

Sally Collier  
Chief Regulator and Chair  
Ofqual  
Earlsdon Park  
53-55 Butts Road  
Coventry  
CV1 3BH

24 August 2020

Dear Sally

I am writing on behalf of ASCL members to alert you to an injustice some students may have suffered as a result of the decision to revert to the higher of either centre-assessed grades (CAGs) or calculated results for most qualifications this year, and to ask Ofqual to consider how this might be addressed.

As you know, ASCL was supportive of the principle of the use of a statistical model to moderate CAGs. We also produced detailed guidance for our members on how to produce CAGs. Our guidance encouraged members to follow Ofqual's instruction, in the guidance for Heads of Centre, that judgments should include consideration of previous results in a centre for a subject, and suggested a way in which they might do that. As you will know, we shared this guidance with colleagues at Ofqual, who felt it was a helpful addition to Ofqual's own guidance.

School and college leaders undertook this process on the understanding that all CAGs would be moderated by the exam boards, using Ofqual's statistical model, to ensure fairness across the system. The Heads of Centre declaration makes it clear that this is the context in which leaders submitted CAGs, i.e. on the understanding that "exam boards will conduct a statistical standardisation exercise, using a model developed with Ofqual, and that, if the profile of grades submitted is substantially different from what might be expected based on my centre's historical results and the prior attainment of this year's students, the grades for my centre will be adjusted to bring them into line with national standards".

When the problems with the statistical model became clear, we agreed with the decision to revert to the higher of either centre-assessed grades or calculated results, as a way of correcting some of the most glaring injustices faced by individual students. However, we are concerned that a different group of students may continue to be disadvantaged as a result of centres interpreting Ofqual's guidance differently.

This disadvantage results, in our view, from different centres putting different weights on the two broad objectives they were set. These were, to quote the Secretary of State in his 20 March [press release](#), to ensure that "students are awarded a grade which fairly reflects the work that they have put in", and to "ensure that the distribution of grades follows a similar pattern to that in other years".

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There was wholly understandable inconsistency, we believe, in the extent to which centres moderated their own CAGs, prior to submission, to align these with their previous performance. Some centres prioritised the first objective above, wanting to ensure their CAGs represented as closely as possible teachers' assessments of the grade each student was most likely to achieve. Others put more emphasis on attempting to align teachers' assessments with their centre's previous performance, keen to minimise the extent of any exam board moderation. All centres undertook this process on the understanding that there would be an external moderation process which would iron out any inconsistencies and ensure fairness across the system.

The fact that this external moderation failed to take place has left many schools feeling that they have inadvertently disadvantaged their own students by following Ofqual's own instructions. They are concerned that students in schools and colleges which placed more weight on alignment with previous performance will have, as a result, received lower grades than students in centres which placed a lower priority on this objective. In some cases, this may have led to students missing out on college and university places, or having to resit exams.

We recognise that correcting this possible injustice is not straightforward. We feel, however, that Ofqual and the Department for Education owes it to this year's students to investigate the extent to which this difference in approach across centres may have disadvantaged some students, and to consider ways in which this issue might be addressed.

We ask for an urgent meeting with Ofqual to discuss these concerns and to explore possible solutions.



c.c. Susan Acland-Hood, Permanent Secretary, DfE

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