



Ms J Arnold  
City Hall  
The Queen's Walk  
London  
SE1 2AA

11 August 2020

Dear Ms Arnold,

Thank you for your further letter, outlining your concerns regarding the awarding of GCSE, AS and A Levels in 2020 and preventing unfairness in awarded grades.

The approach to awarding that we are taking is the fairest way to award grades without exams. But we understand that this does nothing to reduce the frustration of students who believe they would have been able to achieve a better grade, if they had had the chance to sit an exam. Also, we recognise that any process of this sort will produce results that need to be reviewed, which is why we have put in place an appeals process.

In our consultation, an overwhelming majority of teachers said that when it comes to appeals, they did not feel it would be right that students should be able to challenge the judgments that their school or college had made about their work. We agree, as any appeal would have to be done by someone better placed than teachers to judge a student's likely grade; in the circumstances this year, we do not believe there is such a person.

As you are aware, on 6 August we confirmed the [grounds for appeal](#) as set out in our consultation, and following consultation provided additional examples of the circumstances in which appeals might apply. Students can ask their school or college to check whether it made an administrative error when submitting their centre assessment grade or position in the rank order and if it agrees it did, to submit an appeal to the exam board. Schools and colleges can appeal if they believe something has gone wrong in processing their results – for example, if a centre believes it has made an error when submitting its information; or similarly, that an exam board made a mistake when calculating, assigning or communicating a grade. We expect that any such mistakes will be quickly found and corrected.

The centre can also appeal if they can evidence grades are lower than expected because previous cohorts are not sufficiently representative of this year's students. Examples of this may include:

- if a single-sex school has changed to co-educational
- if the centre has had a significant change in leadership or governance and can provide objective evidence that its previous grades are not a reliable indicator of its 2020 results
- where a centre experienced a monumental event (flooding or fire which meant students has to re-locate) which affected one year's results in the historical data used in the model
- or where, because of the ability profile of the students, a centre was expecting results this year to show a very different pattern of grades to results in previous years. That could include where the grades of unusually high or low ability students been affected by the model because they fall outside the pattern of results in that centre in recent years. In most cases, this will only be apparent by reviewing centre wide data. Therefore centres, rather than individual students, will be best placed to consider whether this has occurred.

We are committed to supporting students during these exceptional times, and we agree that where students do not receive the grade they expected, it is important they understand their options. On 6 August, [we also published further information](#) to help students and their families understand how appeals will operate this summer.

We know that some students, and groups representing students, were concerned that some centre assessment grades and rank order positions could be influenced by bias or discrimination. The national results do not indicate bias on the part of schools and colleges; early analysis suggests there will generally be [no widening of gaps between results of different groups of students](#). This does not mean that there will be no individual cases of bias or discrimination. Such cases would be taken very seriously.

The [guide](#) provided will help students to understand whether they might have a reason to make a complaint about malpractice or maladministration, including concerns about bias or discrimination. Whilst in the guide we suggest that students should approach the school in the first instance, we also highlight that where students have evidence of malpractice or maladministration on the part of their school or college and have concerns about raising it directly, they are able to discuss this directly with the relevant exam board instead. The guide considers complaints of both malpractice and maladministration; evidence of unconscious bias can also be considered.

In the guide we provide contact information for the exam boards, along with the specific details of our own helpline, where we are able to provide more information on the process. We have also highlighted in the guidance that students may wish to seek further, independent advice on discrimination claims from the Equality Advisory and Support Service (EASS).


You highlight your concerns regarding admissions to higher education. Overall, students will get the best estimate that can be made of the grade

they would have achieved if exams had gone ahead. Of course a system of calculated grades and a statistical model can never know how an individual student might have performed on the day and it is possible that some students might have done better (or worse) had they taken an exam, but we will never know. Colleagues across higher and further education understand this, and many have committed to showing flexibility in their admissions decisions.

However, ultimately, higher education institutions make their own admissions decisions. Some institutions may also allow students who plan to sit exams in the autumn series to defer entry. However, in many cases, students who sit the examinations in the autumn series may be looking at starting their college or university studies in autumn 2021. As the regulator of qualifications, examinations and assessments we would be unable to place any requirements on Universities and other higher education institutions.

Thank you again for taking the time to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Collier', with a long horizontal flourish extending to the right.

**Sally Collier**  
Chief Regulator