 1, respondents reiterated the importance of ensuring that all learners have access to a fair grade that reflects the hard work they have completed and

will support their progression into the next stage of their learning or into employment. It was noted by some respondents that this is vital for the wellbeing of these learners and to ensure that all learners have equal opportunities later in life.

Some respondents thought that this was an aim of qualifications every year and felt that it should be upheld this year to help maintain public confidence and credibility in the qualifications and the qualification system.

2.13.2 Learners with protected characteristics

Respondents that specifically referred to learners with protected characteristics agreed that it is important these learners are identified, and steps are taken to ensure they have not been disadvantaged by the process. It was also noted that in some instances, learners with protected characteristics are vulnerable and have to overcome other barriers to learning and progression, so it is important that the process for awarding qualifications this summer does not add additional disadvantage.

Respondents took the opportunity to identify groups of learners that have protected characteristics that they felt should be considered in relation to this aim. These groups included:

1. **Learners with ALN, particularly those who have recently been diagnosed and may not have had appropriate support in previous assessments** - Respondents were concerned that teachers may lack understanding about the needs of these learners and the impact their impairment may have on internal assessments, which they felt could affect their decisions regarding attainment. In these instances, it was suggested that centres should seek support from the specialist support staff who work with these learners in their centre. It was also suggested that the model should adjust the focus put on prior attainment for these learners in some qualifications.
2. **Learners who have access arrangements, such as additional time or a scribe** - Respondents felt there may have been instances where learners did not have access to such arrangements for mock exams or other internal assessments. It was suggested that centres should identify these learners and ensure that they have accounted for this in their judgements.
3. **Adult learners** – it was suggested that average grades awarded to adult learners are often higher than those awarded to learners under the age of 19. As there is also a lack of prior attainment for many of these learners, it was suggested that a different approach might be required for these learners.
4. **Boys** – there was a perception that boys generally mature later than girls, so could be disproportionately affected by not being able to demonstrate their ability in final exams, which take place at the end of the academic year.
5. **Learners from Black, Asian and minority Ethnic (BAME) communities** – Respondents discussed instances when learners from BAME communities had far exceeded their predicted grades in their final exams and were concerned that these learners may be under-rewarded in centre assessment data. Some respondents also identified research suggesting that learners from BAME communities often receive lower predicted grades than other learners, which they felt could be a result of

unconscious bias. There were concerns that if learners from these communities were under-rewarded, it could have an impact on programmes to widen their participation in higher education.

2.13.3 Fair approach

Some respondents felt the approach outlined for ensuring groups of learners, including those with protected characteristics, are not disadvantaged is fair or the fairest approach in the circumstances.

It was noted that the process for awarding grades this summer must comply with Section 149 of the Equality Act 2010, the Public Sector Equality Duty (PSED) and the human rights of children that they are entitled to under the United Nations Convention on the Rights of the Child (UNCRC). One of these rights is to equality and non-discrimination. This aim was therefore considered essential as the PSED requires all public authorities to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between those who share protected characteristics and those who do not.

Respondents noted that it is important to protect all learners against the potential of teacher bias and were pleased that the centre assessment data would be checked to identify potential bias. It was noted that learners with protected characteristics may be subject to conscious or unconscious bias by teachers, which could impact on their outcomes. Some respondents were concerned that without this aim, it would be difficult to eliminate bias from an approach that relies on professional judgement.

To ensure centre assessment data is fair to all learners, including those with protected characteristics, a number of suggestions were made. These included:

1. requiring centres to submit a random sample of work to WJEC for external moderation;
2. developing guidance or an online training module to support teachers and Heads of Centre in eliminating conscious and unconscious bias from their judgements;
3. enabling centres to submit supporting qualitative evidence where the centre assessment grades deviate from the grade calculated by the model. It was suggested that this is essential given that the model will not be able to quantify any disadvantage or adjust the rank order;
4. encouraging centres to evaluate their approach to arriving at their judgements and accounting for potential bias before submitting their data to WJEC;
5. requesting up-to-date data on learners with protected characteristics from centres and using this in the standardisation model to address inconsistencies in centre assessment grades;
6. encouraging centres to rank order learners based on anonymised work;
7. reminding centres about their duties under the PSED and providing them with guidance on how to undertake Equality Impact Assessments;
8. requiring centres to make an equalities declaration stating that they have had due regard to equalities and can demonstrate their compliance with the PSED;

9. advising centres to disregard performance since school closures as this could be impacted by a lack of support or resources at home that could adversely affect particular groups of learners.

It was also suggested that following the awarding of grades for learners this summer, Qualifications Wales publish a report evaluating the calculated grades, paying particular attention to any average disparities for learners with protected characteristics.

Some respondents specifically agreed that the judgements submitted by centres should not be changed unless there is substantial evidence in data from previous years to suggest some learners have been inaccurately graded. It was noted that any attempt to change the rank order submitted by centres to account for systemic bias would be problematic because it is not possible to have a clear and consistent criteria by which to make any change, and thus doing so could exacerbate disadvantage. A few respondents agreed that it was important that the rank order is not changed but questioned whether this would be achievable whilst also ensuring no learner is disadvantaged. It was also suggested that any evidence of bias should be investigated on a departmental basis as any inherent bias is likely to come from individual teachers rather than a whole centre.

As the rank order submitted by centres will not be changed, it was noted that it is essential that the standardisation model takes account of potential bias in the centre assessment data. It was noted that the model will need to be clearly communicated to stakeholders so that they can understand what approach will be taken and how it will ensure fairness for all learners.

2.14 Concerns raised about the proposal

2.14.1 Fairness for learners who do not have protected characteristics

Some respondents were concerned about the aim because they felt it was important that no individual learner is disadvantaged and were therefore unsure about the focus on groups of learners and those with protected characteristics. Respondents suggested that the focus of the aim should be on all learners, which can include learners with protected characteristics. Some respondents noted that it is also important that learners with protected characteristics are not advantaged by the process. Concerns were noted that by ensuring learners with protected characteristics are not disadvantaged, the approach may disadvantage other learners, particularly those that face barriers to learning but do not have a protected characteristic.

Some respondents identified groups of learners that do not have characteristics protected under Equalities legislation (some of which had already been mentioned in response to previous questions) that they felt may be disadvantaged by the process for calculating grades this summer. These included:

1. **learners who were likely to perform better in their final exams than they have previously performed in mock exams or classwork.** As outlined in Aim 1, it was

- suggested that this could include those who mature later, work better independently or who have worked with a private tutor in recent months;
2. **learners from lower socio-economic backgrounds, particularly those who are a more able.** It was felt that these learners were more likely to be under-rewarded in the centre assessment data than learners from less deprived backgrounds;
 3. **learners with EAL** who were rapidly improving their command of the language and were as a result, significantly improving their understanding of a range of subjects;
 4. **young carers**, including those who have been helping to care for a disabled sibling at school until appropriate support measures were put in place;
 5. learners whose performance in previous assessments has been poorer than anticipated for a range of **personal reasons**, such as ill health or bereavement;
 6. **learners attending centres who were expecting improved outcomes** this year due to for example, having an abnormally strong cohort or a change in leadership;
 7. **learners who attend small centres** which are subject to significant variations in outcomes each year. In these instances, it was suggested that the influence of centre historical data may need to be mitigated in the statistical standardisation model;
 8. **learners who were due to resit exams this summer**, particularly those entering as private candidates;
 9. **learners who are being graded by teachers with limited experience** or who have limited authority within a centre, and whose views may therefore not be considered appropriately;
 10. **learners who are less favoured or well-known by their teachers**;
 11. **learners who are more able** and are reliant on grades for progression into university – concerns were raised that the approach may not recognise the potential of these learners to perform beyond the average expectation for their centre;
 12. **learners who are considered to be close to achieving a 'C' grade** who will not be able to demonstrate their potential and may miss out.

Some respondents noted that some learners may identify with more than one of these groups, and as such, could experience multiple disadvantages. These respondents suggested it was crucial that this is considered when deciding on the final standardisation model.

Some respondents felt that the cohort of learners due to take these exams this summer are disadvantaged as a whole due to the cancellation of exams. These respondents tended to reiterate concerns explored in Aim 2 relating to the comparison of learners across year groups.

A few respondents suggested that all learners in Wales will be disadvantaged when compared to those learners in England who will have the opportunity to sit exams in November if they are dissatisfied with their results.

2.14.2 Trust in centre assessment data

Some respondents were confident that the judgements made by centres will not disadvantage any learners, and as a result, questioned the need for standardisation. These respondents noted that it is important to trust the judgements submitted by centres, which

will have been considered by professionals, be based on evidence of work already completed and moderated internally to limit the risk of bias. It was noted that teachers have experience of grading learners and are aware of the importance of ensuring all groups of learners are treated equally and able to account for how learners will perform in exam situations. Some respondents highlighted that teachers will be treating their learners as individuals and basing their centre assessment grades on evidence, rather than on personal characteristics, and as a result, they would expect judgements to be accurate.

Schools are providing centre assessment grades which have been carefully decided upon by the teachers of these pupils. Each teacher has spent many hours making these decisions as we all know how important these are and departments should have spent time collating evidence to back these grades up. If these grades are accurate then characteristics of each individual pupil will have been taken into consideration and assessment grade will have been given based on that pupils ability (and evidence to support that) rather than what sex or ethnicity of the pupil. Grades should be based on the pupil's ability not protected characteristics.

It was also noted that teachers understand the additional needs of the learners as they regularly apply for special consideration for exams and are therefore able to also consider this when estimating grades. It was also noted that the guidance issued to centres clearly reminds centres to consider how learners entitled to special consideration would perform in an exam situation, which was considered to be helpful in this regard.

2.14.3 Wording of the aim

Some respondents expressed concerns about the wording used in the aim. These concerns included:

1. **'As far as possible'** – it was considered that this wording may not go far enough to ensure compliance with the Equalities legislation. It was noted that Qualifications Wales and WJEC have a PSED to ensure that groups of learners with protected characteristics are not disadvantaged and there were concerns that as worded, the aim doesn't assure that this will be done. A few respondents were concerned that as a result, appropriate mitigations may not be put in place to ensure these learners are not disadvantaged relative to previous years. It was also noted that more information is needed on how the aim will be achieved to ensure this duty is adhered to.
2. There were some uncertainties about what is meant by **'protected characteristics'** which impacted on people's understanding of the aim. It was suggested that this needs to be clarified in the aim itself.
3. **'spot serious issues'** – this wording was used in the consultation document to explain how data on learners with protected characteristics will be used but it was felt that this was too vague and needs clarification.
4. **'previous achievement'** – some respondents noted that this term needed clarification to make sure everyone was clear on what attainment this was referring to.

Respondents also noted that Aims 2 and 3 cover much of the intent of this aim, and therefore considered it a bit 'odd' to be highlighting it as a separate aim.

2.14.4 Use of data

Some respondents queried what data would be used to identify anomalies in outcomes for groups of learners and how this would be obtained. It was suggested that data for this year's cohort should be checked with centres because learners in certain groups can change fairly quickly, and there could be some gaps in the data. There were some concerns expressed about data protection issues.

There were also some concerns raised about the use of data to compare outcomes for groups of learners relative to previous years at a centre level. For many centres, the number of learners with certain characteristics is small and therefore outcomes can significantly vary each year. It was also queried how such anomalies could be identified in new centres.

2.14.5 Other comments

Some respondents did not feel that the approach was fair or robust but provided little or no elaboration to explain why, and others felt that the aim was laudable but questioned whether it could be achieved in reality.

A few respondents felt that more detail was needed on how learners with protected characteristics would be identified and how the model would mitigate for any bias identified in centre's judgements, to help them reach an informed opinion. It was also felt that WJEC should conduct an equality impact assessment on all potential standardisation models and take this into consideration when deciding on the final model.

Linked to the questions in the next section on the proposed appeals process, respondents felt that not enabling individual learners to appeal could particularly impact those with protected characteristics whose grades could be subject to bias or a lack of understanding about how they could perform in an exam. It was suggested that enabling learners to identify themselves as potential targets of bias and checking their data could be a useful part of the process to ensure accurate judgements and thus prevent appeals.

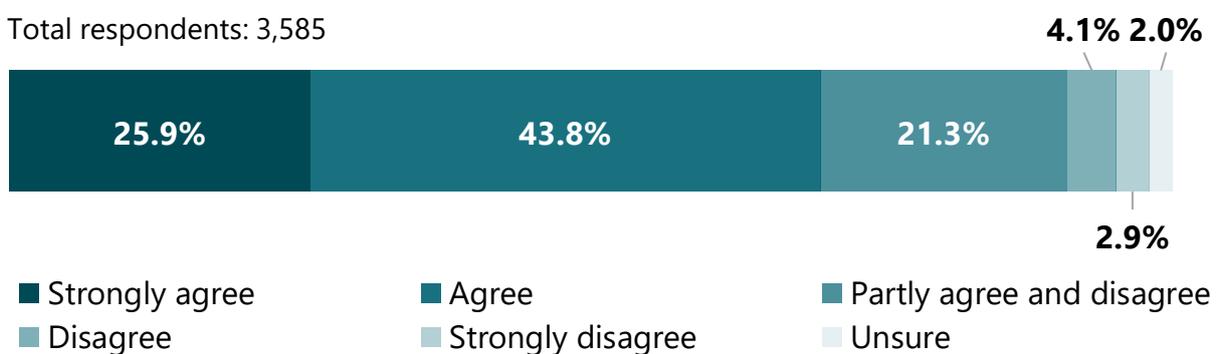
Aim 5: Agreed processes for each qualification type will enable the maximum number of learners to receive grades based on a common approach. The processes will use results from qualifications and units already completed and awarded to learners, where available.

For Aim 5, respondents were asked to provide their views on using results from any qualifications and units already completed and awarded when calculating grades this summer, and whether it was appropriate that the evidence used to calculate grades may therefore differ across qualification types.

2.15 To what extent do you agree with this proposal?

Figure 6

Total respondents: 3,585



3,585 respondents answered this question. As illustrated in figure 6, 69.7% of these respondents either agreed or strongly agreed with the proposal and only 7.0% of respondents disagreed or strongly disagreed.

1,177 respondents provided written comments to explain their response. The written comments suggested that a number of respondents had understood the proposal to be that attainment in previous qualifications and units would be considered on an individual basis for a learner’s own outcomes this year, rather than on a cohort basis. This should be borne in mind when reflecting on the comments in this section.

Although this aim focuses on the attainment of units or qualifications, a number of respondents reiterated their concerns about the use of mock exams and class work in the standardisation model. The concerns raised reflect those outlined in response to Aim 1.

2.16 Support for the proposal

2.16.1 Attainment in qualifications or units already awarded could be a good indicator of likely outcomes this year

A number of respondents felt that this was a fair approach because results obtained in qualifications or units already completed and awarded provide a good indication of how learners perform under exam or controlled conditions. It was also noted that as this work has been marked or moderated by WJEC, it will help mitigate any bias that may be present in the

centre assessment data and help maintain credibility and confidence in the qualification system. Some respondents felt that as a result, this evidence will be the strongest and most reliable evidence available and should be given priority in the standardisation model.

This is the strongest idea as it has proof of what each individual is capable of under exam conditions and has the most reliable portrayal.

Some respondents noted that using results obtained in units or qualifications already awarded also shows what learners can achieve at the end of the academic year, which allayed some concerns about grades this summer being based on work completed up until March 2020 and not taking into account progression in the summer term.

There was particular support for using grades obtained in units that contribute to the qualification being awarded this summer, such as modular exams in GCSE Science, or AS levels. It was felt that these results would provide a good indication of a learner's ability in that subject and as they would contribute towards the final grade in normal circumstances, it was considered to only be fair that they are used to inform outcomes this year. It was also noted that as learners have worked hard towards these unit outcomes, it would not be fair to disregard them.

A few respondents felt that these outcomes should be the basis for calculating grades in their subject, particularly where learners have already completed a significant proportion of the course, such as GCSE English Literature and Science. Where this is the case, it was suggested that final grades should not be lower than unit grades already awarded. A few respondents suggested that it would be beneficial to consider the marks awarded in these units to ascertain how comfortably a learner received that grade. It was felt that this could reduce potential disadvantage for those who narrowly missed out on a higher grade. There was particular support for the use of these results where learners across all centres have completed the units.

There were mixed views about the usefulness of GCSE outcomes as predictors of AS or A level outcomes. Those who felt they could be a useful indicator noted that as these exams were completed under exam conditions and the outcomes were standardised by WJEC, they were a more reliable indicator of likely performance in the summer than internal assessments. Respondents' concerns about using GCSE outcomes to inform AS or A level results are discussed in section 2.17.2.

Some respondents acknowledged the benefits of including attainment in qualifications and units already awarded, particularly when considered alongside other evidence, such as centre assessment grades, completed NEA, whether a learner was due to resit a unit and how learners have progressed since their previous assessment(s). They tended to note that as much evidence as possible should be considered in the process, and that such prior attainment data was an integral part of that evidence base. A few respondents noted the benefits of looking at prior attainment data to identify anomalies in the centre assessment data.

2.16.2 Fair for evidence to differ across qualifications

Some respondents specifically noted that it was fair that the evidence differs across qualification types and subjects. It was highlighted that evidence for subjects always differs due to the nature of the subject and how it is examined, and in this sense, the approach is comparable to the usual awarding of qualifications. It was also considered sensible to use all available evidence to get a rounded picture of a learner's ability.

The evidence is always going to be different for each qualification due to the nature of the subjects. It is only fair that results gained from any unit the learner has already been entered for are used to help determine their result.

It was considered more important to some respondents that where prior attainment data is used, it must be used consistently within that subject and therefore should only be used where all learners entered for a qualification have completed the same units or qualifications previously. It was suggested that Qualifications Wales should check the variance in evidence for different qualification types to make sure that no learners, including those with protected characteristics, are unintentionally disadvantaged.

2.17 Concerns about the proposal

The considerations explored in this section were provided by respondents that agreed with the aim but advised some caution, and those that disagreed or were unsure. Some respondents provided general comments on the use of prior attainment data which had already been discussed in relation to aim 3. To avoid repetition, these have not been discussed again here.

2.17.1 Resit candidates may be disadvantaged

The most frequently expressed concern was about whether prior attainment would be used when a learner had entered to resit a unit this summer. It was noted that learners often improve their grade when they resit a unit, with some respondents recounting instances when they have significantly improved their grade in a previous resit.

Many reasons were given to account for why grades were likely to improve for resit candidates including:

1. units taken in Year 10 are often the first time a learner has taken an external exam and therefore, the exam experience can impact on their grade;
2. it can take some learners time to adjust to the learning style required for A level courses so AS outcomes are lower than learners expect;
3. learners have an improved work ethic in the second year of study or as a result of a disappointing performance;
4. learners may have received additional tailored support, sometimes from a private tutor;
5. learners have a further year's experience and understanding of the subject;

6. learners may have had a different teacher who they engaged with more;
7. learners have had the opportunity to reflect on the exam, identify their weaker areas and refine their revision technique;
8. opting to resit an exam demonstrates dedication and a commitment to studying which suggests that learners will be motivated to study more to improve their grade.

It was noted that taking into account prior performance in a unit that is tiered may be particularly unfair because if a learner had previously been entered for the wrong tier their result could have been significantly lower than they could have been attained on a paper at the appropriate level.

It was suggested that where learners were due to resit a unit, their performance in these units should not be included in the standardisation model.

Where learners are entered for re-sits of previous units and may have made significant progress (especially A Level students re-sitting AS units), the original result should be disregarded in favour of a teacher assessment of what they would have achieved in a re-sit.

Some respondents were concerned that if prior attainment in a unit due to be resat was included in the standardisation model, the outcomes for these learners were unlikely to be a fair reflection of their current ability. These respondents felt that in these instances the centre assessment data should be relied upon as teachers will be able to account for improved performance over the past year. It was felt that the use of prior attainment in these units would likely have an adverse effect on the progression opportunities and wellbeing of learners who have worked hard to improve their grades.

Conversely, a few respondents were concerned that not taking these units into account in the standardisation model just for learners who were due to resit them may advantage those learners over other learners because there is often a natural progression in the second year of study, and therefore, it is likely that the outcomes for other learners would have also improve this summer.

Some respondents were concerned that if grades previously achieved in AS units that were due to be resat this summer are included in the standardisation model, learners in Wales will be disadvantaged when compared to learners in England. Learners do not sit AS exams in England, so poor performance at AS cannot bring a learner's A level grade down. Respondents were concerned that this could have an impact on learners from Wales who are competing for university places or employment alongside learners from England.

It was suggested that if the standardisation model identifies a discrepancy between the centre assessment grade and the calculated grade, then centres should be able to submit learner's work to WJEC to evidence the predicted improvement. In instances where a learner has worked with a private tutor to improve their understanding of a unit, it was suggested that the private tutors should liaise with centres to discuss the learner's development since the previous assessment.

It was also suggested that Qualifications Wales should explore historical data to determine the average improvement of learners who resit exams and take this into account in the model.

On a separate point, some respondents felt that entrance fees for resit exams should be returned to the learners as they are unable to take these exams to improve their grade.

2.17.2 Progress since previous qualification assessment must be accounted for

A number of respondents noted that many learners perform better at A level than at AS level. Many of the reasons given for this reflected those discussed in Aim 3 or in relation to resit candidates above. Additional points raised by respondents included that:

1. learners are more familiar with the style of learning and the exam questions and are able to tailor their preparation to focus on areas they found challenging at AS level;
2. learners may be more motivated in the second year of their study because they have received offers of employment or a university place;
3. learners have developed their understanding of the topic further and can draw on a range of knowledge in their exam answers;
4. many learners focus on fewer subjects at A level and exams are typically more spread out.

Similar reasons were also given to explain why Year 10 unit outcomes are often lower than final GCSE results, with the addition that Year 10 unit exams are often a learners first experience of an external exam and the experience can help them better prepare and complete exams in year 11.

As a result of the concerns outlined above, it was suggested that Year 11 and Year 13 learners should be given a final grade that is at least equal to those that they achieved in external assessments in their previous year of study. Others suggested that prior attainment data should be limited to outcomes from this academic year, or that attainment from the second year of study is given more prominence in the model than attainment in the first year of study.

For similar reasons to those outlined above, some respondents noted that GCSE outcomes were unlikely to be a good predictor of AS or A level outcomes. There were particular concerns about using an average of performance at GCSE to calculate AS or A level results as most learners have subjects that they excel in when compared to others. Generally, learners will study subjects that they achieve better in and enjoy more at A level and therefore, average performance at GCSE may predict lower grades than they are capable of. It was also noted that some learners are more suited to the independent style of learning at A level, and as a result, excel during this stage of their education.

2.17.3 Differences between units within qualifications

Some respondents felt that attainment in previous qualifications should only be considered in the same subject as is being entered this year. It was noted that some learners excel in some subjects or type of subjects, but struggle in others. For example, it would be unfair for a learner who excels in creative subjects, such as Art, to have their grade based on a subject they find more challenging, such as Science.

However, a few other respondents felt that attainment in similar subjects could be useful. For example, a grade attained in GCSE Mathematics-Numeracy may be a good predictor of attainment in GCSE Mathematics. There were differing views on the similarity of GCSE English Language and English Literature, with some respondents suggesting attainment in one could help calculate attainment in the other, and other respondents feeling that the skills they assess are too different to be comparable.

Additionally, where a learner has not yet taken any/all of the units for a particular subject, it might be wise to look at grades obtained from similar subjects that have been fully completed. For example, if a learner has fully completed English Literature and has received their grade (e.g. grade X), but has not yet completed all units of English Language, the grade X achieved in English Literature could be viewed as a good aiding indication regarding the grade that the learner might have achieved after having taken all units in English Language. This could also be applied to Mathematics and Mathematics-Numeracy.

Some respondents expressed concerns about using the results of units already awarded because units have different assessment objectives and often assess different skills. One such example given was in GCSE English Language where the oral assessment is often completed first and tests a different skill to the written examinations.

It was also noted that in some qualifications, a learner may not have completed their strongest unit. For example, in the Skills Challenge Certificate it was suggested that as learners can choose their topic of interest, they often excel in the individual Project, which is also often completed last. Other's suggested that prior attainment in units should only be considered if the learner had already completed more than a set amount of that qualification.

It was also suggested that in instances where different teachers teach different units of a qualification, the quality of teaching could have an impact on the grade. It was specifically noted that in the Skills Challenge Certificate, some learners have a different teacher for each of the challenges.

Some respondents requested that prior attainment in units is only considered if all learners entered have already completed the same units. Respondents felt that it was vital that qualifications for all learners were being awarded on the basis of the same evidence. There were also concerns that some learners may be constrained by poor performance on an earlier exam that other learners in the cohort have not entered. In these instances, it was suggested that Qualifications Wales explore how learners' grades have generally improved from units sat early to their final outcome in previous years.

The evidence may differ across different qualifications, however this must be reduced when collecting evidence around the same qualifications from different centres as this will create variations in the awarding of the grades which may impact some students both positively and negatively depending on the progression their centre has made on the work completed.

2.17.4 Non-examination assessment (NEA)

Although the aim refers to units that have been completed and awarded, a number of respondents discussed the inclusion of NEA that learners have completed this year, and thus has not been awarded. Reflecting comments outlined in Aim 1 about whether NEA should be used by teachers to inform their centre assessment grades, respondents also expressed mixed views on whether the outcomes of NEA completed this year should contribute to the evidence considered by the standardisation model.

Respondents who felt that NEA completed this year should be part of the process for calculating grades reiterated that learners have spent a lot of time and effort completing the work and it has often been completed in controlled conditions, as specified by WJEC. As a result, it was felt that the work provides a good indication of their ability in that subject. It was also noted that some subjects are predominantly assessed by NEA and it is therefore fair that performance in these elements is considered. Finally, it was suggested that improvements in NEA in a centre could be used to evidence overall improvements in outcomes.

Conversely, other respondents were concerned about the inclusion of NEA that has been completed this year. Respondents noted that in their subject the NEA unit is considered to be particularly difficult and for many learners is their poorest performing element. For other subjects, the NEA unit is often amongst the top performing units for learners and could lead to inflation of grades. It was also noted that the way in which NEA is completed can vary across centres, and where it is internally marked, it hasn't undergone any external moderation. As a result, the consistency of outcomes could vary across centres.

Other concerns raised about the use of NEA completed this year included:

1. for some subjects, it will be the only unit completed and as a result, it's inclusion could disadvantage learners who perform better in exams than NEA;
2. some learners have completed their NEA at home since school closures and may not have had access to all the required resources;
3. not all learners will have completed it and it is unfair to take it into account for some learners and not for others;
4. some subjects do not include NEA, so it is not possible to have a consistent approach across qualifications.

2.17.5 Lack of prior attainment data

Some respondents queried how this approach would affect learners who had not yet been awarded any units or qualifications, or who's previous qualifications dated back several years and were therefore less relevant to their current performance. Clarity was requested on how these learners would be graded by the model, with concerns that learners who have followed linear GCSE courses might be disadvantaged as they will have limited prior qualification attainment.

It was also queried how the approach would affect learners who are taking AS levels in subjects that they did not complete at GCSE, or who are taking A levels in one year and therefore do not have an AS grade. A few respondents queried which qualifications would be considered in these instances. For example, would it just be attainment in GCSEs or AS levels, or would attainment in vocational qualifications also be taken into consideration.

2.17.6 Prioritise the centre assessment data

Due to the concerns outlined in this section, some respondents felt that the centre assessment data should either be prioritised in the standardisation model, or solely relied upon for calculating grades this summer. Most reasons given for this reflect those outlined in response to Aim 3, but some respondents also noted that as teachers will be taking prior attainment into account when forming their judgements, including it within the standardisation model effectively means that it is being accounted for twice.

My issue with this is if you are asking the teaching professionals to enter their judgement on the grade that each of their pupils would have achieved, then they will be considering past units/qualifications etc themselves - if you then take what they judge and apply another different formula to it or try and apply past units to that judgement again, you are diluting their judgement to the detriment of the pupils.

A few respondents noted that where a centre's rank order and a learner's prior attainment conflict, it is paramount that maintaining the rank order is prioritised because it will be based on a centre's judgement of how the learner has progressed since the previous assessments.

2.17.7 Other comments

A few respondents interpreted this aim as proposing that prior attainment would be the only type of data considered when calculating grades this summer. These respondents noted that this would be unfair because it would not consider any work that the learners have worked hard to complete this year.

A few respondents requested clarity on what prior attainment will be used for which qualifications, and to what extent it will feature in the standardisation model. It was suggested that this needs to be clearly explained to all centres.

A few respondents understood prior attainment to mean that predicted grades, such as those produced by commercial testing and assessment organisations, would be part of the

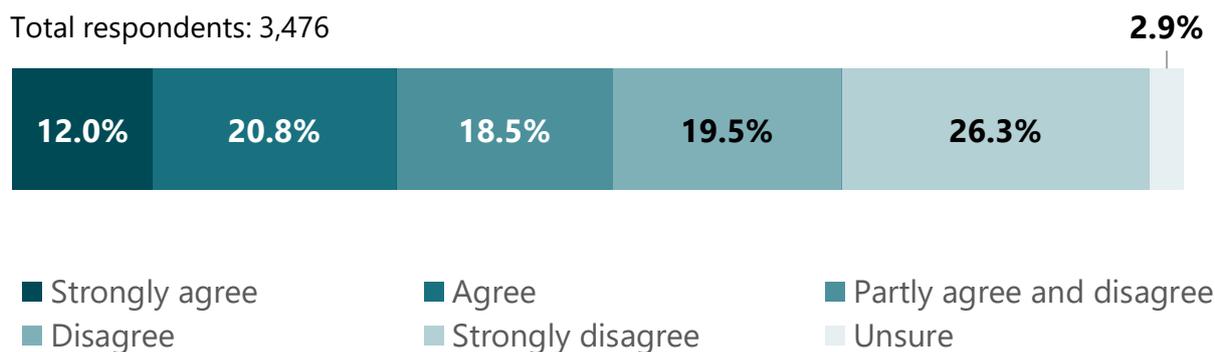
standardisation model. These respondents challenged the use of this data because it is not consistently used across centres and has not been proven to be accurate for the purposes of calculating final qualification outcomes.

3 Introduce a specific appeals process for the summer 2020 exam series

Learners who are dissatisfied with their results this summer will not be able to appeal against the professional judgement made by their centre, or the procedure used by their centre to arrive at this judgement.

3.1 To what extent do you agree with this proposal?

Figure 7



Of the 3,476 respondents who answered this question, 32.8% agreed or strongly agreed and 45.8% of respondents disagreed or strongly disagreed with the proposal. 1,637 respondents provided written comments to explain their response.

3.2 Support for the proposal

3.2.1 The proposal protects teacher autonomy and impartiality

Respondents believed that allowing appeals against the professional judgement of teachers would create a risk of teachers feeling, or even being, pressured regarding their decision. This would prevent them from being objective in the first place, but also could lead to them giving a learner an undeserved higher grade as a result of their appeal. Respondents felt that teachers would be vulnerable to pressures this year because firstly they would not be protected by the processes that would be in place when marking exams or NEA and secondly there is no common benchmark or standard against which teachers' professional judgements can be evaluated.

Respondents also raised concerns that appeals could lead to conflicts between learner families and centres and damage the teacher-learner relationship. There was concern that this risk will not only make teachers less objective but will also emotionally burden them after already being under the stress of the unusual position of providing data to support with the calculation of grades this summer. However, some respondents who disagreed with the proposal argued that not allowing appeals could increase the tensions between centres and parents.

Based on the number of parents already contacting schools trying to ensure that their children are given grades that help them move onto next steps, I would say that this is

potentially a risk if not controlled carefully - removal of appeals is probably the only way to stop this.

[Allowing learners to appeal] is problematic due to the implications for teacher mental health, the burden of scrutiny and accusation during such uncertain times and can open a dialogue of lack of faith in a teacher.

3.2.2 The proposal ensures efficiency and prevents disruption

Respondents believed that learners would overwhelm centres with appeals if they are permitted to appeal. It was suggested that centres and WJEC will need to spend a significant amount of time and resource investigating the appeals which will eventually affect centres and will disrupt the teaching in the new academic year.

It would be an unbearable pressure on schools at a time when we will be trying to restore normality.

3.2.3 Allowing appeals is impractical

Respondents felt that appeals against professional judgement will be very difficult, if not impossible, to be effectively exercised.

Firstly, respondents mentioned that there was no benchmark or set of standards being applied, against which teachers' professional judgements can be evaluated. All an appeal could achieve would be to correct data errors and the wider proposal already includes this. Respondents believed that examining an appeal, in effect, will entail scrutinising the same evidence again and reaffirming the judgement.

Secondly, respondents noted that learners would find it difficult to substantiate the appeals because the centres will hold the data. Furthermore, individual learners cannot fairly know the contextual information that was considered to reach the decisions about grades, or the ranking system applied by their centre.

I am not sure what evidence could be gathered by a pupil/ parent to make a case for an appeal unless grades differ wildly from those presented in regular reports as predicted.

In the current situation it would be exceedingly difficult to adjudicate on evidence placed from different subjects or centres therefore an investigation of an individual grade would be futile.

Some respondents believed that an appeal by learners who had applied for a university place might delay the awarding of their grades and prevent them from getting into university.

3.2.4 Trusting teachers' professional judgements

Respondents believed that in the exceptional situation of this year, teachers are best placed to make a reliable and fair assessment of what their learners would have achieved. Centres

will have in place proper checks and balances before they approve the grades. Therefore, respondents felt that stakeholders needed to trust the integrity and the professionalism of the teachers to make the best possible decisions.

A lot of work has been put in to assign these students a grade using all information available. The professionalism of teachers across the nation needs to be respected. CAGs [centre assessment grade] produced are the result of a transparent and robust system, and represent what teachers and school believe is accurate and fair, then the opportunity to appeal should not be allowed against the professional judgement of the centre.

3.3 Concerns about the proposal

Respondents who disagreed and explained their answers included various reasons for allowing learners to appeal teachers' professional judgements. Before outlining those reasons, it is useful to describe how they argued an appeal could be implemented.

Respondents believed that a formal appeal process with clear guidelines for those who are appealing should be put in place. Some respondents suggested that appeals should be free of charge and that centres should document all the evidence used, so that it would be possible for learners to challenge their professional judgements. To ensure teachers' impartiality, some respondents believed that learners might not need access to all information. Similarly, to lower the pressure on centres and WJEC, it was suggested that learners could initially have an informal discussion with the centre and appeal only if not satisfied.

Respondents outlined several approaches to implementing appeals:

- A right to appeal only to the centre. Some respondents considered that teachers could review the appeals, while others suggested that an external person or at least a panel of teachers from the centre and external moderators should examine the appeals.
- A staged approach in which the centre should be approached in the first instance. If learners are not satisfied, they could subsequently appeal to WJEC, to review all aspects, including the fairness of the professional judgement.
- A right to appeal to WJEC which should review all aspects, including the fairness of the professional judgement.

When answering this question, some respondents referred to the appeals against professional judgement, while others included comments about the appeals exercised against the final grades. Depending on their relevance, these latter comments were included in the findings under this or the subsequent questions. When it was not clear if a respondent referred to this question or took a larger perspective (most of the cases) the comments were considered as referring to this question.

Why appeals should be allowed

3.3.1 Learners should have the right to appeal

By far the most common reason that respondents cited against the proposal was that appeals are an inherent part of our democratic society and are an essential element of natural justice. Some respondents believed that not allowing learners to appeal would also violate the UN Convention on the Rights of the Child, which stipulates that children have the right to participate and express their opinions in matters important to them. It was noted that the Committee on the Rights of the Child, commenting on the implementation of these rights, stated that young people should be provided with 'safe and accessible complaint and redress mechanisms with the authority to adjudicate claims made by adolescents' (Comment No. 20 (2016), paragraph 23).

Respondents emphasised that not being able to appeal was unfair to young people because they would be excluded from a decision process that concerned them. It was suggested that an appeal mechanism that was simple and clear would protect the right to equality and non-discrimination for families from more disadvantaged backgrounds as it would make it more likely that they would be able to access it.

It was also noted that the direction given to QW by Welsh Government expressly stated that 'an avenue of recourse is available for those learners who do not believe that the process has been followed correctly in issuing their grades'.

3.3.2 Teachers judgements may underestimate the true grades

Respondents worried that teachers may underestimate learners' grades. For example, it was believed that teachers would be unwilling to commit to predicting an A* even if they would otherwise predict it. However, most respondents worried that the centre assessment grades would be lower because teacher evaluation and class performance weren't always reliable representations of how a learner will perform during exams. They gave two reasons for their concern.

1. Formative tests and performance in class differ from exam performance

Whenever learners produce their schoolwork, it will have been done on the premise that it would never be used for determining their grade. Classwork and mocks were suggested to be an opportunity to identify weaknesses and improve, not to show performance. Therefore, reduced amount of revision and effort goes into this work compared to exam preparations. Consequently, classwork rarely reflects learners' true potential.

During my GCSEs I failed nearly all of my mock exams, but passed every single one of my GCSEs with grades higher than C.

Respondents believed that exam conditions were more conducive to better performance than classroom conditions. Some respondents were concerned that teachers may have marked mock exams using a formative assessment approach (e.g. stricter marking for high

achievers to motivate them) and were therefore seen to be less reliable and standardised in comparison to exam marking. There was also a concern that teachers may be less systematic about marking classwork compared to exam marking.

2. Teachers may be unaware of all relevant information

Respondents felt that professional judgements rely heavily on teachers knowing each one of their learners very well. Therefore, they thought learners may be disadvantaged if the teachers did not have an up-to-date and accurate picture of the learners' abilities. Respondents mentioned various situations where they felt that this could happen:

- Learners or teachers have only recently joined the school.
- Learners or teachers have been absent for extended periods, or the centre has a high teacher turnover.
- A teacher has too many learners to know them all well.
- Some subjects may not have enough evidence to calculate a reliable grade.
- Learners may not have been able to declare conditions or special circumstances which would have affected their performance in internal assessments because there was no mechanism to declare and consider them as there is for exams. A suggestion to address this issue was to involve specialists when making the professional judgement (e.g. invite Qualified Teachers of the Deaf in the case of deaf children).
- Private tutoring, extra studies undertaken to improve performance are not known and not considered.

Consideration must be made for students who are, or have been, suffering with any mental health issues, as this will have an impact on their learning. If students were sitting exams, they could have a medical letter evidencing any issues, to be submitted to the exam board for special consideration. (...) However, in this instance, the student is relying on each subject teacher being aware of any difficulties they may have.

My son is too often judged on his inability to write, which is a physical thing due to extremely poor coordination [caused by dyspraxia]. He excels best at exams with a scribe.

I am in year 10 and am due to receive a grade this Summer [for my] business qualification. There was no coursework or previous units to complete. I am worried that I won't receive the grade I was working at due to lack of evidence.

In relation to evidence used to inform judgements, some respondents were not satisfied that marking or externally moderating coursework, which would have guaranteed a higher reliability of learners' grades than teacher assessment, had not taken place.

3.3.3 Teacher bias

Respondents felt that, unlike exams and NEAs, the proposed mechanism did not have enough safeguards against teacher bias. Whereas it was acknowledged that teachers should be protected from undue pressure from learners, it was felt that learners should also be protected from teacher biases.

Some respondents suggested that some teachers, for example, could like or dislike intentionally or unconsciously certain learners. Other respondents worried that some teachers, or even centres, could be harsher or more lenient than others. In this later case, groups of learners could be disadvantaged depending on the centre they attend or the individual teacher who makes the judgement.

There will always be a clash of personalities between certain teachers and students. This may affect the grade they are awarded. This will be clear to the student and they should be given the right to appeal.

[I]n my experience vocal students are given more credit than those who are quiet and just get on with things. Girls are often predicted lower grades than they go on to achieve in STEM subjects and boys are often predicted higher grades than they go on to achieve in STEM subjects.

3.3.4 Appeals are an integral part of the awarding process

The right to appeal has always been an integral part of the awarding process. Respondents felt that the proposed awarding mechanism should be no exception to this rule. This was not explained as a matter of following tradition, but as a matter of fairness. It was felt that denying the right to appeal would disadvantage against learners who had received their grades during previous years as they had had the opportunity to request a review.

3.3.5 Accountability

Although some respondents felt it was understandable that under the current proposal teachers should feel free from unnecessary pressure when determining the grades and the rank orders, respondents still felt it was unacceptable that teachers' judgements should be exempt from any review. Respondents considered that not allowing the appeals would lead to a lack of accountability and transparency.

Therefore, it was suggested that the possibility of an appeal scrutiny would encourage centres to be as diligent as possible while banning it would open the way to abuse and was felt to be dictatorial and autocratic.

We are public servants and should be held accountable by the public. Educational professionals should be confident that the grades they are awarding are fair and based upon evidence.

The centres are effectively judge, jury and executioner.

Sign off by a Head of Centre is, in reality, little more than a token gesture towards audit.

3.3.6 Appeals ensure grade accuracy

Respondents believed that although in most cases the judgements would be accurate, there was always the chance that teachers would make mistakes. This was considered more likely given that the proposed approach was new and was felt to be subjective because it relies on the teachers' opinions. Therefore, they suggested that there had to be a robust process of verification which should include the opportunity to appeal.

The impact of not allowing appeals

3.3.7 Increased risk of legal challenges

Respondents worried that not allowing an appeal would make learners use the legal avenues to challenge the professional judgement such as requests made under the Freedom of Information Act, the school complaints procedure, the judicial review and GDPR personal data requests. If the legal challenge is successful, learners will get access to the professional judgements. This would pose a similar risk to teacher autonomy as an appeal.

Respondents also felt that legal challenges could have a nation-wide negative resonance as they would reveal the inevitable differences among centres when making the judgements. It was also felt that legal challenges can leave centres open to malpractice litigation, even where centres have acted on their informed professional judgement.

Whereas some respondents believed that legal guarantees to prevent legal challenges should exist, others suggested that a straightforward appeal process would be less confrontational and damaging than a legal challenge.

3.3.8 Lower confidence in the awarded qualifications

Learners, universities, employers and other stakeholders must have confidence that grades have been determined fairly and accurately. Respondents believed that mistakes will be made and the inability to appeal the professional judgement or the final grade will risk undermining trust in the system and in the qualifications awarded.

[T]his method of assessment is untested and if confidence in the system is to be maintained, it's important that learners feel that their concerns have been heard. Attempts to restrict this, however well intentioned, will undermine confidence that the assessment is robust, accountable and fair.

3.3.9 Public perception that learners' interests are disregarded

Some respondents believed that the reasons for not allowing learners to appeal seemed to focus more on protecting teachers, rather than on achieving a fair and transparent outcome for the learners. The respondents believed that if this perception is held by the public, there is a risk they could believe that teachers' concerns are more important to the system than learners' needs. This risk is even greater considering that, as it was felt by these respondents,

an appeal mechanism could still ensure a certain level of teacher protection. It was also suggested that fear of workload was not an acceptable reason to prevent appeals.

3.3.10 Negative effect on mental health wellbeing

Some respondents considered that preventing learners from appealing or, at least, from contributing evidence and receiving an explanation of how the judgements were made will add to their existing emotional burden and anxiety.

Personally, I'm finding it hard to deal with the fact that I have no control over the matter whatsoever.

Students will become stressed and no doubt depressed if they can't challenge in any way their issued grades.

3.4 Alternative suggestions provided by respondents

3.4.1 Allowing learners to sit exams

Allowing learners to sit exams was the most favoured suggestion expressed by respondents. They viewed it as an alternative to the current proposal or as a subsequent step to an appeal process. In this latter case, many argued that the learners should keep the higher grade.

Most respondents suggested that the exam opportunity should be offered as soon as it is safe (perhaps September - October) either by organising a special Autumn or Winter exam series or by extending the November or January exams series. It was also suggested that exams should be held even before the Covid-19 epidemic is over by implementing social distancing or by organising open book exams as some universities did. This suggestion was considered especially beneficial for the Year 11 and Year 13 learners because these learners will need to decide quickly about their next steps.

As mentioned earlier, most respondents favoured exams because they believed that exam results were the only accurate representation of their abilities. In addition, some felt that compared to the learners in England, the Welsh learners would be disadvantaged as England was allowing learners to sit exams if they are unhappy with their results. These respondents felt that Welsh learners would be disadvantaged either because the grades awarded in Wales will not have the same credibility as those awarded in England, or because learners in England could use the resit to improve their grades which increases their chances of securing a university place (assuming the university entry decisions take place after resits). Furthermore, under the suggested approach learners in Wales will have to wait a year to take a resit.

However, some respondents mentioned that allowing late exams would have the disadvantage of learners taking them many months after they had their last lesson. They suggested that this would make it harder to prepare for the exams, especially if coupled with the need to study for other subjects.

3.4.2 Inform learners about evidence used and allow them to suggest additional evidence

Respondents believed that centres should, at least, inform learners about the evidence used to make the professional judgements. They felt that this will offer an opportunity to involve the learners constructively, will introduce greater transparency and could reduce the need to lodge an appeal.

Respondents believed this idea was not controversial since they felt many centres would have already shared the expected grades with learners. Respondents suggested that since this suggestion does not require full disclosure, teachers' impartiality would be adequately protected.

Several respondents took a step further and recommended that learners should be allowed to suggest evidence that centres should consider. Some of these respondents believed that learners should suggest only the evidence produced up until the point at which schools had been closed. They believed the work produced after the lockdown might be unreliable because it could not be verified as being the learners' work or because learners could have been unable to properly complete the tasks (for example if a family member had been affected by Covid-19). Other respondents believed that learners could suggest any relevant information as this would increase the chances of an accurate judgement.

3.4.3 Allowing a limited right to appeal

Respondents felt that allowing appeals against teachers' judgements opens the possibility for a huge number of appeals and for an enormous amount of work needing to be done. However, some respondents believed that this could be managed by limiting the right to appeal or by allowing it only in exceptional situations. Suggested scenarios were as follows:

- Allow learners to appeal only one or a few judgements/grades.
- Allow learners to appeal the grades that prevent them from progressing to their next chosen options / steps.
- Allow learners to appeal the fail grades or the grades that are significantly lower than the targeted results (e.g. a learner achieves an A grade in the mock exam but is awarded a C grade).
- Allow learners to appeal if they can justify and evidence additional effort or learning (e.g. attending private tuition and extra lessons).
- Allow an appeal if it is supported by the centre/a teacher.
- Allow an appeal for learners who missed school because of exceptional personal circumstances (e.g. illness).
- Allow an appeal for learners with specific conditions (e.g. children who are the autistic spectrum, deaf children).

The majority of those who made these suggestions agreed that learners would only be able to make any such appeal if it is supported by additional evidence (e.g. letter form a tutor), and not just be based on disappointment about the grade awarded.

3.4.4 Providing guidance to ensure consistency among centres

Although respondents accepted that centres could not use the same type of evidence to make their judgements, they were concerned that there would be great disparities in the approaches used by centres. To ensure a fair approach to all learners, they felt that there should be some guidance on the evidence to be used and the weighting given to each type of evidence.

Qualifications Wales would do well to publish the rules and guidelines which institutions are obliged to follow when ranking learners, for the purpose of transparency and confidence.

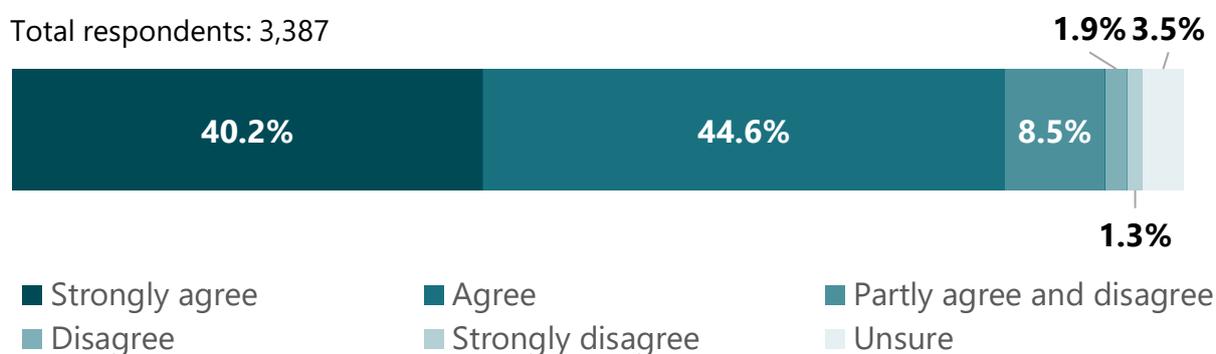
Some believed that there needs to be a moderation across all centres to ensure that there isn't a local bias and that the results are reasonable compared to historical trends.

Centres will be able to appeal to WJEC on the grounds that they used the wrong data when calculating a grade, the calculated grades generated by the statistical standardisation model were incorrectly allocated or communicated and/or there was some other procedural failing on the part of WJEC.

3.5 To what extent do you agree with this proposal?

Figure 8

Total respondents: 3,387



Of the 3,387 respondents who answered this question, 84.8% agreed or strongly agreed and 3.2% of respondents disagreed or strongly disagreed with the proposal. 695 respondents provided written comments to explain their response.

3.6 Support for the proposal

Respondents who agreed with the proposal mentioned that it was well thought out and argued. They believed that allowing centres to appeal would increase the **confidence in the accuracy** of the grades. This would also make the awarding more **transparent, accountable and fair**. The last aspect was considered especially important given that learners would not be allowed to appeal, and an appeal by their centre should ensure that any possible mistakes are corrected.

Some respondents supported the proposal because they felt **centres were better positioned to appeal** than learners. Allowing appeals only from centres would reduce, in their opinion, the number of unwarranted appeals. This idea was further developed by respondents commenting on the next question, therefore more information on this is included in the findings under that question.

Respondents also agreed with the suggested grounds for appeal. They considered that, in the current situation, **no other aspects could be usefully reviewed** in an appeal. They also believed that restricting the appeals only to the three grounds will further increase the **efficiency** of the whole process.

This approach will allow professionals to appropriately challenge results cognisant of the statistical modelling applied and in doing so secure greater confidence in the system.

3.7 Concerns about the proposal

Respondents who disagreed expressed their concern that centres would use the proposal to **launch 'opportunistic' and 'speculative' appeals**. They felt this would **overwhelm WJEC**. There were also concerns that the process may be open to malpractice because centres may change their initial grades or rank order and submit an appeal claiming they had made a data error.

To avoid abuse of the appeals process, some respondents suggested that centres **should not be permitted to appeal on the grounds of submitting wrong data**. Alternatively, other respondents suggested that **centres should adhere to strict data quality assurance requirements** or that WJEC should require substantial evidence when centres claim they made a data error.

Centres need to ensure double/triple checks are made when analysing data to calculate a grade. It is their responsibility. There should be no appeal on this aspect.

Other respondents disagreed with the proposal because they thought that offering a possibility to appeal on such restricted grounds was a token gesture, considering that the centres' professional judgements could not be challenged. It was felt that learners would ask centres for reviews that would not be possible to solve with the proposed approach.

3.8 Alternative suggestions provided by respondents

3.8.1 Challenge the statistical model results

As a result of the concerns discussed in relation to the statistical standardisation model under Aim 3, some respondents suggested that learners should be able to appeal the final calculated grade

Respondents believed that in some instances the centre **historical data might not be a good fit** for all learners or all types of centres because it either would not capture an unusual improvement during the current year, or would not consider cohorts being different in other

ways from previous years. An example of the latter is the case of a class in which this year there is an unusual number of people with similar abilities. However, once you rank them, they will probably be awarded different grades.

There was also a concern that some centres might deliberately inflate their centre assessment grades, which would lead to the statistical model lowering the grades of other centres.

As a possible solution to these issues, some respondents reiterated the suggestion that no statistical model was used, and that the calculated grades should be based entirely on teachers' judgements. Other respondents suggested that WJEC collect data on centres whose cohorts this year are significantly different (e.g. improved more than expected) and use it as part of the statistical modelling.

Respondents believed that centres are better positioned to consider various relevant factors (e.g. characteristics of children who benefit from free school meals or have ALN). Therefore, centres should be able to provide evidence when they feel that the statistical model could or has disadvantaged certain groups.

However, most respondents commenting on the use of the statistical model believed that the grounds for appeals should be extended to include an examination of the cases where the calculated grades came out substantially lower than the centre assessment grades, even if no data error occurred. They saw this as a guarantee against the possibility that the statistical model did not perform as planned. Some respondents went further and suggested that appeals could be made whenever the centre assessment grades are changed.

Respondents suggested that a feasible way of solving such appeals would be the creation of an independent panel. It was proposed that this panel would examine the evidence and submissions from centres and compare them to the awarded grades. If the panel finds unacceptable discrepancies, it should correct them.

Centres must have the chance to appeal or query a result which seems to be erroneous. This might be extended to a whole set of results if circumstances like mine where we would be reasonably expecting a much better set of results this year were not reflected in the actual results.

Our year 11 this year have achieved outstanding results to date and have proved to be a particularly high performing cohort. Where evidence can be provided of such a situation the expected overall outcome should be adapted accordingly.

The WJEC don't know pupils individually and what they are capable of. Statistics don't show the full picture so are likely to make mistakes in some cases. Unlike teachers who know pupils very well.

3.8.2 Other recommendations

- As an alternative or complementary step to the suggestion that learners can appeal the awarded grades, some respondents recommended that WJEC **inform centres about the criteria that the statistical model will use** to generate the results. Respondents felt that this will ensure transparency, increase the confidence in the awarded grades and will increase the likelihood of identifying errors. They also felt that it could prevent centres making unwarranted appeals. At the same time, some respondents thought that without knowing how the statistical model works, no effective appeals would be possible.
- As with the previous question, respondents suggested a **greater involvement of learners**. Most of the respondents believed that learners should be allowed to appeal alongside centres or should have the right to ask the centre to appeal on their behalf. Other respondents suggested that learners should be able to appeal only if centres recommend or allow them to do this. Conversely, it was also suggested that centres should not appeal the results if learners are satisfied with their grades as it was felt that doing so, could lead to negative emotional effects if the grades are lowered.
- Respondents believed that it was important that the centres were informed in advance if there was an issue with the grades well before the grades are issued to learners. It was also suggested that ideally, the appeal procedure should also take place before any grades go to the learners. It was reported that this would prevent re-publishing data and the individual results but would also avoid negatively affecting learners whose grades were lowered.
- Some respondents felt that given the unprecedented circumstances of this year **there should be no appeals** process. However, centres should be allowed to clarify their questions about the awarded grades using the already existing channels of communication with WJEC. Related to this was the suggestion that if WJEC discover an error they should fix it without the need for an appeal process.
- Centres should not be able to appeal if their centre assessment grades are 'much higher' than the grades their learners received in the past.
- The appeal process should be free.

3.8.3 Observations and questions

When commenting on the proposal respondents expressed some concerns and raised certain questions about it.

Some respondents stated that they did not understand the question, or it was not clear enough and urged for more detailed and clearer guidelines. Respondents wondered what 'wrong data' was (e.g. does this refer to previous exam attainment only). Respondents were unclear on what type of evidence centres would need to have to challenge the awarded grades or what evidence they would need to show that data was incorrect. There were concerns that this lack of clarity would lead to WJEC facing numerous appeals on a range of issues.

Respondents enquired if centres were expected to appeal if they receive higher than expected grades. Should they regard this as them being wrong when estimating grades, that is making a 'pessimistic guess', or should they flag this as a potential mistake?

Some respondents felt that this proposal was inherently incorrect. Allowing centres to appeal because they submitted wrong data would mean that centres would be recognising that they had committed malpractice/maladministration. It was suggested that in such cases centres should be investigated rather than allowed to appeal. Some considered that centres recognising that they submitted wrong data would call into question the validity of any data from these centres.

Respondents felt that some centres could be more motivated to speak on behalf of their learners than other centres. Because of this, it was felt that the proposal would overall disadvantage learners from understaffed centres or centres in socially underprivileged areas.

There was a concern that appeals that were dealt last would be less likely to be properly examined as WJEC would be reluctant to make additional changes by that time because there would be 'too much impact on the standardised model'.

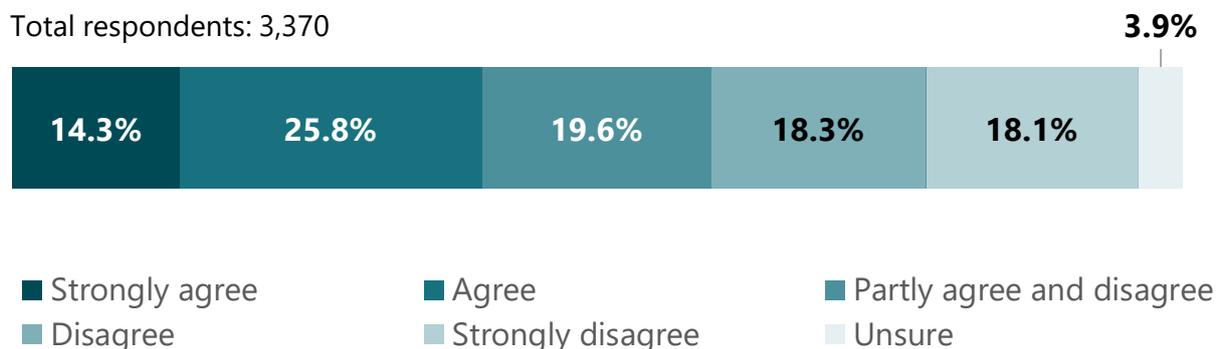
Some respondents misunderstood the proposal as giving the right to appeal the grades and raised clarifying questions from this perspective. For example, respondents asked if candidates would be allowed to provide as evidence private tutor lessons to prove why their grade should be higher.

For results issued this summer, we should require WJEC to only consider appeals submitted by centres, and not those submitted by individual learners.

3.9 To what extent do you agree with this proposal?

Figure 9

Total respondents: 3,370



Of the 3,370 respondents who answered this question, 40.1% agreed or strongly agreed and 36.4% of respondents disagreed or strongly disagreed with the proposal. 1,208 respondents provided written comments to explain their response.

3.10 Support for the proposal

3.10.1 Ensures efficiency

Respondents considered that unlike an exam situation where there is a paper that can be re-marked against strict criteria, this year it would be very difficult to prove whether the grade awarded was an accurate reflection of a learner's performance. Other than asking for a review of the procedural or data errors, respondents felt that there wouldn't be anything else that learners could reasonably appeal against. Moreover, they felt that learners would find it difficult to make substantiated appeals even in these cases because they would not have access to the data from centres as it is confidential.

Therefore, it was felt that if learners could appeal, they would overwhelm WJEC with unsupported appeals. Having to examine these appeals would put a strain on resources and delay awarding.

The right to appeal should be as fair and transparent as possible. However, individual learners will not have enough context or evidence to launch a credible appeal, so it needs to fall to the centres to do so.

As you can't appeal against the procedure but only against incorrect application of the procedure, to allow appeals by learners who are not aware of the complex nature of the procedure would just produce many wasteful appeals, and so waste time and money.

A further point raised by respondents was that centres would have access to all the data that had been used to calculate the centre assessment grades. It was therefore suggested that centres would be best placed to identify if any errors have been made and to decide whether to appeal.

If learners from a centre appeal individually, this could affect the centre's rank order and, therefore, affect other candidates in the cohort. Consequently, it was felt that there was additional efficiency to be gained if the decisions about appeals were made at the centre and not an individual level.

The very process of awarded grades for this year is based on statistical modelling, underpinned by sources of evidence. Subsequently, any appeal must use the same process whereby groups of learners may be looked at, not individuals. For example, if learner performance from BAME learners is lower than in previous years, the institution should appeal this based on the statistical evidence. Allowing individual appeals will move away from the methodology of national standardisation.

To further streamline the process, respondents felt that the proposal should clearly state whether the centres were expected to hold an internal appeal process where learners could submit their requests for appeals. If that was the case, then it was suggested that there should be some clear guidance on how to implement this internal appeals stage.

Some respondents argued that internal appeals should take place. They believed it was good for transparency and for giving learners a voice. This would also be a useful forum for explaining to learners why their request could or could not be taken to WJEC, which should reduce learners' dissatisfaction.

3.10.2 Ensures fairness

Respondents believed that appeals this year would require more sophistication. Therefore, allowing learners to appeal would advantage the more educated or affluent families which respondents felt had more knowledge and time to substantiate an appeal. On the other hand, socially disadvantaged learners would be further disadvantaged.

However, there were respondents who believed that ensuring that learners could appeal was the key to ensuring fairness.

3.10.3 Other reasons for agreeing

Respondents mentioned the following additional reasons to support the proposal:

- It will be very difficult to deal with appeals from learners without revealing the information about the professional judgements. Therefore, the proposal is consistent with the reasons behind the recommendation to not allow learners to appeal the professional judgements.
- It is acceptable not to allow learners to appeal, given the time constraints and the robust measures taken to ensure teachers make an accurate and professional judgement about a learner's likely attainment in exams this summer.
- Centres' decisions are an objective and fair reflection of learner progress. Allowing individual learners to appeal on the basis that they do not agree with the grades would undermine the trust in the profession.
- Appeals have always been made via centres. There is no pressing need to change the procedure this year. On the contrary, centres have access to all learner data and can appeal when they believe there has been an error.

3.11 Concerns about the proposal

Many respondents who disagreed with the proposal reiterated the following reasons discussed under the proposal to not allow learners to appeal teachers' judgements (question 9 in the consultation): the right to appeal and the benefits that appeals bring with them, such as transparency and accountability; teachers' decisions being biased; learners performing better during exams; the risks of a legal challenge; negative emotional effect on learners; appeals being a traditional part of the awarding process; the proposal being too strongly weighted towards protecting centres and exam boards; the appeal being the opportunity to correct any mistakes; and the increased trust in the system if appeals are allowed. The respondents also reiterated the suggestions made under Q9 such as allowing exams and allowing appeals under certain conditions.

The content of the comments where these reasons were given are similar to what has been already described under Q9 so, only any additional points are included in the analysis of this question.

3.11.1 Right to appeal

As well as the comments made under Q9 in relation to the right to appeal, respondents suggested that if learners are denied the right to appeal at this stage, it would mean that learners would not have any opportunity to challenge their grade.

I feel hopeless and unthought for in the face of this. It feels as though there is nothing proactive I can do personally to make any difference to an incorrect grade in this process.

Individuals need to have some right of appeal. As it stands, you are removing any individual right of appeal, which cannot be justified.

It was suggested that teacher judgements are a better indication of the learner's ability than the results determined by the statistical model. Therefore, learners must have the right to appeal this process if they do not agree with the results.

Respondents believed that the right to appeal would give learners an opportunity to understand the evidence that had been used to calculate their centre assessment grades. This then will ensure that they can challenge any decisions on the grounds of malpractice, if they felt that would be the case.

In relation to the appeal mechanism, respondents reiterated that learners should have the right to appeal either through their centre and, if not satisfied, appeal to WJEC or be given the opportunity to appeal directly to WJEC. In this latter case, it was suggested that WJEC either solve the appeals or select those that they consider acceptable and send them to centres to be decided.

Respondents considered that learners should be allowed to appeal on any grounds. Some respondents also added that at this stage learners should be able to appeal the professional judgements as well.

3.11.2 Centres may be reluctant to appeal

Some respondents were concerned that centres may be reluctant to appeal because:

- it might mean questioning the centre assessment grades submitted by their centre;
- centres might be biased towards certain learners;
- centres might want to hide their errors;
- centres would like to avoid the hassle or do not have the time to appeal;
- centres might disagree unjustifiably that an appeal is warranted or needed (e.g. consider that a pass grade is enough for a learner).

Therefore, these respondents argued that learners should be able to make appeals independently. They suggested that this will have an additional advantage of avoiding situations where learners are disadvantaged because their centres decided not to appeal whereas other centres might have appealed in similar situations.

It was also suggested that even if centres agree to appeal, they might be reluctant to present the case from the perspective that learners consider appropriate.

3.11.3 Professional judgements unchecked

Some respondents believed that not allowing learners to appeal would leave centres' decisions unchecked. They felt that this goes against the principles of accountability and excludes the possibility that a potentially wrong decision is corrected because the centres themselves could be reluctant to appeal against themselves.

3.12 Alternative suggestions provided by respondents

As mentioned earlier, respondents made similar suggestions to those made under Q9. For example, they asked that learners sit exams or that learners' appeals are accepted in exceptional circumstances (e.g. adverse personal circumstances which had not have disclosed to the centre, appeals supported by the centre/teacher).

Apart from these recurrences, respondents made the following additional suggestions:

- It was recommended that QW considers the comments the Equality and Human Rights Commission⁶ had made in response to the Ofqual's consultation, which among others stated that "in the event that learners are not happy with the outcome of their assessment and awarded grade, they must have a meaningful and timely route of appeal".
- A third party, other than centres and WJEC should be involved in resolving the appeals. This would prevent WJEC being overwhelmed by appeals.
- Learners should be able to appeal to WJEC but appeals submitted by centres should be prioritised.
- To discourage unnecessary appeals learners and centres should pay for any appeals made. If they are successful, they should be reimbursed.
- Paragraph 2.67 of the consultation document talks about disclosing to a centre the information it might need to decide whether to launch an appeal. It was recommended that centres are not charged for accessing this information and that WJEC should endeavour to provide detailed and timely information. It was also recommended that WJEC should provide this information by default to all centres so they then could decide whether to appeal.
- Learners educated at school should have the centre appeal on their behalf, however those home schooled or educated outside of a school may need to appeal on an individual basis.

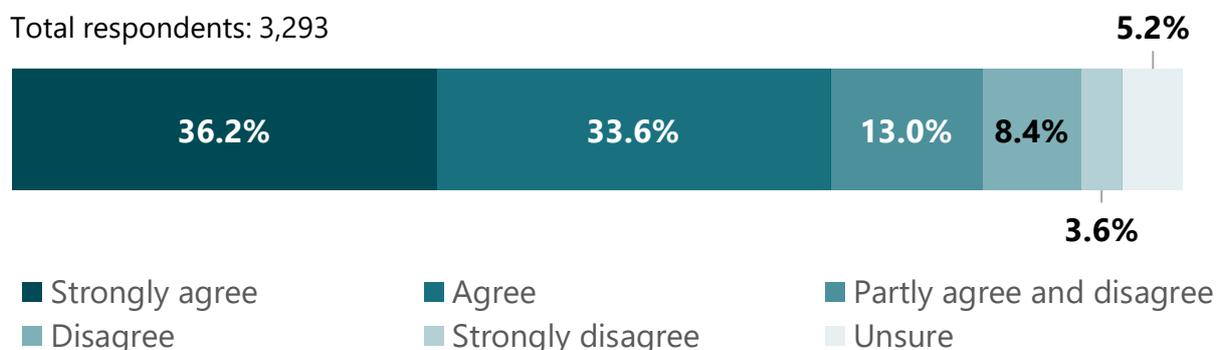
⁶ Equality and Human Rights Commission (2020) *Response to Ofqual consultation on specified general qualifications* <https://www.equalityhumanrights.com/en/our-work/news/predicted-grading-during-covid-19-could-limit-young-peoples-futures>

If an appeals process identifies an error that would result in a lower grade for learners other than those cited in the appeal, then WJEC should not lower these grades.

3.13 To what extent do you agree with this proposal?

Figure 10

Total respondents: 3,293



Of the 3,293 respondents who answered this question, 69.8% agreed or strongly agreed and 12.0% of respondents disagreed or strongly disagreed with the proposal. 744 respondents provided written comments to explain their response.

3.14 Support for the proposal

3.14.1 Ensures fairness

Respondents who agreed with the proposal believed that lowering the grades of learners who were not included in the appeal would be unfair under the current arrangements. They felt that lowering the grades of these learners who were happy with the grades would penalise them unfairly as the grades would be lowered because of the mistakes they had not made.

Respondents considered that the proposal was consistent with the practice of previous years when exam boards would not lower the marks of other learners. They thought this would ensure that this year cohort would not be disadvantaged compared to previous cohorts.

3.14.2 Prevents the negative emotional effect on learners

Respondents mentioned that learners would have already gone through significant stress and uncertainty this year. They argued that lowering learners' grades following an appeal that had not included them would only cause these learners additional stress and anxiety. They suggested that this could be especially the case when the new grades affect the learners' plans, for example, by preventing them from getting a university place.

[Learners] are at a vulnerable age: giving bad news after what seemed to be good at this time may be more than some young people will be able to withstand.

I think this pandemic is causing a great deal of stress for students as there are so many unknowns. If an error is discovered later it would be better to ignore it to protect students' mental health/wellbeing and their trust in the education system through this crisis.

3.14.3 Ensures a feasible way of dealing with appeals

Some respondents supported the proposal because they believed it would make the appeal process more efficient. They considered that it wouldn't be possible to lower the grades of other learners without permission for their data to be re-examined. Getting this permission from them could be difficult and would require time. On the other hand, it was suggested that changing the grades without permission would leave WJEC open to legal challenges from learners. Either way, respondents reported that the awarding would be protracted.

There were also concerns that if grades are lowered, learners would want to appeal the new grade. These appeals might trigger a 'snowballing effect' in which WJEC would be in a prolonged period of adjusting the grades.

On a different note, some respondents considered that lowering the grades of learners who appeal would also ensure efficiency. They thought that if the grades could only stay the same or improve after an appeal then there would be a risk of many learners appealing with no reason other than just trying to improve their grade.

3.14.4 Ensures centres will appeal

Some respondents believed that lowering the grades of other learners would make centres reluctant to appeal. This would happen either because centres would want to protect other learners or even because centres would want to protect the learners who the centre might be appealing for. The latter case is likely to occur in small communities where it might be challenging to keep the identity of those appealing anonymous. If other learners' grades are lowered, it was suggested that these learners could consider the learners who appealed responsible for their lower grade.

Therefore, respondents felt that the proposal ensures that centres will feel free to appeal when they consider they have a valid reason to do so.

3.14.5 Ensures trust in the system

Some respondents felt that lowering the grades of other learners could send the wrong message about the quality of the centres' work and undermine trust in the system.

3.15 Concerns about the proposal

3.15.1 The proposal is unfair

Respondents who disagreed believed that correcting all mistakes was a matter of fairness and natural justice.

If it were me then I would not want my grades lowered (and would be greatly distressed if it were) but it is unfair and therefore should be corrected.

All students should be marked fairly. Unfortunately, if this means students grades change as a result of WJEC error then they have to be changed.

3.15.2 Accuracy is still important

Respondents considered that the grade accuracy was the most important aspect in the awarding. Therefore, they argued that if an appeal finds that other learners' grades are higher than they should be, those grades must be lowered even if this might seem unfair to those learners. Moreover, some respondents believed that if errors regarding some learners were found, the grades of every single learner needed to be reviewed. Some learners argued that this should be done at least when the errors were large.

Grades awarded should be as accurate as possible, so if an error has been identified then it should not be ignored.

Morally this should not happen as it undermines the underpinning principles behind grades based on the quality of work and the accuracy of answers and application of learning.

Respondents believed that ensuring accuracy was not only a matter of principle but also a matter of helping learners whose grades would be higher than they should be. If their grades are not lowered, there may be instances where learners get into A level or university courses believing that the grade they achieved indicated they would be able to cope with the course demand. There was a concern that they may not be able to cope with their studies and this could result in these learners experiencing a negative emotional effect. It was suggested that if the proposal stands, to address this problem, these learners should be notified about their grades being higher than they should be.

Every student should be awarded to right grades to their own capabilities and not a grade higher than they cannot cope with in further education as they would struggle in their further studies.

3.15.3 Erodes public confidence

Respondents mentioned that leaving mistakes uncorrected would only maintain inconsistencies in grades. They suggested that this would erode public credibility of the grades awarded; therefore, all mistakes should be remedied. At the same time, these respondents felt that WJEC should explain to parents and learners why the grades were lowered.

It was also believed that the proposed approach would encourage more appeals which would send a message to the public that the system is not functioning properly.

3.16 Alternative suggestions provided by respondents

3.16.1 A flexible approach to lowering the grades

Some respondents thought that the decision whether to lower the grades of other learners should be made on a case-by-case basis.

Many of these respondents suggested that the size of the change should be considered. Some thought grades should be lowered only if the change is insignificant. This was defined as either the change not having a severe effect (e.g. prevents learners from getting into a university) or, in most cases, as the difference being of only one grade. Conversely, other respondents thought that the grades should be lowered only when the discrepancy between the grades is large. Many of these respondents thought that lowering the grade when the change is small was not reasonable as the results would have a margin of error, so a minor difference should not trigger the change.

It would be pointless to drop grades that are very closely aligned (e.g. C to D), but, where errors are starker (B to G) the lower grade should be applied.

It should only be dropped if the evidence is very strong e.g. more than 1 grade change.

I believe that students should receive the lower grade only if the difference in grades is substantial whereas if the grade difference is only one grade then the candidate should receive the higher grade.

It was also suggested that the change should be made only if the error affects the grades of all learners from a centre or only if there is a good reason to do this (e.g. the ranking was tampered with).

3.16.2 Other suggestions

Some other suggestions were:

- To distribute the grades to centres well before the awarding date (e.g. three weeks). If any disagreements exist, these should be solved between WJEC and the centres. In this way once the results are announced, there would hopefully be no need to correct other learners' grades.
- To make clear to centres that any multiple subsequent changes they make to their data would be subject to a malpractice/maladministration investigation. This suggestion was made because there were concerns that the proposal might make it easier for centres to try improving some grades in bad faith by stating that they had made an error knowing that other grades would be protected. Alternatively, WJEC could announce that they would take a case-by-case approach when deciding if the grades should be lowered.
- To not lower any grades at all, especially because appeal decisions would be difficult to be made without UMS scores and standardised evidence.
- To award the average of the two grades.

3.17 Aspects on which respondents wanted additional clarity

Respondents worried that if an error was discovered, this could have wider implications than just on the learners associated with an assessment centre. These respondents wondered whether in the instance of error, the standardisation model should be re-run to ensure that national outcomes remain comparable to previous years. Some respondents asked whether the grades of other learners should go up if the grades of the appealing learners go up.

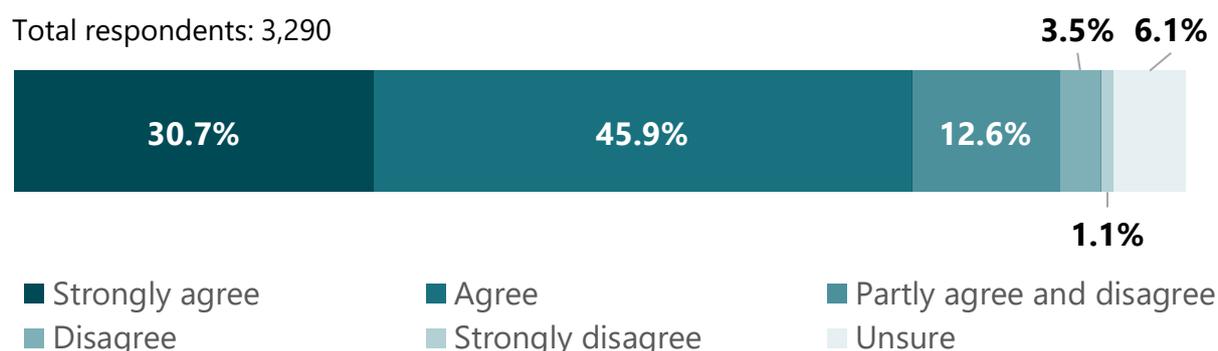
A respondent wondered if lowering one candidate's grade would mean raising the grade of another candidate to compensate for the pass percentage rate for a certain grade. If yes, the respondent asked how the learner to be awarded a higher grade would be selected.

WJEC should be required to take all reasonable steps to ensure that all appeal decisions are taken by people who were not involved in the process leading to the issue of those results.

3.18 To what extent do you agree with this proposal?

Figure 11

Total respondents: 3,290



Of the 3,290 respondents who answered this question, 76.6% agreed or strongly agreed and 4.6% of respondents disagreed or strongly disagreed with the proposal. 577 respondents provided written comments to explain their response.

3.19 Support for the proposal

Before describing respondents' comments, it should be noted that respondents understood differently various aspects of the proposal.

Some respondents thought the question was referring to appeals made because of procedural or data errors (as proposed in the consultation document), while other respondents seemed to believe that the question was referring to an appeal process that would review every aspect of the awarding process (e.g. professional judgements). From the comments it was not always clear whether the latter group believed this was the proposal or whether they wished this would have been the proposal.

In addition, some respondents understood that only WJEC would examine the appeals, while others understood that centres would also examine some appeals.

If students/parents disagree with the grades based on the centre assessment grades provided in the 1st place then the professionals who made those decisions must be given an opportunity to explain their rationale and share the data they used to come to those decisions.

The teachers involved in making the decision know the students' capabilities better than anyone else. However, they may be the reason the incorrect grade was given maybe through a clash of personalities or not identifying true potential of quieter students. So, a fresh set of eyes may produce a different more accurate grade.

Yes, this should be done otherwise people could be influenced by how much they like [learners].

Can be difficult especially in small schools or subjects with a low uptake as there may not be staff available with the required knowledge on the individual concerned.

Based on their comments, it could be seen that respondents agreed with the proposal while having opposite views about it. This happened because some respondents understood the proposal as insisting that other people should examine the appeals, while others viewed the proposal as allowing an exception from this rule.

These various views of the question should be kept in mind when reading the analysis for this question.

3.19.1 Proposal ensures impartiality and therefore accuracy

Respondents who viewed the proposal as reinforcing the existing appeal rule that other people decide the appeals agreed with the proposal because they thought this would increase the accuracy of the results and would ensure the impartiality of the appeal decisions. They felt it was less likely that the same person would be able to address their own errors. Therefore, respondents believed that involving the same people would lead to a systematic institutional bias and erode public confidence.

If someone is in question of providing an incorrect grade, they shouldn't be involved in the appeal - it would make no sense for someone to reanalyse their own proceedings or judgement and expect them to be totally objective.

The people who deal with appeals should not be the same ones who calculated the results - otherwise there will be no point in appealing. It is important that this happens to ensure that no learner is put at a substantial disadvantage.

In order to be credible, any appeal process must be free of bias, or perception of bias. This can't possibly be the case if people are being asked to make a judgement on their own prior decisions.

3.19.2 Proposal is reasonable

Respondents who viewed that the proposal allowed, as an exception, the same people to decide the appeals, supported it because they considered that there would not be many competent staff with no prior involvement available to decide appeals. Therefore, it seemed reasonable to have this exception.

3.20 Concerns about the proposal

The respondents who understood the question as allowing WJEC to make an exception from the current rules worried that the **appeal decisions would not be accurate**. They insisted that people who were not involved in the process leading to the issue of the results should examine the appeals.

The wording should be changed to the WJEC must. This in turn will place an absolute requirement on the body to take all reasonable steps to ensure that appeals are fair and consistent and unbiased in approach. There is a wealth of experienced professionals to assist with this process and whilst it might be a planning nightmare to coordinate it must be done to ensure confidence in the qualification system.

Conversely, the other group of respondents disagreed with the proposal because they thought that, alongside prior involvement, an **important criterion for selecting people should be their competence**. They worried that if WJEC strives at all cost to involve other people, those people may be less competent.

I would rather have this completed by competent staff (who may have made a mistake before when processing data), than by people brought in to review an appeal-but having less knowledge than the person who made the mistake initially.

It should be noted that most of these respondents were thinking of appeals as involving a re-examination of the professional judgements and the awarded grades.

We disagree with the above as we feel that should the person/s not involved with issuing the result of the learner does not have enough detail of the learners capabilities and how they are working towards any goals set forth.

I do understand the point of this, however if the people involved in the process leading to the issue of those results know the student and have taught them for a length of time, then I believe that they are the best person to review the grades that have been issued to them, To have a group of people who have never taught or possibly even met a student review a grade seems strange.

... it will not be possible for schools to review centre assessed grade without involving the subject teachers.

3.21 Alternative suggestions provided by respondents

3.21.1 Involve people from both groups

Some respondents believed a panel of people who were previously involved in the awarding together with those who were not involved should examine the appeals.

These respondents felt that the former would already know the data well, while the latter would ensure a fresh perspective that would allow the identification of errors. Some respondents felt that the people who made the decision should be at least consulted about the reasons for the decision they made.

I believe you need a mix of people who were and weren't involved so that you can get a fair decision, as there may be questions raised that only those involved would be able to answer.

It would be useful for the people who are dealing with the appeals to discuss how certain grades were arrived at with the person who made the decision.

They may need to discuss the decision with the people who made the predictions to get a full picture of how the grades were assigned.

An alternative suggestion given was to engage staff who were familiar with the process first - to quickly identify any glaring errors and to verify and contextualise where necessary the original information - and then pass all the information to independent reviewers.

Some respondents suggested that the proposal (to involve new experts) should only apply to more difficult cases. If a clear administrative error was made, the suggestion was that this could be corrected quickly by people who made the original decision.

Finally, some respondents suggested that the decision to involve or not a new set of experts should be made by the appellants or be made depending on the matters to be reviewed. For example, if the appeal was launched on reasons of teachers being biased, then learners should have the right to insist that different people should review it.

3.21.2 Other observations

Some respondents considered the proposal to be reasonable. However, they were concerned that WJEC might use the exception even when this would not have been absolutely needed. They thought that safeguards should exist to prevent such situations. For example, they suggested that WJEC should use the exception only when they can show that they had taken their best efforts to avoid the need to make use of the exception.

Conversely, another concern expressed was that stakeholders might always expect that new experts are involved at each stage of the review process and accuse WJEC of being non-compliant if this does not happen.

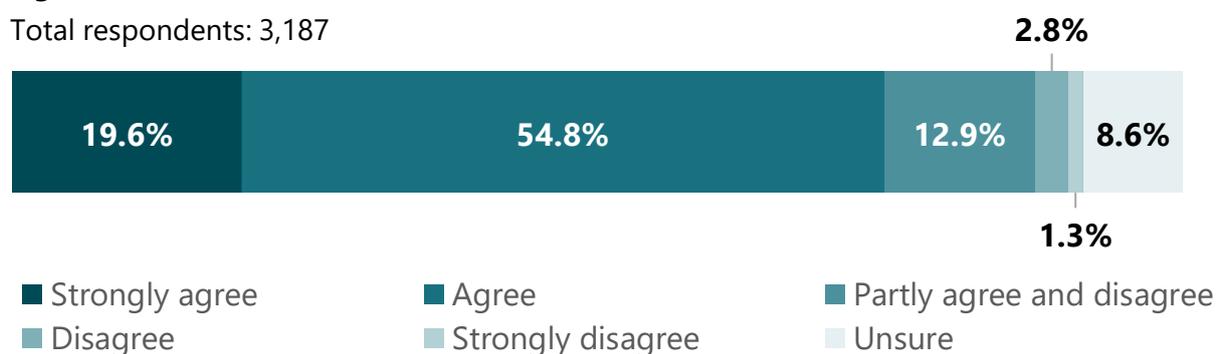
Some respondents wondered how the appeal procedure would work given that there would be no papers to remark and the appeals will be focused on inspecting the grades generated by the statistical model.

WJEC should be permitted to run a simplified appeals process whereby the decision-maker considers a report by the member of staff conducting the administrative review and any representations made by the centre in light of that report.

3.22 To what extent do you agree with this proposal?

Figure 12

Total respondents: 3,187



Of the 3,187 respondents who answered this question, 74.4% agreed or strongly agreed and 4.1% of respondents disagreed or strongly disagreed with the proposal. 504 respondents provided written comments to explain their response.

3.23 Support for the proposal

Respondents who agreed with the proposal mentioned that the extraordinary circumstances of this year impose that a **simplified appeals process** would be the most **efficient** way to examine appeals. Several reasons were given to support this position:

- In conditions of self-isolation and restrictions of movement a **full appeal investigation may be difficult**, especially if many people need to be involved.
- The awarding process this year is new, therefore a higher number of appeals could be expected. A simplified procedure will help deal with those appeals more efficiently.
- More time than usual will be needed to prepare for the new school year; therefore, the process must be completed as quickly as possible.
- The awarding period needs to be short so that **learners get their grades quickly** and can decide about their future in good time.
- Having a full appeal review is not appropriate considering the allowed grounds for appeal and that no physical papers would be examined. A simplified appeal process is more appropriate.

For A level students like myself, I think this will be in our best interests because a simplified appeals process may affect university choices and clearing decisions. Some universities start a few weeks after results day and during this uncertain time, it would be useful to have a final set of grades in place before term starts.

Respondents also thought that prolonged appeal procedures would be emotionally draining for the learners.

Some respondents who agreed with the proposal emphasised that the appeal process needs to have the trust of participants, be robust, fair and defensible otherwise it may lack sufficient authority. To achieve this, they considered that a set of guidelines to regulate the appeals should be drafted. Respondents believed the process should allow all parties to bring evidence. If needed, the parties, and especially teachers and learners, should be contacted for additional clarifications.

Finally, it was felt that provisions about the expertise of the people to review the appeals are drafted. Respondents believed that these people should understand the statistical side of the process as well as the education system and qualifications.

3.24 Concerns about the proposal

Respondents who disagree with the proposal considered that there should be a **full appeal process** even if some review rules might need to be adjusted. They suggested that appeals this year are more important than in any previous year because a **completely new and more subjective approach** was being implemented. They felt the whole process seemed to not have enough **accuracy checks** in place and that a simplified review would only lead to more mistakes.

The appeals process should not change. People's futures are at stake. There is no marking so usual quality assurance checks should be kept in place.

If the data collected is not 100% reliable and clear then how can errors be corrected quickly.

Some respondents felt that the proposal was designed to **ease the WJEC burden** at the risk of not having a proper and fair process. Aside from the accuracy aspect, they felt that this wasn't acceptable because they believed that WJEC would have more time available given that they would not have to issue, mark and grade any exams.

Corners shouldn't be cut when dealing with learners' grades and their futures.

Some respondents disagreed because they felt the proposal would transform the appeals into a **superficial 'box ticking' exercise** which would not change the appealed results.

Respondents felt that using a simplified appeal procedure was **unfair** to the learners from this year cohort because learners in the previous years could use a full appeal procedure.

[learners] deserve the same appeals service if the grades are to be seen in the 'same light as all other learners from previous years.'

To ensure accuracy, respondents felt that those who examine the appeals need to have access to all information and, if needed, should be able to collect further data on individual learners. It was suggested that this data might also include information about the rationale for the professional judgements and details of the moderation process that centres undertook.

3.25 Alternative suggestions provided by respondents

Respondents also offered suggestions on how to improve the appeals process. It seems that many of these respondents made these recommendations on the understanding that the appeals could or even would include a full review of the grades and the professional judgements.

3.25.1 Involve learners

Some respondents expressed the concern that centres, for various reasons, would not represent fairly the learners' positions in their representations. Therefore, respondents opted for a greater involvement of learners in the appeal process at different levels. For example, at the centre level the centre could appoint 3 senior teachers and then the learner selects one that should represent their case. At the WJEC level, respondents suggested that learners should be allowed to present their report alongside the centre representation. Some respondents also suggested that the appeal should be between the candidates and WJEC.

3.25.2 Should involve teachers/centres

Some respondents considered that the issue of poor representations could be solved by involving the right teachers into this process. For example, respondents recommended that subject teachers should write the representations.

The teacher should be able to give any evidence they believe to be appropriate to support their case (even if it is not directly exam based). Especially for creative subjects. For example- A school production performance, a sporting event, musical performance, speech or art piece. Anything which shows the candidate level of skill and how we as a centre know them and their ability.

Some respondents recommended that the representations are drafted by a team of teachers.

3.25.3 Other recommendations

- Some respondents considered that teachers and centre staff are the ones who know the learners better than anyone and therefore would probably do the best job at

examining appeals. These respondents recommended that **centres examine the appeals**.

- A quick and simple process is preferable, but if this still does not bring a result that the parties believe to be fair or satisfactory, a formal appeals process should be allowed to take place.
- If the appeal is examining whether the **grade should be changed by more than 2 grades or that the grade should be lowered**, then a full review should take place.
- Conduct **simplified appeal procedure** when the appeal is about **checking and rectifying an error** but have a full review in the rest of the cases.
- When needed, those involved in the appeal could be invited to present their cases even if done in an online meeting.
- Appeals should be **free**.

3.26 Additional comments about the proposal

Some respondents felt they needed more detail about the proposal to express an opinion.

It was noted that the word 'may' in the paragraph 2.80 of the consultation document ('a simplified process [...] **may** be appropriate given the exceptional circumstances this summer') implies an element of discretion on whether a simplified process is implemented. Some respondents understood this as all appeals being examined in a simplified process (if this decision is made) or as appeals following a simplified procedure when the case is simple and a full procedure when the case is more complex.

In relation to the last point, some respondents felt it was not clear why sometimes simplified appeals would be appropriate while in other instances it would not be, given the procedural nature of the appeals. It was suggested that clearer guidelines on this proposal were needed, otherwise the decision can become a matter of appeal itself if participants in an appeal disagree with the proposed (simplified or full) approach. A suggestion was that a simplified appeals process is represented in a schema that is shared with the stakeholders.

Respondents asked the following further questions about the proposal:

- What should be included in the report or the representation?
- Who is the independent decision-maker? Would it be acceptable that the decision-maker had prior involvement in determining the centre assessment grades or rank order for a centre involved in an appeal?
- Is the simplified procedure a review of a single case or a review of how the grades were allocated?
- Would this simplified procedure be open to everyone wishing to appeal?

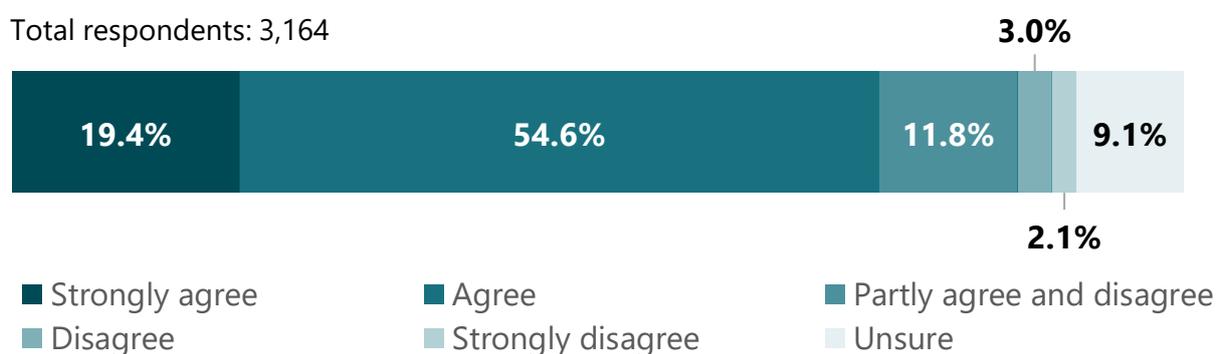
The only functions of the Exam Procedures Review Service (EPRS) this summer will be to review:

- i) the extent to which WJEC was compliant with our requirements and with their own policies and procedures, or
- ii) if any error was identified in the data used to generate the calculated grade(s) and/or in the grade(s) issued, whether that error was properly corrected.

3.27 To what extent do you agree with this proposal?

Figure 13

Total respondents: 3,164



Of the 3,164 respondents who answered this question, 74.0% agreed or strongly agreed and 5.1% of respondents disagreed or strongly disagreed with the proposal. 358 respondents provided written comments to explain their response.

3.28 Support for the proposal

Respondents felt that restricting the issues to be reviewed by ERPS seemed **appropriate** given that there was no marking, so any errors were likely to be only those indicated in the proposal.

There is no other responsibility necessary in this current situation that students face.

Difficult to see how else they could contribute to the process.

They also believed that the **proposal aligned with the general approach for this summer** where centres verify the academic judgements of their teachers, and WJEC verifies the centres against the evidence supplied. Given this approach, there should not be a detailed unpicking of the awarding process by EPRS, so it was felt acceptable that other issues be solved at the WJEC-centre level. Respondents felt that this will ensure that the process stays streamlined as the more bodies and the more competencies attributed to them, the more complicated the process becomes.

Other respondents believed that having EPRS as an additional verifying body (in the instances outlined in the proposal) would give learners a better chance of getting accurate grades because the oversight would ensure a [fair and standardised approach](#).

3.29 Concerns about the proposal

Some respondents who disagreed saw [no ground for departure](#) from the level of scrutiny in previous years.

They argued that the proposal would limit the extent to which learners can appeal the professional judgements and their grades. They reiterated that it was against the [fundamental right to appeal](#) and was [unfair](#). They also believed that the proposal was meant to help WJEC and centres deal with their functions but did not represent the interests of the learners and was open to legal challenges.

Respondents reiterated that because there would be no exams to mark and grade, there should be [enough time for appeals](#). It was suggested that a full review by EPRS was important considering that, as respondents felt, all other usual checks had been limited or removed from the awarding process. Having the simplified process puts this year's cohort at a significant disadvantage to previous and (most likely) future year groups.

3.30 Alternative suggestions provided by respondents

3.30.1 EPRS to act as a court of last resort

Some respondents who disagreed with the proposal suggested that data errors can occur not only at the WJEC level but also at the centre level. So, they considered that EPRS should act as a court of last resort which would examine and decide all types of complaints with appellants being able to bring evidence, if needed.

Respondents mentioned that EPRS could examine:

- Complaints in relation to the information provided or used in awarding (schoolwork, past grades etc) and how WJEC used this information.
- Complaints on whether the underlying principles of the statistical model and the awarded grades were fair. Some felt that learners should be able to appeal to EPRS if they believed that the statistical model had not adequately reflected the evidence submitted by centre. If this turns to be too onerous, it was recommended that there should be, at least, a random sampling of the standardisation process.
- Complaints about teacher bias or malpractice.
- Complaints about the grades being lower than expected or predicted.

3.30.2 EPRS to assume a quality-assurance role

Some respondents believed that aside from examining appeals on any grounds, EPRS should also have a proactive role of reviewing whether the results were acceptable. For

example, EPRS should check whether the overall set of grades awarded at subject or centre levels are appropriate given all relevant factors and the evidence put forward by centres. Some respondents argued that EPRS should also verify whether schools and colleges followed the procedures correctly and assess the WJEC requirements, policies and procedures in addition to their compliance with them. To get an objective view, it was thought that the EPRS would need to speak to learners and centres.

The main reason given suggesting this proactive approach was the worry that the grades would be lower than expected because the historical data would not reflect the recent progress.

A more overarching look at the fairness, integrity, consistency and reliability of the results process is essential in this unprecedented situation. There is no experience to go on: this is new and untrod. It is vital that the whole process is scrutinised to ensure it has been appropriate.

The EPRS should be doing both those things but it must also look into the grade awarding process and ensure it is awarding the fairest grades possible.

3.30.3 Other observations and recommendations

Some respondents felt they needed more detail about the proposal to be able to comment. One respondent asked if grades could be lowered as a result of the EPRS review. Other respondents reiterated the need to clarify what 'wrong data' was. Some respondents were not clear if learners could appeal to EPRS. They considered that this should be allowed.

Some respondents believed that EPRS review should be an occasion to ensure that a 'lessons learned' exercise is conducted should any such circumstance happen again in the future. Similarly, it was recommended that WJEC should take every opportunity to learn from this extraordinary situation and assess the quality assurance procedures.

A respondent recommended that a new service should be set up to cater for the 2020 learners, for example, a Grading review service.

4 Integrated Impact Assessment

Respondents were asked to comment on our Regulatory Impact Assessment, Equalities Impact Assessment and Welsh Language Impact Assessment. Respondents' views on each of these impact assessments are discussed in turn below. These questions were not included in the survey adapted for young people.

4.1 Regulatory Impact Assessment

4.1.1 An overview of the responses

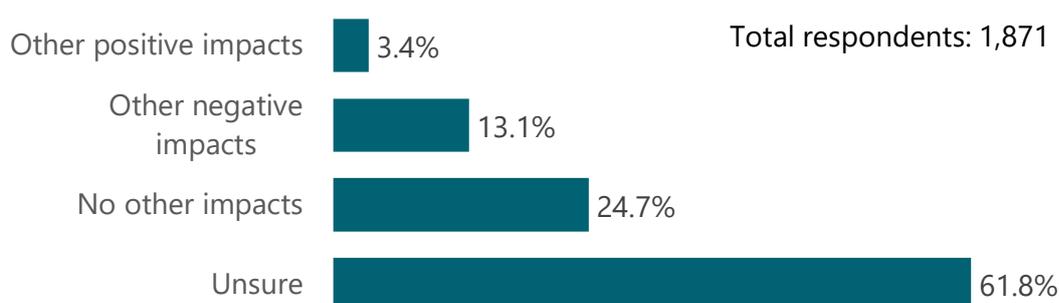
Respondents were asked three questions about the Regulatory Impact Assessment:

1. To identify any additional steps that we could take to mitigate against any of the regulatory impacts that we had already identified in the impact assessment.

445 respondents commented on this question, however nearly half of these respondents either noted that the Regulatory Impact Assessment was comprehensive, and they had no further comments, or that they were unsure. The remaining comments were either the same as, or very similar to, those provided by respondents to the third question on this impact assessment. In the interests of presenting the findings clearly, the comments have been combined and are presented together in section 4.1.2.

2. To indicate whether they felt there were additional positive or negative regulatory impacts that we had not identified in the impact assessment.

Figure 14



Note: Some respondents gave more than one answer to this question. Therefore, the sum of all values shown in the chart may be greater than 100%.

1,871 respondents answered this question. Of those respondents, fewer than 20% indicated that they had identified additional impacts. The remaining respondents either indicated that they had not identified any additional impacts or that they were unsure.

3. To explain their answer to question 2, clearly outlining what additional impacts they had identified and any steps that we could take to reduce that impact.

319 respondents commented on this question. Almost a fifth of these comments indicated that the respondent had nothing further to add or that they were unsure. The remaining comments are presented alongside the responses to the first question on this impact assessment in section 4.1.2 below.

4.1.2 A summary of comments on the Regulatory Impact Assessment questions

A number of respondents took the opportunity to reiterate views that have already been explored in relation to the questions about the aims that will underpin the statistical standardisation model, or the appeals process. These comments have only been repeated where they clearly relate to the Regulatory Impact Assessment.

Impact on learners

Wellbeing of learners

Some respondents felt that the impact assessment should give more consideration to the wellbeing of learners who were due to complete their assessments this summer. A few respondents highlighted positive impacts, including that learners will get a grade without having to sit an exam, which can be a stressful experience for some, and that for some learners, this grade may be higher than what they would have got had they completed their assessments.

However, the majority of respondents who discussed impacts on learners were concerned about possible negative impacts. Reflecting views already explored in this report, respondents noted that some learners could get a grade that is lower than what they would have got had they completed their assessments. Respondents also felt that some learners are anxious because they are not clear on how their grades will be calculated this year and feel as though they have lost control of their results. It was considered important to identify the impacts of these concerns on a learner's wellbeing and progression opportunities in this impact assessment.

To help mitigate the potential impact on learners, respondents reiterated the importance of ensuring that the process for calculating grades this summer is clearly explained to learners. It was suggested that this information is available as soon as possible and in a range of formats to ensure it is easily accessible. It was also suggested that learners' results are accompanied by a factsheet explaining how their grades have been calculated. Another suggestion was that learners are more involved in the process and can discuss their grades with their centres. It was felt that this may help learners feel that they have more control over their grades.

It was also felt that the final model for standardising grades should be simple and robust to avoid any delay in results. It was felt that any delay could be detrimental to the wellbeing of learners.

Respondents also reiterated concerns that qualifications awarded this summer may not be valued in the same way as qualifications attained by learners in other years, and as a result,

learners may face challenges in securing university places or employment in the future. It was suggested that we work closely with universities and employers to ensure they are clear on how grades have been calculated this summer and feel that the outcomes are credible. It was also suggested that if national outcomes improve this year, we clearly communicate that this could be due to a genuine improvement in standards or a stronger cohort to ensure that the outcomes are respected. A final suggestion was that the approach to calculating grades this summer should be consistent with the approach being adopted in other UK jurisdictions to make it easier for stakeholders to understand and compare the achievements of learners.

Finally, it was reported that not allowing individual appeals could have an adverse impact on the longer-term wellbeing of learners, who may always be wondering 'what if'. It was felt that the impact assessment should give more consideration to this.

Impact on specific groups of learners

Some respondents felt that more consideration needs to be given to how the process will impact particular groups of learners. These have been identified in the commentary on Aim 4 but include learners who:

1. were due to resit assessments this year and were expected to exceed their prior attainment in that unit;
2. have recently been diagnosed with ALN and were due to have additional support for their assessments this summer;
3. underperformed in previous assessments due to personal circumstances, such as ill health;
4. are adult learners who are unable to attend all lessons and who have little or no prior attainment data;
5. were taught by either an inexperienced teacher, or multiple different teachers, who may therefore lack experience or knowledge to accurately provide centre assessment data;
6. excel in exams but often underperform in internal assessments and classwork;
7. were anticipating better results than they had achieved in mock exams or classwork as they had had additional support from a private tutor, attended intervention sessions at school or were planning to put a lot of effort into their revision.

There was also some suggestion that the proposals could benefit learners who attend independent schools because the centre's historical data would be favourable. It was felt that the impact assessments should consider the impact on learners who attend state schools and ensure that the appropriate mitigations are in place.

Further reflecting comments discussed in Aim 4, respondents noted the importance of assessing the potential impact on learners with protected characteristics or who are from a lower socio-economic background. It was again suggested that outcomes for these learners are reviewed to ensure they have not been disadvantaged by the process for calculating grades.

Reflecting comments in Aim 5, it was also suggested that the impact assessment should consider the effects of using AS level prior attainment data as part of the standardisation model for A levels. It was felt that because many learners achieve a higher grade at A level than at AS, using AS attainment to standardise outcomes could disadvantage learners in Wales when compared to England. It was suggested that as a result, learners in Wales could attain lower grades than those in England, which could be detrimental to their ability to progress onto their chosen university or into employment.

Decision not to hold a full autumn exam series

Some respondents felt that the impact assessment should consider the impact on learners who are disappointed with their grades and are unable to sit an exam until summer 2021. It was noted that in England, learners will be able to enter exams in Autumn 2020. Respondents were concerned that as a result, learners in Wales could be disadvantaged.

A few respondents noted the potential impacts on a learner's wellbeing if they have to wait a year before they can sit an exam. Others suggested it might not be financially viable for some learners to sit their exams next summer, which they suggested could be a barrier to progression. As one way to mitigate this, it was suggested that learners should be able to sit exams next summer for free. It was also suggested that Welsh Government should support learners who are unable to progress as they had planned to ensure they are able to sit the exams next summer with the appropriate preparation and professional guidance.

Given that, in most subjects, learners will not be able to sit an exam until summer 2021, it was requested that information is made clear about how universities will consider the results this year and if they may change their offers to accommodate the exceptional circumstances surrounding the awarding of grades this summer. Similarly, it was suggested that colleges should review their entry criteria to help learners progress where possible.

A few respondents felt that the impact assessment should give more consideration to the possibility that a large number of learners may want to sit an exam next summer if they are unhappy with their calculated grade this year. It was noted that many centres will be unable to facilitate additional classes to help learners prepare as they will need to spend time ensuring that next year's learners are fully prepared following school closures. It was also suggested that the impact assessment should consider the number of exams some learners will be taking next summer if they are resitting qualifications from this summer, as well as entering other qualifications. Reflecting comments explored in Aim 2, it was suggested that these potential impacts could be partly mitigated by allowing outcomes to be more generous than usual this year. It was felt that this would enable more learners to progress as they had planned and limit the number of learners who have to take their exams next summer.

Private candidates

In relation to private candidates who do not have an existing relationship with a centre who can provide centre assessment data, it was reiterated that it is important that alternative solutions are sought. In addition to the suggestions for private candidates discussed in Aim

1, it was suggested that we should explore options for these learners to sit their exams in Autumn 2020, and support them to establish a link with a centre who would be able to provide centre assessment data should the Autumn exam series also need to be cancelled.

It was also suggested that clear guidance is needed to help these learners identify which centres may be able to support their entry this summer. It was queried whether any other types of learner may not receive a grade and suggested that this is made clear in the impact assessment.

Another suggestion was that we should work with universities to make sure they understand that private candidates may not receive a grade this year and encourage them to consider alternative entry requirements for these learners to enable them to progress as they had planned.

Impact on teachers and centres

Pressure for teachers

Some respondents noted that they were pleased that steps had been taken to mitigate the influence of pressure from learners and parents in the process. They felt this was important in helping centres maintain a positive relationship with learners and their families.

However, other respondents were concerned that they might feel pressure from learners or parents once results have been issued, especially if centre assessment data is released. It was suggested that the impact assessment should consider this and the ways in which we can support education professionals in this regard.

Some respondents felt that it would be helpful for centres to receive the results earlier than usual to enable them to check how the calculated grades differ from their centre assessment grades. It was felt that this would enable centres to make any appropriate challenges to WJEC before they are shared with learners to reduce the number of requests for appeal. It was noted that it would also help centres prepare for results day where they may experience a high volume of queries and concerns from learners and their families.

It was also noted that the process of providing centre assessment data could be a burden for teachers, many of whom may be facing challenges with working remotely or managing their care duties. It was suggested that as teachers have not provided data for this purpose before, rigorous training and comprehensive guidance documents should be made available. It was suggested that this guidance should include information on how to eliminate bias from the process, how to internally standardise decisions and how to ensure compliance with their duties under the PSED.

A few respondents noted the importance of ensuring that teachers are trusted to provide accurate centre assessment data. It was felt that any suggestion that they are not able to provide this could lead to a lack of trust in the profession and a climate of micromanagement within centres.

It was also suggested that some centres may feel pressure to provide grades for private candidates or be adversely impacted if they are not able to. It was felt that this should be considered within the impact assessment.

Centres anticipating improved or declining outcomes

Reflecting comments discussed in Aim 3, some respondents felt that the impact assessment should more carefully consider the impact of the process on schools who were anticipating improved results this summer. The suggestions to enable these schools to submit evidence to support this, to explore data over at least three years and to minimise the weighting given to centre historical data in the standardisation model, were reiterated as mitigations.

Conversely, it was noted that centres who may have experienced a decline in results this summer may not be identified, which could mean that the appropriate support is not put in place over the coming academic year.

Financial impacts on centres

It was noted that centres are managing decreased budgets and as exams are not taking place this year, some respondents suggested that WJEC should clearly justify the exam entry fees and consider partially or fully refunding centres or learners if these costs cannot be ratified.

Impact on low-entry subjects

There were some concerns that qualifications with low entry numbers may be adversely affected by the proposals because the available data sets will be small. It was suggested that a research project is conducted to explore the impact on these subjects.

Impact on WJEC

A few respondents felt that the process will be a burden for WJEC this summer and felt that it was important that all stakeholders have trust in them.

A few respondents highlighted the positive financial impact for WJEC who are not paying for examiners and moderators this summer. It was also noted that this could have a financial impact on individuals who work for WJEC in this capacity and who are not receiving an income.

Impact on colleges, universities, and employers

Some respondents noted the potential implications on funding for post-16 providers, including universities. It was suggested that if learners receive lower grades than they anticipated, they may not continue with their planned progression pathway. This could limit the amount of income colleges and universities receive, which in the worst case, could make it unviable for them to continue as education providers. There was some suggestion that this could impact university admissions for the next three to four years, and as a result, it was considered paramount to consider the impact on these institutions.

Some respondents noted the potential logistical challenge facing centres who are planning their provision for the next academic year. It was suggested that if outcomes are higher than usual, centres might have higher numbers than usual applying for courses, which could have an impact on their timetabling arrangements. Conversely, it was suggested that if AS level learners get results that are lower than they are expecting, they may not continue onto A level, which could make some classes unviable. It was felt that these scenarios need to be considered in the impact assessment.

Impact on parents

It was suggested that the impact assessment should include consideration of the impact on parents. It was noted that parents will need to support and guide their children through the process this year and help them to deal with any emotional or practical consequences if they are disappointed with their results. It was suggested that all decisions are clearly articulated and shared with parents to help them understand the process. It was also suggested that parents are provided with a short document explaining what they can do if their child does not get the grades they are expecting. It was felt that this will also help mitigate concerns about the wellbeing of learners discussed above.

Impact on the future of qualifications

Some respondents felt it was important to consider the impact on the future of qualifications. It was felt that awarding grades to learners who have not sat exams this year could call into question the need for such exams in the future. A few respondents were concerned about this and suggested that following the process, a comprehensive 'lessons learned' exercise is completed to enable key stakeholders to reflect on it. This will also enable the system to be prepared should exams need to be cancelled again in the future.

There was also a concern that awarding qualifications to learners who had not completed the course could undermine the qualifications, especially if they have the same status as in other years. It was felt that the impact assessment should carefully consider this.

Other comments

A few respondents noted that although they were unable to identify additional impacts at present, it is important that the impact of decisions is regularly reviewed to ensure early identification of any unintended consequences.

An overarching comment was the need to ensure that all decisions from this consultation, and details on how grades will be calculated and how learners can appeal, are clearly communicated to all stakeholders in a timely manner. It was suggested that this will help mitigate against many of the impacts identified.

It was also suggested that details of alternative standardisation models that have been considered should be published so stakeholders can understand the options and the merits of the selected model.

4.2 Equalities Impact Assessment

4.2.1 An overview of the responses

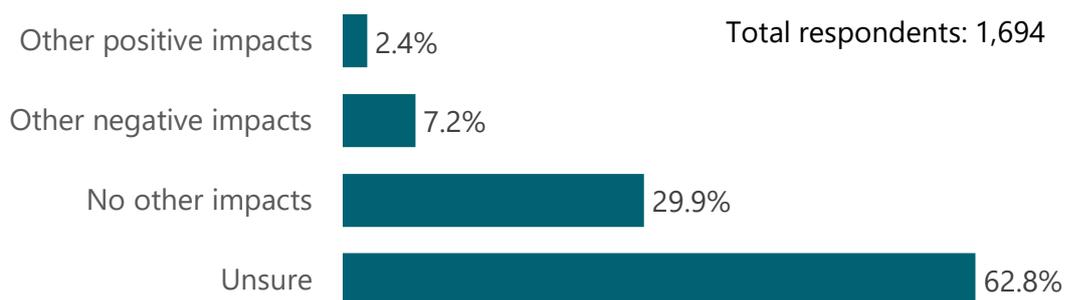
Respondents were asked three questions about the Equalities Impact Assessment:

1. To identify any additional steps that we could take to mitigate against any of the equalities impacts that we had already identified in the impact assessment.

451 respondents commented on this question, however almost two thirds of these respondents either noted that the Equalities Impact Assessment was comprehensive, and they had no further comments, or that they were unsure. The remaining comments were either the same as, or very similar to, those identified by respondents to the third question on this impact assessment. In the interests of presenting the findings clearly, the comments have been combined and are presented together in section 4.2.2.

2. To indicate whether they felt there were additional positive or negative equalities impacts that we had not identified in the impact assessment.

Figure 15



Note: Some respondents gave more than one answer to this question. Therefore, the sum of all values shown in the chart may be greater than 100%.

1,694 respondents answered this question. Of those respondents, fewer than 10% indicated that they had identified additional impacts. The remaining respondents either indicated that they had not identified any additional impacts or that they were unsure.

3. To explain their answer to question 2, clearly outlining what additional impacts they had identified and any steps that we could take to reduce that impact.

264 respondents commented on this question. Around a half of these comments indicated that the respondent had nothing further to add or that they were unsure. The remaining comments are presented alongside the responses to the first question on this impact assessment in section 4.2.2.

4.2.2 A summary of comments on the Equalities Impact Assessment questions

Centre assessment data may systematically disadvantage groups of learners

Reflecting comments discussed in Aim 4, respondents again identified groups of learners who they believed may be systematically disadvantaged by process for calculating grades this summer. These respondents felt that the impact of the process on these groups should be carefully considered within the Equalities Impact Assessment. The groups of learners identified by respondents included:

1. **Learners who were due to resit assessments this summer** – it was noted that some of these learners will be resitting A level assessments and will need to attain their expected grades to be able to progress into university without deferring another year. Respondents felt that specific guidance should be issued to these learners to make sure they are clear on their options.
2. **Learners from BAME communities** - concerns were raised that these learners may be under-rewarded in the centre assessment data due to unconscious bias. It was suggested that the standardisation model should take account of this.
3. **More able learners** - there were particular concerns about the wellbeing of more able learners should they not receive their expected grades. It was felt that these learners would require higher grades to fulfil their ambitions and that not receiving these could adversely affect their wellbeing.
4. **Learners who have access arrangements in place for exams** – there were concerns that the centre assessment data may under-predict the outcomes for these learners as some internal assessments are completed without these access arrangements in place. It was also noted that some learners may not have had appropriate support for previous qualification assessments and therefore, prior attainment data may also be affected.
5. **Learners with ALN or emotional difficulties** – it was felt that teachers may not have a full understanding of the ability of these learners in an exam situation and may therefore under-predict their potential. Conversely, it was noted that for some of these learners, not having to sit an exam may be a benefit as they find them particularly stressful situations.
6. **Learners from a lower socio-economic background** - It was felt that the impact on learners who are eligible for free school meals (as a proxy for socio-economic disadvantage) needs more consideration within this impact assessment.
7. **Learners who speak EAL** – it was noted that some of these learners make rapid advancements in their command of the English language, which can impact their understanding of many of their subjects. It was therefore considered reasonable to expect that these learners may make significant improvements more quickly than other learners.
8. **Mature learners** – there were concerns about how the centre assessment data for these learners would be standardised in the model because they often lack relevant prior attainment data. There was also some suggestion that outcomes for mature learners may be higher than average outcomes in normal years, and that this may not be reflected in this year's results.
9. **Learners who have been absent from their learning** due to ill health and for whom the centre may therefore lack evidence to inform their judgements. There were some concerns that these learners may not be able to receive a grade this year.

10. **Learners who excel in exams or tend to mature later in the academic year** – a few respondents suggested that this could particularly affect boys and felt it was important that this was taken into consideration when calculating grades.
11. **Learners with mental health issues** – it was noted that some learners will be coping with mental health issues that are not identified under the Equality Act 2010. It was suggested that their health may have impacted their performance in class to date, and as such, could affect their centre assessment data.
12. **Girls taking science subjects** – there were a few concerns that girls may be under-rewarded in the centre assessment data in science subjects, such as physics.

To help mitigate against the potential impacts on these groups of learners, respondents reiterated suggestions already discussed in this report. These included that:

1. centres are supported to eliminate bias from their decisions;
2. centres are required to publish what evidence they considered to inform their judgements;
3. centres are required to work with specialist support staff for learners with ALN to help teachers understand how that learner may have improved on their outcomes in the final exams;
4. WJEC collect up to date data on learners with protected characteristics to help identify disadvantage;
5. centres are reminded about their duties under the PSED and provided with guidance on completing an Equality Impact Assessment;
6. centres are required to check their centre assessment data for bias before it is submitted;
7. centres are required to have a teacher who does not know the learners check their judgements;
8. centre assessment grades are compared with outcomes for learners with protected characteristics in previous years to identify potential bias early on.

It was also suggested that learners should be able to appeal where they suspect bias may have contributed to their grade, or where they feel their centre assessment grade may have been impacted by barriers to accessing the work on which the judgements are based.

Another suggestion was that universities should be encouraged to consider contextualised admissions to ensure learners from minority groups are not disadvantaged and are able to progress as they had planned.

Private candidates

The second aspect of our Equalities Impact Assessment considered the impact on learners for whom a centre will not be able to provide centre assessment data.

Many of the impacts on these learners have already been explored in Aim 1 and in the regulatory impact assessment section, but respondents provided the following additional comments in response to this question:

1. It is important to consider the financial and wellbeing impact on learners who have had to seek a validation centre and sit an exam. It was noted that the cost of asking a validation centre to submit centre assessment data was not viable for all private candidates, and it was therefore suggested that this should be funded by WJEC. The wellbeing impact of having to sit an exam, a matter of weeks after being told that exams were cancelled, was also noted.
2. It was suggested that not all learners will be able to wait to take exams next summer due to financial pressures. It was felt that the impact of this should be considered within this impact assessment.
3. It was considered important to establish what proportion of private candidates have protected characteristics to ensure that no one group of learners is disproportionately disadvantaged by the process for calculating grades this summer.

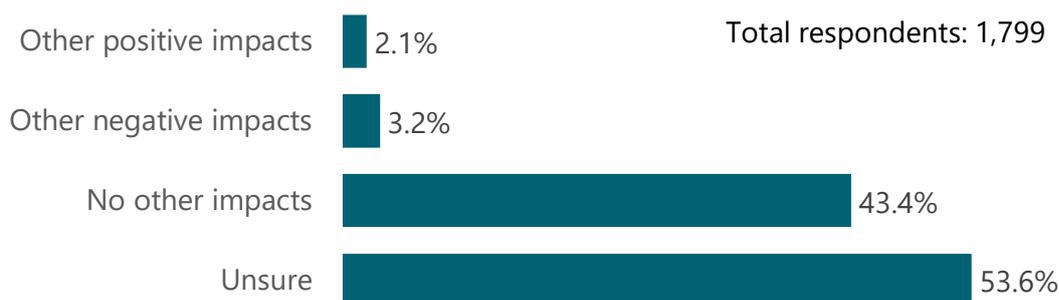
4.3 Welsh-language Impact Assessment

4.3.1 An overview of the questions and number of responses

Respondents were asked four questions about our Welsh-language Impact Assessment.

1. To indicate whether they felt there were any positive or negative impacts on opportunities for people to use the Welsh language that we had not identified in the impact assessment.

Figure 16



Note: Some respondents gave more than one answer to this question. Therefore, the sum of all values shown in the chart may be greater than 100%.

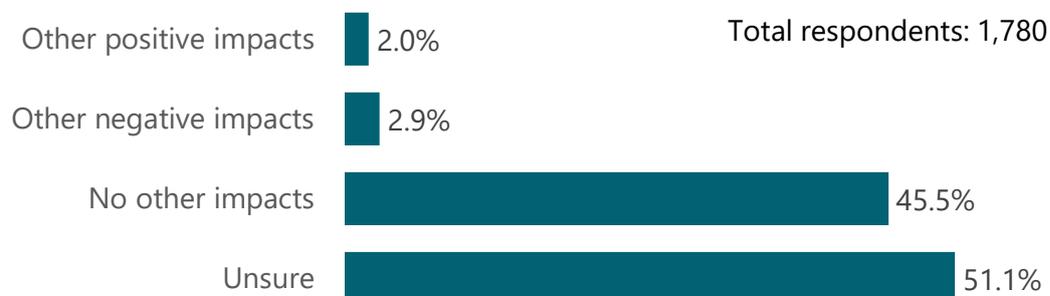
1,799 respondents answered this question. Of those respondents, only around 5% indicated that they had identified additional impacts. The remaining respondents either indicated that they had not identified any additional impacts or that they were unsure.

2. To explain their answer to question one, clearly outlining what additional impacts they had identified and any steps that we could take to reduce that impact.

197 respondents commented on this question, however almost 80% of these respondents either noted that the Welsh-language Impact Assessment was comprehensive, and they had no further comments, that they were unsure or that they did not feel the question was relevant to them because they did not speak Welsh. The remaining comments were either the same as, or very similar to, those identified by respondents to the fourth question on this impact assessment. In the interests of presenting the findings clearly, the comments have been combined and are presented together in section 4.3.2.

3. To indicate whether they felt there were any positive or negative impacts in relation to treating the Welsh language no less favourably than the English language that we had not identified in the impact assessment.

Figure 17



Note: Some respondents gave more than one answer to this question. Therefore, the sum of all values shown in the chart may be greater than 100%.

1,780 respondents answered this question. Of those respondents, fewer than 5% indicated that they had identified additional impacts. The remaining respondents either indicated that they had not identified any additional impacts or that they were unsure.

4. To explain their answer to question 3, clearly outlining what additional impacts they had identified and any steps that we could take to reduce that impact.

184 respondents commented on this question. Around two thirds of these comments indicated that the respondent had nothing further to add, that they were unsure or that they did not feel the question was relevant because they did not speak Welsh.

4.3.2 A summary of comments on the Welsh-language Impact Assessment questions

It is important to note that many of these comments were made by relatively few respondents.

Some respondents questioned the inclusion of a Welsh language impact assessment in the document. These respondents recognised that the proposed approach treats both languages equally, as is required by the Welsh Language (Wales) Measure 2011.

Respondents raised the following points that they felt should be considered in the Welsh-language Impact Assessment:

1. Welsh-medium schools may generally have smaller cohorts than English-medium schools. As a result, these respondents were concerned that the use of centre historical data may disproportionately affect Welsh-medium schools who may experience more variation in their outcomes each year.
2. The outcomes from exam papers sat in the medium of Welsh may differ from those sat in the medium of English. It was felt that this may have had an impact on results in previous years that may not be accounted for in the proposed approach.
3. Taking an exam in the Welsh language can boost the confidence of some learners who choose to study it at A level after they receive their results. There were some concerns that this may not be the case this year which could have an adverse effect on take-up.
4. Guidance should be issued to clarify whether bilingual schools should rank order all their learners together, or as separate streams. There were differing views about which approach should be adopted.
5. Welsh-speaking teachers may assess work differently to non Welsh-speaking teachers, and that as a result, outcomes may differ.

5 Additional comments

It should be noted that some respondents felt unable to access all or some of the consultation questions, partly because the consultation document was lengthy and partly because they were unclear on what was being proposed. As discussed in the report, this may have resulted in some respondents misunderstanding some of the questions. It may also be why some respondents indicated that they were 'unsure' about each of the proposals.

Additionally, throughout the consultation, some respondents commented on decisions that were out of scope. The concerns typically raised by respondents regarded:

1. decisions about how Year 10 unit and AS level outcomes will not contribute towards the final GCSE or A level grades for these learners in summer 2021;
2. the impact of home learning on the ability of learners to achieve their potential in qualifications in future years;
3. the impact of school closures on teachers being able to deliver the full specification for learners due to take qualifications in summer 2021;
4. the impact of not having fully prepared for, and sat, GCSEs exams this year on AS outcomes next year;
5. the decisions to cancel assessments this summer and adopt an alternative approach to awarding qualifications;
6. results day not being brought forward to enable additional time for learners to secure their progression into further or higher education, or employment;
7. the awarding of vocational qualifications this summer.