

INDEPENDENT REVIEW OF THE SUMMER 2020 ARRANGEMENTS TO AWARD GRADES, AND CONSIDERATIONS FOR SUMMER 2021: FINAL REPORT DECEMBER 2020

Foreword

In August 2020, substantial numbers of young people across Wales were left feeling bewildered and distressed as they received A level results that bore no relation to their expectations and their abilities. Their parents, carers and their teachers were put in the difficult position of supporting these learners when they could not understand the results themselves. University admissions were thrown into confusion. Anxiety increased among learners awaiting their results for GCSEs, AS levels and vocational qualifications over the coming weeks as they feared a similar outcome. Some learners lost their university place and some were not able to progress as planned in 2020. Similar events were playing out in the rest of the UK. Public outcry and media interest grew, with increasing pressure for the results that had been calculated by statistical standardisation models to be withdrawn and reissued based on the Centre Assessment Grades (CAG) that had been submitted for each learner by their school or college. Public trust and confidence in the qualifications systems were at a low ebb. Aware of the injustices of many of the results, the UK governments announced individually their decisions to re-issue results based on the higher of either the CAG or the calculated grade.

The Covid-19 pandemic had created unique and exceptionally challenging circumstances for the awarding of the qualifications and grades that would enable learners to progress in their lives. All those involved in delivering qualifications in 2020 had worked with dedication and professionalism to deliver a system that they believed would be fair to learners and maintain standards. The events of August 2020 showed however that despite such professionalism, the outcomes delivered by that system proved unacceptable to many.

Recognising this, the Independent Review of the Arrangements for Award of Qualifications was established in Wales to learn the lessons from the experiences of 2020 and to draw out recommendations for 2021 and beyond.

I have been supported in the work of this Review by a panel and officers whose combined experience and expertise has truly been greater than the sum of its parts. The Panel has worked through September, October and November 2020 to listen to those involved and impacted by the summer 2020 awards series. We are grateful to the hundreds of people who gave up their time to meet with us and the thousands who responded to our online survey. Without exception our engagements have been conducted in a positive, professional and thoughtful manner. We have been fortunate to have had access to such a high quality of inputs. It is important that same thoughtfulness and collaboration characterises future work on qualifications to the benefit of all learners.

We made an Interim Report in October 2020 that drew on the lessons we had learned and focused on recommendations for arrangements in 2021. In all of our work both looking forward and assessing events of 2020, the interests of learners has been at the heart of our considerations. The 2020 and 2021 cohorts of learners hold within them no less potential and ability to progress than their peers in other years. They deserved, and deserve, to receive qualifications and gradings that allow that progress to happen. Our findings and recommendations in this final report look at where decisions in 2020 might have been made differently, assess whether that was possible given the circumstances and make recommendations about future practices that would strengthen the qualifications system in Wales and provide greater assurance to Welsh learners that their abilities will be duly recognised and progress supported.

Arrangements for 2021 are now underway with the establishment of the Design & Delivery Group and we welcome the involvement of a range of expertise and voices in the design of arrangements for 2021. Our Final Report highlights the importance of developing the maturity of the tiered arrangements for the

oversight and development of the education sector in Wales and emphasises the value of improved dialogue between parties. The collaboration that is now underway on the design aspects for 2021 must extend too into the delivery phase to ensure that there is co-ordinated leadership and management across tiers and clear, concise and timely communications with all stakeholders. These are the lessons that must be taken from 2020 to be able to build more strongly for the future.

In times of crisis opportunities emerge to do things differently, innovation becomes essential and actions are adopted at a speed that might be unthinkable in more stable times. There is now a real opportunity for the education sector of Wales to come together to develop and deliver a qualifications system that puts learners at its heart, not only for the cohort facing qualifications in 2021, but for the longer term.

Louise Casella

Chair of the Independent Review Panel

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Note on Terminology used in this Report

In this report we are using the following key terms:

Qualifications¹ confirm that the holder of the qualification has a level of knowledge, understanding or skills which, applied together, form the competence to progress. The qualifications within the scope of this Review are:

- **General qualifications in Wales:** GCSEs, AS and A levels, Skills Challenge Certificates (those Qualification Wales regulated and approved qualifications, delivered through the WJEC, and not qualifications awarded by English awarding bodies);
- **Approved vocational qualifications designed for Wales:** health and social care and childcare qualifications and Essential Skills Wales qualifications.

Assessments, in the context of this report, are the methods by which a learner demonstrates that they meet the requirements for the award of the qualification (and a grade). The arrangements for assessing relevant skills, knowledge and understanding in relation to the qualification include externally set and marked examinations, non-examination assessments, coursework and / or continuous assessments.

¹ Definitions of 'qualifications' and 'assessment arrangements' drawn from:
the Credit and Qualifications Framework for Wales: <https://gov.wales/credit-and-qualifications-framework-cqfw>,
accessed 30 November 2020
Qualifications Wales Act 2015, <https://www.legislation.gov.uk/anaw/2015/5/contents>, accessed 30 November 2020

EXECUTIVE SUMMARY

The Covid-19 pandemic presented unprecedented challenges and uncertainty across the Welsh education system in 2020. School and college sites closed in the Spring and the decision was taken by the governments of all UK nations to cancel the Summer exam series and award qualifications by other types of assessment.

We have found nothing but dedication and professionalism from those who worked under very difficult and challenging circumstances to ensure that learners could progress by awarding grades in 2020. However, despite these efforts, the chosen approach of calculating grades failed to deliver fair results to many learners. This applied across all four nations of the UK. To correct for this, in mid-August 2020, all the UK governments decided to award the higher of the centre assessment grade (CAG) or the calculated grade.

This Independent Review was established by the Welsh Minister for Education, Kirsty Williams, MS, to learn lessons from the 2020 awarding of grades and to advise on the approach for 2021 and beyond.

We have reported in two phases. Our Interim Report² set out recommendations for an approach to awarding qualifications in summer 2021 that recognised that an exam series would be unfair to learners given the unevenness of the learning experiences across Wales. The Minister has since announced her decision to cancel exams for 2021 for GCSEs, AS and A levels and a Design and Delivery Advisory Group is now developing the approach for awarding grades in summer 2021.

This is our Final Report which reviews the events of spring and summer 2020 in detail to learn lessons and advise on how the lessons can be applied to 2021 and beyond.

Throughout our analysis of findings, we keep returning to the statistical standardisation models. We have concluded that the UK regulatory and awarding body community placed too much confidence in the ability of statistical models to predict the right results for learners and that, by doing so, they missed opportunities to improve the fairness of the outcomes. This confidence derived from the precedence given to achieving system-wide outcomes that were consistent with previous years while failing to pay regard to the individual consequences of that approach. While the regulator was seeking to ensure confidence in the qualifications system as a whole, the detrimental consequences of doing so on such large numbers of individuals served in the end to severely damage that same confidence.

At the same time, there was also a failure to put in place a fair and workable appeals process in 2020 that would deal with the known inabilities of the statistical processes to give a fair outcome to every learner.

The decision to rely totally upon the statistical standardisation models to 'moderate' between centres was taken without fully testing any alternative routes or approaches. External moderation of the decisions reached in assigning CAGs and rank orders, together with training of assessors to ensure the avoidance of any bias in arriving at CAGs, would have improved the fairness of the outcomes.

Given the extremely challenging circumstances presented by the pandemic, testing with communities beyond the regulatory and awarding bodies may have reached the same decisions, i.e. to rely on the models. This would, at least, have surfaced a greater understanding of the risks then inherent in the adopted system and actions to mitigate for those risks could have been better planned.

'Our National Mission' (Action Plan 2017) sets out a leadership and governance structure³ within the Welsh education system, a three-tier model of responsibility and accountability, that was designed to support a

² Interim Report of the Independent Review: <https://gov.wales/independent-review-summer-2020-arrangements-award-grades-and-considerations-summer-2021>

³ <https://gov.wales/sites/default/files/publications/2018-03/education-in-wales-our-national-mission.pdf>

‘self-improving education system’ encompassing a middle tier of organisations sitting between Welsh Government and schools and colleges, including Regional Consortia, Estyn, Qualifications Wales and the WJEC. The awarding of grades in 2020 was an opportunity for this structure to show its value, however genuine two-way communication and engagement through this leadership and governance structure did not take place. There was an over-reliance on the consultation exercise run by Qualifications Wales as equating with wide and inclusive stakeholder engagement. Greater involvement of school and college leaders, in a process of consultation and feedback to the main bodies could have helped offset some of the issues and problems caused by the approach to awarding qualifications in 2020.

Similarly, there are lessons to learn to ensure effective engagement with all learners taking both general and vocational qualifications, including private candidates, in moving forward. For a major change process such as the awarding of grades there should have been effective two-way communication with learners during the spring and summer of 2020, enabling learners’ voices to be heard to inform decisions and ensuring learners and their parents and carers had the information they needed.

We conclude that a clearly co-ordinated, cross-organisation leadership response, that brought together various strands of work and various bodies, would have resulted in fairer outcomes for all learners in Wales and would have limited the distress caused to the learners and their families. It is now evident that adherence to normative decision-making processes did not serve learners well and that listening to learners is a critical lesson for those organisations responsible for awarding qualifications and conducting assessments that lead to national qualifications.

The learning from 2020 has shown the critical importance of having a single place that can hold the overview during the design and the delivery of the approach to awarding grades. That overview during the design phase for 2021 awards is being provided now through the Design and Delivery Advisory Group. It will be critical to maintain strong oversight of the delivery of the agreed approach for 2021 and to provide assurance to the Minister that:

1. all elements of the changes needed are being co-ordinated and delivered to schedule;
2. the expertise of all in the education sector in Wales is drawn on in delivering the approach;
3. decisions taken during the delivery phase consider the well-being and interests of all those who will be affected;
4. a comprehensive and open communication plan is in place to ensure all who need to understand the changes being introduced do so and are able to seek assurance and further information where appropriate;
5. risks to successful delivery are being kept under review and mitigating actions are identified and enacted by the appropriate body.

Finally, the lessons from 2020 and from 2021 must be learnt and applied positively for the benefit of all Welsh learners. The cancellation of exams for a second year, provides the Welsh education system with a unique and important opportunity to prepare for the new curriculum. The education system in Wales prides itself on its national mission to deliver equity and excellence for all learners. If this is to be realised, the opportunity to rethink assessment and examinations cannot be wasted, side-stepped or derailed by a desire to return to an examination system that cannot meet the requirements of a new curriculum and the needs of all learners in Wales. The first year of external assessment of Curriculum for Wales will be 2027 and we recommend that the doors are opened to a transition to alternative forms of assessment much sooner than previously planned.

1 INTRODUCTION

1.1 Background to the Review

- 1.1.1 Every summer, thousands of learners across Wales receive their results for GCSEs, AS and A level, Skills Challenge Certificates, vocational and technical qualifications. These qualifications enable them to progress on to the next stage of education or into employment. Schools, colleges, universities and employers receiving these learners into further study or work understand these qualifications. They, and the learner, need to be confident that the qualification grades represent the level of knowledge, skills and capacity for further learning of an applicant for a place on a course of study or an applicant for a job to enable successful progression.
- 1.1.2 A successful qualifications system is built on sound principles of fairness to individuals, delivering the right grades to the right learners, and is underpinned by robust, high quality processes. The qualifications system is a variable mix that might include externally set and marked examinations, non-examination assessments, coursework and / or continuous assessments.
- 1.1.3 The Summer of 2020 was an exceptional time due to the impact of the Covid-19 pandemic. The normal operation of this qualifications system was disrupted as school and college sites closed and the decision was taken by the governments of all UK nations to cancel the Summer exam series and award qualifications by other types of assessment. Essentially, for the majority of qualifications this involved combining assessments of each learner by their school or college (centre) based both on estimated grades for every qualification and ranking within grades, with data on prior attainment and historic data on performance at cohort, qualification and centre level to arrive at a calculated grade.
- 1.1.4 However, when the results were published, starting with the Scottish Highers, in early August, it quickly became apparent that learners, parents and centres did not believe that the system had awarded grades in a manner that was consistent with learner performance and expectations. There appeared to be a large number of cases where the right result had not been delivered to the right learner creating confusion, upset and anger among learners, their parents and carers and for their teachers, schools and colleges. Over the following two weeks, each UK government took the decision to change the awards to the higher of either the Centre Assessment Grade (CAG) or the calculated grade.
- 1.1.5 For some vocational qualifications, learners were not able to complete their qualification in summer 2020 as they were unable to complete practical assessment of certain skills.
- 1.1.6 On 18 August, Kirsty Williams, MS, Minister for Education in Wales, announced an Independent Review of the arrangements for awarding grades in 2020 with the intention to learn lessons and provide advice for the approach in future years.
- 1.1.7 In October, the Minister received the interim report and recommendations from the Independent Review for the arrangements for summer 2021⁴. This final report provides an analysis of the arrangements in 2020 and draws out key lessons for moving forwards.

⁴ Interim Report of the Independent Review: <https://gov.wales/independent-review-summer-2020-arrangements-award-grades-and-considerations-summer-2021>, accessed 30 November 2020

1.2 The Independent Review Terms of Reference and Membership

1.2.1 The review was undertaken by an independent panel of:

- Louise Casella, the Director of The Open University in Wales (Chair of the Review);
- Professor Alma Harris, Deputy Head of Swansea University School of Education. International Council Adviser to First Minister and Deputy Minister, Scotland;
- Rosemary Jones, OBE, School Improvement Advisor, Education Consultant and former Headteacher;
- Andy Youell, freelance data and systems specialist, formerly Director of Data Policy and Governance at the Higher Education Statistics Agency (HESA).

The Panel was supported in its work by Dr Sue Hybart as Lead Officer.

1.2.2 The Terms of Reference are set out in full in Appendix 1. In summary, we were asked to:

- Consider the key issues which emerged from the arrangements which were developed and implemented following the cancellation of the 2020 summer exam series (GCSEs, AS and A levels, Skills Challenge Certificate and approved vocational qualifications designed for Wales).
- Consider the challenges resulting from the 2020 experience and (in the context of future Covid uncertainty) the challenges for learners in the summer 2021 exam series.
- Take key lessons from the experience in 2020 to inform recommendations and considerations of a possible approach to prepare for 2021 which prioritises the needs of learners and their progression, and has regard to the continued need to maintain the standards and integrity of the education system and awarding of qualifications.
- Provide recommendations and considerations for the Minister for Education, and to recognise the multiple partners involved in supporting learners in Wales.

1.2.3 It is important to note that the approved vocational qualifications designed for Wales are the Health and Social Care and Childcare qualifications and Essential Skills Wales qualifications. Therefore, there are many vocational qualifications taken by Welsh learners that are not within the scope of this Review.

1.2.4 In-depth testing or review of the statistical processes used in the standardisation stage of grade allocation in 2020 was also beyond the scope of this Review. However, we have considered how the processes were developed and used. The Office for Statistics Regulation (OSR) is undertaking a review⁵, due to be published in early 2021, focused on the process of developing the statistical models designed for awarding 2020 exam results across all four UK nations. Members of this Independent Review Panel met with the Director General for Regulation of the OSR and the Statistics Regulator to learn more about their review and to ensure that any reference to the models in this Report are placed in the correct context.

⁵Office for Statistics Regulations: <https://osr.statisticsauthority.gov.uk/our-regulatory-work/osr-review-of-approach-to-developing-statistical-models-designed-for-awarding-2020-exam-results/>, accessed 30 November 2020

1.3 How the Panel has worked

1.3.1 In our work, we have placed emphasis on listening to all those involved in and/or affected by the events of summer 2020 awarding of grades:

- the bodies involved in setting the policy and in developing and delivering the arrangements;
- the educators and those organisations supporting them in delivery of education;
- the learners and their families/supporters;
- those receiving the learners into further study or employment; and
- those with roles to scrutinise decisions and their implementation.

Appendix 2 lists those contributing to the Review. The roles of those bodies setting policy and developing and delivering qualifications are explained below.

We held on-line meetings with as many stakeholder representatives as possible in the time available, and in total we spent 51 hours interviewing a wide range of stakeholders.

1.3.2 Recognising that we could not meet with everyone, we have also invited written submissions from a wide range of stakeholders and groups, and through an on-line survey which was widely publicised through education networks. We received close to 4,000 responses (3,951) to the survey (42% from learners, 33% from parents/carers and 27% from teachers and Heads of Schools and Colleges).

1.3.3 All stakeholder meetings were conducted with an emphasis on learning key lessons from 2020 to ensure that the best possible way forward for 2021 and beyond can be found, and that learners will be able to progress to further study or employment with confidence. We have been impressed by the expertise and professionalism of all those involved in developing and delivering learning and assessment.

1.3.4 The constructive engagement from stakeholders in our meetings, and in particular the engagement from school/college leaders and teachers/lecturers, places a high degree of confidence in our findings and conclusions.

1.3.5 We have also been impressed by the learners' positive attitudes to learning and their constructive contributions in the meetings. Our meeting with members of the Youth Senedd (Welsh Youth Parliament / Senedd Ieuenctid Cymru) is of particular note. The representatives we met provided extremely valuable insight and the role of the Youth Senedd in providing input and views on future developments must be carefully considered.

1.3.6 We wish to thank all participants for their open engagement, valued comments and for the thoughtful and respectful way in which ideas were shared.

1.4 The roles of the bodies responsible for qualifications in Wales

1.4.1 **The Welsh Government:** The Welsh Government is responsible for setting policy for qualifications in Wales. Through the Qualifications Wales Act 2015, it established an independent regulator, Qualifications Wales, to which it provides funding and direction to implement Government policy.

1.4.2 **Qualifications Wales:** The Qualifications Wales Act 2015 ('the Act') established Qualifications Wales as an independent body corporate. Section 3 of the Act requires Qualifications Wales to act in a way it considers appropriate for the purpose of achieving the principal aims:

- of ensuring that qualifications, and the Welsh qualification system, are effective for meeting the reasonable needs of learners in Wales, and
- of promoting public confidence in qualifications and the system.

All qualifications designed for Wales are approved and regulated by Qualifications Wales to ensure they meet the above aims. Qualifications Wales sets the rules for the awarding bodies for the qualifications and the appeals processes. Qualifications Wales works with Ofqual and the Council for Curriculum, Examinations and Assessment, the qualifications regulators in England and Northern Ireland respectively, as these three UK nations share the common brand of GCSEs, AS and A levels.

Under the provisions of Section 8 of the Act, if requested to do so by the Welsh Ministers, Qualifications Wales must provide the Welsh Ministers with such information or advice, on matters relating to any of its functions, as is specified in the request. Further, Qualifications Wales may work jointly with another person if Qualifications Wales considers it is appropriate to do so in connection with any of Qualifications Wales' functions.

In exercising its functions, Qualifications Wales must have regard to such aspects of government policy, and to such other matters, as the Welsh Ministers may direct.

1.4.3 **The awarding bodies:** The awarding bodies implement the Qualifications Wales rules and provide the specification of the qualifications to the schools and colleges and hence to the learners, and establish the appeals processes. In Wales, the WJEC is the sole awarding body for GCSEs, AS and A levels and the Skills Challenge Certificate. The approved vocational qualifications designed for Wales are awarded by Agored Cymru, City and Guilds, Pearsons and WJEC. The majority of vocational qualifications taken by learners in Wales are, however, delivered by awarding bodies operating across UK nations and these are regulated by Ofqual rather than Qualifications Wales.

1.4.4 Qualifications Wales provided useful clarification on its website on the roles and responsibilities of the Welsh Government, Qualification Wales and WJEC in delivering GCSE, AS and A level and Skills Challenge Certificate qualifications in 2020⁶. The distinctions between these roles and responsibilities is important to ensure protection of standards and independence in exercising responsibilities.

1.4.5 In our online survey of stakeholders, we found strong understanding of the roles and responsibilities among the education professionals and lower levels of understanding among learners and their parents/carers. While there would be benefit in further promoting understanding of the respective roles of bodies beyond education professionals, more important in relation to 2020 was whether the respective roles were appropriately enacted, and given the multiple actors, whether co-ordination and leadership was sufficient to support the outcomes needed.

⁶ Working together to help learners get their grades in GCSE, AS, A Level and Skills Challenge Certificate qualifications in summer 2020: <https://qualificationswales.org/media/6298/wg-qw-wjec-graphic-eng.pdf>, accessed 17 November 2020

2 REVIEW OF ARRANGEMENTS FOR AWARDING GRADES IN 2020

2.1 GCSEs, AS and A levels, and the Skills Challenge Certificate

- 2.1.1 For GCSEs, AS and A levels, and the Skills Challenge Certificate, an approach for awarding grades in 2020 was developed by WJEC and signed-off by Qualifications Wales. Schools and colleges were asked to submit Centre Assessment Grades (CAGs) and to rank order their learners within each grade for each qualification. This data was combined with relevant historical data where it was available to predict final grades for each learner in each qualification – a process that was called standardisation.
- 2.1.2 This approach was broadly similar across the UK in 2020 as the qualifications regulators and awarding bodies, led by Ofqual, co-ordinated their activities and shared plans. Scotland was the first country to publish results (Highers) on 4 August and a public outcry followed as many learners received results that differed significantly from those that had been expected. This outcry led to a change of decision a week later in Scotland to award results based solely on the CAGs in cases where the CAG was higher than the calculated award.
- 2.1.3 Over the course of the following week, similar events unfolded across the rest of the UK's nations. A level results day in Wales saw many learners, parents/carers, schools and colleges bewildered, distressed and angry with results that they could not explain, and many learners' future plans and aspirations were put on hold. There followed a weekend of public protests, demonstrations and extensive media commentary, both in Wales and across the UK.
- 2.1.4 On 12 August, the day before A level publication and as England introduced their 'Triple Lock' whereby a student could accept their calculated grade, appeal to receive a valid mock result, or sit autumn exams, the Welsh Education Minister announced her decision that the A level result would not be lower than the AS level grade achieved. On Monday 17 August the Education Minister announced the further decision to revise the results such that all Welsh learners (GCSE, AS level, A level and Skills Challenge Certificate) would be re-issued grades using CAGs where these were higher than the calculated grade. The Minister declared these decisions were driven by the need to ensure a level playing field for Welsh learners with their peers in the rest of the UK in gaining access to higher education and employment.

2.2 Approved Vocational Qualifications

- 2.2.1 For the Approved Vocational Qualifications designed for Wales, the approach for awarding grades in 2020 was aligned with the approach being taken in the rest of the UK, recognising that the majority of vocational qualifications are available across Wales, England and Northern Ireland.
- 2.2.2 Those qualifications used for progression into further or higher education followed the CAG approach, but without the statistical standardisation. For those qualifications requiring demonstration of occupational competence, the awarding bodies were required to adapt existing assessments to take account of the public health restrictions arising from Covid-19. Some assessments could not be undertaken, and some learners were not able to complete their qualifications in summer 2020.
- 2.2.3 It is notable that for centres that work with multiple awarding bodies in Wales and England to run vocational qualifications, there was additional complexity given different requirements and varying timings of communications from these bodies. Those differences added to distress for learners and

frustrations for centres as government and regulatory body actions and media commentary appeared to centre on the non-vocational qualification arena.

2.3 Decision Points

2.3.1 We have given much consideration to whether or not the disruptive events of August 2020 could have been avoided. We have sought to identify where different courses of action could have been taken at key decision points and to understand from the Welsh Government, Qualifications Wales and WJEC the context and reasons for the decisions taken.

2.3.2 The timing of key stages in spring and summer of 2020 are provided below. A detailed timeline of key dates is presented in Appendix 3.

March 2020	<ul style="list-style-type: none"> • Welsh Government decision to close schools/colleges, cancel summer 2020 exams and put in place alternative arrangements. • Qualifications Wales decision to issue calculated grades based on assessment evidence available supported by teacher estimates
April 2020	<ul style="list-style-type: none"> • 3 April – first guidance issued by Qualifications Wales to centres on centre-assessment data: CAGs / Rank order • Qualifications Wales decision not to moderate externally prior to submission of CAGs • 28 April, Qualifications Wales publish consultation on the aims to underpin the development of the statistical standardisation model and on the development of an appeals process
May / June 2020	<ul style="list-style-type: none"> • Results available from Qualifications Wales consultation on aims underpinning the standardisation model and appeals process • Development of the statistical standardisation models by WJEC for approval by Qualifications Wales • Development of the appeals process by Qualifications Wales and WJEC
June/July 2020	<ul style="list-style-type: none"> • Qualifications Wales and WJEC decision not to put in place any external moderation following submission of centre assessed data • Qualifications Wales sign off the statistical standardisation models and results
August 2020	<ul style="list-style-type: none"> • Publication of GCSE, AS and A level results. • Public outcry with protests and media coverage. • Change of government policy decisions across the UK nations.

2.3.3 Accepting that there was no alternative but to cancel exams in 2020 due to the pandemic and put in place an alternative approach to awarding grades, there are three particular questions that we have explored:

- Were there alternative approaches available that if taken would have produced better, more equitable and more credible results?
- Could the traumatic events of A level publication day in Wales have been avoided?
- What are the lessons that can be learnt from the challenges and circumstances of awarding and grading qualifications in 2020 that can inform future arrangements for qualifications in Wales?

2.3.4 In considering these questions, we have had regard to the unique and extremely challenging crisis conditions under which everyone in the education system was working due to the Covid-19 pandemic. The pandemic has presented unprecedented challenges and uncertainty across the Welsh education system, and resulted in enormous professional and personal pressures on individuals and on teams. Difficult decisions had to be taken quickly. People were learning to work remotely at home rather than in the office, school or college. These were clearly not ideal conditions in which to implement a significant change project, and we have found nothing but dedication and professionalism from those who worked under very difficult and challenging circumstances to ensure that learners could progress with grades awarded in 2020.

2.3.5 Our Interim Report focused on recommendations for the approach to awarding grades in summer 2021. Those recommendations derived from our key finding that the level of unevenness in learner experiences across 2020 and extending into 2021 would make any exam series an unfair way to judge progress and ability across the 2021 cohort of learners. To quote one of our expert contributors, exams would serve to *advantage the most advantaged and disadvantage the most disadvantaged...* Operationally, to run any form of exam series for 2021 would be a high-risk endeavour, easily knocked off course by ongoing uncertainty around the progress of the pandemic that could upend any examination schedule - a Plan B would always be required.

2.3.6 Our key recommendation that has been accepted by the Minister was, therefore, that it would be far better to invest concentrated time and effort now in developing, collectively, an alternative centre-based assessment plan and committing to it. This gives learners and their parents, carers, schools and colleges certainty about the way ahead and clear direction about prioritising available time in schools and colleges to maximise learning.

2.3.7 Acknowledgement and understanding of the difficulties and challenges that arose in the awarding and grading of qualifications in 2020 will inform and assist the generation of creative solutions for 2021 and beyond.

2.4 Findings and Recommendations

2.4.1 Chapters 3 to 9 discuss the sequence of events during Spring/Summer 2020 and identify a number of critical cross-cutting themes. Through our analysis we draw out key findings that lead us to our recommendations for 2021 and beyond.

2.4.2 Throughout the following sections we refer to the findings from our online survey. The analysis of the responses was undertaken independently for us by Wavehill. We provide their analysis in full in Appendix 4.

3 MARCH 2020:

- Welsh Government decision to close schools/colleges, cancel summer 2020 exams and put in place alternative arrangements.
- Qualifications Wales decision to issue calculated grades based on assessment evidence available supported by teacher estimates

- 3.1 From the start of March 2020, the Minister for Education, Kirsty Williams, MS, was receiving advice from Qualifications Wales and WJEC on the impact of the Covid-19 pandemic on the summer exam series in 2020, and placing this advice in the context of UK and Welsh Government decisions, more broadly, related to the pandemic.
- 3.2 Scientific modelling, at the time, identified the exam period as the peak of the pandemic (which in fact came sooner) and, as such, the Government could not guarantee that schools and colleges would be open. Consequently, the difficult decision to cancel the summer exam series on public health grounds was taken by the Minister. To ensure that all learners were able to progress to further study or employment, alternative arrangements for awarding and grading qualifications needed to be put in place.
- 3.3 During this time, Qualifications Wales provided advice to the Minister (18 March) on the three main options that had been identified by the UK qualifications regulators:
- continue with exams as planned;
 - delay exams; and
 - issue grades based on assessment evidence available supported by teacher estimates.
- 3.4 Benefits and risks were identified by Qualifications Wales for all options. While preferring that exams should take place, Qualifications Wales advised the Minister that, if exams were not possible, then its recommendation was to issue grades based on assessment evidence available supported by teacher estimates.
- 3.5 In their advice Qualifications Wales were clear that teacher estimated grades would then need to be ‘moderated’⁷ to try to ensure that grades were comparable between schools and colleges and to ensure comparability with past cohorts. The Ministerial Direction to Qualifications Wales of 6 April states that the approach should include ...‘standardisation of centres’ judgements’, and a statistical model can be inferred in the explanation that learners’ grades for qualifications would need to be generated from a range of available evidence.
- 3.6 This advice was accepted by the Minister and the Welsh Government principles for the subsequent development of arrangements to award grades to learners were set:
1. To enable the future progression of all learners and recognise their hard work by awarding grades;
 2. To ensure learners are not disadvantaged, particularly in relation to those elsewhere in the UK;
 3. To deliver a robust and fair approach, that is fair for past, present and future learners; and
 4. To maintain confidence in and credibility of the qualifications system.

⁷ The language used by Qualifications Wales in its advice to the Minister

- 3.7 Our Terms of Reference asked us to explore whether the Welsh Government’s principles were clearly understood and shared by all delivery partners, and whether they were given the right weighting.
- 3.8 Our findings are based on meetings with the Minister, Welsh Government Education Directorate officials, Qualifications Wales and WJEC where we explored how these principles were put into practice and how the experience of practice might, or might not have, fed back into revisiting or reaffirming principles. We also tested the priorities in the online survey with the full range of stakeholders.
- 3.9 Overall, in our survey, we found strong support across all groups of stakeholders for the principles set by the Welsh Government for the award of qualifications in 2021. All four principles set by the Welsh Government were found to be valid and important. All of these principles play a role in providing fairness to the learner, some more directly than others.
- 3.10 In our survey, we asked whether there were further principles that respondents would wish to see considered for 2021. Almost half of respondents offered additional principles with the main themes raised having a focus on wellbeing and including:
- issues around equality of outcome, considering the needs of pupils, and reflecting the impact on learning caused by disruptions to teaching during the pandemic; and
 - issues around ensuring and promoting learner welfare in arrangements, with consideration being given to the wellbeing impacts of the unique circumstances faced by all learners facing qualifications in 2021, particularly with regard to potential mental health implications.
- 3.11 These responses echoed the concerns that we heard in our interviews with learners and with schools and colleges, and led us to the recommendation in our Interim Report that:
- Decisions on awarding grades in Wales in 2021 should prioritise the needs of, and fairness to, the learners who are being assessed by acknowledging the challenging circumstances in which their learning has taken place through 2020 and 2021. (Interim Report Recommendation 1)*
- 3.12 The recommendation acknowledged the different experiences of the 2021 qualifications cohort and that of 2020. While the 2020 cohort had largely completed their learning when the decision to cancel examinations was taken, for the 2021 cohort a significantly different pattern of lost learning has been and continues to be experienced. For the 2021 cohort therefore our recommendation emphasised that the need to ensure fairness **within and across** the cohort should form part of the key principles and take precedence over attempts to normalise across years when learning experiences have been so different.

Summary of findings

- 3.13 All four principles set by the Welsh Government for developing an alternative approach to awarding grades in 2020 were valid and important. All of these principles play a role in providing fairness to the learner, some more directly than others.

Recommendations:

- 3.14 The principles adopted for 2020 need to be amended and updated for 2021. Decisions on awarding grades in Wales in 2021 should prioritise the needs of, and fairness to, the learners who are being

assessed by acknowledging the challenging circumstances in which their learning has taken place through 2020 and 2021 (*Recommendation 1 of our Interim Report*).

4 APRIL 2020

- 3 April – first guidance issued by Qualifications Wales to centres on centre-assessment data: CAGs / Rank order
- Qualifications Wales decision not to moderate externally prior to submission of CAGs
- 28 April, Qualifications Wales publish consultation on the aims to underpin the development of the statistical standardisation model and on the development of an appeals process

- 4.1 We have sought to understand when and how Qualifications Wales and WJEC identified and considered different options in arriving at the chosen approach. We have looked for evidence of how various options were developed, checked and communicated. We have examined how these options were tested against intended policy outcomes and against equality, diversity and inclusion criteria to ensure fairness to all learners.
- 4.2 The timeline in Appendix 3 shows that the UK qualifications regulators held contingency planning workshops in early March to inform their advice to their respective Ministers on broadly similar approaches across all UK nations, i.e. issuing grades based on assessment evidence available supported by teacher estimates.
- 4.3 The timeline shows that Qualifications Wales, WJEC and Ofqual met on 23 March to discuss early thoughts on CAGs and again on 3 April to discuss options for generating grades, defining the approach and the model. The UK regulators and examining bodies continued to meet and develop the detail of the arrangements for awarding grades, with Scotland involved in some but not all of the regulator meetings. Throughout this time, Qualifications Wales and WJEC were meeting to define the specific approach for Wales.
- 4.4 As noted above in paragraph 3.5, once the approach to combine existing assessment evidence at centre, qualification and individual level was taken, then a statistical model was implicit and required, to take account of variability in interpretation of grade boundaries between centres and to align with historic data. However, there was an opportunity to consider alternatives to statistical models to provide the comparability between schools and colleges, including options to apply external moderation across centres either prior to their submission of the CAGs to WJEC or prior to WJEC entering the CAGs into their statistical standardisation models. The latter option and timing is considered under the section on June/July 2020 below. We discuss the statistical standardisation models in Chapter 8 as an underlying feature to the whole timeline of events.

4.5 ***Decision not to moderate externally prior to submission of CAGs***

- 4.6 In their evidence to the Independent Review and also to the Children, Young People and Education Committee (18 August 2020), Qualifications Wales and WJEC have both set out their reasons for not introducing any form of external moderation of CAGs prior to their final submission by centres, including their view that:
- 1 there was insufficient time to develop and implement an external moderation process (including training and deployment of large teams of moderators);
 - 2 external moderation would have been difficult given the variability in evidence held by centres and difficulties in accessing data held within sites that were closed;
 - 3 they did not want to add further to the workload in centres which were already operating under challenging conditions;

- 4 there was insufficient time available for validation of centres' internal processes for arriving at CAGs and for training to avoid bias in assessments;
 - 5 there were public health considerations of going into schools to conduct training.
- 4.7 Instead, Qualifications Wales and WJEC implemented a process whereby Heads of Centre were required to sign a declaration⁸ that data being submitted to WJEC honestly and fairly represent the grades that these learners would have been most likely to achieve if they had sat their exams as planned. The declaration also stated that the Head of Centre understood that, if the profile of grades submitted was substantially different from what might be expected based on the centre's historic results and the prior attainment of the 2020 cohort of learners, then the grades for the centre would be adjusted through the statistical standardisation models to bring them into line with national standards.
- 4.8 The guidance on CAGs and ranking was issued to centres on 3 April 2020 and updated on 18 May 2020. The submission date for the data to WJEC was 12 June. Centres therefore had a period of ten weeks between the first guidance and submission date in which to compile data for every candidate and in every qualification. We have given much consideration to whether any form of external moderation would have been useful, feasible or possible in the time that was available.
- 4.9 We tested assumptions regarding the feasibility of external moderation with the schools and colleges and the regional consortia that we met. They pointed to their perceptions of available capacity, at that time, among for example external examiners, Estyn, and the regional consortia that could have supported a process of moderation. The schools told us that they would also have welcomed external moderation.
- 4.10 We note that particularly in the first part of the 10 week period, between guidance being issued and submissions being made, the scale and range of adaptations that organisations in the sector were facing in the light of the pandemic was immense and capacity and scope for considered decision-making was under considerable strain. Critical business operations needed to be maintained at the same time as new processes were being implemented.
- 4.11 We therefore understand the valid concerns regarding the logistical problems of developing and implementing external moderation but we have not found evidence that Qualifications Wales or WJEC thoroughly tested their assumptions with communities beyond the regulatory and awarding bodies. It may be that the same decisions not to have attempted any external moderation would have been reached after dialogue with the sector, but if so there would also have been a greater understanding of the risks then inherent in the adopted system and actions to mitigate for those risks could have been planned.
- 4.12 We conclude, based on the evidence we have collected, that the decision to rely totally upon the statistical standardisation models to 'moderate' between centres was taken without fully testing any alternative routes or approaches.

⁸ Qualifications Wales guidance to Centres, 3 April 2000: <https://qualificationswales.org/english/publications/information-for-centres-on-the-submission-of-centre-assessment-grades/>, accessed on 26 November 2020

4.13 Centre-assessed data: CAGs and Rank Order

Guidance was issued to schools and colleges by Qualifications Wales on 3 April (updated on 18 May⁹) confirming what they would be required to provide, namely:

- a centre assessment grade (CAG) for every learner entered for each qualification;
- the rank order of learners within each grade for each qualification; and
- a declaration from the Head of Centre, or a deputy as described in the guidance.

4.14 During the following weeks, Qualifications Wales issued further guidance at a national level and WJEC issued guidance at a subject level on how centres should collate and submit their assessment data. Centres were informed, in the Qualifications Wales guidance *Information for Centres on the submission of Centre Assessment Grades, Version 2 – 18 May 2020*, that the WJEC could investigate any attempts to undermine this system which might be regarded as malpractice. The guidance issued to centres by Qualifications Wales was clear that CAGs, and rankings within CAGs, were elements in a broader statistical model to calculate individual outcomes.

4.15 We met with a number of representative schools and colleges from across Wales and also with representatives from the organisations that support them (e.g. regional consortia, local education authorities, trade unions, etc.). We heard of the dedication and professionalism of teachers and lecturers to implement the approach, of the internal moderation arrangements that they put in place and of the challenges experienced within the centres.

4.16 We heard how it was a significant challenge for all to interpret, manage and convey the volume of guidance, with its complexity and different times of receipt. We also learned of the challenges of operationalising CAGs and particularly the rank ordering of learners within grades, for both small and large cohorts (ranging from cohorts in single figures to those over a thousand). In large centres, such as multi-site FE Colleges, some felt that the regulator and examining body did not have sufficient appreciation of the difficulty of ranking large cohorts. In small schools or subjects where single subject teachers were working, there was a risk of individual staff being exposed to pressure from some learners and parents/carers. We heard that one suggestion made by school leaders that schools with small cohorts in specific subjects be brought together by regional consortia or Local Authorities to help them apply moderation and improve decision-making was not taken up. We conclude that this represents a lost opportunity.

4.17 The difficulties and challenges of the rank ordering of candidates is significant. Qualifications Wales told us they anticipated that there would be volatility in the awarding of CAGs, and that the rank ordering of candidates was expected to be the critical data element from centres that fed into the awarding of grades. CAGs were seen to be helpful to the awarding body in dealing with small cohorts where the statistical standardisation processes might struggle. We did not gather the same understanding from centres who regarded the CAGs as the key data element and who struggled with a uniform linear ranking of candidates when they knew that, in reality, candidates bunched around performance points.

4.18 In our meetings with schools and college leaders we were told that they would have welcomed more timely and clearer guidance on the approach and on suggested processes for arriving at CAGs and rank orders. Responses to our survey showed though that among school leaders and teachers around three-quarters of respondents were positive about the support and guidance that was received. The process had not been prescribed in detail by Qualifications Wales and WJEC as they recognised that schools and colleges had different systems, processes and evidence-bases. Both

⁹Qualifications Wales guidance to Centres, 18 May 2020: <https://qualificationswales.org/media/5973/information-for-centres-on-the-submission-of-centre-assessment-grades-version-2-18-may-2020.pdf>, accessed 26 November 2020

Qualifications Wales and the WJEC told us that, with hindsight and with more time, more guidance could have been provided to centres. We believe that investment of time in greater guidance and support to the centres, together with external moderation ahead of submission, would have resulted in greater confidence among schools and colleges in the grades and rankings they were producing, greater confidence for WJEC and Qualifications Wales in the data being produced by the centres, and would have reduced over-reliance on the statistical standardisation processes to moderate between centre outcomes.

- 4.19 While responsibility was placed on the centres to ensure and to declare that their Public Sector Equality Duties were satisfied, we have not found any attempt by the regulatory or awarding bodies to take a concerted national approach to supporting centres with these duties. The responses to the Qualifications Wales consultation highlighted concerns that there was a risk of unconscious bias which could impact particularly on the black, Asian and minority ethnic (BAME) learners. The absence of mitigating actions to address this risk for example through initiating training or systematically raising awareness among those undertaking the gradings and rankings of candidates in centres of the need to avoid bias was notable.
- 4.20 We learnt of the experience and good practice that exists particularly in FE colleges in avoiding unconscious bias from centre assessments in vocational qualifications. We recommend that this good practice is shared across colleges and schools.
- 4.21 We heard also about the challenges experienced by centres providing vocational qualifications and how this was further compounded by receiving guidance from a range of different regulators and examining boards working under both Welsh and English systems.

Summary of findings:

- 4.22 The decision by Qualifications Wales and WJEC to rely totally upon the statistical standardisation models to ‘moderate’ between centres was taken without fully testing any alternative routes or approaches. If testing with communities beyond the regulatory and awarding bodies had reached the same decisions (i.e. to rely on the models), then there would have been a greater understanding of the risks then inherent in the adopted system and actions to mitigate for those risks could have been better planned.
- 4.23 While recognising the risk of bias within CAGs which could impact particularly on the black, Asian and minority ethnic (BAME) learners, Qualifications Wales and WJEC transferred the risk to the centres and did not initiate a concerted national approach to minimising the risk (e.g. systematically raising awareness and initiating training (delivered by another body) of teachers to avoid bias.

Recommendations:

- 4.24 Investment of time in greater guidance and support to the centres, together with external moderation ahead of submission of centre-assessed data, is needed to build greater confidence among schools and colleges in the grades and rankings they produce, and to give greater confidence for WJEC and Qualifications Wales in the data being produced by the centres.
- 4.25 Good practice in removing bias from centre assessments should be shared between colleges and schools, with training put in place to support teachers/assessors.

5 MAY / JUNE 2020

- Results available from Qualifications Wales consultation on aims underpinning the standardisation model and appeals process
- Development of the statistical standardisation models by WJEC for approval by Qualifications Wales
- Development of the appeals process by Qualifications Wales and WJEC

5.1 The Qualifications Wales consultation, issued on 28 April 2020, sought views on a series of aims that would underpin the development of the statistical standardisation model and the features of the proposed appeals process. Consultation closed on 13 May, and Qualifications Wales published the outcomes of consultation on 19 June. The consultation generated an unprecedented 4,057 responses, including 2,079 from learners and 1,129 from parents/carers, indicating the substantial levels of interest in the matters.

5.2 Qualifications Wales had translated the Welsh Government’s policy and principles in its design for the approach to awarding grades. Its consultation sought views on draft aims underpinning the work and on the statistical standardisation process. Following the consultation, the aims to underpin the development of the statistical standardisation models were finalised as:

1. Learners for whom a qualification-level Centre Assessment Grade and rank order are submitted will receive a grade.
2. National outcomes will be broadly similar to those in previous years to reduce the risk of unfairness for learners over time and maintain public confidence.
3. As far as possible, the process for awarding grades will not systematically advantage or disadvantage learners, including those with characteristics protected by equalities legislation.
4. The statistical standardisation model will use a range of evidence to calculate the likely grades that learners would have achieved, had they been able to complete their assessments.

Aims 1, 2 and 3 clearly map onto the Welsh Government’s four principles.

5.3 Qualifications Wales set the aims for the development of the standardisation models. WJEC developed the models for Wales in line with these aims. The standardisation models were then approved by Qualifications Wales who took responsibility for testing that the models met the Welsh Government’s policy objectives and principles.

5.4 The responses to Qualifications Wales’ consultation highlighted a number of concerns with the proposed statistical standardisation approach. These are comprehensively documented in the outcomes¹⁰ published by Qualifications Wales which were reviewed prior to publication by Qualifications Wales’ Board at its meeting on 16 June 2020. Those concerns included:

- potential unconscious and conscious bias in the determination of CAGs and rankings,
- the variability of available evidence to underpin judgements in centres
- the ability of the standardisation models to deal with small cohorts and learners with additional learning needs where it was acknowledged that cohorts can fluctuate year to year in their attainment,

¹⁰Qualifications Wales finding from consultation and resulting decisions: <https://qualificationswales.org/english/covid-19---results-2020/summer-2020/summer-2020-decisions/>, accessed 26 November 2020

- the challenge of ranking among large cohorts,
- how those centres or individual learners who were on a trajectory of improvement would be treated given the use of historical data
- the challenge of awarding CAGs for candidates who had shorter educational histories with centres and to private candidates unconnected to centres.

- 5.5 Qualifications Wales told us that there were a number of the concerns where any proposed solutions were challenging in terms of consistency across centres. For example, they could not find a solution that would give consistency of opportunity to submit evidence on recent improvements within a centre. While aware that historic data would not reflect such improvements, there remained concerns that not all centres would have been able to present recent data to evidence improvements.
- 5.6 The scale of interest in Qualifications Wales' consultation was significant. The issues raised by respondents rehearse in large part the events and concerns that unfolded around A level results day in August 2020. We explored with Qualifications Wales how they had reached the decisions they made in the light of those responses, particularly where there were significantly large numbers of respondents not in full agreement with the proposals or raising concerns.
- 5.7 The Decisions Report, referred to in paragraph 5.4, clearly sets out the number and nature of responses to the consultation and the rationale for Qualifications Wales either adopting or amending its original recommendations. Amendments, for example, were made that enabled some private candidates to receive grades, and for the proposed appeals process to be broadened to enable learners to appeal to their centres on the basis of incorrect data being submitted to WJEC and to make complaints where there was evidence of bias.
- 5.8 Views on whether national outcomes for summer 2020 should be broadly similar to outcomes in previous years (Aim 2, paragraph 5.2 above) showed significant divergence (55% agreeing/strongly agreeing and 42% agreeing/disagreeing in part or disagreeing/strongly disagreeing). Those in agreement focused on maintaining confidence in the system. Concerns expressed by those not in agreement included that it could be unreasonable and inappropriate to compare the 2020 cohort against previous years' cohorts due to the unprecedented circumstances, and the fact that the awarding process itself would be very different.
- 5.9 Qualifications Wales' response rejected the concerns stating: *We must also be mindful of the need to avoid any undue disruption to the wider system. For example, if learners were to receive much higher grades than those they would most likely have achieved had they sat their exams as planned, this may result in them making very different choices in terms of further studies or career opportunities. These could be choices that later prove to be ill-advised and may not be in their best interests in terms of progression.*
Aim 2 was then strengthened by the addition of the reference to 'maintaining public confidence in qualifications and the qualifications system'.
- 5.10 Views on the fairness and likely accuracy of a statistical standardisation model (Aim 4 in paragraph 5.2 above) also showed significant divergence (57% agreeing/strongly agreeing and 41% agreeing/disagreeing in part or disagreeing/strongly disagreeing). The Decisions Report shows the consideration that Qualifications Wales gave to a range of concerns, particularly concerns of small cohorts and learners with additional learning needs, variability in judgements across centres, bias by centres and inability of historic data to take account of centres and individual learners on an upward trajectory.

- 5.11 Qualifications Wales however concluded that *Unfortunately, there is no way that the process can distinguish between unconscious optimism on the part of centres, inflation in centre assessment grades and the possibility that individual learners or cohorts of learners would actually have done much better this year than statistics from previous years would predict. There is a significant risk that if we give more weight to centre assessment grades to seek to mitigate these shortcomings, we will create a degree of unfairness for all centres and their learners. Specifically, it would risk learners in centres which had inflated centre assessment grades receiving better outcomes than learners in centres that had sought to do the right thing or perhaps been conservative in their judgements.*
- Given that this conclusion acknowledges the inability of the statistical standardisation processes to deal with known concerns we find the ongoing confidence and reliance by Qualifications Wales on the standardisation processes surprising and find that Qualifications Wales and WJEC should, at this point, have explored and put in place additional safeguards to address known factors.
- 5.12 Qualifications Wales Decisions Report also lists a number of areas where respondents raised issues or made comments outside of the scope of the consultation and so were not addressed in the decisions made. These included:
- *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;*
 - *the impact of home learning on the ability of learners to achieve their potential in qualifications in future years;*
 - *the impact of school closures on teachers being able to deliver the full specification for learners due to take qualifications in summer 2021;*
 - *the impact of not having fully prepared for, and sat, GCSEs exams this year on AS outcomes next year;*
 - *the decisions to cancel assessments this summer and adopt an alternative approach to awarding qualifications;*
 - *results day not being brought forward to enable additional time for learners to secure their progression into further or higher education, or employment;*
 - *the awarding of vocational qualifications this summer.*
- 5.13 We learnt of the confidence held by the regulator in the processes being put in place. We were told in our meeting with Qualifications Wales leadership team:
- We had confidence in what we were doing..... We knew no process could be perfect Absolutely nothing could replace taking exams ... We were trying to establish the fairest process possible balancing many many factors We were confident that it was the right thing given the circumstances.....We knew the appeals mechanism would need to pick up on some things. We knew it was imperfect and would need to be sorted out through appeals*
- 5.14 Thus the Appeals process was being relied upon to address individual cases where a fair grade for an individual learner was not the outcome of the proposed approach. Great weight was therefore being placed on the Appeals process to deal with known issues. We explore this further at paragraphs 5.18 to 5.22 below.
- 5.15 Our reading of the responses to Qualifications Wales' consultation suggests that learners, parents, carers and educational professionals were understanding of the pressures on the system and broadly supportive of the attempts to design a fair and equitable outcome that supported the integrity of the qualifications at system level. The responses though also raised understandable

and legitimate concerns about how such system-wide approaches would have impact on individual learners and particular concerns about how statistical standardisation processes might have impact at individual level in unfair ways. We find that the confidence expressed by the regulator in the standardisation processes was misplaced and overstated and derived from the precedence given to achieving system-wide outcomes that were consistent with previous years while failing to pay regard to the consequences on individuals of that approach.

We understand that the regulator was seeking to ensure confidence in the qualifications system as a whole but the detrimental consequences of doing so on such large numbers of individuals served in the end to severely damage that same confidence.

5.16 **Statistical Standardisation model**

The timeline in Appendix 3 demonstrates how the UK's qualifications community worked together to discuss the issues around developing the models, sharing thinking and expertise, and developing broadly similar approaches. The models developed for Wales took account of differences in the Welsh education system, the available evidence and the feedback from the Qualifications Wales consultation (details of these differences are provided in Appendix 5). These models aimed to predict grades for each learner in each qualification. These predictions were based on the data submitted by centres (predicted grades and rankings within each grade) and, where it was available and appropriate, historical data about the learners' performance and the performance of the centre. The detail of the models varied between qualifications, but all involved complex statistical processes.

5.17 Across the UK, the qualifications bodies stated that they were confident in their use of these statistical standardisation models. Qualifications Wales told us that they had been confident that the standardisation models for Wales would provide a sufficiently robust set of outcomes that satisfied the agreed principles and that the Appeals process would address those instances that the model could not accommodate. We explore the models further in chapter 8.

5.18 **Appeals Process**

The awarding of grades without exams required a specific appeals process for 2020 to be designed and delivered. Qualifications Wales consulted on proposals for the process as part of its formal consultation, and decisions were published along with the other outcomes on 19 June 2020. Essentially, the process¹¹ was:

- learners could ask their centre to check whether they had made an error in submitting their centre assessment data;
- centres could appeal to WJEC on behalf of learners, as in previous years, on the grounds that the wrong data had been used, that the calculated grade generated by the statistical standardisation model was incorrectly allocated or communicated, or that there had been some other procedural failing.

5.19 Appeals were not permitted on the grounds that a learner did not agree with the professional judgement of their centre. Qualifications Wales also did not allow the outcomes of the statistical standardisation model to be challenged as the consistent application of the national model was

¹¹ The published appeals process: <https://qualificationswales.org/media/6213/appeals-process-summer-2020.pdf>, accessed 18 November 2020.

perceived as being central to maintaining standards. The effectiveness of the appeals process once results were published in August is discussed in chapter 7 below.

- 5.20 We note that the development and testing of the Appeals process took place late in the implementation of the approach to awarding grades. The chosen approach to awarding grades was therefore implemented without knowing that a fair and equitable appeals process could be developed. We also note a contradiction in the approach taken: We were told by Qualifications Wales that they knew the standardisation model would not be perfect and that the Appeals process would therefore need to deal with those instances where the calculated grade did not give a fair outcome to an individual learner. However, the guidance from Qualifications Wales is clear that an appeal cannot be made on the basis that the national process of standardisation did not operate as expected.
- 5.21 We conclude that there was a failure to put in place a fair and workable appeals process in 2020 that would deal with the known inabilities of the statistical processes to give a fair outcome to every learner.
- 5.22 The development of an appeals process is an essential element in the design stage of the approach to qualifications and grading to ensure that there is a workable and fair right to appeal available to individuals.

Summary of findings:

- 5.23 Recognising the inability of the statistical standardisation processes to deal with known concerns, Qualifications Wales and WJEC should have explored and put in place additional safeguards to address known factors.
- 5.24 The confidence expressed by the regulator in the standardisation processes was misplaced and overstated and derived from the precedence given to achieving system-wide outcomes that were consistent with previous years while failing to pay regard to the individual consequences of that approach. While the regulator was seeking to ensure confidence in the qualifications system as a whole, the detrimental consequences of doing so on such large numbers of individuals served in the end to severely damage that same confidence.
- 5.25 There was a contradiction in the approach taken: while Qualifications Wales knew the standardisation model would not be perfect and that the Appeals process would therefore need to deal with those instances where the calculated grade did not give a fair outcome to an individual learner, it was clear that an appeal could not be made on the basis that the national process of standardisation did not operate as expected.
- 5.26 There was, therefore, a failure to put in place a fair and workable appeals process in 2020 that would deal with the known inabilities of the statistical processes to give a fair outcome to every learner. The chosen approach to awarding grades was implemented without knowing that a deliverable appeals process could be developed.

Recommendations:

- 5.27 The development of an appeals process is an essential element in the design stage of the approach to qualifications and grading for 2021 to ensure that there is a workable and fair right to appeal available to individuals.

6 JUNE/JULY 2020:

- Qualifications Wales and WJEC decision not to put in place any external moderation following submission of centre assessed data
- Qualifications Wales sign off the statistical standardisation models and results

- 6.1 Centres submitted their CAGs and rank orders in June 2020 together with the declaration from the Head of Centre that the centre data was accurate, honest and fair.
- 6.2 We heard how school and college leaders had expected WJEC to test and challenge their CAGs. There was an expectation of ‘professional conversations’ should any centre’s submissions be found to be inconsistent with historic patterns of achievement. School and college leaders stated that they would have welcomed the opportunity to explain how they had arrived at their CAGs and rankings and to show the corroborating evidence. All those with whom we engaged were clear that they would have welcomed such check and challenge being in place to ensure that there was confidence in the approaches taken by all centres and that there were no suggestions of ‘game playing’ by centres.
- 6.3 When the CAGs and rankings were submitted significant uplifts were observed by WJEC and Qualifications Wales in the proportions of grades awarded both at GCSE and A level in the upper half of the grade distribution. Qualifications Wales and WJEC told us that the extent of difference between the profile of CAGs and the profile of previous grades awarded at both national level¹² and for individual schools confirmed to them the need for the statistical standardisation models to ‘moderate’ the grades.
- 6.4 It is notable that in statements made to the Panel, notes of meetings with Welsh Government and the Education Minister and in reported dialogue with schools and colleges, Qualifications Wales repeatedly referred to CAGs as being ‘inflated’ and ‘generous’. However, without having exercised the right for WJEC to investigate centre submissions that appeared out of line with historical patterns, the reality of whether or by how much such grades were indeed ‘inflated’ is not possible to assess.
- 6.5 In our interim report we observed that there is an extent to which such a shift in grade profile is not surprising. In previous years there will always have been a proportion of candidates who do not show for the exams; there will be those whose performance on the day in part or in whole does not reflect their ability and those who have adverse events in their personal lives that affect their performance either on a single day or through the exam period. CAGs would not, nor should not, have reflected any of those circumstances. It should also be noted that any comparison of CAG outcomes with previous year grade distributions are not a comparison of like with like. Previous year outcomes would already have been through considerable moderation as well as the standardisation process to meet an expected profile. Therefore, any perturbations or change in year-on-year outcomes prior to 2020 had *already* been smoothed through moderation and through standardisation to a pattern which allowed only a very limited percentage increase in higher grade profiles in any qualification cohort.
- 6.6 We were told by Qualifications Wales that they felt that the existence of the ‘warrant’, the signed declaration by Heads of Centre, put both them and WJEC in a position where they could not

¹² Powerpoint slides summarising Centre Assessment Grades available at <https://qualificationswales.org/english/covid-19---results-2020/summer-2020/standardisation-arrangements-for-summer-2020-in-wales/>, accessed 17 November 2020.

challenge. We note above in paragraph 6.2 that the Heads of Centre with whom we met did not feel the same way and had expected and would have welcomed professional conversations around their submitted data. Qualifications Wales further explained to us that they thought such investigations or dialogue would, though, be a 'low yield exercise' WJEC also informed us that any investigation with centres at this stage could have delayed the publication of results; a delay in publication would not have been acceptable as the Education Minister had already taken the decision that Welsh learners must not receive results later than England and Northern Ireland to ensure they were not disadvantaged in accessing university places.

- 6.7 WJEC ran the statistical standardisation models with the CAGs, rank orders and other available data and entered an iterative review and sign-off process with Qualifications Wales to reach final grades in a series of Maintenance of Standards meetings (30 July to 11 August). In many instances the CAG and the standardised grade differed significantly. There was movement both up and down. On the publication of results, it became evident to the centres and learners that the difference in many cases was dramatically out of line with their expectations. This is discussed further in the section on the models below (Chapter 8).
- 6.8 The CAGs were always intended to be just one factor in the calculation of the awarded grade, along with prior attainment/assessment data and ranking. However, the use of CAGs within the process gave rise to the risk that any substantial deviation of the final calculated grade for an individual from the submitted CAG would undermine confidence in and credibility of the calculated grade. While this risk was recognised by Qualifications Wales and referenced in the Board papers of 16 July 2020 we have not seen evidence of any mitigating action put in place.
- 6.9 As we have noted above, Qualifications Wales and WJEC did consider whether some form of external moderation of the CAGs could be undertaken prior to final submission, but this option was dismissed with the assumptions underpinning that decision not being fully tested. The right for WJEC to go back to centres submitting CAGs that appeared out of line with expectation was also reserved, and expected by centres, but this did not take place.
- 6.10 Without external moderation of the decisions reached in assigning CAGs and rank orders, and without training of assessors to ensure the avoidance of any bias in arriving at CAGs, total reliance was being placed on the statistical standardisation processes to ensure fairness between centres. The outcomes of those processes themselves created outliers and gave rise to widespread disquiet that the processes had forced outcomes that did not deliver fair grades for large numbers of individual learners whatever the overall pattern for the cohort.
- 6.11 We conclude that Qualifications Wales and WJEC would have had an insight into the likely number of potential appeals that would arise based on the data that they had seen. They would have known the scale of the outliers and would have had an understanding that the published appeals process would not allow these learners and their centres to challenge the processes adopted for the national standardisation. We have not found evidence that either WJEC or Qualifications Wales acknowledged, accepted or anticipated the scale of the issues that would result and the risk of inequity to so many individual learners from their inaction.
- 6.12 We conclude that Qualifications Wales and WJEC were over-confident in their statistical model and placed too much reliance on the statistical standardisation models to address any variability in judgements of centres on their CAGs and the perceived generosity of centre practices. We heard how the opportunity for external moderation of CAGs prior to submitting CAGs to WJEC was missed. Professional conversations towards the end of June between WJEC and those centres

identified as having CAGs at variance to their previous performance could have helped either modify the CAGs or have given WJEC the confidence to defend a national increase of CAGs against last year's grade profile to Qualifications Wales.

- 6.13 WJEC acknowledged that if the CAGs themselves had been more in line with previous years' results, then the recalibrations applied through the standardisation models would not have been so extensive and there would not have been such significant movements from CAGs to calculated grades. WJEC further observed that, in an ideal world, external moderation of CAGs would have taken place prior to the standardisation process.

Summary of findings:

- 6.14 Without external moderation of the decisions reached in assigning CAGs and rank orders, and without training of assessors to ensure the avoidance of any bias in arriving at CAGs, total reliance was placed on the statistical standardisation processes to ensure fairness between centres. The outcomes of those processes themselves created outliers and gave rise to widespread disquiet that the processes had forced outcomes that did not deliver fair grades for large numbers of individual learners whatever the overall pattern for the cohort.
- 6.15 Neither WJEC nor Qualifications Wales acknowledged, accepted or anticipated the scale of the issues that would result and the risk of inequity to so many individual learners from their inaction. We regard this as a significant failure.
- 6.16 Professional conversations towards the end of June between WJEC and those centres identified as having CAGs at variance to their previous performance could have helped either modify the CAGs or have given WJEC the confidence to defend a national increase of CAGs against last year's grade profile to Qualifications Wales.

Recommendations:

- 6.17 External moderation rather than statistical processes should be employed to provide consistency across Wales in an agreed national approach to awarding grades in summer 2021.

7 AUGUST 2020:

- Publication of GCSE, AS and A level results.
- Public outcry with protests and media coverage.
- Change of government policy decisions across the UK nations.

- 7.1 The standardisation models produced grades that, in many instances, were different from the CAGs, with the extent of downgrading causing a significant loss of confidence in the system. The results for Scottish Highers were published first on 4 August with many learners receiving results that differed significantly from those that had been expected. A public outcry unfolded and led to a decision by the Scottish Minister for Education that learners be awarded the higher of their CAG or their calculated grade.
- 7.2 By the time that Scottish Highers were published on 4 August, both Qualifications Wales and WJEC knew that there were also significant differences between CAGs and standardised grades in Wales, and Qualifications Wales shared the outcome of the standardised models with the Welsh Government Education officials.
- 7.3 In our meetings with the Welsh Government officials, Qualifications Wales and WJEC, we were told that they were not expecting the same events and public reactions to play out in Wales. That view was based largely on the differences in the data used in the Welsh standardisation models where, unlike the rest of the UK, KS3 data and AS levels had been utilised. Further the Scottish education system was seen to be very different to the rest of the UK. Confidence in the statistical standardisation approach was also still being shown in England at this time.
- 7.4 Qualifications Wales and WJEC were aware of the extent of the gap between CAGs and standardised grades. Both bodies knew that the standardisation models would not work satisfactorily for some learners and they had placed reliance on the Appeals process to deal with those individual cases, despite the process not allowing the application of the standardisation models to be challenged. From our discussions with the Welsh Government officials, we observed that the confidence of Qualifications Wales was transferred through to them also. Further, the Welsh A level results were due to UCAS on 6 August, therefore very little time was available for the impact of the Scottish Highers' publication to be fully understood and considered.
- 7.5 While the Welsh Education Minister had been made aware that submitted CAGs had been showing considerable variance from historical patterns of results during a meeting with Qualifications Wales and Welsh Government officials on 22 June 2020, she was not informed of the extent of the variance between CAGs and standardised grades for Welsh learners until 10 August when she received the national outcome of A levels at the same time as results information packs were sent out to centres. This was in line with normal practice that requires that results should be safeguarded from political interference.
- 7.6 This safeguard is important, and we acknowledge that, in the course of reporting on qualifications outcomes from a normal series, it is not appropriate for Qualifications Wales to advise Ministers of outcomes ahead of the schedule. However, the extent of the variation of calculated awards from centre expectations was exceptional in 2020 and arose not from the direct performance of candidates but from the application of processes designed to fulfil Welsh Government principles in extraordinary times. In these particular circumstances, we conclude that it would have been

appropriate to at least forewarn the Minister of the extent of the gap between CAGs and the calculated grades at an earlier stage.

- 7.7 As a result of the issues revealed in Scotland, the rest of the UK made limited modifications to their A level grades ahead of results day. In Wales, this was in the form of the Minister's direction that the A level grade should not be lower than the AS grade achieved by the learner.
- 7.8 A level results were published in Wales, England and Northern Ireland on 14 August. We heard from schools and colleges and from learners of the distress, confusion and sense of disbelief felt by many on that day. Teachers and lecturers reported feeling helpless to support learners who had received inexplicable results. Furthermore, the statistical standardisation models were technical and complex and lacked the transparency that could have enabled staff in schools and colleges to help learners understand their calculated grades. More than one school leader told the Panel that A level results day was the worst day of their teaching career – a day normally so full of joy and excitement that instead became full of upset and confusion. Media coverage of the day and a rising public outcry in Wales followed.
- 7.9 Similar events unfolded in England and Northern Ireland and, over the course of Monday 17th August, Wales, England and Northern Ireland followed Scotland's lead and reverted to the use of CAGs where these were higher than the calculated grades. At this stage, the Welsh Education Minister was clear that her priority became ensuring that the 2020 cohort of Welsh learners were not disadvantaged in relation to those elsewhere in the UK.
- 7.10 The announcement of the change in the method of awarding grades created significant additional administrative load for centres as they reprocessed the notifications of awards to individual learners. This added to the stress felt by centre staff. The announcement that CAGs would be used where these were higher than the calculated grade also required some revisions to the appeals process¹³. We heard concerns from the centres that they received information about the Appeals process late in the cycle and they did not feel they had sufficient clarity.
- 7.11 Appeals were also raised as an issue by the universities that we met; they were experiencing applicants having delays to their appeals being resolved which were affecting them finalise the students' places on degree courses. Those involved in university admissions had been receiving information via UCAS on the arrangements for awards across the four UK nations. However, in the days around A level results publications the stress and difficulties for universities were compounded by a lack of information as they heard via the media of the changing decisions by governments in the different nations of the UK. The failure to give universities, whether via UCAS or directly, prior notice of the changes of decisions on A levels left them handling many more phone calls than normal from worried learners and their parents/carers and without the information available to them at the right time to be able to make informed decisions and advise applicants accordingly.
- 7.12 Higher education providers did respond rapidly to the change of A level results but also faced considerable challenges and sometimes additional costs arising from accommodating additional students. On many more selective courses, and those where places are limited for sound practical and operational reasons, some learners lost their place for 2020 and were asked to defer to 2021.

¹³ Qualifications Wales Full Statement of the Appeals Process following the Minister's announcement on 17 August 2020: <https://qualificationswales.org/english/covid-19---results-2020/summer-2020/qualifications-wales-statements/qualifications-wales-statement-on-appeals-process/>, accessed 18 November 2020

It is notable that universities dealt with the highly charged situation at a time when they were also responding to the challenges of managing returns to campus in new socially-distanced conditions.

- 7.13 In developing and delivering the arrangements for awarding grades in 2021, it will be important that there is a comprehensive communications plan in place that addresses the needs of all stakeholders, including universities and employers, at all stages through the process and rebuilds confidence in the Welsh system. This is discussed further in chapter 9.3.

Summary of findings:

- 7.14 In the course of reporting on qualifications outcomes from a normal series, it is not appropriate for Qualifications Wales to advise Ministers of outcomes ahead of the schedule. However, the extent of the variation of calculated awards from centre expectations was exceptional in 2020 and arose not from the direct performance of candidates but from the application of processes designed to fulfil Welsh Government principles in extraordinary times. In these particular circumstances, we conclude that it would have been appropriate to at least forewarn the Minister of the extent of the gap between CAGs and the calculated grades at an earlier stage.

Recommendations:

- 7.15 In developing and delivering the arrangements for awarding grades in 2021, it will be important for the progression of Welsh learners that higher education providers and employers are given clear and timely information that gives them confidence in recruiting from Wales.

8 THE STANDARDISATION MODELS

- 8.1 The decision to cancel the Summer 2020 examination series meant that an alternative approach to calculating qualification grades had to be established. The timeline in Appendix 3 demonstrates how the UK's qualifications community worked together to discuss the issues around developing the models, sharing thinking and expertise, and developing broadly similar approaches. The models developed for Wales aligned with the approaches taken in other parts of the UK and took into account differences in the Welsh education system, the available evidence and the feedback from the Qualifications Wales consultation (details of these differences are provided in Appendix 5).
- 8.2 In previous years examination marks have been put through two distinct processes. The term *moderation* has traditionally been used to describe a process which monitors the standard of marking to ensure it is accurate and consistent. The term *standardisation* has been used to describe a process of deciding on grade boundaries to ensure that standards are comparable from year to year. In 2020 the term *standardisation* was used to describe the calculation of predicted grades using statistical processes¹⁴.
- 8.3 The 2020 standardisation models aimed to predict grades for each learner in each qualification. These predictions were based on the data submitted by centres (predicted grades and rankings within each grade) and, where it was available and appropriate, historical data about the learners' performance and the performance of the centre.
- 8.4 The 2020 standardisation process had to deal with two significant factors that were novel to that qualifications series. First the data going into the models was not subject to a national moderation process so it was likely to have a significantly different, and more disparate, distribution to previous years. Second, the data – grades and rankings within each centre – was significantly different from the very granular data (typically exam scores) that comes out of an examinations process.
- 8.5 In 2020 the models also had to deal with exceptional cases such as centres with small cohorts where regular statistical approaches could become unreliable and centres or subjects where no historical data was available.
- 8.6 Members of the Independent Review Panel met with statisticians at WJEC to learn more about the models used in 2020. Detailed consideration of the models is beyond the remit of this Review, but we saw evidence of detailed evaluation of different statistical approaches and high levels of technical expertise in the development of the models.
- 8.7 The detail of the models varied between qualifications, but all involved complex statistical processes. The models worked on a set of data – usually a qualification cohort within a centre – and predicted the likely grades for the learners in that set. Although an impressive amount of support documentation was published the nature of the algorithms meant that it was not possible for centres to recreate the algorithmic process for an individual learner.
- 8.8 Across the UK, the qualifications bodies stated that they were confident in their use of these statistical standardisation models. Qualifications Wales told us that they had been confident that these standardisation models would provide a sufficiently robust set of outcomes and that the appeals process would address those instances that the model could not accommodate.

¹⁴ We note that the term moderation has been used to describe this process in the review of the 2020 qualifications experience in Scotland, led by Professor Mark Priestly <https://www.gov.scot/publications/rapid-review-national-qualifications-experience-2020/>

Discussions with WJEC and civil servants in the Welsh Government also highlighted the high-level of confidence that there was in the approach that was being taken. This confidence appeared to come from two sources. First there was confidence from working with, and being aligned to, the UK qualifications community. Second there was confidence generated from areas where additional evidence (e.g. AS levels for the A level grades) was available to inform the calculated grade hence leading to the view that Wales had a 'better model' (see Appendix 5).

- 8.9 However, concerns about an approach based on statistical predictions were flagged up during the consultation undertaken by Qualification Wales in May 2020 and in the UK national press¹⁵. There was concern in the public commentary and in the responses to the Qualification Wales consultation about the extent to which the standardisation models would depress the Centre Assessment Grades (CAGs) and deprive learners of results that reflected their knowledge and abilities.
- 8.10 We heard from schools and colleges, and those supporting them in the regions and local authorities, about the absence of transparency around the standardisation models. Without transparency schools and colleges could not help learners and their parents and carers to understand either the process or the outcomes. The complexities of the standardisation models were a risk noted by Qualifications Wales in its advice to the Minister in March 2020.
- 8.11 The models were subject to an iterative review process by Qualifications Wales and were signed-off in July 2020. At the Children, Young People and Education Committee on 18 August, the Minister noted that she had not been made aware of the extent of the grade depression until 10 August.
- 8.12 The decision to apply any kind of standardisation model to the CAGs meant that some movement between CAGs and standardised grades was to be expected though the extent of the movement became central to the controversy which unfolded following the publication of results. The standardisation models had the overall effect of depressing 42% of A-level grades¹⁶. The CAGs were perceived as being generous and optimistic and the models generated results at national level that fell within acceptable year-on-year tolerances.
- 8.13 On 12 October Qualifications Wales published an analysis of the differences between the CAGs, the standardised grades and the final (revised) grades¹⁷. This analysis found that the CAGs were, on average, 0.4 of a grade higher than in 2019 and yet this increase became 0.1 of a grade after the 2020 standardisation process. These average figures mask more significant perturbations in the grades for individual learners. In our discussions with schools, colleges and individual learners we heard of many instances where learners had received grades that were significantly lower than the grades predicted by their teachers. Individual learners effectively became statistical collateral in the drive to protect the overall grade distribution.

¹⁵ For example, lead story in the i newspaper 19 June 2020 <https://inews.co.uk/news/education/gcse-a-level-exams-2020-millions-proposed-grades-cut-generous-predictions-england-450236>

¹⁶ Overview of AS, A level and Advanced Skills Challenge Certificate results in Wales, Qualifications Wales, 13 August 2020 – Table 1, page 22 <https://www.qualificationswales.org/media/6470/overview-of-as-a-level-and-ascc-results-summer-2020-eng-final-complete.pdf>

¹⁷ Variation in GCSE, AS and A level qualification results in Wales, Summer 2020, 12 October 2020 <https://www.qualificationswales.org/english/publications/variation-in-gcse-as-and-a-level-qualification-results-in-wales-summer-2020/>

8.14 A lot of the debate around the 2020 qualifications series has focused on the use of algorithms. This topic is covered extensively in the Scottish review led by Professor Mark Priestly (noted above). There are two other reviews which are relevant to this area.

8.15 **Review into bias in algorithmic decision-making by the Centre for Data Ethics and Innovation**

8.15.1 We welcome the publication of this report¹⁸ by the Centre for Data Ethics and Innovation (CDEI). The report focuses on issues of bias in algorithmic decision making and investigates the use of algorithms in recruitment, financial services, policing and local government. It was commissioned prior to the 2020 qualifications series though the final report makes numerous references to the experiences of learners in 2020.

8.15.2 We note that the sectors investigated in the CDEI report use algorithm-driven decisions in a distinctly different context to the way algorithms were used in the 2020 qualifications series. The sectors covered in the CDEI report tend to use algorithm-driven decisions in the earlier stages of longer processes and in conjunction with human-based decisions. In the 2020 qualifications series the algorithms produced the final result with no element of human input prior to the final outcome. The impact of the inherent weaknesses in algorithmic decision making are significantly amplified in the case of the 2020 qualifications series.

8.15.3 Although the CDEI review is looking specifically at issues of bias, the findings and recommendations touch on some of the broader issues of the use of algorithms in the delivery of public services and there is much to be learnt from this report. In particular we support the principle set out in recommendation 16 of the CDEI report:

Government should place a mandatory transparency obligation on all public sector organisations using algorithms that have a significant influence on significant decisions affecting individuals. Government should conduct a project to scope this obligation more precisely, and to pilot an approach to implement it, but it should require the proactive publication of information on how the decision to use an algorithm was made, the type of algorithm, how it is used in the overall decision-making process, and steps taken to ensure fair treatment of individuals.

8.16 **Review of approach to developing statistical models designed for awarding 2020 exam results by the Office for Statistics Regulation**

The Office for Statistics Regulation (OSR) has launched a review into the issues around the 2020 qualifications series. This review is addressing two key questions:

- To what extent did the approach to developing and communicating the models support public confidence in the outputs?
- To what extent were the algorithms developed appropriate for their intended purpose?

The review will look at events across the UK and will consider lessons from these events that are applicable across the public sector when considering the use of statistical models to support decisions. The OSR review is due to be published in early 2021.

¹⁸ Review of bias in algorithmic decision-making, published by the Centre for Data Ethics and Innovation, 27 November 2020 <https://www.gov.uk/government/publications/cdei-publishes-review-into-bias-in-algorithmic-decision-making>

Summary of findings

- 8.17 Too much confidence was placed in the ability of statistical models to predict the right results for individual learners.
- 8.18 When the extent of the downgrading became apparent, the governance framework that reviewed and signed-off the standardisation models appears not to have provided a robust challenge back to the initial policy direction. Subsequent events suggest that this level of downgrading was an unintended consequence of the policy.
- 8.19 The 2020 standardisation models were generally not well understood beyond the specialist community of qualifications organisations. This was compounded by confusing and inconsistent use of key terms in the broader public debate around the 2020 qualifications series.

Recommendations

- 8.20 The use of automated algorithms to predict individual grades should be avoided in future.
- 8.21 The governance and oversight of major policy implementations should have strong feedback mechanisms to test and assure policy objectives.
- 8.22 The broader public understanding of qualifications processing – from assessment to award – should be improved through better communications and the use of clear, well-defined terms.

9 CROSS-CUTTING THEMES

Chapters 1 to 8 of our report have focused on the events surrounding the award and grading of qualifications of 2020, the actions that were taken and decisions made during this period. There are matters we have identified however that go beyond decisions made in this time of crisis that are systemic, cross-cutting in so far that they have infused the whole fabric of events in 2020 and explain some of the complexities that arose. Chapter 9 therefore addresses these matters.

9.1 Leadership and governance

- 9.1.1 In terms of the key leadership and governance structures¹⁹ within the Welsh education system, a three-tier model of responsibility and accountability was created to deliver and support the main policy imperatives outlined in 'Our National Mission' (Action Plan 2017). These leadership and governance structures were designed to support a 'self-improving education system' encompassing a middle tier of organisations sitting between Welsh Government and schools, including Regional consortia, Estyn, Qualifications Wales and the WJEC.
- 9.1.2 The Welsh education system separates leadership functions both between, as well as within, the different tiers with a clear expectation that all organisations will work collectively to best serve the needs of all learners in Wales. Such system leadership requires clear communication and collaboration across the different layers to work most effectively.
- 9.1.3 The Covid-19 crisis meant that the relatively untested middle tier was challenged in ways that it had not been challenged before. Developing and implementing major changes quickly under exceptionally difficult conditions was undoubtedly fraught, hence careful, strategic, and responsive leadership was required at all levels in the system to make progress. Pressing timelines, aligned with a whole range of practical issues generated by the pandemic, made working within and across the education system exceptionally difficult.
- 9.1.4 The unprecedented circumstances that accompanied Covid-19 and the subsequent impact on qualifications in 2020, placed unusual and unpredictable demands upon the leadership of many parts of the Welsh education sector. While we saw evidence of increased and regular communication between some parts of the system, the flexibility and creative thinking needed to fully address the challenges of moving away from examinations, was not as evident. We heard from many sources about how key organisations remained wedded to their boundaries of operation rather than engaging in authentic collaborative working that is the hallmark of a mature education system.
- 9.1.5 We conclude that the series of decisions made by the Welsh Government pertaining to the awarding of grades in summer of 2020, and the repercussions that accompanied those decisions, were directly informed by Qualifications Wales and WJEC and reflected the underlying cultures of both these key organisations within the middle tier with responsibility for examinations and qualifications.
- 9.1.6 In our interim report we stated that we could not identify, among those leading the work on the changes, where the overarching and coherent overview of the whole picture of change taking place in assessment in Wales through summer 2020 was held. There was not a place in which all the

¹⁹ <https://gov.wales/sites/default/files/publications/2018-03/education-in-wales-our-national-mission.pdf>

strands of work that needed to be completed were being overseen together and the interdependencies reviewed. Instead the close adherence to organisational remits and responsibilities allowed gaps to emerge and alternative voices and options were overlooked. We conclude that the lack of a coherent overview did not serve the Welsh education system or its learners well and, subsequently, the stratification of responsibility proved to be wholly inadequate for the challenges of the summer of 2020.

- 9.1.7 Whilst we recognise the complexity in making decisions about the summer of 2020, once it was decided that exams would not go ahead, it was clear that coordinated, collaborative and transparent leadership, with clear lines of communication and accountability, was urgently needed. Such an approach could have ensured that the interests of everyone in the system, from government to learner, were properly reflected and that co-ordinated and focused communication plans were put in place thus ensuring that the different stakeholders received the tailored communications that they needed and understood the need for, and shape of, the change underway. .
- 9.1.8 Qualifications Wales and WJEC repeatedly expressed their confidence in the statistical standardisation processes throughout summer 2020. This confidence, they suggested, was based on the ability of those processes to deliver a profile of calculated grades that would be consistent with historical patterns and temper any perceived generosity through teacher assessments. Such confidence led to the prime focus of energy and attention being given to the development of the statistical models, at the expense of developing and improving the reliability of inputs from the centres. The net result was a concentration on maintaining confidence in the overall system, or 'keeping the system intact' as we were told, at the expense of ensuring fair outcomes for individual learners. We have discussed in chapters 4, 5 and 6 the lost opportunities to undertake moderation of Centre Assessment Grades or engage in professional conversations with schools and colleges.
- 9.1.9 We have also noted elsewhere in this report, that alternative views were not sought out by Qualifications Wales and WJEC despite the radical and unprecedented upheaval of the qualifications system in 2020. In sharp contrast, the decision to return to school in July 2020 was informed by the Children's Commissioner's survey 'Coronavirus and Me', with over 23,700 responses. The Welsh Government also consulted widely across the system with regions, local authorities, and schools to ensure that all parties agreed and supported the plans. The extent of the Welsh Government consultation and their willingness to listen to alternative views ensured that the return to school was as effective as it could be under the circumstances.
- 9.1.10 In summary, we could not see how all the strands of the work that so urgently needed to be completed for awarding grades in 2020 were being led, overseen, risk-assessed, tested, or reviewed. Our evidence suggests a significant disconnect in communication across bodies in the middle tier and with schools and colleges thus resulting in confusion about where responsibility and accountability resided for certain actions.
- 9.1.11 We conclude that a clearly led, co-ordinated, cross-organisation response, that brought together various strands of work and various bodies, would have resulted in fairer outcomes for all learners in Wales and would have limited the distress caused to the learners and their families by the events of 2020. It is now evident that the adherence to normative decision-making processes did not serve learners well and that listening to learners is an essential lesson for those organisations responsible for awarding qualifications and conducting assessments that lead to national qualifications.

- 9.1.12 As referenced in paragraph 1.4.2 above, under the provisions of Section 8 of the Qualifications Wales Act, Qualifications Wales may work jointly with another person if Qualifications Wales considers it is appropriate to do so in connection with any of Qualifications Wales' functions. We conclude therefore that it was within Qualifications Wales remit to have brought together other expertise to assist with programme coherence, co-ordination and management.
- 9.1.13 Looking towards 2021, we recommend that putting learner interests at the heart of any ongoing decision-making process is imperative to regain trust and to re-build much needed confidence and certainty in the assessment and qualification process. More responsive leadership is now needed, from both Qualifications Wales and the WJEC, to operate in the best interests of all learners in Wales in ways that are more inclusive and fundamentally aligned to collaborative ways of working.

Summary of Findings

- 9.1.14 The series of decisions made by the Welsh Government pertaining to the awarding of grades in summer of 2020, and the repercussions that accompanied those decisions, were directly informed by Qualifications Wales and WJEC and reflected the underlying cultures of both these key organisations within the middle tier with responsibility for examinations and qualifications.
- 9.1.15 Close adherence to organisational remits and responsibilities allowed gaps to emerge and alternative voices and options were overlooked. This lack of a coherent overview did not serve the Welsh education system or its learners well and, subsequently, the stratification of responsibility proved to be wholly inadequate for the challenges of the summer of 2020.
- 9.1.16 A clearly led, co-ordinated, cross-organisation response, that brought together various strands of work and various bodies, would have resulted in fairer outcomes for all learners in Wales and would have limited the distress caused to the learners and their families.

Recommendations

- 9.1.17 Listening to learners is an essential lesson for those organisations responsible for awarding qualifications and conducting assessments that lead to national qualifications. Putting learner interests at the heart of any ongoing decision-making process is imperative to regain trust and to re-build much needed confidence and certainty in the assessment and qualification process.
- 9.1.18 More responsive leadership is now needed, from both Qualifications Wales and the WJEC, to operate in the best interests of all learners in Wales in ways that are more inclusive and fundamentally aligned to collaborative ways of working.
- 9.1.19 Completion of this Review and our analysis has strengthened our view that an overarching, co-ordinated, and independently chaired, leadership structure is vitally important to the successful design and successful delivery of the agreed approach to awarding grades for summer 2021.

9.2 Fairness to all learners

- 9.2.1 We have outlined in Chapter 3 how fairness to all learners was a core principle built into the fabric and development of the approach to the awarding of qualifications in 2020. We heard from Qualifications Wales and from the WJEC how they developed and implemented their agreed approach. We also heard from stakeholders, including the Youth Senedd, of the lived experiences of young people as the agreed approach to calculate grades resulted in outcomes that were unexpected and difficult to explain for many. We heard first-hand how learners had lost their first choice University place as a result of this approach and had their career prospects interrupted or overturned by this process. We conclude that the principle of fairness to all learners was not upheld in the summer of 2020 and in fact, inequities were exacerbated by the approach deployed.
- 9.2.2 With regard to Children's Rights and to equality, diversity and inclusion, documentation shared by Qualifications Wales shows that impact analyses were undertaken in 2020, and concerns were highlighted regarding the awarding of fair grades, especially to certain groups of learners. Concerns about intentional or unintentional bias within CAGs were identified. The Equalities and Human Rights Commissioner and the Children's Commissioner raised similar concerns and told us that insufficient account was taken of these analyses in subsequent work and that effective mitigating action was not put into place by Qualifications Wales and the WJEC.
- 9.2.3 We noted that serious concerns were raised that some groups of students, for example those from a black, Asian and minority ethnic (BAME) background and those with additional learning needs, would receive less favourable treatment due to unconscious bias in centre-based assessments. Those concerns were raised in the Qualifications Wales' consultation and echoed in the many interviews we conducted. We heard how living in poverty deprived many learners of the advantages taken for granted by others, such as access to digital devices and uninterrupted access to the internet. Those from BAME backgrounds, brought together through the Ethnic Minorities and Youth Support Team (EYST), highlighted the disproportionate impact that Covid-19 is acknowledged to have had on BAME communities. Contributors from refugee backgrounds and from those in families where English was a second language in the home told the Panel that they often did not feel 'known' or recognised in schools or colleges, particularly where they had short educational histories.
- 9.2.4 Given these important concerns it would have been expected that some mitigating actions would have been considered to counter the risks that had been raised. Qualifications Wales and WJEC provided us with information on how they satisfied their Public Sector Equality Duties. For example, WJEC's guidance included specific references to students who receive access arrangements, those for whom an application for reasonable adjustments had been submitted and also guidance on ensuring objectivity in centre assessment judgements. Likewise, Heads of Centres were required to confirm that they had satisfied their Public Sector Equality Duties when they signed the declaration to submit the centre assessment data. These assurances while welcome appear rather detached from the nature of the risks articulated. We conclude that without training and without any external moderation applied to the processes of determining CAGs those risks for learners remained in place.
- 9.2.5 We conclude that all the lessons from 2020 must now inform more detailed and actionable Children's Rights and Equality Impact Assessments for 2021. As an early decision has been made about exams in 2021, hence there is now sufficient time to ensure that impact assessments are used as formative tools to ensure that the adopted approach for 2021 is tested to ensure that it does deliver fairness for all learners. The Children's Commissioner and the Equality and Human

Rights Commission (EHRC) offered their assistance with impact assessments for 2021, and we draw the attention of the Design and Delivery Advisory Group and Qualifications Wales to those offers. Collaboration and co-operation at an early stage will be important to ensure that action is taken to mitigate any risks of certain learners with different degrees of disadvantage not being treated equally and fairly.

- 9.2.6 Much of the discourse around ‘fairness’ in the media in the summer of 2020, and which at times also threatened to dominate policy making, has centred on ensuring the most able students are not disadvantaged in competition with their peers across the UK for places on the most selective courses at universities. We note that fairness to learners must encompass all learners who rely on the qualifications system to support their progress, whatever their background and whatever the nature of the qualifications they are pursuing to further their ambitions.

Summary of findings

- 9.2.7 The principle of fairness to all learners was not upheld in the summer of 2020 and inequities were exacerbated by the approach deployed.
- 9.2.8 While Children’s Rights and Equality Impact Analyses were undertaken in 2020 by Welsh Government, Qualifications Wales and WJEC, insufficient account was taken of these analyses in subsequent work and effective mitigating action was not put into place by Qualifications Wales and the WJEC.

Recommendations

- 9.2.9 Fairness to all learners must be a central, visible and clearly upheld component in the planning for 2021. Fairness to learners must encompass all learners who rely on the qualifications system to support their progress, whatever their background and whatever the nature of the qualifications they are pursuing to further their ambitions.
- 9.2.10 Lessons from 2020 must now inform more detailed and actionable Children’s Rights and Equality Impact Assessments for 2021. The Children’s Commissioner and the Equality and Human Rights Commission (EHRC) offered their assistance with impact assessments for 2021, and we draw the attention of the Design and Delivery Advisory Group and Qualifications Wales to those offers.

9.3 Consultation, communication and engagement

- 9.3.1 From our interviews, there was a strong and consistent view from learners and other stakeholders that they had not been listened to or, indeed, adequately consulted about developments in the build up to the summer of 2020. We heard how students had used social media to share information among themselves about what was happening and that no clear and continuous communication channels were open for learners causing them considerable anxiety, confusion and frustration. We observed how there had been limited direct engagement from the core bodies with young people and an over reliance upon schools and colleges to keep young people informed of developments.
- 9.3.2 In the development of the approach for 2020, Qualifications Wales undertook a formal consultation, that involved schools, colleges and learners, on the standardisation approach and on

the appeals process. Communications on the outcomes of that consultation back to participants was via Qualifications Wales Decisions Report and the final approach was published on their website. We heard an overwhelming concern from teachers and school and college leaders that their concerns raised in responses to this consultation had not been considered or addressed in the approach that was subsequently taken. We heard that the approach that was agreed to awarding grades was 'done to them' rather than 'done with them', calling into question the purpose of the consultation and its influence. Our online survey also confirmed the view that there was a top-down approach to communication.

- 9.3.3 Across respondent groups in our survey, knowledge of the Qualifications Wales' consultation was generally low, and the perceptions of the outcomes of the process were poor. On average, across all groups of respondents, those that were aware that the Qualifications Wales' consultation had taken place were more likely to think that the subsequent arrangements had taken account of their views (36.3% of those aware compared with 7.2% of those that were not aware of the consultation). While this finding suggests that there may be a positive relationship between knowledge and engagement and the subsequent attitudes and perceptions of the outcomes of the consultation, a third of engaged respondents feeling that their views had been taken into account is a low proportion.
- 9.3.4 School and college leaders, who we spoke with, felt that more use could have been made of their frontline experience and feedback by those bodies designing the system for 2020 and would have helped to ensure that the approach could be implemented fairly in the centres. Such input was not actively sought by Qualifications Wales at key points in the design process. Communication and engagement between schools and colleges and the leading bodies was reported to be far from optimum.
- 9.3.5 We were told that the WJEC Headteachers' Stakeholder Group was appreciated by participants and was noted as having direct school and college leader representation. Members of this group said that felt they had received information about next steps and were invited to comment upon how proposals were being operationalised. In contrast, the Welsh Government and Qualifications Wales stakeholder groups were viewed as less inclusive of the school and college leaders' perspectives drawing membership from sector representative groups, and tended to be centred on information delivery rather than dialogue. In our discussions with the Welsh Government Education officials, on this point, we were encouraged to note that they intend to involve school and college leaders more directly in the future.
- 9.3.6 We were also made aware of various offers of help from Colegau Cymru and from regional consortia to Qualifications Wales to facilitate engagement with Centres and to support the design and delivery of the approach to awarding grades in general and vocational qualifications in 2020. We heard that Qualification Wales did not take advantage of these offers of help.
- 9.3.7 We heard from leadership teams in schools and colleges that they had received a great deal of information from Qualifications Wales and the WJEC in relation to the processes of summer 2020, but that much of it required interpretation and collation to help their staff find their way through. We heard how helpful schools and colleges had found the Trade Unions and Colegau Cymru in interpreting this guidance and offering advice where they were able. Nevertheless, it largely fell to school and college leaders to interpret and distil key information before sharing it with teachers and onwards to learners, parents and carers.

- 9.3.8 We also heard from the colleges that they experienced disruption to the normal relationship with some vocational qualification awarding bodies because of furloughing of staff based in Wales who were needed to help make arrangements for results or provide advice. In some cases, staff were furloughed on rotation which further disrupted continuity of advice.
- 9.3.9 We are aware of Qualifications Wales published Regulatory Framework and Approach²⁰ which sets out the five principles of good regulation²¹ and how Qualifications Wales will work to achieve those. Qualifications Wales' Framework also sets out ways of working and underpinning values which emphasise the need for collaborative and thoughtful working with others. Section 4 of the Framework covers Engagement, Communication and Collaboration and sets out a way of working which we commend as the basis for mature cross-tier working. In the prevailing circumstances of the spring and summer of 2020, however, we observed that such a collaborative engagement approach was absent.
- 9.3.10 We conclude that too much reliance was placed on the formal consultation process put in place by Qualification Wales as being a basis for adequate stakeholder feedback and engagement. Welsh Government, Qualifications Wales and WJEC told us that were very conscious of not adding unnecessarily to the workload of schools and colleges during the pandemic. However, in the course of the pandemic, the adoption of online tools has eased communication and consultation burdens, removing geographic barriers to participation and promoting more effective and efficient collaboration across Wales. We note that the opportunity to adapt methods and approaches to communication with schools and colleges and embrace additional expert voices was missed and with it the opportunity to shape some of the critical decisions made and mitigate some of the consequences of these decisions.
- 9.3.11 We recommend that more inclusive consultation and stronger two-way engagement with all stakeholders should be a priority for Welsh Government, Qualification Wales and the WJEC going forward.
- 9.3.12 We conclude that the extent of shifts between Centre Assessment Grades and the calculated grades resulting from the standardisation models and the chaos arising from the subsequent, and inevitable, U turn on results has significantly undermined professional trust in the qualifications system. We heard from various groups that their greatest concern remains the significant breakdown in trust between the regulator and examining body and the teaching profession as a result of the approach in 2020. This trust needs to be rebuilt by both organisations for the benefit of all Welsh learners through meaningful dialogue and direct engagement with the teaching professionals in the design of the robust, reliable and fair qualifications system for the future.
- 9.3.13 Looking at the communication of information to stakeholders, our survey responses showed that the general view about how well the final approach had been communicated to them tended towards negative perceptions. Across all respondent groups, 50.5% of respondents disagreed or strongly disagreed that the process had been communicated well. In chapter 7 above, we have also noted that was a communication breakdown with universities at the point that the decision to award the higher of the CAG or calculated grade was made. Effective communication of the

²⁰ <https://www.qualificationswales.org/english/publications/regulatory-framework-and-approach/>

²¹ Better Regulation Task Force, Principles of Good Regulation: <https://webarchive.nationalarchives.gov.uk/20100407173247/http://archive.cabinetoffice.gov.uk/brc/upload/assets/www.brc.gov.uk/principlesleaflet.pdf>

approach, and the reasons why it can be trusted to deliver robust and credible results, needs to be managed through a coherent communication plan that covers all stakeholders.

- 9.3.14 The changes now underway to arrangements for 2021 represent a substantial programme of change and the impact and interest in that change is widespread. Communication with stakeholders needs to be clear, concise, timely and tailored. and we strongly recommend that a comprehensive communication plan addressing needs of all stakeholders - including learners, universities and employers - is developed jointly by the key organisations. Such a plan must identify responsibilities for delivery with each audience and build in monitoring of the effectiveness and understanding of messages.

Summary of findings:

- 9.3.15 Too much reliance was placed on the formal consultation process put in place by Qualification Wales as being a basis for adequate stakeholder feedback and engagement.
- 9.3.16 The opportunity to adapt methods and approaches to communication with schools and colleges and embrace additional expert voices was missed and with it the opportunity to shape some of the critical decisions made and mitigate some of the consequences of these decisions.
- 9.3.17 There has been a significant breakdown in trust between the regulator and examining body and the teaching profession as a result of the approach in 2020.
- 9.3.18 There was no coherent and comprehensive communication plan that would have ensured all stakeholders received the information they needed in a timely and tailored manner.

Recommendations:

- 9.3.19 More inclusive consultation and stronger two-way engagement with all stakeholders should be a priority for Welsh Government, Qualification Wales and the WJEC going forward.
- 9.3.20 Trust needs to be rebuilt by both Qualifications Wales and WJEC for the benefit of all Welsh learners through meaningful dialogue and direct engagement with the teaching professionals in the design of the robust, reliable and fair qualifications system for the future.
- 9.3.21 A comprehensive communication plan addressing needs of all stakeholders - including learners, universities and employers – should be developed jointly by the key organisations. Such a plan must identify responsibilities for delivery with each audience and build in monitoring of the effectiveness and understanding of messages.

9.4 Learner Voice and information

- 9.4.1 The qualifications system in Wales exists to serve the learners. The need for and design of changes to that system, especially at times of major crisis, must be clearly and comprehensively communicated to the learner. What is more. that communication must be two way, both listening to learner voices and concerns, and maintaining clear information channels on decisions and

implementation. It is important that learners clearly understand how their voices will be heard and where and how they will receive information.

- 9.4.2 We met with learners from a wide range of educational settings and received 1,669 responses from learners to our survey. Members of the Youth Senedd and young people from black, Asian and minority ethnic backgrounds also shared thoughtful contributions with us. What was striking about those contributions was the contrast between the depth of interest and desire to contribute that we heard and the frustration around the lack of opportunity to communicate that those young people felt had been made available to them.
- 9.4.3 Learners told us that they did not always have the information they needed about the arrangements for qualifications in 2020 available to them at the right times. They wanted to receive information via their schools and colleges who could support them and who they trusted, but they could see that their teachers were often equally in the dark.
- 9.4.4 In the period following A level results day that frustration among learners turned to anger and became protests as learners made their voices heard. In towns and cities students joined protests and across social media the disquiet and sense of unfairness was strongly expressed. Petitions for change gained support in substantive numbers and learners were supported in their actions by parents and carers and by their schools and colleges.
- 9.4.5 In our meetings with Welsh Government, Qualifications Wales and WJEC we asked who took responsibility for communicating the approach to awarding grades to the learners during this exceptional time. Both Qualifications Wales and WJEC explained to us that communication to learners was not a part of their normal way of working. Schools and colleges were seen as the conduit to learners and the qualifications bodies provide information to the schools and colleges to convey onwards. Learners confirmed to us that they would be looking to schools and colleges for their advice but also in the height of public events that impacted so directly upon them they were also seeking out information more independently and looking for material directed to their needs. For private candidates the route through schools and colleges is irrelevant, unattached to a centre they needed to seek out information directly from the examining board.
- 9.4.6 In recognition of the exceptional nature of the changes to the awarding of qualifications, Qualifications Wales developed further learner focused materials on their website and produced a version of the consultation for learners, to which a large number of learners (2,079) responded. This level of response indicated the depth of interest and willingness to engage among learners. Welsh Government's *Ask Kirsty* online sessions on Facebook were also cited by learners as being very welcome.
- 9.4.7 The Children's Commissioner offered support from her office to review the material to ensure it was presented in an accessible way for learners and told us that in the event this offer was not taken up by Qualifications Wales.
- 9.4.8 Just a quarter of the learners responding to our survey said that they felt the planned approach took account of the views of learners and their parents and carers. We also heard concerns from FE Colleges and Colegau Cymru that learners taking vocational qualifications were not treated equitably with their peers taking GCSEs, AS and A levels. The Qualifications Wales announcements that sought to give certainty to learners taking the general qualifications left the vocational learners largely uninformed.

- 9.4.9 The learners who spoke with us expressed how they and fellow learners had experienced confusion, heartbreak and anger on A level results day with a sense that the grade “belonged to the algorithm” and not to them. The Youth Senedd representatives described to us how they had sought out information on the processes from websites and social media, and how they had tried to help other young people make sense of what was happening.
- 9.4.10 Learners told us that even when they had sought out information from social media and websites they were still unsure what to believe. As the events around A level results unfolded, learners wanted to receive information and guidance via their schools and colleges who could support them and who they trusted, but could see that their teachers were often equally in the dark.
- 9.4.11 While recognising the increased efforts by Qualifications Wales and WJEC to improve and expand their communications with learners through the learner version of the formal consultation and the expanded information on websites, we believe that the assistance of the Children’s Commissioner for Wales in ensuring the information was accessible for learners would have been beneficial, and could have served to reduce anxiety of learners at the time.
- 9.4.12 The expectation that schools and colleges will convey relevant information to the learners holds sound for normal times when centres are themselves familiar with the systems. That expectation though excludes one audience – private candidates and their parents and carers who are not connected with a centre. It also breaks down when centres do not feel they have either the information or the clarity required to reassure learners and their parents and carers. Announcements made during school holidays also mean that learners do not have access to the support or advice of their teachers.
- 9.4.13 The circumstances of 2020 restricted the flow of information and created tensions in the teacher: learner/parent/carer relationships that could have been avoided. Qualifications Wales expressed to us a reluctance to engage with the learner when there is uncertainty of direction. Having met with representatives of the Youth Senedd, we feel that there is great value in early engagement with learners that will then improve communications once direction is set.
- 9.4.14 While the vast majority of vocational qualifications offered in Wales are regulated by Ofqual and are beyond our Terms of Reference, it would be remiss of us not to raise the importance of treating Welsh learners equitably regardless of the type of qualification they are studying.

Summary of findings:

- 9.4.15 Learners taking vocational qualifications were not treated equitably with their peers taking GCSEs, AS and A levels. The Qualifications Wales announcements that sought to give certainty to learners taking the general qualifications left the vocational learners largely uninformed.
- 9.4.16 The expectation that schools and colleges will convey relevant information to the learners holds sound for normal times when centres are themselves familiar with the systems. That expectation though excludes one audience – private candidates and their parents and carers who are not connected with a centre. It also breaks down when centres do not feel they have either the information or the clarity required to reassure learners and their parents and carers.

Recommendations:

- 9.4.17 Early engagement with learners during the design phase of the approach for awarding grades in 2021 will give them confidence that their voice is being heard and will then improve communications once direction is set.
- 9.4.18 Welsh learners must be treated equitably regardless of the type of qualification they are studying. Centres providing vocational qualifications and learners taking these qualifications need to be heard by the Welsh Government and Qualifications Wales so that their concerns and needs can be reflected in any discussions with Ofqual and the vocational qualifications awarding bodies in 2021.

10. LEARNING FOR AWARDING QUALIFICATIONS IN 2021

- 10.1 The Minister asked us to consider how the learning from 2020 might inform the approach to awards in summer 2021 .
- 10.2 The unprecedented challenges presented by the Covid-19 pandemic across the Welsh education system in 2020 regrettably continue into 2021. The urgency for decisions to be made for the awarding of grades for 2021 came across strongly in all our meetings and discussions. We were told about the considerable stress and anxiety created by learners and teachers not knowing whether there would be exams or not, and the stress and additional workload of having to prepare for both eventualities.
- 10.3 It also became clear to us that the level of unevenness in learner experiences across 2020 and extending into 2021 would make any exam series an unfair way to judge progress and ability across the 2021 cohort of learners. To quote one of our expert contributors on continuing with an exam series

..it would advantage the most advantaged and disadvantage the most disadvantaged...

We concluded that operationally, to run any form of exam series for 2021 would be a high-risk endeavour, easily knocked off course by ongoing uncertainty around the progress of the pandemic that could upend any examination schedule - a Plan B would always be required. We advised that it would be far better to invest concentrated time and effort now in developing, collectively, an alternative centre-based assessment plan and committing to it. This would give learners and their parents, carers, schools and colleges certainty about the way ahead and clear direction about prioritising available time in schools and colleges to maximise learning.

- 10.4 Drawing on these urgent issues and the lessons from the review of awarding grades in 2020, we therefore gave early recommendations to the Minister in late October 2020 in our Interim Report that:
- Decisions on awarding grades in Wales in 2021 should prioritise the needs of, and fairness to, the learners who are being assessed by acknowledging the challenging circumstances in which their learning has taken place through 2020 and 2021.
 - In 2021, qualifications should be awarded on the basis of robust and moderated assessment undertaken by the learner's educational setting and not through an exam series.
 - Robust centre assessment methods need to be developed so that learners are awarded fair grades whilst ensuring the integrity of qualifications.
 - These assessment methods should be developed in consultation with key stakeholders and the key decisions should be communicated clearly to all involved.
 - Welsh Government should establish an independently chaired Delivery Board to oversee and steer the revised approach to qualification in 2021.
- 10.5 On 10 November 2020, the Minister announced her decision and direction to Qualifications Wales that:
- there should be no end-of-year exams for GCSE, AS or A-level qualifications for 2021;
 - instead of exams, the Welsh Government will work with schools and colleges to take forward teacher-managed assessments. These will include externally set and marked assessments delivered within a classroom environment under teacher supervision. These will form the

basis for centre-based outcomes which will be linked to an agreed national approach to provide consistency across Wales;

- a Design and Delivery Advisory Group will be established, chaired by Geraint Rees, to develop the proposed approach to centre-based outcomes, an appeals process and arrangements for private candidates. The Group will involve school and college leaders, supported by Welsh Government and advised by Qualifications Wales and WJEC;
- that Wales would continue to work with Ofqual to ensure that awards could be made for vocational qualifications.

10.6 The work of the Design and Delivery Advisory Group²² is now underway to develop proposals which could deliver the policy on qualifications in 2021. The Group membership is school and college leaders, and Qualifications Wales and WJEC have observer status.

10.7 Our remit asks us to consider what learning there is from the operationalisation of the standardisation process in 2020 and what should be considered in agreeing the criteria or principles for any standardisation process in 2021. We have therefore summarised below key points for each of the design and delivery phases in 2021, drawing on our findings and recommendations, to inform the work of the Design and Delivery Group and Qualifications Wales as they work to put in place successful and workable proposals for the summer of 2021.

10.8 **Design phase**

Drawing upon our evidence concerning 2020, we would summarise the key learning points to take into the current design phase as:

- *Collaborative working across all parts of the Welsh education sector.*
The Minister emphasises this way of working in the Terms of Reference of the Design and Delivery Advisory Group. It will be vital that all parts of the sector take responsibility to work together constructively for the benefit of learners whether they are full members of the Group, observers to the Group or involved by the Group in some other way.
- *Ensure that alternative options are properly assessed against the principles and that assumptions made within those analyses are tested.*
Involving the teaching profession in the assessment of options, and the design, enables policy to be enacted on the ground. Our survey included the opportunity for respondents to suggest alternatives to CAGs should exams not be possible in 2021 (Appendix 4). It is now for the Design and Delivery Advisory Group to consider these suggestions as it sees fit.
- *Design the appeals process alongside the testing of options for the assessments and awards processes to ensure that both can be delivered fairly.*
- *The learner voice must be heard as the proposals are developed and delivered.*
The needs of, and fairness to, the learners should be prioritised in all decisions on the approach to awarding grades in 2021, with decisions tested to ensure that the principles most directly supporting fairness are paramount. Learner wellbeing should be central to the agreed processes and there should be confidence to do what is right for Welsh learners.
- *Children's Rights and Equality Impact Assessments must be used as positive tools to improve policy and its implementation to ensure fairness for all learners for 2021.*

²² Design and Delivery Advisory Group Terms of Reference <https://gov.wales/design-and-delivery-advisory-group/terms-reference#section-55732>, accessed 22 November 2020.

We suggest the Design and Delivery Advisory Group takes up any offer of assistance with impact assessment for 2021 from the Children’s Commissioner and the Equality and Human Rights Commission (EHRC). Early engagement in such assessments will help ensure actions are put in place to mitigate any risks of learners with protected characteristics, additional learning needs and in different educational settings not being treated fairly.

- *Ensure that the recommended approach is developed in a transparent manner and communicated clearly to all stakeholders.*

Transparency will be critical to confidence and trust in the Welsh qualifications system for all stakeholders. Definition of terminology will aid shared understanding.

- *Ensure all forms of validation, moderation and standardisation employed in the model adopted are simple, transparent and understandable*

Confidence in the adopted approach will be strengthened by ensuring inputs from across centres are comparable and fair, the systems employed to do so must be straightforward to understand and implement to build that confidence.

10.9 **Delivery phase**

The learning from 2020 has shown the critical importance of having a single place that can hold the overview of the delivery phase. The Design and Delivery Advisory Group work needs to continue to oversee the delivery of the agreed approach and provide assurance to the Minister that:

- all elements of the changes needed are being co-ordinated and delivered to schedule;
- the expertise of all in the education sector in Wales is drawn on in delivering the approach;
- decisions taken during the delivery phase have considered the interests of all those who will be affected;
- a comprehensive and open communication plan is in place to ensure all who need to understand the changes being introduced do so and are able to seek assurance and further information where appropriate;
- risks to successful delivery are kept under review and mitigating actions are identified and enacted by the appropriate body;
- as lessons are learnt from 2021 they are captured and carried forward into future years and into the development of qualifications in Wales.

The responsibilities and work of the Group in both design and delivery phases are considerable and we recognise that will need sufficient supporting resource to ensure success. We suggest that there may be value in reviewing and refreshing membership for the delivery phase to both to spread workload and to embrace further input.

10.10 **Appeals Process for GCSEs, AS and A levels**

We said in our Interim Report that we would include recommendations on the Appeals process in our Final Report. Our analysis of the approach to awards in Summer 2020 has taught us of the critical importance of designing the appeals process as part of the design of the approach to making awards. With this in mind and as the Design and Delivery Advisory Group is now responsible for developing the approach, it would act against our advice to make recommendations on the detail of an appeals process for 2021. However, we offer the following advice on the conditions that will support successful development of a fair appeals process.

Minimising the number of appeals by awarding a fair grade to the right learner first time round will be supported by:

- training and development of assessors;
- internal and external moderation prior to submitting centre assessment data to the awarding body;
- awarding body querying any centre assessment data that appears out of line with expectations prior to using the data to confirm a final award;
- ensuring design of the approach to awarding grades, including the national approach to ensure consistency, is transparent.

10.11 In our work we have seen that there are existing processes and practices in place across the schools and colleges and the awarding bodies that could be considered and developed to provide an appeals process that will be grounded on familiar processes. For example:

- schools are required to have internal appeals processes in place for internal assessments;
- schools and colleges delivering vocational qualifications have appeals processes that start with internal appeal prior to escalation to the awarding body.

There is an opportunity here for sharing of learning and good practice across the vocational and general qualifications.

10.12 **Private candidates**

We also said in our Interim Report that we would offer further advice on arrangements for private candidates. With an approach to awards based on centre assessment, it will be important to promote the route to accessing assessments clearly and early to private candidates to enable them to register with a centre for assessment in 2021. As with the appeals process, consideration of route for private candidates will need to be considered alongside the design of the approach for making awards.

10.13 **Vocational qualifications**

While our terms of reference cover just those approved vocational qualifications designed for Wales, it is still important that the Welsh Government does not lose sight of all the learners taking vocational and technical qualifications, whether these qualifications are regulated by Qualifications Wales or Ofqual. Learners taking vocational qualifications must be treated equitably with their peers taking GCSEs, AS and A levels regarding receipt of clarification of arrangements for the approach to awards in 2021, recognising that timings of decisions and announcements will be different. We advise the Welsh Government Education Department and Qualifications Wales to engage with centres providing vocational qualifications and with learners taking these qualifications so that their concerns and needs can be reflected in any discussions with Ofqual in 2021.

10.14 **Engagement with universities and employers**

It is critical that universities and employers understand and have confidence in Welsh qualifications so that Welsh learners can progress into further study and employment on a level playing field to their peers elsewhere in the UK. Qualifications Wales's confirmation that the approach is robust and meets standards will be essential. There is also the opportunity for pro-active communications with universities and employers that can emphasise the benefits that Welsh learners will have gained over the UK counterparts through having the learning time maximised in place of exam revision time.

- 10.15 The universities that we met also suggested that their Schools Liaison Officers, who focus on student recruitment and marketing, could play a key role in communicating the universities' confidence to Welsh learners, teachers and careers officers. To take advantage of this offer, the Design and Delivery Group could offer briefings on the agreed approach to university staff involved in recruitment, especially to those recruiting significant numbers of Welsh students.
- 10.16 **School performance data**
When the Minister announced the cancellation of the 2020 summer examinations series, due to the coronavirus pandemic, she also confirmed that the Welsh Government would not be publishing performance measures for the 2019/20 academic year. This assurance was essential in ensuring learners could be awarded fair outcomes, based on objective centre assessed grades, arrived at without the pressure associated with performance measures or accountability arrangements. The Minister's written statement of 3 July, further states that in 2020/21, as for 2019/20, qualification awards data will not be used to report on attainment outcomes at a school, local authority or regional consortium level. As the approach for 2021 is developed and approved, further reassurances that school performance measures will not include awards data may be needed in order to avoid any unintentional behaviours and additional pressure on schools and colleges.
- 10.17 **Wellbeing**
The design and delivery of the approach for 2021 will need to continue to have regard to well-being of both learners and school and college staff.

11. 2022 AND LESSONS FOR THE NEW CURRICULUM

- 11.1 We heard from schools and colleges of the on-going impact of Covid-19 on learning for all years of learners. The ongoing impact of the Covid-19 pandemic has been severe and continues to cause significant disruption to the learning of many young people. Missing school for a prolonged period means that entire groups of students are already significantly and substantially behind academically²³. Covid-19 has rendered their learning uneven and this must be considered in the award of qualifications from 2021 onwards. Our evidence reinforces how Covid-19 has widened the poverty attainment gap thus making examinations in 2021 not only untenable but also profoundly unfair. Such deep inequities will not disappear quickly, thus raising questions about the wisdom of an examination system that is predisposed, as we saw in the 2020 results, to disadvantage those already disadvantaged.
- 11.2 We underline that fairness to learners is of paramount importance and that consequently, there must be an urgent review of the assessment arrangements for 2022. A co-constructed, approach following the approach taken by the 2021 Design and Delivery Advisory Group is one possible way forward. We advocate, however, that early decisions must be made to allow adequate planning to take place and to reduce the considerable burden of anxiety and uncertainty placed upon 2022 learners, who have already embarked on their courses of study.
- 11.3 In terms of the future role and design of qualifications, in 2021 and beyond, our conclusion, is that the cancellation of exams for a second year, provides the Welsh education system with a unique and important opportunity to prepare for the new curriculum by engaging professionals in robust discussion about alternative assessment pathways. Alongside the many constraints and difficulties experienced during Covid-19, we are of the view that a unique opportunity now presents itself in the transition to the new curriculum.
- 11.4 A recent Estyn report (Preparing for the Curriculum for Wales 2020²⁴) identifies the impact of uncertainty about external assessment on curriculum planning:
- In a majority of schools visited, there is a reluctance to plan new whole-school curriculum and assessment arrangements while still delivering a curriculum that meets the needs of current public examinations. A minority of schools visited cited the lack of information about future qualifications and assessment arrangements as a reason to delay the development of a new curriculum. These schools use accountability as a reason not to develop an exciting curriculum or to make even minor adaptations. This suggests that the focus in these schools is more on 'teaching to the test' rather than on delivering a broad, balanced and relevant curriculum.*
- 11.5 We question whether current examinations, particularly at 16, remain fit for purpose. A report by Cardiff Business School (Fit for Future Education in Wales²⁵) concluded:

²³ Kuhfeld et al (2020) Projecting the Potential Impact of COVID 19 School Closures on Academic Achievement *Education Researcher* Vol 49 no 8 549-566

²⁴ <https://www.estyn.gov.wales/system/files/2020-11/Preparing%20for%20the%20Curriculum%20for%20Wales%20en.pdf>

²⁵ <https://www.futuregenerations.wales/wp-content/uploads/2019/10/2019-10-16-Fit-for-the-Future-Education-in-Wales-1-1.pdf>

In terms of preparation for the future, public exams at 16 are largely pointless, lead to costly gaming between and within schools, and the hugely problematic process of 'off-rolling' less academic children. (p27)

The Future Generations Report²⁶ similarly concluded:

There is a need to align our qualifications system with the Well-being of Future Generations (Wales) Act and vision for education in Wales. The way children and young people are currently taught to pass exams will not provide them with the skills and knowledge to meet future needs. Assessment should reflect the values and principles of the new curriculum: a focus on narrative feedback, a move away from age based assessing and a need to separate pupil assessment from how we hold teachers and schools to account. (p130)

- 11.6 Qualifications Wales²⁷ acknowledge that their vision for 16-year olds in Wales is to take globally respected qualifications that inspire and prepare them for life, learning and work. Such qualifications will require appropriate, robust, and reliable assessment processes that reflect and embrace the new curriculum. If the aspirations laid out in the new curriculum are to be fulfilled, this will mean moving away from an over-reliance on testing or examinations as the dominant form of assessment.
- 11.7 The four purposes of the new curriculum demand a radical change in pedagogical practice, a new approach to teaching subject knowledge and alternative forms of assessment that are in keeping with a dynamic, new curriculum in Wales. Planning for the new curriculum, through alternative assessments to exams, is an opportunity to close the gap between the perceived value of academic and vocational qualifications, equally valuing learning in all fields of study and learning from the good practice that already exists in the vocational sector.
- 11.8 The education system in Wales prides itself on its national mission to deliver equity and excellence for all learners. If this is to be realised, the opportunity to rethink assessment and examinations cannot be wasted, side-stepped or derailed by a desire to return to an examination system that cannot meet the requirements of a new curriculum and the needs of all learners in Wales. The first year of external assessment of Curriculum for Wales will be 2027 and we recommend that the doors are opened to a transition to alternative forms of assessment much sooner than previously planned.
- 11.9 We are aware that there are education systems that perform particularly well on a wide range of international assessments (e.g. Finland) and have few mandatory tests or external exams, relying instead on teacher assessment and continuous assessment methods. There is much that can be gained from looking at the awarding of qualifications in other education systems, not to borrow their approaches, but to learn from differences.

Summary of findings

- 11.10 The cancellation of exams for a second year, provides the Welsh education system with a unique and important opportunity to prepare for the new curriculum by engaging professionals in robust discussion about alternative assessment pathways.

²⁶ <https://www.futuregenerations.wales/wp-content/uploads/2020/07/FGC-Eng-Exec-Summary.pdf>

²⁷ <https://qualificationswales.org/english/qualified-for-the-future/>

Recommendations

- 11.11 Fairness to learners is of paramount importance and, consequently, there must be an urgent review of the assessment arrangements for 2022. A co-constructed, approach following the approach taken by the 2021 Design and Delivery Advisory Group is one possible way forward. We advocate, however, that early decisions must be made to allow adequate planning to take place and to reduce the considerable burden of anxiety and uncertainty placed upon 2022 learners, who have already embarked on their courses of study.
- 11.12 The education system in Wales prides itself on its national mission to deliver equity and excellence for all learners. If this is to be realised, the opportunity to rethink assessment and examinations cannot be wasted, side-stepped or derailed by a desire to return to an examination system that cannot meet the requirements of a new curriculum and the needs of all learners in Wales. The first year of external assessment of Curriculum for Wales will be 2027 and we recommend that the doors are opened to a transition to alternative forms of assessment much sooner than previously planned.

12. SUMMARY OF FINDINGS AND RECOMMENDATIONS

12.1 Welsh Government Policy Principles and Priorities:

- 12.1.1 All four principles set by the Welsh Government for developing an alternative approach to awarding grades in 2020 were valid and important. All of these principles play a role in providing fairness to the learner, some more directly than others (paragraph 3.13).
- 12.1.2 When the extent of the downgrading became apparent, the governance framework that reviewed and signed-off the standardisation models appears not to have provided a robust challenge back to the initial policy direction. Subsequent events suggest that this level of downgrading was an unintended consequence of the policy (paragraph 8.18).
- 12.1.3 The principle of fairness to all learners was not upheld in the summer of 2020 and inequities were exacerbated by the approach deployed (paragraph 9.2.7).
- 12.1.4 In the course of reporting on qualifications outcomes from a normal series, it is not appropriate for Qualifications Wales to advise Ministers of outcomes ahead of the schedule. However, the extent of the variation of calculated awards from centre expectations was exceptional in 2020 and arose not from the direct performance of candidates but from the application of processes designed to fulfil Welsh Government principles in extraordinary times. In these particular circumstances, we conclude that it would have been appropriate to at least forewarn the Minister of the extent of the gap between CAGs and the calculated grades at an earlier stage (paragraph 7.14).

Recommendations

- 12.1.5 The principles adopted for 2020 need to be amended and updated for 2021. Decisions on awarding grades in Wales in 2021 should prioritise the needs of, and fairness to, the learners who are being assessed by acknowledging the challenging circumstances in which their learning has taken place through 2020 and 2021 (*Recommendation 1 of our Interim Report*) (paragraph 3.14).
- 12.1.6 Fairness to all learners must be a central, visible and clearly upheld component in the planning for 2021. Fairness to learners must encompass all learners who rely on the qualifications system to support their progress, whatever their background and whatever the nature of the qualifications they are pursuing to further their ambitions (paragraph 9.2.9).
- 12.1.7 The governance and oversight of major policy implementations should have strong feedback mechanisms to test and assure policy objectives (paragraph 8.21).

12.2 The approach to awarding grades

- 12.2.1 Too much confidence was placed in the ability of statistical models to predict the right results for individual learners (paragraph 8.17).
- 12.2.2 The 2020 standardisation models were generally not well understood beyond the specialist community of qualifications organisations. This was compounded by confusing and inconsistent use of key terms in the broader public debate around the 2020 qualifications series (paragraph 8.19).
- 12.2.3 The decision by Qualifications Wales and WJEC to rely totally upon the statistical standardisation models to ‘moderate’ between centres was taken without fully testing any alternative routes or approaches. If testing with communities beyond the regulatory and awarding bodies had reached the same decisions (i.e. to rely on the models), then there would have been a greater understanding

of the risks then inherent in the adopted system and actions to mitigate for those risks could have been better planned (paragraph 4.22).

- 12.2.4 While Children’s Rights and Equality Impact Analyses were undertaken in 2020 by Welsh Government, Qualifications Wales and WJEC, insufficient account was taken of these analyses in subsequent work and effective mitigating action was not put into place by Qualifications Wales and the WJEC (paragraph 9.2.8).
- 12.2.5 While recognising the risk of bias within CAGs which could impact particularly on the black, Asian and minority ethnic (BAME) learners, Qualifications Wales and WJEC transferred the risk to the centres and did not initiate a concerted national approach to minimising the risk (e.g. systematically raising awareness and initiating training (delivered by another body) of teachers to avoid bias (paragraph 4.23).
- 12.2.6 Recognising the inability of the statistical standardisation processes to deal with known concerns, Qualifications Wales and WJEC should have explored and put in place additional safeguards to address known factors (paragraph 5.23).
- 12.2.7 The confidence expressed by the regulator in the standardisation processes was misplaced and overstated and derived from the precedence given to achieving system-wide outcomes that were consistent with previous years while failing to pay regard to the individual consequences of that approach. While the regulator was seeking to ensure confidence in the qualifications system as a whole, the detrimental consequences of doing so on such large numbers of individuals served in the end to severely damage that same confidence (paragraph 5.24).
- 12.2.8 There was a contradiction in the approach taken: while Qualifications Wales knew the standardisation model would not be perfect and that the Appeals process would therefore need to deal with those instances where the calculated grade did not give a fair outcome to an individual learner, it was clear that an appeal could not be made on the basis that the national process of standardisation did not operate as expected (paragraph 5.25).
- 12.2.9 There was, therefore, a failure to put in place a fair and workable appeals process in 2020 that would deal with the known inability of the statistical processes to give a fair outcome to every learner. The chosen approach to awarding grades was implemented without knowing that a deliverable appeals process could be developed (paragraph 5.26).
- 12.2.10 Without external moderation of the decisions reached in assigning CAGs and rank orders, and without training of assessors to ensure the avoidance of any bias in arriving at CAGs, total reliance was placed on the statistical standardisation processes to ensure fairness between centres. The outcomes of those processes themselves created outliers and gave rise to widespread disquiet that the processes had forced outcomes that did not deliver fair grades for large numbers of individual learners whatever the overall pattern for the cohort (paragraph 6.14).
- 12.2.11 Neither WJEC nor Qualifications Wales acknowledged, accepted or anticipated the scale of the issues that would result and the risk of inequity to so many individual learners from their inaction. We regard this as a significant failure (paragraph 6.15).
- 12.2.12 Professional conversations towards the end of June between WJEC and those centres identified as having CAGs at variance to their previous performance could have helped either modify the CAGs or have given WJEC the confidence to defend a national increase of CAGs against last year’s grade profile to Qualifications Wales (paragraph 6.16).

Recommendations

- 12.2.13 The use of automated algorithms to predict individual grades should be avoided in future (paragraph 8.20).
- 12.2.14 External moderation rather than statistical processes should be employed to provide consistency across Wales in an agreed national approach to awarding grades in summer 2021 (paragraph 6.17).
- 12.2.15 Investment of time in greater guidance and support to the centres, together with external moderation ahead of submission of centre-assessed data, is needed to build greater confidence among schools and colleges in the grades and rankings they produce, and to give greater confidence for WJEC and Qualifications Wales in the data being produced by the centres (paragraph 4.24).
- 12.2.16 Lessons from 2020 must now inform more detailed and actionable Children’s Rights and Equality Impact Assessments for 2021. The Children’s Commissioner and the Equality and Human Rights Commission (EHRC) offered their assistance with impact assessments for 2021, and we draw the attention of the Design and Delivery Advisory Group and Qualifications Wales to those offers (paragraph 9.2.10).
- 12.2.17 Good practice in removing bias from centre assessments should be shared between colleges and schools, with training put in place to support teachers/assessors (paragraph 4.25).
- 12.2.18 The development of an appeals process is an essential element in the design stage of the approach to qualifications and grading for 2021 to ensure that there is a workable and fair right to appeal available to individuals (paragraph 5.27).
- 12.2.19 The broader public understanding of qualifications processing – from assessment to award – should be improved through better communications and the use of clear, well-defined terms (paragraph 8.22).

12.3 Learner Voice and information

- 12.3.1 The expectation that schools and colleges will convey relevant information to the learners holds sound for normal times when centres are themselves familiar with the systems. That expectation though excludes one audience – private candidates and their parents and carers who are not connected with a centre. It also breaks down when centres do not feel they have either the information or the clarity required to reassure learners and their parents and carers (paragraph 9.4.16).
- 12.3.2 Learners taking vocational qualifications were not treated equitably with their peers taking GCSEs, AS and A levels. The Qualifications Wales announcements that sought to give certainty to learners taking the general qualifications left the vocational learners largely uninformed (paragraph 9.4.15).

Recommendations

- 12.3.3 Early engagement with learners during the design phase of the approach for awarding grades in 2021 will give them confidence that their voice is being heard and will then improve communications once direction is set (paragraph 9.4.17).
- 12.3.4 Welsh learners must be treated equitably regardless of the type of qualification they are studying. Centres providing vocational qualifications and learners taking these qualifications need to be heard by the Welsh Government and Qualifications Wales so that their concerns and needs can be

reflected in any discussions with Ofqual and the vocational qualifications awarding bodies in 2021 (paragraph 9.4.18).

- 12.3.5 Listening to learners is an essential lesson for those organisations responsible for awarding qualifications and conducting assessments that lead to national qualifications. Putting learner interests at the heart of any ongoing decision-making process is imperative to regain trust and to re-build much needed confidence and certainty in the assessment and qualification process (paragraph 9.1.18).
- 12.3.6 In developing and delivering the arrangements for awarding grades in 2021, it will be important for the progression of Welsh learners that higher education providers and employers are given clear and timely information that gives them confidence in recruiting from Wales (paragraph 7.15).

12.4 Consultation, Communication and Engagement

- 12.4.1 There has been a significant breakdown in trust between the regulator and examining body and the teaching profession as a result of the approach in 2020 (paragraph 9.3.17).
- 12.4.2 Too much reliance was placed on the formal consultation process put in place by Qualification Wales as being a basis for adequate stakeholder feedback and engagement (paragraph 9.3.15).
- 12.4.3 The opportunity to adapt methods and approaches to communication with schools and colleges and embrace additional expert voices was missed and with it the opportunity to shape some of the critical decisions made and mitigate some of the consequences of these decisions (paragraph 9.3.16).
- 12.4.4 There was no coherent and comprehensive communication plan that would have ensured all stakeholders received the information they needed in a timely and tailored manner (paragraph 9.3.18).

Recommendation

- 12.4.5 Trust needs to be rebuilt by both Qualifications Wales and WJEC for the benefit of all Welsh learners through meaningful dialogue and direct engagement with the teaching professionals in the design of the robust, reliable and fair qualifications system for the future (paragraph 9.3.20).
- 12.4.6 More inclusive consultation and stronger two-way engagement with all stakeholders should be a priority for Welsh Government, Qualification Wales and the WJEC going forward (paragraph 9.3.19).
- 12.4.7 A comprehensive communication plan addressing needs of all stakeholders - including learners, universities and employers – should be developed jointly by the key organisations. Such a plan must identify responsibilities for delivery with each audience and build in monitoring of the effectiveness and understanding of messages (paragraph 9.3.21).

12.5 Leadership and governance

- 12.5.1 The series of decisions made by the Welsh Government pertaining to the awarding of grades in summer of 2020, and the repercussions that accompanied those decisions, were directly informed by Qualifications Wales and WJEC and reflected the underlying cultures of both these key

organisations within the middle tier with responsibility for examinations and qualifications (paragraph 9.1.14).

- 12.5.2 Close adherence to organisational remits and responsibilities allowed gaps to emerge and alternative voices and options were overlooked. This lack of a coherent overview did not serve the Welsh education system or its learners well and, subsequently, the stratification of responsibility proved to be wholly inadequate for the challenges of the summer of 2020 (paragraph 9.1.15).
- 12.5.3 A clearly led, co-ordinated, cross-organisation response, that brought together various strands of work and various bodies, would have resulted in fairer outcomes for all learners in Wales and would have limited the distress caused to the learners and their families (paragraph 9.1.16).
- 12.5.4 It was within Qualifications Wales remit to have brought together other expertise to assist with programme coherence, co-ordination and management (paragraph 9.1.17).

Recommendations

- 12.5.5 More responsive leadership is now needed, from both Qualifications Wales and the WJEC, to operate in the best interests of all learners in Wales in ways that are more inclusive and fundamentally aligned to collaborative ways of working (paragraph 9.1.19).
- 12.5.6 Completion of this Review and our analysis has strengthened our view that an overarching, co-ordinated, and independently chaired, leadership structure is vitally important to the successful design and successful delivery of the agreed approach to awarding grades for summer 2021 (paragraph 9.1.20).

12.6 2022 and the New Curriculum

- 12.6.1 The cancellation of exams for a second year, provides the Welsh education system with a unique and important opportunity to prepare for the new curriculum by engaging professionals in robust discussion about alternative assessment pathways (paragraph 11.10).

Recommendations

- 12.6.2 Fairness to learners is of paramount importance and, consequently, there must be an urgent review of the assessment arrangements for 2022. A co-constructed, approach following the approach taken by the 2021 Design and Delivery Advisory Group is one possible way forward. We advocate, however, that early decisions must be made to allow adequate planning to take place and to reduce the considerable burden of anxiety and uncertainty placed upon 2022 learners, who have already embarked on their courses of study (paragraph 11.11).
- 12.6.3 The education system in Wales prides itself on its national mission to deliver equity and excellence for all learners. If this is to be realised, the opportunity to rethink assessment and examinations cannot be wasted, side-stepped or derailed by a desire to return to an examination system that cannot meet the requirements of a new curriculum and the needs of all learners in Wales. The first year of external assessment of Curriculum for Wales will be 2027 and we recommend that the doors are opened to a transition to alternative forms of assessment much sooner than previously planned (paragraph 11.12).

Appendix 1: Terms of Reference and Membership

Remit and objectives:

- Recognising there was no alternative but to cancel the 2020 summer exam series (GCSEs, AS levels, A levels and Skills Challenge Certificate, and approved vocational qualifications designed for Wales) in light of the public health pandemic and the anxiety that the uncertainty was creating for learners, their families and practitioners, this independent review should consider the key issues which emerged from the arrangements which were developed and implemented.
- The review should consider the challenges resulting from the 2020 experience and (in the context of future Covid uncertainty) the challenges for learners in the summer 2021 exam series.
- Key lessons from the experience this year should be drawn specifically to provide recommendations and considerations of a possible approach to prepare for 2021 which prioritises the needs of learners and their progression, and has regard to the continued need to maintain the standards and integrity of the education system and awarding of qualifications.
- This review is intended to provide recommendations and considerations for the Minister for Education, with recognition of the multiple partners involved in supporting learners in Wales.

Scope of review and questions to be addressed

Welsh Government principles and priorities

- In setting the policy for the cancellation of the exams and subsequent development of arrangements to award grades to learners, the Welsh Government prioritised the following principles:
 - Enabling the future progression of all learners and recognising their hard-work by awarding grades
 - Ensuring learners are not disadvantaged, particularly in relation to those elsewhere in the UK
 - Delivering a robust and fair approach, that is fair for past, present and future learners
 - Maintaining confidence in and credibility of the qualifications system.
- Were these priorities clearly understood and shared by all delivery partners?
- Were they given the right weighting?

Challenges of operationalisation

- What were the key issues and challenges in the operationalisation of the arrangements in 2020, recognising the constraints within which all parts of the sector were working?
- Were the approaches adopted, and those alternatives not adopted, robustly tested and evaluated against the intended policy directions?
- Were the approaches adopted, and those alternatives not adopted, robustly tested and evaluated against equality, diversity and inclusivity criteria to ensure fairness?

Organisational roles, responsibilities and relationships

- Is there clarity in the different responsibilities within the Welsh education sector for supporting the delivery of qualifications?
- Were the respective roles played this year in the awarding of grades appropriately enacted, well understood and communicated by the parties concerned?
- Was the emphasis placed on the interdependencies across the UK, and the impact for Wales of different approaches taken elsewhere in the UK in the consideration and operationalisation of arrangements for 2020, appropriate?

Transparency and learner voice

- Was there sufficient engagement, communication and transparency with stakeholders to develop and deliver the arrangements in 2020 and was the learner voice appropriately represented?

Challenges and options for 2021

- Given the challenges for the 2020/21 cohort in terms of progression and achievement, and achieving fairness and credibility both in the context of the wider UK qualifications system and for individual learners, what assessment approaches might be considered for 2021 that would help achieve the Welsh Government priorities set out above?

In considering the above, the Review is particularly invited to consider the following questions:

- What learning is there from the operationalisation of the standardisation process from 2020, and what should be considered in agreeing the criteria or principles for any standardisation process in 2021?
- How can the voice of learners and their well-being be recognised and prioritised in any future approach?
- Is there a role for a greater teacher and centre assessment contribution, which is proportionate to the need to prioritise teaching and learning time?
- Is there a possible model of moderation across clusters/centres, supported by professional learning provision, and could practitioners, Estyn, local authorities or regional education consortia play a greater role in ensuring consistency of approach between schools?
- What role should there be for any appeals process, and how might the responsibilities from school through to regulator level be considered in any future process?
- What further analysis is needed to understand the impact of events this summer on cohorts in following years?

Further areas for consideration

- The review may also note areas for further consideration and exploration as we start the transition to curriculum reform. This can include, but is not limited to, areas relating to: practitioners' approach to assessment and professional judgement, the role of accountability systems and the behaviour the drive, and the future role and design of qualifications.
- The review may also consider learning that we can draw from approaches taken to assessment and awarding of qualifications internationally.

Operation of the review and timing

- The Chair will consider membership of the review team and will bring in partners and stakeholders to provide contributions and reflections. Welsh Government officials will provide the secretariat.
- Given the pressing need to put measures in place to ensure the deliverability of the 2021 exam series alongside the development of contingency arrangements in case of further disruption, the review should report in two phases:
 - an interim report containing key findings and factors to be addressed will be presented to the Minister by the end of October 2020;
 - a final report with full recommendations will be presented to the Minister by mid-December 2020.

Membership of the review panel

- Louise Casella, the Director of The Open University in Wales (Chair of the Review);
- Professor Alma Harris, Deputy Head of Swansea University School of Education. International Council Adviser to First Minister and Deputy Minister, Scotland;
- Rosemary Jones OBE, School Improvement Advisor, Education Consultant and former Headteacher;
- Andy Youell, freelance data and systems specialist, formerly Director of Data Policy and Governance at the Higher Education Statistics Agency (HESA).

Appendix 2: Summary of Evidence

The Panel interviewed:

- Kirsty Williams, MS, Minister for Education, Welsh Government
- Welsh Government Education Department
- Qualifications Wales
- WJEC
- Sir Alasdair Macdonald, Adviser to the Welsh Government and Pupil Premium Advocate
- Learners, Headteachers, Teachers, Additional Learning Needs Coordinators, Exam Officers and Governors from School settings:
 - Bishop Hedley High School
 - Prestatyn High School
 - St Cenydd Community School
 - Ysgol Bro Teifi
- Learners with BAME backgrounds and youth workers with the Chair of Ethnic Minorities and Youth Support Team Wales (EYST)
- Learners, Head, lecturers and governors from an FE setting:
 - Cardiff and Vale College
- Welsh Youth Parliament/Senedd Ieuencid Cymru
- Headteachers from a representative group of Schools across Wales:
 - Bishop Hedley High School
 - Bishop Vaughan Catholic School
 - Cathedral School Cardiff
 - St Cenydd Community School
 - Pontarddulais Comprehensive School
 - Prestatyn High School
 - The River Centre Learning Community
 - Ysgol Alun
 - Ysgol Bro Teifi
 - Ysgol Brynrefail
 - Ysgol Gyfun Cwm Rhymney
 - Ysgol Llanhari
 - Ysgol y Deri
- Representatives of FE college leaders and Colegau Cymru:
 - Cardiff and Vale College
 - Grwp Llandrillo Menai (Coleg Menai / Coleg Meirion Dwyfor)
 - Gower College
 - Chief Executive, Colegau Cymru
- All Regional Consortia Managing Directors (EAS, ERW, CSC and GWE)
- Association of Directors of Education in Wales (ADEW) /Local Authority and Diocesan Authority representatives
- Trade Unions and representative bodies (all invited but not all able to attend due to time pressures of the Review):
 - ASCL
 - GMB
 - NAHT
 - NASUWT
 - UCAC
 - UCU
- Estyn
- Children’s Commissioner for Wales
- Equality and Human Rights Commissioner for Wales
- Welsh University representatives involved in recruitment and Universities Wales:
 - Aberystwyth University
 - Cardiff University
 - University of South Wales
 - Swansea University
 - Director, Universities Wales
- English University representatives involved in recruitment:
 - Loughborough University
 - University of West England

Individual invitations to make written submissions were also invited from a range of other stakeholders (including all approved vocational qualification awarding bodies, work-based learning providers and Ofqual).

Written submissions from learners, parents/carers, education professionals and a wide range of other stakeholders were also invited by an online survey.

Almost 4,000 responses to the online survey were received, and additional written submissions were received from:

- Future Generations Commissioner for Wales
- Education Workforce Council
- Colegau Cymru Curriculum and Qualifications Groups
- Individuals

The Panel also reviewed the transcript of the Children, Young People and Education Committee meeting of 18 August 2020: <https://record.assembly.wales/Committee/6452>

Members of the Panel also have met with the Director General for Regulation of the OSR and the Statistics Regulator to learn more about their UK review of the approach to developing statistical models designed for awarding 2020 exam results.

The Panel would like to thank all those who have provided input to the Review.

Appendix 3: Key Dates during 2020

Date	Body/Stakeholder	Action
3 March	Welsh Government and Qualifications Wales	First discussion on contingency planning for awards
10 March	Welsh Government and Qualifications Wales	Further discussion on contingency planning for awards
12 March and then fortnightly	Welsh Government Education officials meetings with other UK nations' education officials	Arrangements for awards
12 March	Qualifications Wales and WJEC	Contingency planning
17 March	Qualifications Wales and WJEC	Planning for collection of data from Centres and options for awarding qualifications
Prior to 18 March (<i>dates not determined – referred to in advice to Minister of 18 March</i>)	Qualifications Wales workshops with Ofqual	Contingency planning for awards
18 March	Welsh Government with advice from Qualifications Wales and WJEC	Decision to cancel exams in summer 2020 and to use alternative arrangements to award grades
18 March	Qualifications Wales and Ofqual ²⁸	Contingency planning update
20 March	Qualifications Wales	Statement on issuing grades in 2020 – early indication of approach
23 March	Qualifications Wales/WJEC/Ofqual	To discuss early thoughts on teacher assessed grades (CAGs)
24 March onwards	Joint Council for Qualifications (JCQ) - including WJEC and the other main awarding bodies across all four UK nations (including Scottish Qualifications Authority (SQA))	Regular catch-ups
3 April	Qualifications Wales/WJEC/Ofqual	To discuss options for generating grades - defining the approach and model.
16 April	Qualifications Wales/WJEC/Ofqual	To discuss management of rank orders for large cohorts.
23 April – 14 August (increased frequency in June/July)	WJEC/Ofqual	Standards & Technical Implementation Group – grading standards; discussion of issues relating to final proposals and implementation
24 April onwards	Qualifications Wales/Ofqual/CCEA	Regular updates

²⁸ The meetings with Ofqual may also have included the Council for Curriculum, Examinations and Assessment (CCEA) from Northern Ireland – Qualifications Wales refers to the three nations approach that sought commonality of approach for the shared brands of GCSEs, AS and A levels.

Date	Body/Stakeholder	Action
28 April – 26 May fortnightly	WJEC/Ofqual	Modelling sub-group to develop ideas and discuss testing arrangements for approaches to grading
28 April	Qualifications Wales	Issued consultation on arrangements for calculating grades
28 April - 13 May	All – including learners, parents/carers, teaching profession from schools and colleges, other education professionals	Responses to consultation (over 4,000 responses)
5 May	Qualifications Wales/Ofqual/CCEA/SQA	Four country update
May	Qualifications Wales	Finalised the approach to gathering centre data and issued guidance at general level
May	WJEC	Issued guidance at subject level
May/June	Centres (schools/colleges)	Arrived at Centre-Assessed Grades (CAGs) and rankings. Using internal moderation between teachers in Centre
16 June	Qualifications Wales Board	Meeting to approve decisions report on consultation and criteria for approved statistical models
19 June	Qualifications Wales	Published outcomes of consultation
22 June	Minister/Welsh Government Education officials and Qualifications Wales	Generosity of CAGs compared with previous years' profile of grades discussed. Consideration of how to manage and the need for standardisation models
June/July	Qualifications Wales/WJEC	Standardisation model development and sign-off
30 July	Qualifications Wales/WJEC	Maintenance of Standards meeting – A level outcomes reviewed
3 August	Qualifications Wales/WJEC	Maintenance of Standards meeting – As level outcomes reviewed
3 August	Welsh Government Education officials and Qualifications Wales	Information Sharing Group – A level results
4 August	Publication of Scottish Highers results	
4 August	Qualifications Wales/Ofqual/CCEA	A level presentations
6, 10, 11 August	Qualifications Wales/WJEC	Maintenance of Standards meeting – GCSE results
6 August	WJEC	Issued standardised A level grades to UCAS
10 August	Minister/Welsh Government Education officials/Qualifications Wales	QW Interim equalities analysis of A level results
10 August	Qualifications Wales	A level results information packs sent to Centres

Date	Body/Stakeholder	Action
11 August	Scottish announcement to use CAGs	
12 August	England DfE direction to Ofqual	Direction to use the 'triple lock' (accept the calculated grade, appeal to receive a valid mock result, or sit autumn exams)
12 August	Minister/Welsh Government Education officials/Qualifications Wales	To discuss England's decision
12 August	Welsh Government (and direction to Qualifications Wales)	Announcement to use AS level floor for A levels
13 August	AS and A level results day	
17 August	Welsh Government/Qualifications Wales	Update of Welsh policy position following England's decision to move to CAGs
17 August	Welsh Government (and direction to Qualifications Wales)	Announcement to move to CAGs for GCSEs, AS, A level and Skills Challenge Certificate – balance of fairness now lying with CAGs
20 August	GCSE Results Day	

Qualifications Consultation Analysis

This paper summarises an independent analysis of responses providing feedback on assessment arrangements in Wales. It is intended to support and inform the development of the final report being prepared by the Independent Panel.

Navigating this Document

Through an online questionnaire, respondents were asked questions designed to explore their views and perceptions across four substantive topics, including:

- The underlying principles supporting the Welsh Governments approach to assessment arrangements.
- The extent to which views and perspectives of respondents were reflected in the design of 2020 arrangements.
- The processes and policies informing the 2020 arrangements, and how they could be improved for 2021.
- The impact of the 2020 arrangements on learners and schools.

This paper presents a detailed examination of the main trends and themes raised across responses. It first outlines some overarching findings and reflections (Section 1). It goes onto present a detailed narrative account of trends and themes, working chronologically through the topics and questions as they appear in the survey (Section 3).

Interpreting Responses

In order to make sense of the qualitative perspectives expressed by respondents, the authors conducted thematic analysis. This approach systematically examines each response, highlighting the themes and issues that are raised. The analysis is then able to explore how prevalent each theme or idea is throughout the responses.

In communicating the balance of opinion in qualitative data, a number of factors need to be taken into account: Interpretation must be considered in the context of the questions asked – many respondents did not offer views across every question, nor did every respondent provide enough information to determine their viewpoint accurately. An absence of a response does not suggest that a respondent does not hold views or concerns towards a given topic. Therefore, the raw prevalence

of themes cannot be assumed to relate numerically back to respondents as a whole, nor to the educational community more broadly.

A further consideration is the presence of any self-selection bias which may influence the prevalence of certain viewpoints over others in response data. This limits the ability of subsequent analyses to estimate the true balance of opinion beyond those who responded.

Together, therefore, we have presented here a cautious reading of the balance of opinion within qualitative data. We have aimed to provide a broad picture of the views and perspectives expressed in responses. A range of qualitative terms are used to express prevalence, including 'most', 'many', 'some', and 'a few', with a decreasing order of prevalence. The approach taken is largely qualitative, with the aim being to understand the range of key issues raised by respondents, as well as the reasons for holding particular views. Such information includes potential areas of agreement and disagreement between the different groups of respondents.

There are further limitations with regard to this analysis that are important to note. The respondents contributing to the analysis are not necessarily representative of the wider educational community, or the broader public as a whole. It is difficult to estimate the extent of self-selection bias and its impact on the overall trends reflected in the data. It is possible that, given the sensitive nature of the topic, that those holding the strongest views may have been more likely to have taken the time to respond to the consultation.

There is a further question regarding the status of responses from certain stakeholder groups, including whether respondents were responding within a personal capacity, or whether they reflect organisational responses. 52 responses were received from those responding on behalf of Awarding Bodies, for example. It is not always clear from the data whether they are responding in an individual capacity, or that the views reflect those of Awarding Bodies themselves.

Together, therefore, responses and the subsequent analyses presented here should be considered to provide an indication of the views, sentiments and opinions of respondents, rather than a definitive statement of the perspectives of the community at large towards qualifications arrangements.

Key Findings and Reflections

Underlying Principles

Overall, there was strong support across all stakeholder groups for the underlying principles identified by the Welsh Government and informing the 2020 qualifications awards process. This suggests that they may present a strong foundation upon which to consider 2021 qualifications arrangements, one that resonates with the views and perspectives of the education community as a whole.

Respondents also highlighted the importance of ensuring equality of outcome in 2021 arrangements. This appears to reinforce and extend the second principle identified by the Welsh Government, namely, 'to ensure that learners are not disadvantaged, particularly in relation to those elsewhere in the UK'. Respondents also highlighted a range of different dimensions and characteristics feeding into questions of equity and fairness, including reflecting the challenges faced by different communities across Wales surrounding disruptions to teaching, learning and support.

Respondents also highlighted the importance of ensuring and promoting learner welfare in arrangements. From these perspectives, greater consideration should be given to the wellbeing impacts of the unique circumstances faced by all learners, particularly around the potential mental health implications.

Consultation Informing 2020 Approach

Overall, knowledge of the consultation feeding into the design of the 2020 approach were generally low, and the perceptions of the outcomes of the process were poor. Only 20.8 percent of respondents highlighted that they were aware that the consultation took place, and 84.5 percent of respondents felt that their voice was not adequately represented in the development of the approach.

Further analysis suggests that, on average, across all groups of respondents those that were aware that the consultation had taken place were more likely to think that the subsequent arrangements had taken account of their views. This suggests that communication, clarification, and consultation may be important in the development of future policy, especially in building support for a specific approach.

Implementation of 2020 Approach

Overall, respondents felt that certain aspects of the implementation of the 2020 approach worked better than others. The general view towards how well the final approach had been communicated to respondents, for example, tended towards negative perceptions. In recognition of the challenges facing organisations in developing and implementing the approach, 63.5 percent of all respondents agreed or strongly agreed that they had done their best.

The most significant disagreement centred on whether the process was done in a way that addressed learners' anxieties in uncertain circumstances. Overall, 61.5 percent of respondents disagreed or strongly disagreed that the process had adequately considered the wellbeing implications for learners.

A running theme across responses was the importance of effective communication. Whilst the majority of respondents felt it important to know, significant proportions of respondents felt that they did not know the precise roles and responsibilities of organisations feeding into the design and implementation of the approach. Many respondents felt that communication could be improved, including around the mechanics of the awards process. Teachers and school leaders, however, felt positive that they had received sufficient support and guidance on Centre-Assessed Grades (CAGs) and learner rankings.

There was broad recognition from respondents of the important role CAGs in assessment arrangements. From these perspectives, those within centres know learners' capabilities and are able to make informed and sensitive decisions. This included being sensitive to the level of disruption to teaching and learning for individual learners. Many respondents also recognised the important role moderation should have in awarding grades. Many felt that this could be strengthened, with clearer, streamlined processes that were not too onerous on teachers and schools.

Respondents were then asked about the main issues with drawing on standardisation models and the moderation of centre assessment inputs. Respondents offered a diverse range of responses, including restating the importance of ensuring fairness within the system. Some felt that standardised models, whilst imperfect, offered a means to moderate awards to ensure parity across generations of learners. Conversely, others felt that standardised models were not sensitive enough to individual circumstances. From these perspectives, standardised models could recreate inequalities inherent within the education system and penalised some individual learners, especially those high performing young people in disadvantaged communities.

[Impact of the 2020 Process](#)

There was broad agreement that that using the higher of either the Centre Assessed Grades or the standardised model was the best outcome for learners. Overall, 61.1 percent of respondents either agreed or strongly agreed that this was the case. A key finding around the impact of the 2020 approach, however, is that most groups felt that their confidence in qualifications in Wales had been undermined by the experience of 2020.

The impact of the 2020 experience on learner welfare was a key theme highlighted by many respondents. From these perspectives, the uncertainty surrounding the development and implementation of alternative arrangements served to exacerbate the anxiety and pressure some learners faced.

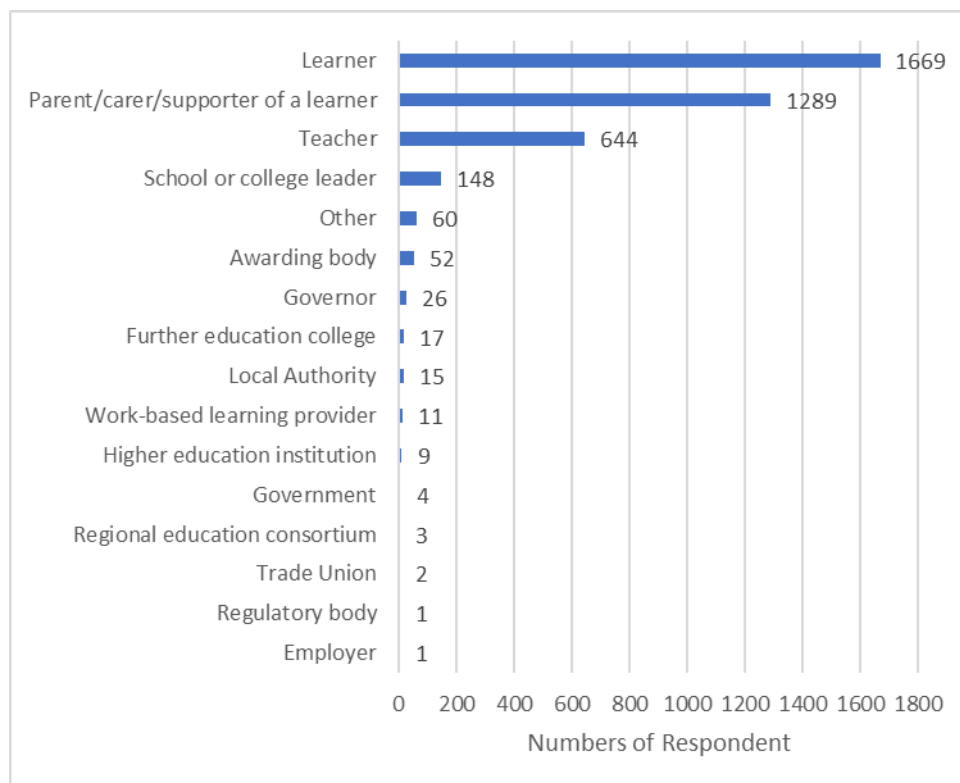
[Tentative Reflections](#)

Responses suggest that, across most groups, there was broad recognition of the challenges of developing a robust and fair approach to awarding grades under the circumstances. Many agreed with the final approach, supporting the use of standardised models or CAGs to award grades.

Concerns tended to centre on the clarity of communication and effectiveness of consultation in reflecting the wishes and concerns of different voices, especially amongst learners and their parents or carers. Another key area of concern includes the impact of the process on the wellbeing of learners, which many felt were not sufficiently reflected in arrangements.

Responses

Together, 3,951 respondents kindly took the time to complete the response form. This included responses from a diverse range of people from across the education community. Learners contributed 42.2 percent of responses, with parents and carers making up 32.6 percent. Teachers and school leaders also offered their views in significant numbers (20 percent). The remaining 5.2 percent of respondents reported that they were offering their views from a range of perspectives, including as school governors, higher education institutions, or regional consortia:



Q1, N = 3951

A total of 476 respondents reported that they were offering views from two or more groups. Some responding as parents or carers, for example, reported that they were also responding as teachers, governors, or as learners (N = 302). For the purposes of this analysis, those who offered multiple perspectives were assigned to one group. Where parents also identified as teachers, for example, we included them in analyses of parent’s views. Analytically, this was to ensure that the views of parents were not diluted with those of the education workforce.

The views of some groups are better represented than others within responses. Due to low response numbers it is not possible, for example, to be precise around the views of stakeholder groups such as employers and higher education institutions. Three constituent groups are however well represented, including learners, their parents or carers, and the education workforce.

Detailed Findings

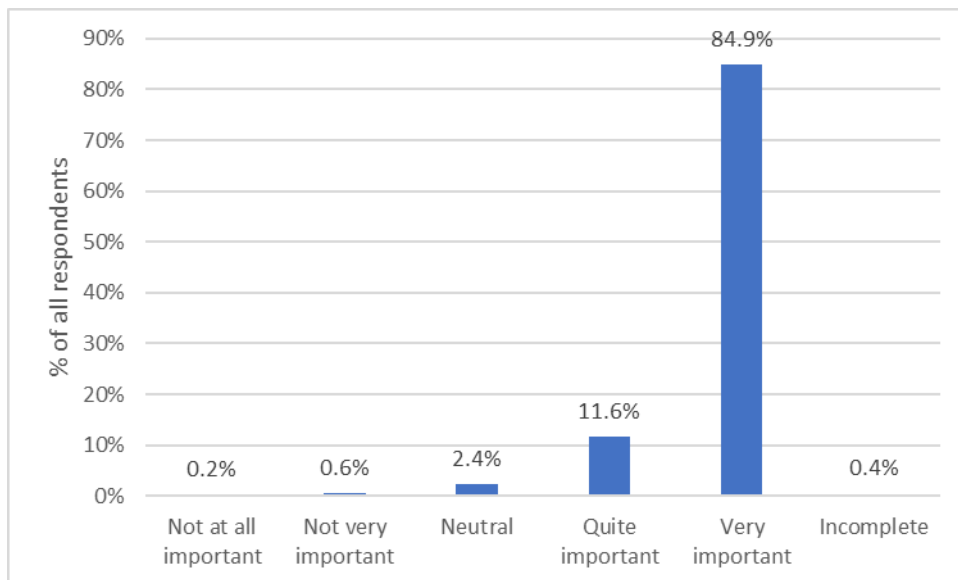
3.1 Underlying Principles

The Welsh Government identified four overarching principles that informed the design and conduct of 2020 qualifications arrangements, including:

- i. Enabling the future progression of all learners and recognising their hard-work by awarding grades.
- ii. Ensuring learners are not disadvantaged, particularly in relation to those elsewhere in the UK.
- iii. Delivering a robust and fair approach, that is fair for past, present and future learners.
- iv. Maintaining confidence in and credibility of the qualifications system.

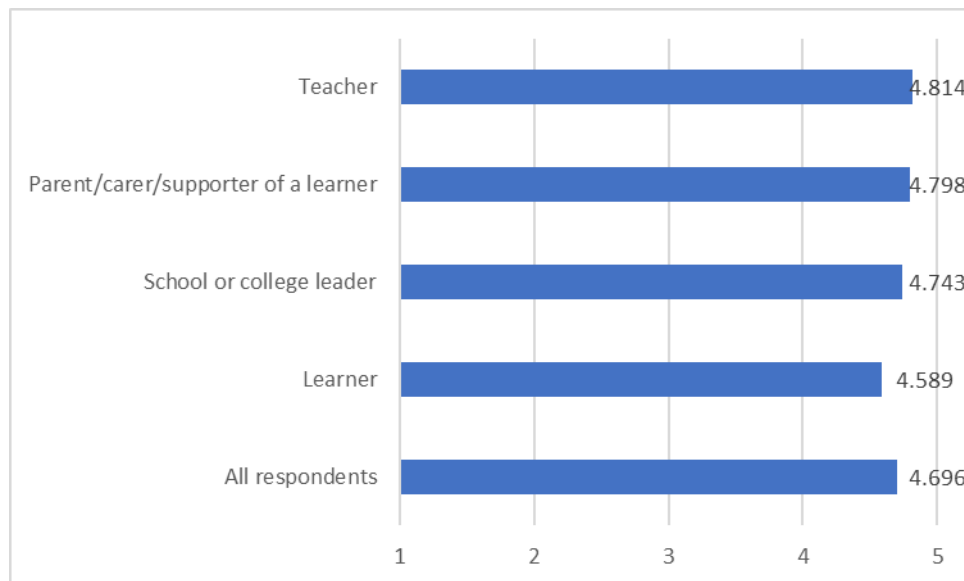
Respondents were first asked for their views on each of the four principles, specifically how important they were to them.

Overall, there was strong support across all stakeholder groups for the underlying principles informing the 2020 awards process. Most respondents believed that each of the four principles were either important or very important. The principle of enabling the future progression of all learners and recognising their hard work, for example, were highly valued across all groups of respondents, with 84.9 percent of respondents stating it was very important:



Q2(i), N = 3951

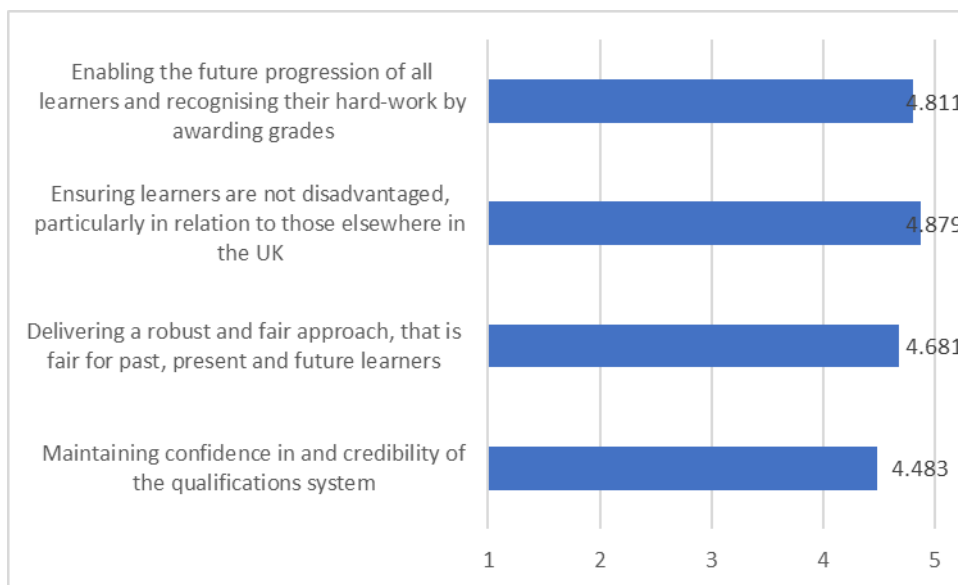
There was only very slight variation in views across different groups of respondents. Teachers, for example, felt that together the four principles were marginally more important than the assessments offered by learners. This difference is, however, only marginal and not necessarily meaningful:²⁹



Key: 1 = Not at all important, 2 = Not very important, 3 = Neutral, 4 = Quite important, 5 = Very important
Q2 (i, ii, iii, iv) combined mean scores, N = 3951

²⁹ Composite variable encompassing the four principles highlighted in the survey combining answers to questions 2, 3, 4 and 5. Teachers reported a mean score of 4.816, and Learners 4.628 (with 4 being Quite important and 5 being Very important).

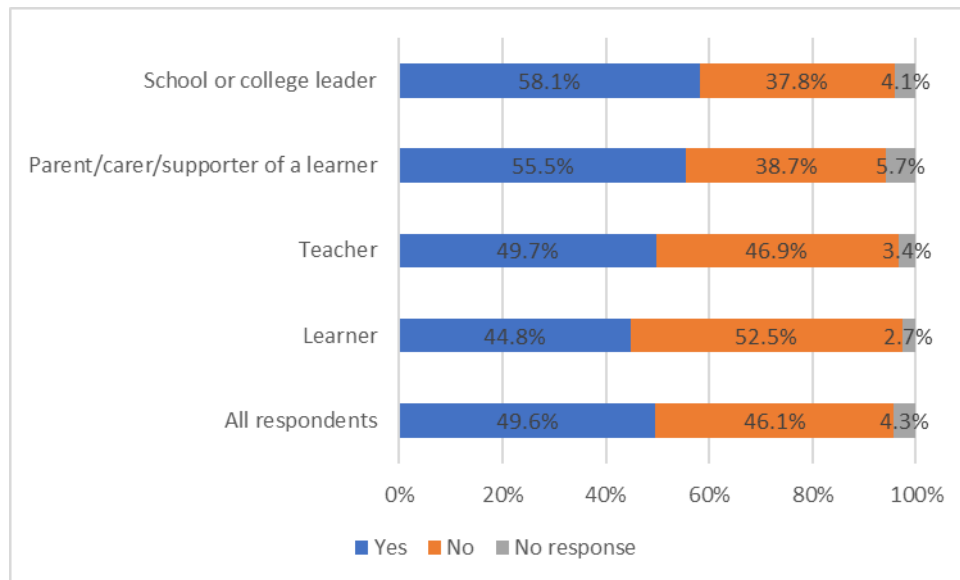
There were only minor variations in viewpoints in responses across the four principles. For all groups of respondents, maintaining confidence in and credibility of the qualifications system was marginally less important than other the principles identified by the Welsh Government. Conversely, ensuring learners are not disadvantaged by the arrangements was the most important highlighted by respondents, relative to the other principles:



Key: 1 = Not at all important, 2 = Not very important, 3 = Neutral, 4 = Quite important, 5 = Very important
Q2 (i, ii, iii, iv) combined mean scores, N = 3951

Together, this suggest that there is broad and strong support for the four principles identified by the Welsh Government. They may present a strong foundation upon which to consider 2021 qualifications arrangements, one that resonates with the views and perspectives of the education community as a whole.

Respondents were then asked if they felt additional principles should be considered in the design and conduct of the 2021 arrangements. Overall 49.6 percent of respondents suggested that further principles should be considered. School leaders and parents and carers were more likely to offer suggestions than other groups, with 58.1 and 55.5 percent respectively responding that they felt additional principles should be considered:



Q3, N = 3951

Those who felt additional principles should be considered in the design of 2021 arrangements were offered the opportunity to expand on their thoughts and views. Across responses, respondents proposed a diverse range of principles and themes. Some sought to elaborate and reinforce the importance of certain principles identified by the Welsh Government. Others took the opportunity to offer broader reflections, including practical issues, concerns or processes that they felt were important to highlight.

Fairness for all Pupils

A key principle highlighted by many respondents was the importance of equality of outcome. From these perspectives, learners should not be disadvantaged in any way by assessment arrangements. This appears to reinforce and extend the second principle identified by the Welsh Government, namely, 'to ensure that learners are not disadvantaged, particularly in relation to those elsewhere in the UK'.

Respondents highlighted the importance of recognising and promoting equality and fairness across a range of different dimensions and characteristics. This included parity across both time and location. Some felt, for example, that the arrangements should not disadvantage different generations of young people. From these perspectives, respondents felt that those currently working towards their GCSEs or A-levels could be at a significant disadvantage compared to previous generations of young people. The extenuating circumstances and disruptions to teaching and learning should be taken into account in the process of assessing and awarding grades:

To ensure that learners in year 11/13 are not disadvantaged during this global pandemic. Some learners are already on their second period of isolation. They are already hugely disadvantaged.

Parent or Carer

Ensure learners are not disadvantaged (in relation to other parts of the country or past/future years) due to the reduced learning and time in school this year.

Parent or Carer

Conversely, a few respondents suggested that the arrangements should not disadvantage other generations of young people. From these perspectives, issues such as grade inflation could work to undermine the achievements of previous or future cohorts of young people. Others suggested that the situation was so extraordinary that it was not appropriate to consider issues surrounding generational equality and that the focus should be on support current learners through the challenges they face:

It is not about past or future students. This is unprecedented and should not be compared to last or future. It has to be just about the present.

Parent or Carer

Not to compare the pupils of the summer of 2021 with those of the past - that is not fair considering all that has happened in 2020.

School or College Leader

Another dimension raised by respondents included the importance of ensuring equality across different cohorts of learners. Respondents citing this theme often highlighted the importance of ensuring parity across different educational settings and institutions within Wales. This included learners from more disadvantaged communities, as well as between those attending state and private schools and other education settings:

Shouldn't get grades based on where you live and what previous people in your school have gotten.

Learner

[Future arrangements should be] Equitable and shouldn't discriminate against particular groups/schools. (Very bright son attending new and previously low achieving school should not be disadvantaged by this).

Parent or Carer

No resilient provision is in place for home educators. They have been discriminated against throughout this process and it is likely to continue given the treatment by local exam centres.

Parent or Carer

Further, a few respondents reinforced the importance of ensuring parity between learners in Wales with their peers in other parts of the UK. These perspectives often drew on the importance of maintaining confidence and ultimately the portability of awards, including for those seeking to apply to universities outside of Wales:

[It is important to ensure] credibility of grades as recognised by universities.

Learner

Others highlighted the importance of ensuring that learners with Additional Learning Needs (ALN, often understood as Special Education Needs (SEN)) are not disadvantaged. This in some cases included learners experiencing disabilities or impairments that impact on teaching and learning. From these perspectives, these learners were particularly affected by school closures and disruptions to support, which ultimately have had an adverse impact on learning and preparation:

Consideration to those learners with SEN needs who need more adjustment time, extra support face to face with teachers which would have usually been in place.

Parent or Carer

Take into consideration ability of SEN students to complete coursework or exams at home instead of in class - not everyone can do it.

Learner

There were also concerns surrounding Welsh language learning, especially for households in which Welsh is not often spoken. A few respondents highlighted that lack of exposure and disrupted learning could place these learners at a disadvantage, both for those attending Welsh medium schools and those preparing for assessments in Welsh:

Children in Welsh schools who come from English speaking homes may not have the variety of vocabulary to answer exam questions as previous year groups did.

Parent or Carer

Across responses, a key driver underscoring these perspectives were concerns that the arrangements could exacerbate existing disadvantage within the education system. Implicitly and explicitly, these perspectives were driven in part by concerns that the impacts of disruption to teaching, learning, and support were not equally distributed amongst learners. These respondents felt that the 2021 arrangements should recognise the challenges facing some learners, and work towards recognising or addressing the apparent disadvantages or barriers that learners have faced in working towards their qualifications:

The pandemic has impacted differentially on our pupils, therefore the arrangements should ensure that disadvantaged and vulnerable learners are not further disadvantaged in relation to other learners in Wales.

Government Respondent

Across all groups of respondents, the principle of fairness and addressing disadvantage were strongly felt and was the most prevalent theme in responses. These issues were particularly prevalent amongst responses from parents, school or college leaders and teachers.

Lost Preparation

A key principle or consideration which many respondents highlighted as important was giving due regard to the impact of lost teaching and learning over the last two academic years. This stemmed from concerns that school closures, lockdowns and self-isolation have led to significant disruption to learner's development and preparation:

We should consider the impact of which the 6 months lost learning has affected GCSE and A-Level Learners.

Learner

Attendance is a concern. This makes completing the course challenging & particularly affects the teaching of non-examination assessments.

School or College Leader

There were also concerns that learning at home may not have sufficiently made up for lost teaching time. Further, some felt that disruption experienced by learners was variable across different groups of young people. Closely linked to the principle of ensuring fairness and addressing disadvantage, some held concerns around the abilities and resources of some learners and their parents or carers to respond to disruption cause by school closures. Issues such as the digital divide – the unequal access to the internet and other online tools – were viewed as putting some at a significant disadvantage. It potentially compromised some learner's engagement with materials at home and served to undermine learning and preparation:

Many schools and year groups have had to isolate, some more than once - this is unfair as even with some schools maintaining digital learning/online lesson the disruption is causing much stress.

Teacher

The fact that all schools and pupils are off for different amount of time and off at different times which would make the final examination extremely unfair and not consistent.

Learner

Angen cydnabod yr holl amser addysgu wyneb yn wyneb a gollwyd gan gohort 2021 ers Mawrth 2020. A'r anghyfartaledd yn y modd mae Covid yn effeithio ar draws Cymru.

Need to acknowledge all the face-to-face teaching time lost by the 2021 cohort since March 2020, and the inequality in how Covid affects communities across Wales.

School or College Leader, English translation

Lost preparation was a key concern across all groups of respondents, but particularly held amongst teachers, school leaders and school governors.

Learner Welfare

A further significant theme or principle running through responses was the importance of considering learner well-being in the design of 2021 arrangements. This was felt amongst all respondent groups, but particularly strongly amongst learners and parents or carers. From these perspectives, consideration should be given to the wellbeing impacts of the unique circumstances faced by all learners, particularly around the mental health implications. This includes the broader wellbeing implications of the pandemic, and specifically the impact on welfare of the exam processes themselves:

The mental well-being of students should be taken into account. These are stressful times for everyone and could majorly affect pupil's performance in exams.

Learner

The well-being and mental health of students and teachers should also be a key consideration in the decision-making process.

Awarding Body

Pupils should not be placed under any more stress. Anxiety levels are sky high in the school I teach in.

Teacher

From these perspectives, the situation placed unique demands on learners that needed to be reflected in future arrangements. This theme also included the observation that exams and other arrangements should be conducted in a way that is safe and ensures the physical health of all concerned, including teachers, learners, and their families:

To consider learners health, social distancing can only do so much and wearing a mask whilst completing tests would be unfair and hard to cope with.

Learner

Broader Considerations

Respondents also took the opportunity to highlight broader concerns or reflections. These included the processes by which learners should be assessed, the implications for teachers, and role of exams in awarding grades.

The most prevalent themes included highlighting the important role of teachers in the process of awarding grades. From these perspectives, grading should be led by teachers' assessments. Grades should be backed up by evidence collected throughout the academic year. This could include formative and summative assessments, including class tests that feed into final grades:

Due to the continuing disruption to learning due to Covid 19 and increased anxiety/stress for current Yr 11s. assessment should be teacher assessment and coursework completed in school.

Parent or Carer

The professional judgement of teachers is paramount. An algorithm does not recognise pupil performance as well as professional judgement. Trust schools to do what they are paid to do.

School or College Leader

From these perspectives, consideration should be given to supporting and preparing teachers to effectively implement this in practice. Others explicitly mentioned that Centre Assessed Grades (CAG) should be the key mechanism by which to assign grades. It was often felt that there was a greater need for clarity and guidance on how these are decided and a robust moderation procedure to ensure fairness.

Conversely, a few respondents felt that it was important to maintain confidence in qualifications arrangements. From these perspectives, exams had a role to play in ensuring consistency and confidence in awards. Suggestions included drawing on online exams or taking a flexible approach to setting exams could allow them to take place in this academic year. Respondents offering these perspectives sometimes highlighted that teacher assessments and Non-exam Assessments (NEAs) were limited in that have the potential for subjective grading and therefore not offering complete

fairness to all. Others highlighted that previous performance was not necessarily a fair reflection of the progress some learners had made.

Confidence in exam grades is essential and another year of teacher assessment only may well lose this confidence. A combination of CAG and exam would be much preferable.

School or College Leader

These were, however, more marginal perspectives offered by respondents, predominantly by school or college leaders. On the whole the weight of opinion across responses heavily lent towards using other forms of assessment, including CAGs. Drawing on other forms of assessment was most strongly felt by learners and parents and carers:

Cancel exams, too much pressure, have lost out on a lot of important education.

Learner

Future is unknown and my year 11 son and fellow students will not be prepared for exams as previous pupils. No exams this year and grade on work done.

Parent or Carer

A further significant theme raised by respondents was the importance of clarity, consistency and commitment to a given approach. From these perspectives, clarity was important in order to enable learners, teachers and schools to plan and prepare for any set arrangements. Others also felt this was important to build trust and buy-in to the process from a range of stakeholders, including teachers and schools:

A well planned, consistent, transparent and clear approach that is shared with learners and their parents and does not change.

School or College Leader

Telling the students early, so they understand that coursework and assessment will be key to their success. Telling them in a clear manner so they understand.

Parent or Carer

Th included concerns around the consistency of approach, with some citing the importance that all exam boards should follow same rules. Others cited the importance of visibility, especially around the robust moderation processes – some suggested that WJEC and other organisations could have a role in leading this:

No external examinations but rather an independent person allocated from Estyn/ WJEC/ Consortia to be the Quality Assurance Person for each school.

School or College Leader

The accessibility to exam practice especially for those who have not experienced exams before. External moderation of coursework for any assessment grades eg not just teachers. WJEC to moderate coursework.

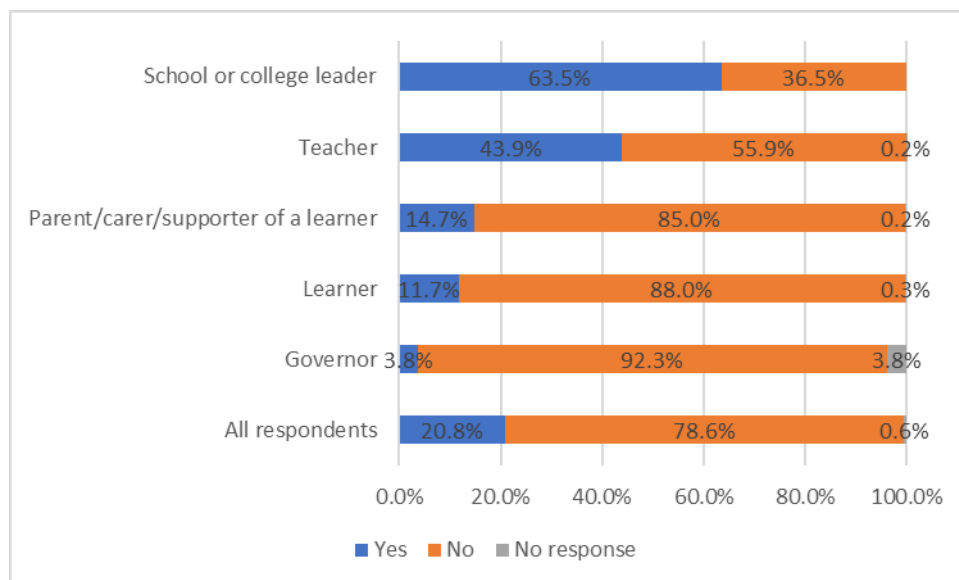
Parent or Carer

3.2 Consultation Informing 2020 Approach

Respondents were then asked a series of questions relating to their knowledge and perceptions of the consultation process feeding into the development of the 2020 arrangements.

Awareness of the Consultation

Overall, knowledge of the consultation was found to be generally low. Across all response groups, only 20.8 percent of respondents highlighted that they were aware that the consultation took place (N = 822). There was, however, significant variation amongst different groups of respondents. Amongst school governors, for example, 92.3 percent responded that they were not aware that the consultation took place, whereas 36.5 percent of school or college leaders were in a similar position:

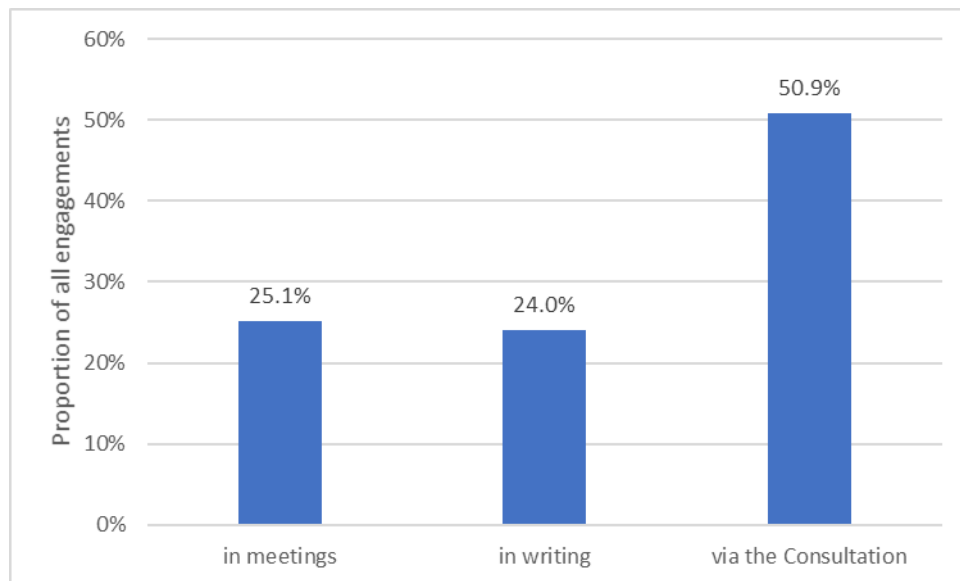


Q4, N = 3951

Responding to the Consultation

Of the 20.8 percent of respondents that were aware that the consultation took place, 82.9 percent ultimately went on to contribute their views (N =682). Teachers, school or college leaders and other educational professionals made up a significant proportion of those responding to the consultation (61.2 percent).

The consultation offered respondents three different methods for contributing their views, including in meetings, in writing, and through an online consultation. The most common approach taken by respondents was via the online consultation itself (50.9 percent, N = 358):



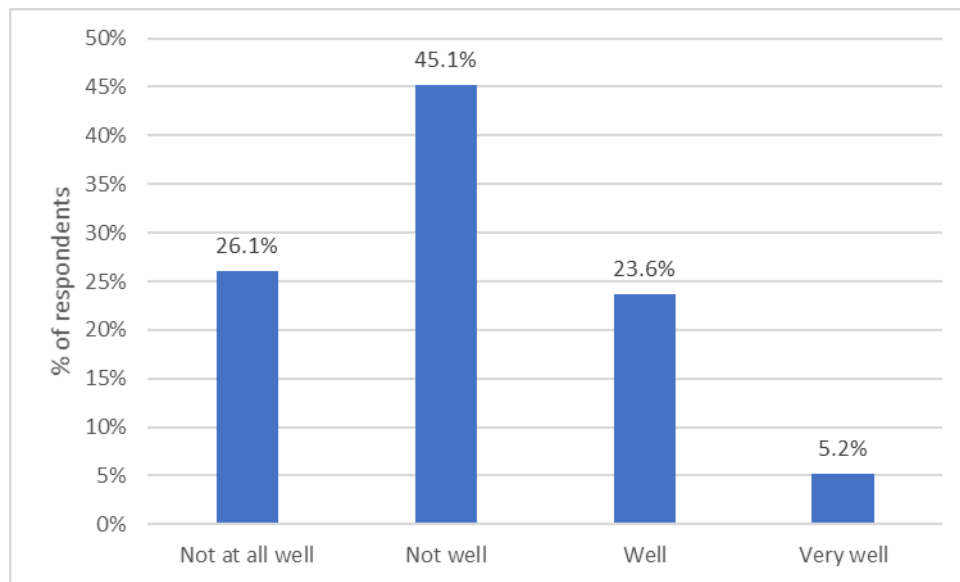
Q6, N = 682

Views Towards the Outcomes of the Consultation

Respondents were then asked for their views towards the outcomes of the consultation, specifically whether the final approach adequately accounted for the views and perspectives of different stakeholder groups, including:

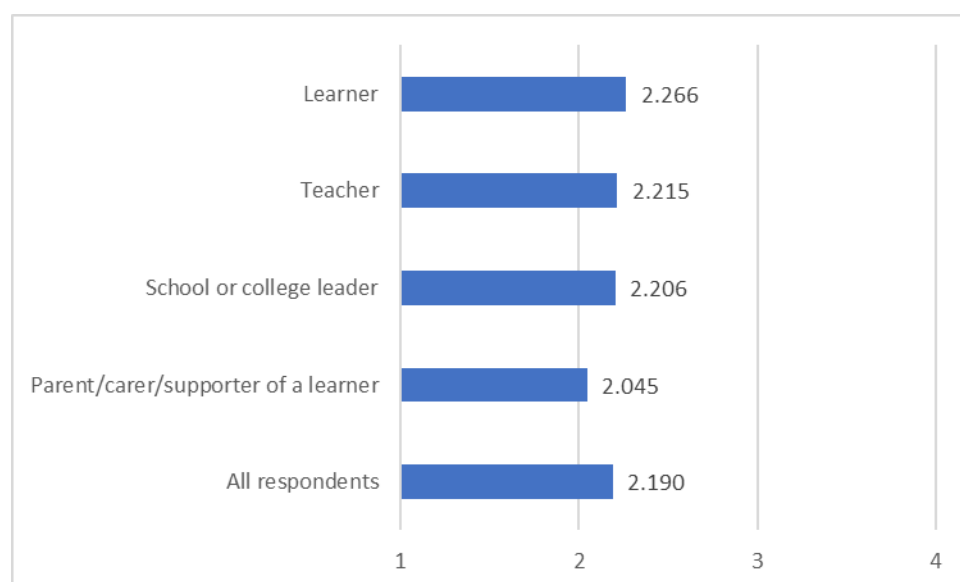
- Learners and their parents, carers or supporters.
- Educators including schools and colleges.
- Further and higher education institutions
- Employers and,
- Expert advisors

Overall, most felt that the consultation process had not sufficiently considered the voices and perspectives of these groups. Of those respondents who felt in a position to say, 71.2 percent suggested that the approach adopted after the consultation had considered the views of learners and parents not well or not well at all:



Q7, N = 3011

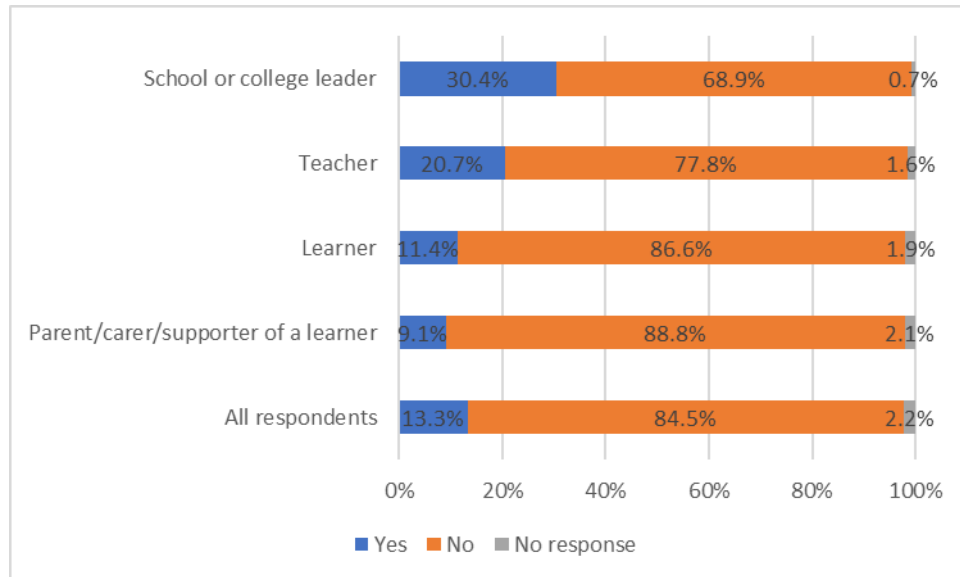
Overall, there were not significant variations in views across different respondent groups. Parents or carers, for example, were on average only marginally more sceptical than other groups that the arrangements had effectively considered the views and perspectives of the five stakeholder groups:
30



Key: 1 = Not well at all, 2 = Not well, 3 = Well, 4 = Very well
Q7 (i, ii, iii, iv, v) combined mean scores, N = 3951

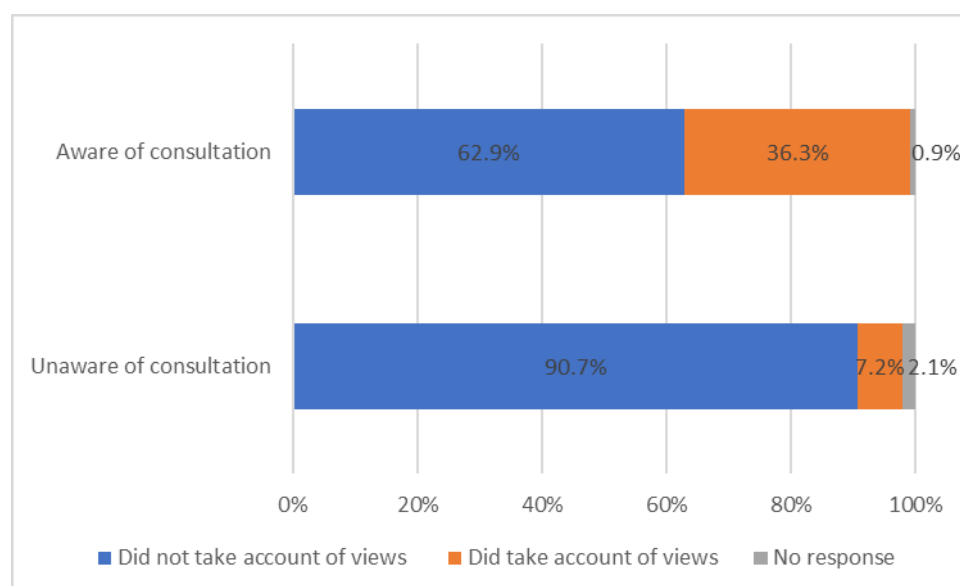
³⁰ Composite mean scores combining answers to the five stakeholder groups highlighted in the survey.

Exploring this issue further, respondents were then asked if they felt that their voice was represented in the development of the approach to 2020 qualifications. Reflecting general perceptions, 84.5 percent of respondents felt that their voice was not adequately represented. Parents and carers again felt this most acutely, with 88.8 percent of parents reporting that they felt this way. Teachers (20.7 percent) and school or college leaders (30.4 percent) were marginally more positive, suggesting that efforts to engage these groups may have been slightly more effective than for other stakeholders:



Q8, N = 3951

Further analysis suggests that, on average, across all groups of respondents those that were aware that the consultation had taken place were more likely to think that the subsequent arrangements had taken account of their views. Of those that were aware that the consultation had taken place, 36.3 percent felt the subsequent arrangements had considered their views. Of those that were unaware, only 7.2 percent felt that it had:



Cross tabs, Q4 and Q8, N = 3928

This finding suggests that there may be a positive relationship between knowledge and engagement and the subsequent attitudes and perceptions of the outcomes of the consultation.³¹ Those that were aware of the consultation were more likely to feel that the process had delivered an approach that adequately considered their views. This suggests that communication, clarification, and consultation may be important in the development of future policy, especially in building support for a specific approach.

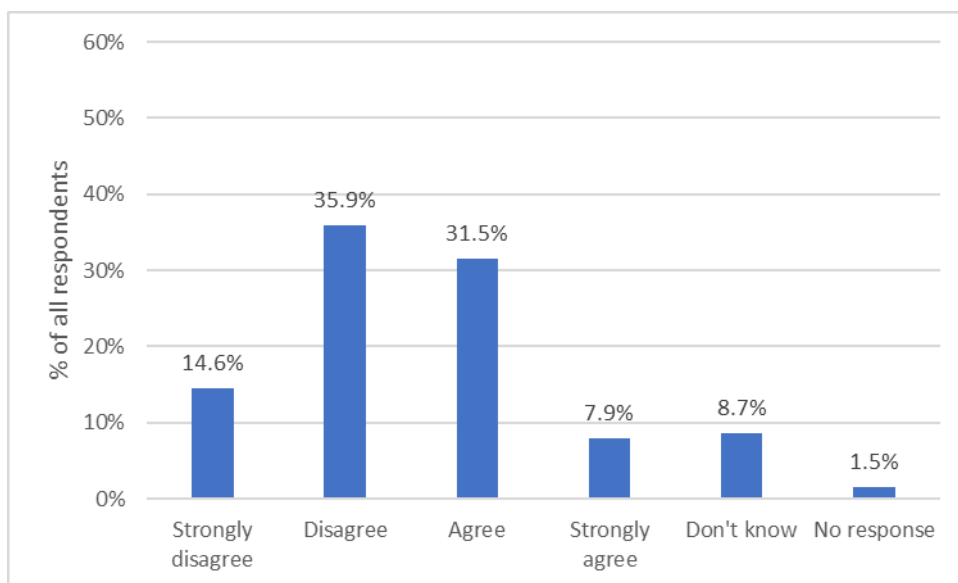
Overall, however, knowledge of the consultation across respondent groups were generally low, and the perceptions of the outcomes of the process were poor.

³¹ This relationship was found to be statistically significant, $\chi^2(1, N = 3856) = 469.97, p < .001$.

3.3 Implementation of 2020 Approach

Respondents were then asked a series of questions designed to explore their views towards the practical implementation of the 2020 awards process. This included questions concerning the communication of the approach, and the extent to which in considered the impact of the approach on learners' anxiety.

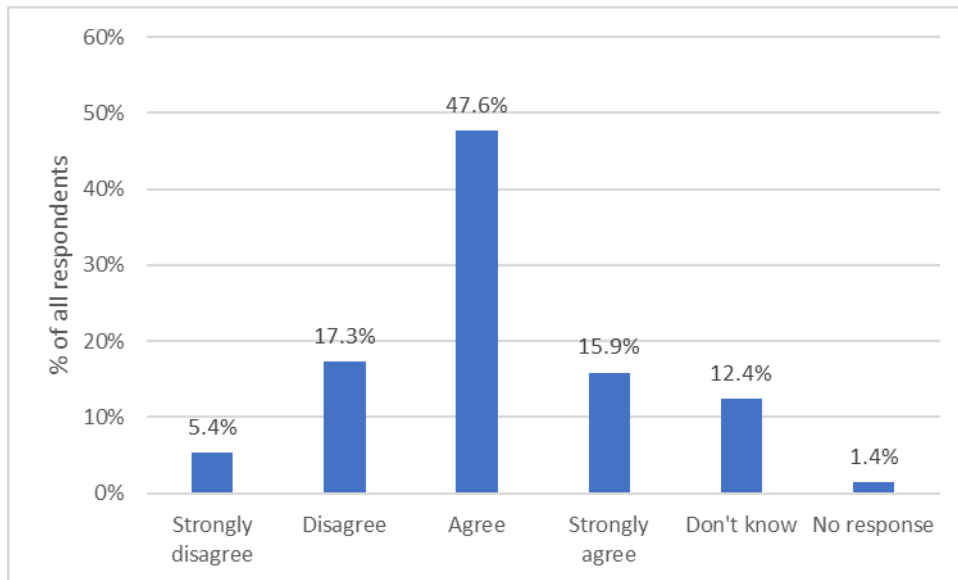
Overall, respondents felt that certain aspects of the implementation worked better than others. The general view towards how well the final approach had been communicated to respondents, for example, tended towards negative perceptions. Across all respondent groups, 50.5 percent of respondents disagreed or strongly disagreed that the process had been communicated well:



Q9 (i), N = 3951

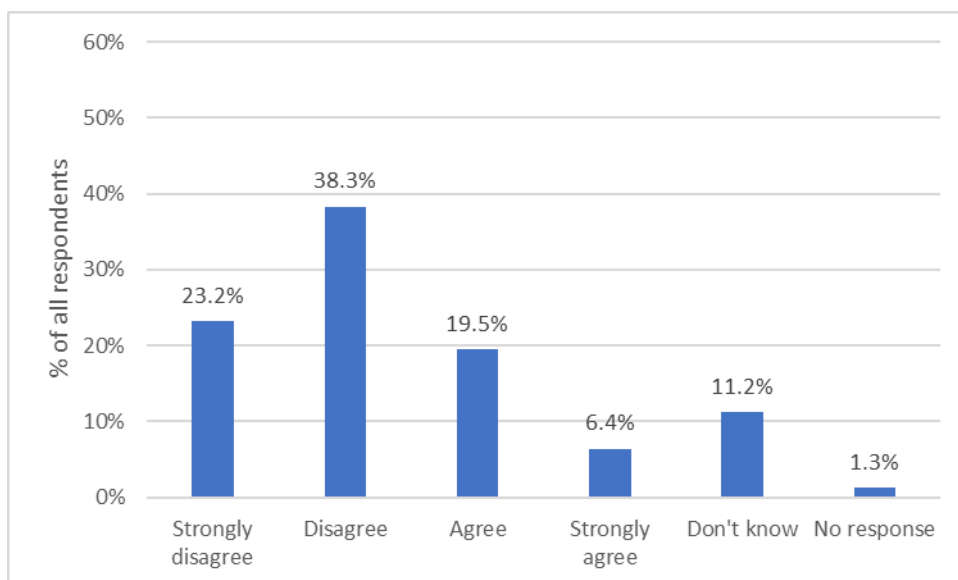
There were slight variations in views across different groups of respondents. School or college leaders, for example, were more likely to disagree or strongly disagree that the process had been communicated well to them and their schools (56.8 percent). Teachers were, on the whole, more positive, with 47 percent disagreeing or strongly disagreeing that the process had been communicated well.

Respondents were then asked whether they felt that the organisations developing arrangements for the awarding of grades in 2020 were trying to do their best in difficult circumstances. In recognition of the challenges facing these organisations, 63.5 percent of all respondents agreed or strongly agreed that they had done their best:



Q9 (ii), N = 3951

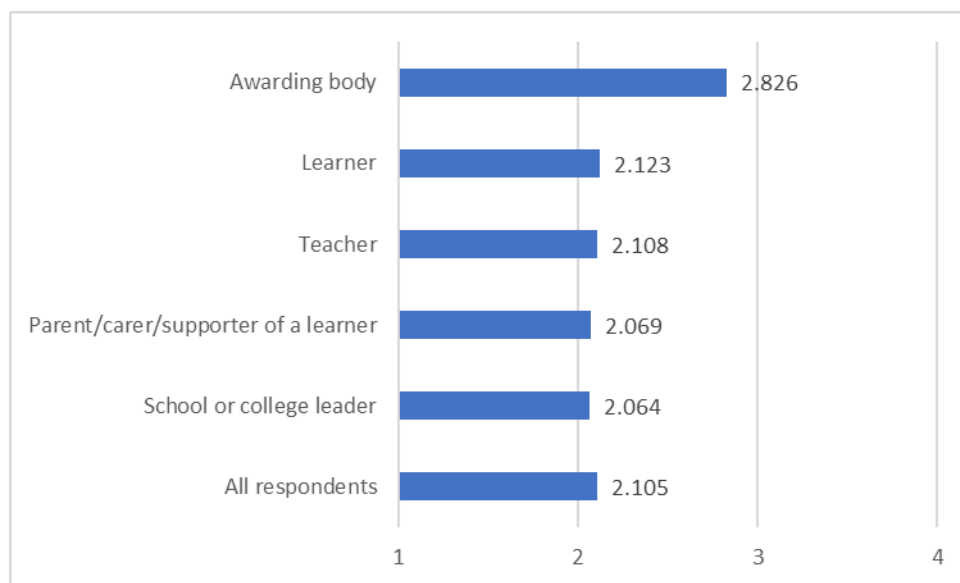
The most significant disagreement centred on whether the process was done in a way that addressed learners’ anxieties in uncertain circumstances. Overall, 61.5 percent of respondents disagreed or strongly disagreed that the process had adequately considered the wellbeing implications for learners:



Q9 (iii), N = 3951

The perception that arrangements had not taken into consideration learners’ anxiety was most strongly felt by school leaders, parents, teachers and learners themselves. Those responding from

Awarding Bodies felt however that the process had sufficiently considered the wellbeing implications for learners:³²

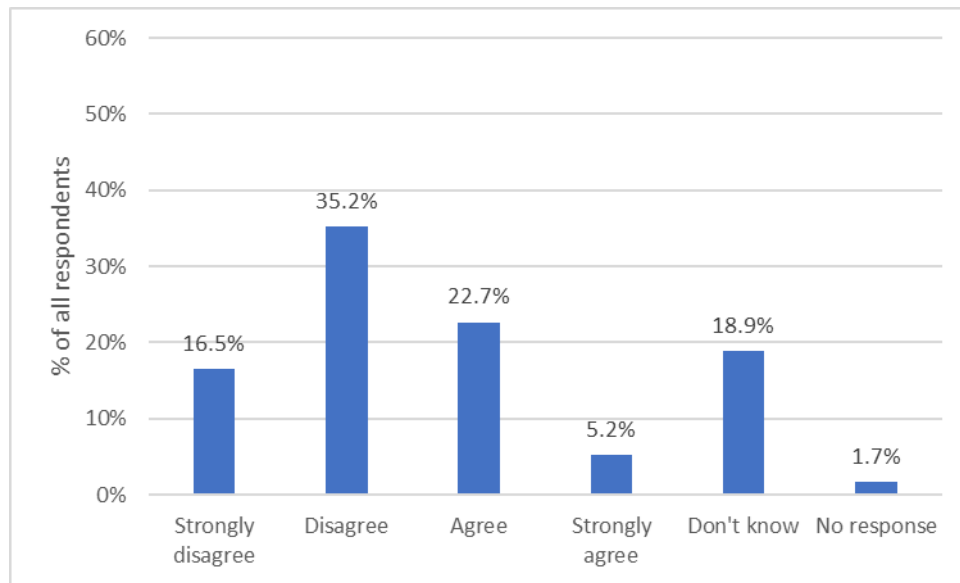


Key: 1 = Strongly disagree, 2 = Disagree, 3 = Agree, 4 = Strongly agree
Q9 (iii) mean scores, N = 3951

In terms of the extent to which respondents were aware that Centre Assessed Grades (CAGs) were part of a wider approach to final grades, the majority of respondents agreed or strongly agreed (59.8 percent). There were, however, significant variations in responses across different groups. Teachers and school or college leaders, for example, were more likely to have been aware of the role of CAGs (69.7 and 80.4 percent respectively), than parents and learners (51.5 and 59.9 percent respectively).

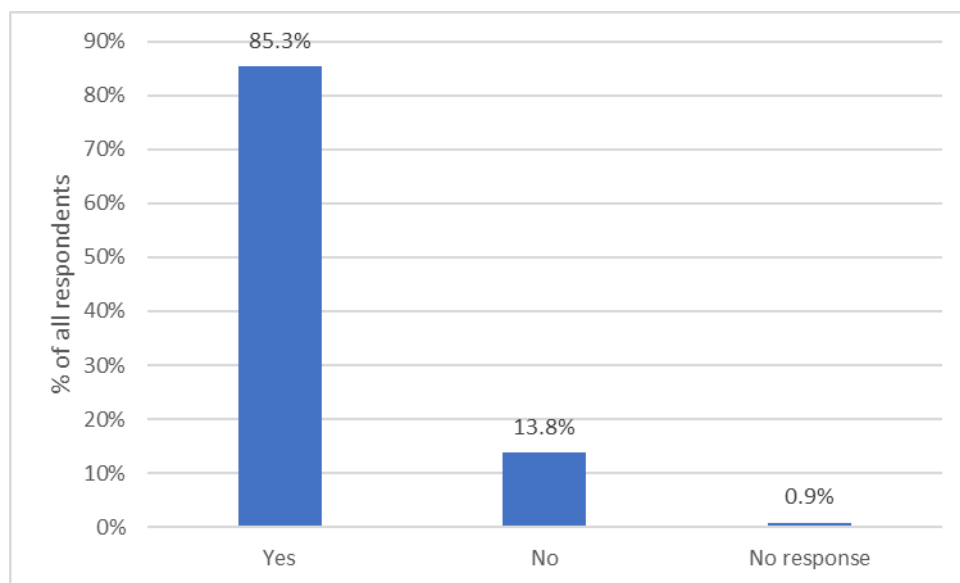
³² Mean scores to Q9: iii: The planning of how grades would be awarded in 2020 was done in a way that addressed learners' anxieties in uncertain circumstances.

Conversely, awareness of the appeals process was low. Overall, 51.6 percent disagreed or strongly disagreed that the appeals process had been communicated well:



Q9 (v), N = 3951

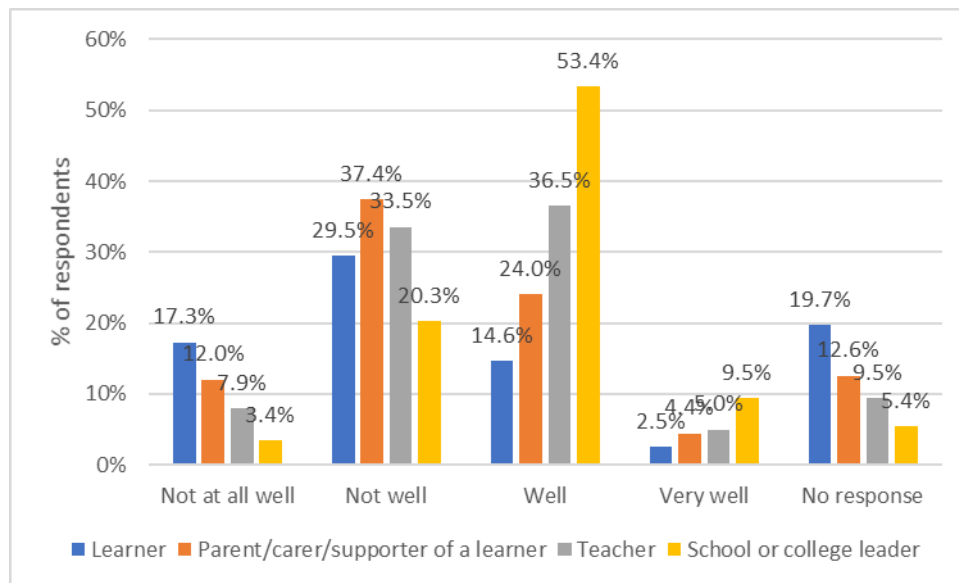
In exploring the role and importance of communication further, 85.3 percent of respondents agreed that it was important to know the remit of the various organisations with a role in developing and delivering qualifications in Wales. This was most strongly felt amongst school leaders and teachers, with 94.6 and 90.7 percent of respondents agreeing that it was important to know.



Q10, N = 3951

Whilst the majority of respondents felt it important to know, significant proportions of respondents felt that they did not know the precise roles and responsibilities of organisations feeding into the design and implementation of the approach. Overall, 45.1 respondents reported that they did not understand the roles of different bodies well, or not well at all. There was considerable variation in

responses across different groups. Significant proportions of learners and parents and carers did not understand the responsibilities of different organisations, whilst school leaders on the whole felt that they knew them well or very well:



Q11, N = 3951

For those that responded that they did not know the roles of different bodies well or not well at all, they were then asked what further clarity they would like to see.

Across responses, the most prevalent theme included the importance of understanding the precise roles and responsibilities of the bodies involved in the development of the arrangements. Some suggested that this could include information on governance structures and decision-making processes. From these perspectives, this information should be made more widely available, and communicated in clear and accessible style:

Detailed information of who is deciding what in terms everyone can understand.

Parent or Carer

Who is responsible for each decision and where we direct questions etc.

Teacher

Respondents also took the opportunity to highlight the importance of clarifying the overall approach to awarding grades. Respondents also felt it would be valuable to have further information and clarification on the approach to awarding grades itself. This could serve to create more transparency and confidence in the approach. It could also raise awareness of mechanisms such as the appeals processes. Details should again be made easily available to all stakeholder groups through a variety of channels:

Clear information being sent to the schools and colleges of exact information regarding the grade process.

Learner

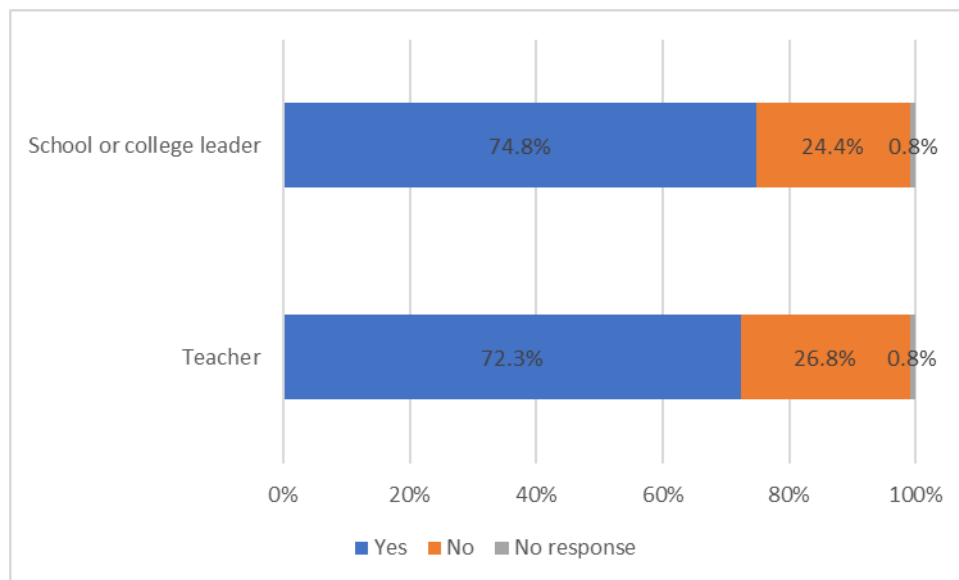
What impact teachers grades have on the final outcome. Who awards the final grade. What this is linked to, how an outcome is decided. Whether school-based course work is considered and all other evidence, not comparative studies with other students, but on individual merit.

Parent or Carer

Respondents also raised more marginal themes that were focused and practical in nature. A few respondents, for example, took the opportunity to highlight importance of an appeals process and having clear responsibilities for who was responsible for arbitration within the system. Some felt that there should be a process that allows learners to appeal directly to exam boards rather than through schools. Others felt it was important to see greater consultation and opportunities to voice concerns and feed into the development and implementation of the appeals process.

Communication with Teachers and Schools

For those working in schools and colleges, respondents were asked if they received sufficient support and guidance on Centre-Assessed Grades (CAGs) and learner rankings. On the whole, school leaders and teachers were positive that they had received sufficient support, with 74.8 and 72.3 percent of respondents reporting positively respectively:



Q14, N = 738

For those that felt that they should have received further support and guidance, respondents were asked for their views on what forms this should take.

Criteria for Rankings and CAGs

It was felt that there needed to be further clarity, guidance and information provided to teachers in order to help them to arrive at rankings and CAGs. This included what was needed as supporting evidence. Any guidance supplied for this academic year (2020/21) should be more comprehensive and provide clarity on sampling and example work needed allowing for consistency across centres.

Clear guidance as to whether the CAG should be reflective of: student's ability in March, their potential for May, a professional prediction of overall attainment, or an accurate reflection of their work to date! I am convinced that there was a range of disparity across subjects and between centres, however in comparison to the discriminatory algorithm it placed my current students at far less of a disadvantage.

Teacher

Messaging and communication

Some felt that there should be better lines of communication between awarding bodies, local authorities, the Welsh Government and centres. This was felt as necessary to ensure everyone working similarly and kept well informed of expectations and any changes to processes. Recommendations also included diversifying communication, including training.

It wasn't clear enough at the start that ranking was the most important factor. Actual grades seemed irrelevant. We spent a lot of time ensuring data fit prior results and was robust. I know there were schools where this wasn't as rigorous a process. More dialogue and accountability was needed prior to and after CAG submission.

Teacher

More Time

Others offered more practical suggestions, including more timely advice and guidance to enable adequate preparation and effective and rigorous processes to be developed. Further time should be inbuilt into the process to complete CAGs. This would enable a more thorough moderation and an investigation of any anomalies. From this perspective this could be supported by more timely decisions on how assessment will take place.

The detailed guidance from WJEC was too late; this resulted in centres having their own approaches. Also the historical data could have been provided early

School or College Leader

CAGs and Moderation

Respondents were asked a follow up question exploring how processes for gathering and moderating centre assessment inputs could be further developed.

There was broad recognition from respondents of the important role CAGs could play in assessment arrangements. From these perspectives, those within centres know learners' capabilities and are able to make informed and sensitive decisions. This included being sensitive to the level of disruption to teaching and learning for individual learners:

I believe that the pupils in the 2021 cohort should be given teacher assessed grades. They have missed 5 months of important learning. I don't think that the majority of pupils will be able to catch up with the time missed. Pupils are also very anxious the moment about covid, making it more difficult to concentrate and learn. Schools have tried there best to support learners however anxiety is high amongst pupils. Pupils don't know whether they will be in school from one week to the next.

Teacher

Evidence

In terms of the evidence that could be used to inform CAGs respondents offered a wide range of suggestions. This included using continuous assessment including Non-Exam Assessments (NEAs), homework and classwork over this academic year. These would be assessed over the year to build up a portfolio of work as evidence of a final grade:

Continuous assessment to be used throughout the year. A sample taken from each school to moderate. Perhaps some shorter 1 hour assessments to be provided by exam board that could be sat in class and used as part of the assessment process.

Teacher

If a school is more than 10% above their average for the last 3 yrs then they should be asked to provide sample evidence of grades awarded. WJEC need to improve the way the grades were input so we do not have to input each grade and each rank order separately for each child. Rank orders were pointless in the end. No algorithm to be used.

School or College Leader

Moderation

Many respondents also recognised the important role moderation should have in awarding grades. Many felt that this could be strengthened, with clearer, streamlines processes that were not too onerous on teachers and schools. From these perspectives, robust moderation process would be required to ensure consistency across all subjects and all centres in Wales. For this to happen, greater guidance and support would be required, as well as more time to complete the process:

If we require CAGs and rankings again, awarding bodies should strengthen their external moderation processes and communication with providers so that we understand the grades well before results day and robust discussion has taken place so that we don't have the same back tracking fiasco as last year.

Time and Resource Constraints

Again, respondents suggested that more time would be valuable. From these perspectives suitable time is needed to allow well considered and effective plans to be put in place. Time is required by teachers to collect evidence and adjust plans. The process should not be rushed to avoid mistakes or grades that do not accurately reflect learners' progress. From these perspectives also, decisions on the overall process should be taken soon:

If Centre Assessed Grades are going to be used, we need to know as early as possible. Pupils also need to know early as possible too so that they can apply themselves fully.

Other

Mae angen eglurder cyn gynted â phosib ar ysgolion o ran trefniadau haf 2021. Mae angen sicrhau tegwch i ysgolion sy'n asesu'n gywir a gonest.

Schools need clarity as soon as possible on the summer 2021 arrangements. There is a need to ensure fairness for schools that assess accurately and honestly.

Regional Education Consortium, English translation

Fairness

Many perspectives were driven, in part, by the importance of ensuring fairness across the process of awarding grades. It is important to consider the individual circumstances of learners as this can impact on any grades awarded or predicted, including lost learning as a result of local lockdowns or periods of self-isolation. Any processes decided on should be robust in the evidence required and clearly justified. Due consideration should be given to the use of mock exams and previous grades as they may no longer be reflective of effort. Furthermore, decisions should be clearly and quickly related to learners and schools to avoid further uncertainty.

Standardised Models

Respondents were then asked about the main issues with drawing on standardisation models and the moderation of centre assessment inputs. Respondents offered a diverse range of responses, including restating the importance of ensuring fairness within the system. Some felt that standardised models, whilst imperfect, offered a means to moderate awards to ensure parity across generations of learners. Standardised models, from these perspectives, These views were more often held by teacher, school leaders and other education professionals:

Too many centres will not award grades fairly and those that do will be even more disadvantaged than they are under the current exam system.

Teachers

Teacher bias and genuine confusion around what constitutes a 'model' student at a certain grade. teachers need to be supported in making judgments - further detail/clarity required as to central expectation from regulator/exam board

School or College Leader

Conversely, others felt that standardised models were not sensitive enough to individual circumstances. From these perspectives, standardised models could recreated inequalities inherent within the education system and penalised some individual learners, especially those high performing young people in disadvantaged communities. These perspectives were more likely to be held by parents and learners:

Downgrading of BAME students and not taking into account extenuating circumstances or completion of homework, good attendance.

Learner

That each pupil is awarded the grades they deserve regardless of the performance of the college as a whole.

Parent and Carer

Taking into account personal circumstances. As a single parent having to work 7.30 hours a day from home with no support or allowance made for parents needing to also support learners. I am a single parent working for the LA my children attend school and received little support in aiding home schooling as well as working.

Parent or Carer

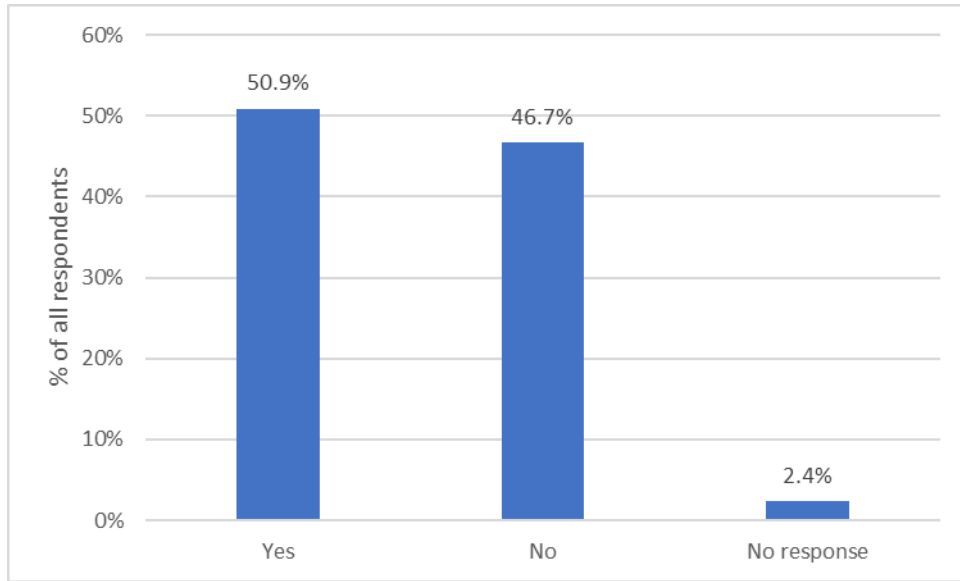
Learner Wellbeing

Respondents also took the opportunity to restate the importance of wellbeing, and the potential implications of standardised models. From these perspectives, learners need to be at the forefront of any decisions, and clarity and consistency should be provided to allay any concerns learners may hold.

Alternative Arrangements

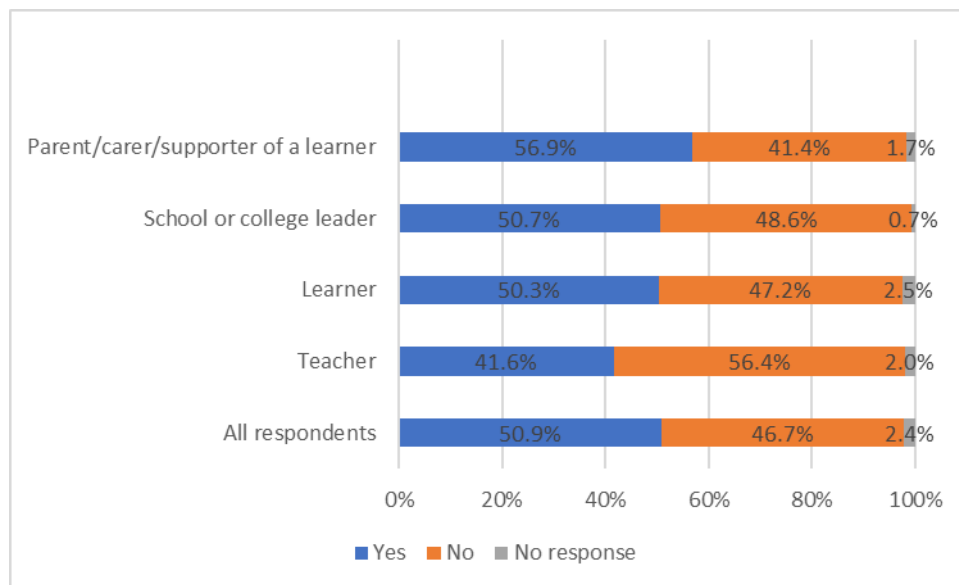
Respondents were asked about alternative approaches to centre assessed inputs and standardised models in the event that exams could not take place in 2021.³³ Overall, 50.9 percent of respondents felt that alternatives were available that would meet the principles set out by the Welsh Government. A further 46.7 percent of respondents could not think of alternatives, suggesting implicit agreement with the 2020 approach of using Centre Assessed Grades which were then standardised.

³³ Q18. If it is not possible to hold traditional exams in 2021, do you think there is an alternative to centre assessed inputs and standardisation models, that can meet the principles set by the Welsh Government?



Q18, N = 3951

There were, however, significant differences of opinion across different groups of respondents. Parents and carers, for example, were more likely to suggest alternatives, with 56.9 percent of respondents agreeing that alternatives were available and appropriate. On the other hand, a similar proportion of teachers felt that the centre assessed inputs and standardisation was the most appropriate approach, with 56.4 percent of respondents not able to offer alternatives:



Q18, N = 3951

Respondents who felt alternative arrangements were available were then asked to outline their suggestion.³⁴ Across most groups continuous assessment of learners through their work in class, homework, in class tests, and coursework represented a viable and preferential alternative to examinations. This option was widely cited by learners, parents and teachers suggesting broad support amongst respondents for this type of assessment.

Using coursework, assessed homework, results from mock exams, other assessments and centre assessed grades. Teachers know the capabilities and potential of their students. Hence, they are able to give a more informed and realistic grade which is something that data from GCSEs and postcodes cannot predict.

Learner

³⁴ Q19. If Yes, please outline your suggestion. (200 words max)

Create a simple process that includes the fair grading system we used internally as a school for submission in the summer. Provide schools with a range of internal assessments that pupils can complete over the year e.g. mock papers, class activities which can contribute to the generation of a fair grade at GCSE/AS/A2. For vocational subjects a similar process (still awaiting final vocational updates for the wjec). Please keep it uncomplicated so everyone involved is clear about what is expected.

School Leader

From these perspectives, respondents often felt that coursework and ongoing class assessments throughout the year were appropriate. It enables teachers to take into account preparation time and the substantive content learners had received. This would enable teachers to tailor assessments against the aspects of the curriculum that had been taught. Some suggested that classwork could be combined with other sources of information to help provide evidence to support a judgement, including through assessed pieces of coursework and end of unit assessments, all coming together to justify why a grade has been awarded.

Closely linked to classroom assessments was the role and potential of teachers in making judgements and awarding grades. These comments were usually based around the assertion that “teacher know the pupils best”. From these perspectives, teachers are best placed to be able to make judgements about their attainment:

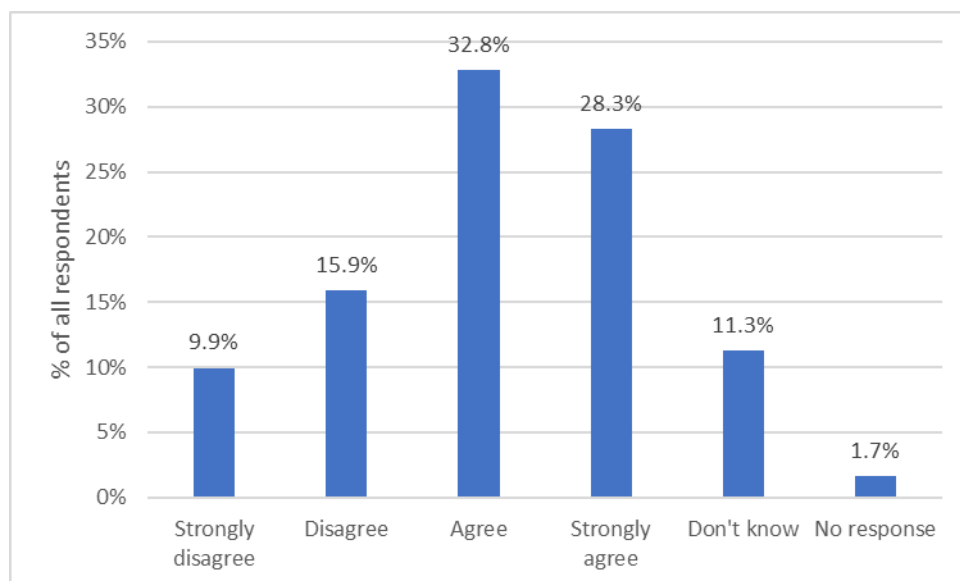
I think teachers are the most reliable people to assess the learner, they already do this with predicted grades every year. They are the ones who know the learners capabilities through tests, homework and assessments.

Parent

This viewpoint, whilst fairly widely cited, was more likely to be held by parents and carers and learners than other groups of respondents. This viewpoint was not widely held by teachers or school leaders, for example. Another widely held view was the importance of moderation processes in supporting any future arrangements. This was often referenced when highlighting the range of possible inputs into any judgment. Teacher assessments and continuous assessment, for example, were often cited within the importance of a moderation procedure.

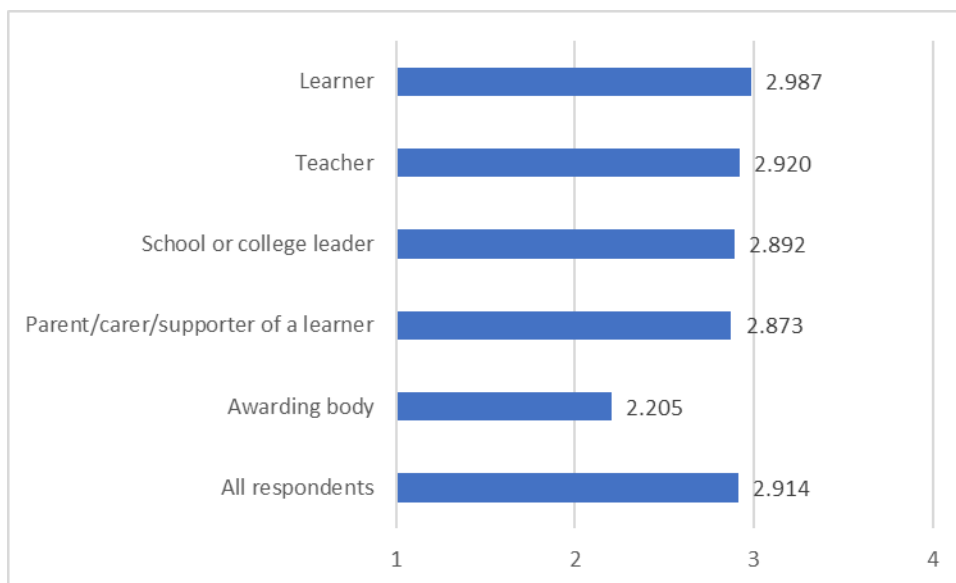
3.4 Impact of the 2020 Process

The response form finally went on to explore respondents' views towards the impact of the 2020 awards process. Respondents were asked, for example, whether they felt using the higher of either the Centre Assessed Grades or the grade generated by the standardisation algorithms was the best outcome for learners in the circumstances. There was broad agreement that that using the higher of either the Centre Assessed Grades or the standardised model was the best outcome for learners. Overall, 61.1 percent of respondents either agreed or strongly agreed that this was the case:



Q20(i), N = 3951

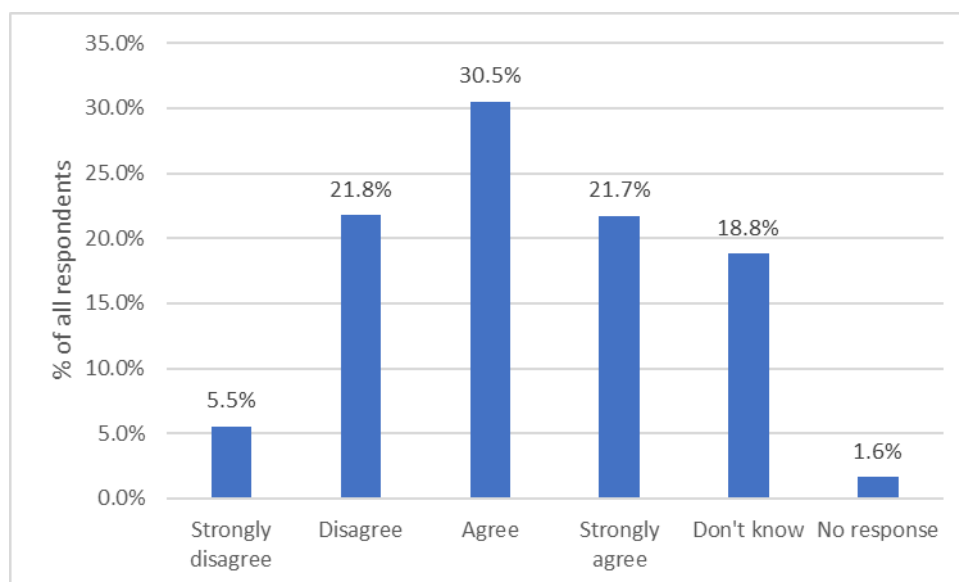
There was broad agreement from most respondent groups. Awarding Bodies, however, disagreed on this point responding on average that they disagreed that the higher of CAGs or standardised grades were the best outcome:



Key: 1 = Strongly disagree, 2 = Disagree, 3 = Agree, 4 = Strongly agree
Q20 (i), N = 3951

Asked if it was right that broadly the same approach to awarding grades was taken across the whole of the UK, overall 75.8 percent of respondents were in agreement. This included learners, parents and carers and teachers. There was also broad recognition that there was never going to be a perfect solution under the circumstances. 73.3 percent of respondents agreed or strongly agreed that there were significant challenges in responding to disruption caused by the pandemic.

A key finding around the impact of the 2020 approach, however, is that most groups felt that their confidence in qualifications in Wales had been undermined by the experience of 2020. Overall, 52.3 percent of respondents agreed or strongly agreed that the process had undermined their confidence in the system. Learners and school or college leaders especially felt that their confidence had been undermined. Other significant proportions of respondents either disagreed or strongly disagreed that it had not undermined confidence (27.3 percent), or were unsure (18.8 percent):



Q20 (iv), N = 3951

Turning to the explore further implications of assessment arrangements, respondents were then asked if there were any longer-term impacts resulting from the final award of grades in 2020. Respondents offered a hugely diverse range of potential impacts or concerns. These ranged from the impact of the 2020 arrangements for learners, teachers and schools, through to broader reflections including the importance of recognising the disruption to teaching and learning faced by many respondents.

Wellbeing Impacts

The impact of the 2020 experience on learner welfare was a key theme highlighted by many respondents. From these perspectives, the uncertainty surrounding the development and implementation of alternative arrangements served to exacerbate the anxiety and pressure some learners faced. This was sometimes expressed in stark terms:

My anxiety has increased, and I now have panic attacks most days due to uncertainty.

Learner

My daughter is already extremely anxious about what will happen in relation to exam results and the uncertainty is affecting her mental health.

Parent or carer

Some respondents highlighted the disruption to teaching and learning as a key source of stress and anxiety. From these perspectives, learners' preparation and development had been compromised by school closures and periods of self-isolation:

Lack of confidence of learners - Y12 are now preparing for exams with a lack of experience of revision, exam technique etc but have had no pressure taken off them.

Teacher

There were also concerns surrounding the compounding stressors young people face in the current climate. From these perspectives, the pandemic had impacted young people in a number of ways, including disrupting support networks as well as teaching and learning. Some referenced the broader anxieties young people could face as a result of the pandemic itself. These served to exacerbate the pressures facing some learners:

Covid has affected the mental health of our young people

Parent or Carer

Yes- mental health is all over the place I'd like to know what the government is doing about grades, if exam will continue I'd love for the content to be reduced as we are all under so much stress because of Covid as well as sitting exams that will determine our future!

Learner

In addition, some also referenced the pressure others were experiencing as a result of the situation, including parents and teachers. From these perspectives, the arrangements had caused uncertainty and concern amongst broader stakeholders:

The right decision was made in the end but the week of A level, the upset for teachers, parents and students and the extra work involved was unnecessary. When Scotland recognised the problem we should have followed. The effects from this is huge regarding wellbeing, confidence and morale. This is all impacting on all staff and students health.

Parent or Carer

Student and staff metal health has been very badly affected. Reactive thinking by leaders leads to anxiety among workers.

Teacher

Total confusion and uncertainty for applicants in the currently live cycle. Workload for admissions staff has caused illness.

Higher Education Institution

Where respondents offered suggestions on how to address issues surrounding wellbeing, these tended to focus on the importance clarity and certainty of approach. Uncertainty appeared to be a key source of anxiety from those offering these perspectives:

My children are in secondary education. Their mental health is of utmost importance. The only fair way to grant grades for the next four years is by abolishing examinations and trusting in teachers assessment grades. Be kind! These children have been through enough!

Parent or Carer

The apparent focus on wellbeing implications of the 2020 approach also reflected and underscored the importance many respondents placed on incorporating wellbeing as an additional principle informing the design of the 2021 arrangements.

Impact on Future Prospects

A further key theme raised by respondents was the subsequent potential impacts of the 2020 arrangements on the future prospects of learners. This encompassed a broad range of reflections, including the perceived reputational damage surrounding the validity and accuracy of grades. This could, from these perspectives, undermine confidence in awards by further education institutions and employers.

1. Increased number of students opting for A level subjects 2. Already seeing students drop out of their selected subjects due to finding them 'too difficult' 3. Grade inflation that cannot be sustained.

School or College Leader

Others felt that the 2020 arrangements, with a focus on CAGs and standardised grades, may have disadvantaged some learners, including those who are underperforming. From these perspectives, the long-term impacts could have a knock-on impact on confidence and prospects:

Anxious that my child will not achieve grades needed for college/ six form as she seems to have dropped in her expected grades.

Parent of Carer

My son lost all confidence in his ability when he was awarded grades 2 grades lower in 2 subjects and 1 grade lower in the 3rd subject - one of the worst weeks I've known. Now very worried about his A Level exams/grades and whether he will be accepted into university. Not helped by having to work from home due to schools self isolating etc

Parent or Carer

As a result of the arrangements, a few respondents highlighted that they were required to adjust their plans. It is possible that some learners were positively impacted by their grades being revised upwards, however those that responded tended to talk of their disappointment:

I lost my place as a 2020 entrant at Oxford University because I was downgraded by the moderating algorithm. I have been forced into taking an unplanned gap year because all places at my college were filled by the initial cohort on Results Day, and I have to wait until 2021 to start university.

Learner

Initially I missed both of my offers for university. After receiving the centre assessed grades I achieved both of my offers, but nevertheless lower than what I had earned. It turned out my drama teachers were worried an A from a department who hadn't produced one in years would have negative effects on all pupils if questioned so decided to give me an A.*

Learner

Suitability of Grades

A key theme raised by respondents was the concern around the suitability of grades awarded to learners. These tended to centre on concerns around perceived extent of grade inflation inherent within the 2020 arrangements and any subsequent, unintended consequences. There were also concerns around a perceived lack of standardization and moderation of grades. This lack of robust procedure again could have resulted in grades being awarded unfairly. From these perspectives, there was concern that learners with results that did not accurately reflect their abilities may struggle when progressing onto further learning:

Some students had grades which were perhaps higher than they should have been and as a result entered Year 1 of their degree instead of the foundation Year. HEIs will need to monitor the progression of this cohort carefully to ascertain whether this has had an adverse impact on students' learning and development.

Higher Education Institution

The process of CAG was rigorous in my faculty and although my centre encouraged such rigour I am not convinced that all pupils received fair grades (I think others did better than they otherwise would have). Therefore, I do think pupils have grades that indicate a level of competence that they don't necessarily have.

Teacher

Public perception it that the WJEC "got it wrong" when they were simply doing what had been agreed with by ministers and the regulators. The data driven system put in place was the fairest possible without any externally evidence that the CAGs were accurate. The eventual awarding of the CAGs without any statistical or hard evidence to support them was unfair on

past and future learners, but inevitable once other parts of the UK did this. It was also unfair on teachers to ask them to award a CAG without any formal training.

Awarding Body

There seems to be a very strong minority voice that are against exams and want teacher assessments. I'm very concerned that this minority voice is being listened to when the majority of people want exams to occur in some form in summer 2021. The over-inflation of grades has to stop as well to be fair to all those pupils who sat exams in previous years.

Awarding Body

The extent to which the consultation is representative of the broader views or perspectives of the education community is open to question, however from responses those wishing to see CAGs and teacher assessments prominently within future arrangements was not a minority view, including from learners, parents and teachers.

Lost Learning

Respondents also took the opportunity to highlight the impact of lockdowns and periods of self-isolation on teaching and learning. As highlighted previously, from these perspectives, learners had missed out on a significant amount of content and preparation. This could negatively impact on learners as they progress through the years, with those coming into their final year most significantly disadvantaged:

Current year 13 are going to find this summers examinations [2021] a challenge, with year 12 grades not counting towards final grades. If they underachieve on 1 of the 2 remaining assessments, then their final grade will be lower than expected. Also, unfair to expect them to sit all 4 exams to avoid this, having missed 4/5 months of teaching.

Teacher

Lost learning time for year 11. I am a Spanish teacher and it is extremely difficult to teach Spanish remotely so we are frantically trying to repair the damage done by the lockdown. The adjustments by WJEC do not go far enough and pupils are disadvantaged due to large content and difficult exams.

Teacher

Trust in Teachers

A further theme included the impact of the experience on trust and the teaching profession. Some felt that the central role placed on standardised models within arrangements served to question teachers own professional judgement:

Confidence in teachers was hit by using the algorithm. A distinct lack of trust shown in teachers integrity at providing fair grades for pupils that some have taught for many years and abandoning this for an algorithm.

Teacher

Stress for learners and for secondary staff. Deprived /high FSM areas were seen as not able to get the higher grades. Schools in these areas work harder than those in the less deprived areas to get there pupils to a high standard, as often these areas have less parental involvement to push learners and it is often left to the schools to do this. In this case teachers should be trusted on judgements given and not undermined by Welsh Government.

School or College Leader

Others found the narratives surrounding the experience, including media portrayals of the presence of grade inflation, were unhelpful and counterproductive. Some felt that this painted a misleading picture, and fed into broader narratives surrounding perpetual crisis and decline that served to undermine the teaching profession. It also served to undermine confidence in the overall system, which did not recognise the profound challenges facing learners, teachers and schools:

Being informed of current situation through the media rather than being informed by the education board/Government as well as the fact that the media stating a blanket comment that 'teachers were too generous' when this was not the case on a school to school basis...

Teacher

Our results were no different to previous years... As we work with BTEC students we know what level the students are so were able to award accurate grades. But questioning teachers professionalism in the media is not constructive. Examined results did have a 10% increase but if you have a student on a grade boundary under the circumstances you have to give the student the benefit that they will succeed. Ultimately these students will often go on to succeed in their future careers with the confidence gained despite the huge impact of COVID.

Teacher

Appendix 5: The Differences of Wales' Approach with those of Scotland and England (text provided by WJEC):

The points provided below highlight the differences in approach to awarding the summer 2020 qualifications. The differences are in relation to the processes involved, and do not reference differences in qualification structures, such as a greater emphasis on internally assessed units in the Scotland model, and the decoupling of AS and A level in the England model.

Scotland compared to England and Wales:

The key differences between the approach are summarised as:

1. Teacher estimates are collected each year by SQA
2. Teacher estimates were collected this year at a more granular level
3. Consideration was given to the estimates compared to the usual relationship between estimates and outcomes in a standard series
4. The data considered when awarding did not include prior attainment of the cohort (e.g. use of achievement in Nationals when making decisions on outcomes in Highers)
5. To adjust outcomes to reach an acceptable national grade distribution, a mathematical optimisation technique was used in Scotland to adjust the granular grade estimates at centre level. No adjustment was made for small centres in the Scotland model.

Wales compared to England:

The key differences in approach are summarised as:

1. Taking candidates' actual achievement in completed units in the qualification from a previous series, at centre level, to determine the final qualification grades to allocate to the centre (e.g. using candidates' actual AS outcomes in a specific qualification to determine the A level qualification grades to allocate to the centre)
2. Using data from 'common centres' (centres with entry patterns across series) in the awarding process
3. Using candidates' data from the national tests in the awarding process
4. The 'small centre' adjustment, that placed greater weight on centre assessment grades in the DCP model in Wales, and the approach taken in England for all general qualifications, was not necessary in Wales for A-levels because of the use of candidates' AS outcomes
5. In England, outcomes were fixed in the standardisation process so that they were brought as close as possible to a statistical prediction. In Wales, model outcomes were adjusted so that outcomes did not fall lower than either those predicted in 2020 on the basis of prior attainment data (common centres at GCSE) or 2019 outcomes. Outcomes were then reviewed by an awarding committee (decision-making group) who could recommend further changes if it was felt outcomes were not fair. In these meetings data on groups of candidates (gender, age, region, and so on) was reviewed to ensure that the model was producing outcomes that were as fair as possible.