



**Geoff Barton**  
**General Secretary**  
**Association of School & College Leaders**  
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11 September 2020

Dear Geoff

Thank you for your letter to me of 7 September, and for your letter to Sally Collier on 24 August. Thank you too for your welcome for my appointment. I also look forward to working closely with you in the coming months.

We are sorry for what happened this summer – for the distress and anxiety it has caused for many students and their parents, the problems it has created for teachers and headteachers, and the impact it has had on higher and further education providers.

You raise a number of questions about schools' and colleges' opportunities to appeal centre assessment grades (CAGs) in your letters. As you will know, in our [guidance for heads of centre and teachers](#) we said that schools and colleges should determine CAGs as “the grade each student would have been most likely to get if they had taken their exams in a subject and completed any non-exam assessment” by making “a holistic professional judgement, balancing the different sources of evidence”. On pages 6 and 7 of the guidance, we listed a wide range of the types of evidence that teachers should draw on to make this holistic judgement – including the evidence they had seen from students' work in class, homework, non-exam assessments, and mock exams as well as “previous results in your centre in this subject” and “the performance of this year's students compared to those in previous years”.

In our guidance we acknowledged that “centres will have incomplete evidence, and that the range and amount of evidence will vary between different subjects”. We also know that teachers vary considerably in the generosity of their grading, particularly in the absence of any opportunity to put in place any national training or specified processes across all schools and colleges. Of course, this is why using statistics to iron out these differences and ensure consistency had looked, in principle, to be a good

idea and why it is understandable that some schools and colleges will feel that the approach they have taken to determining CAGs is appreciably different from those taken elsewhere.

While we welcomed ASCL's own guidance to its members on producing CAGs, it is important to note that it was published before our guidance was finalised, and that we asked that ASCL "review [your] document and any communications you issue to make sure it is very clear that there will be formal expectations about this process published by Ofqual shortly and that it is these on which schools and colleges should rely to complete this process".

On 26 August we published [summary guidance](#) to clarify the grounds for appeal this summer. As you will know, this was developed in response to the suggestion at the government's appeals task force meetings, which ASCL attends, that this would help schools and colleges understand the appeals options available to them and, in turn, help them explain the position to students and their parents. Thank you for the meetings we had with ASCL staff as this was developed and your colleagues' helpful comments on an early draft.

If a school or college has evidence they made a mistake when submitting information to the exam board about their judgement of a student's likely grade, they should take that evidence to the exam board. If the exam board is satisfied that the evidence shows the school or college made a mistake and that the school or college should therefore have submitted a different judgement, the exam board will change the grade awarded.

However, with reference to the concerns you set out in your letter, we have been clear that a centre cannot raise concerns about its CAGs through the appeals process on the basis that another institution took a different approach, that different teachers could have come to a different judgement, or because the national process of standardisation did not operate as expected. Instead, the centre would need to provide evidence that the approach they took was not appropriate, given the published guidance. Exam boards would need to be satisfied that the approach taken by the centre was inappropriate – not that a different judgement about a CAG could have been reached – to allow an appeal on the basis that the original judgement was flawed.

You ask about the specific instance where a school or college used historical data when determining its CAGs that it believes was not a good predictor of its students' likely performance this summer. If a school or college wished to appeal on the basis that it used such data in error it would need to show why it used the data and how this resulted in the submission of inaccurate judgements about their students' likely performance. The school or colleges would also need to acknowledge that this led to them making an incorrect declaration to the exam boards.

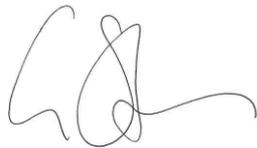
However, in general, it is important to be clear that a centre that took into account the distribution of CAGs compared with grades achieved by the

centre's students in previous years will have acted within the guidance. The taking into account of such information is not in itself an error. Indeed, as we noted at our recent appearance at the Education Select Committee, in general, we would expect that the judgements of the grades students would have most likely have achieved this year would tend to be less accurate without any reference to the grades their students have achieved in previous years. As exam boards would allow such appeals only where the judgement of a school or college was inappropriate, we would not expect to see a large number of such appeals. Indeed, given the care with which centres determined CAGs, we expect it would be very unusual for them to identify systemic issues with their CAGs or for exam boards to find they had made inappropriate judgements about their students' likely performance.

If a school or college is unsure whether it has grounds for an appeal, we would advise them to speak to the exam board(s) directly, as soon as possible. Although we do not intend to review the arrangements for appeals for this summer, we have discussed specific aspects of the arrangements with your colleagues, and are very happy to continue to answer any further questions ASCL has on this issue.

I would like to assure you that we are committed to learning the lessons from what happened this year and to putting in place robust and effective arrangements, with appropriate contingency plans, for exams and other assessments this autumn and in 2021. I have also asked my office to seek to arrange a meeting with you in the next few weeks.

Yours sincerely

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

Dame Glenys Stacey  
Acting Chief Regulator