

The Rt Hon Mr Gavin Williamson CBE MP
Secretary of State for Education
Department for Education
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Dear Secretary of State

Grading of GCSE and A level

It was good to meet virtually at the recent DfE Advisory Group. I'm sorry now to write to you with a concern. I have been discussing the issue of GCSE and A level grading with Ofqual for two months now and I'm not sure where else to turn to try to avoid a severe injustice.

As I understand Ofqual's proposals now:

- For all large subject entry cohorts, they will discard the centre assessment grades (CAGs) in their entirety and rely solely on their statistical model, combined with the centre's rank order;
- For the smallest subject entry cohorts, they will use the CAGs unamended on the grounds that their statistical model is not valid for small cohorts.

The problem with this rationale is that their statistical model will not be statistically valid for large cohorts either. It is easy to build a model which calculates an 'expected' grade distribution for a school – but there is too much variability in outcomes for this to be an accurate model in all but a minority of cases. i.e. Ofqual will not be able to claim anything approaching 'this is accurate for 95% of centres to within +/-2%'. (Even if they were able to claim this, it would be an unjustifiable model for 5% of centres and in other centres would only provide a rationale for moderating to the confidence interval – i.e. to the standardised number +2%, not to the standardised number.)

In consequence:

- It is easy to calculate the level of error nationally that their model will produce. I have shared with them the calculation that it will mean that at least 15,000 young people who should have achieved a grade 4 in maths will not do so. As a result these young people will have to retake in year 12. I have not seen the details of Ofqual's model, but they have not disagreed with this analysis at any stage in the last two months.

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Irrelevant & Sensitive

- There will be two different grade distributions in the country – those young people who were in large cohorts on the one hand, and those who were in small ones on the other. If you happen to have been in a small cohort (e.g. you are one of only three students in your school doing A level French) you will be at an advantage over students in a school or college with a large cohort.

I have huge sympathy with the impossible challenge that Ofqual face in trying to run an exam system without exams this year – it is a problem of nobody's making. It is genuinely impossible to produce a completely fair system which grades everyone accurately in these circumstances.

However, I do believe that they are making two fundamental errors which reduce the fairness of their system compared to the optimal one they could design. First, their modelling does not recognise that in this year, the harms caused by undergrading a candidate are much more serious than the harms caused by overgrading a candidate. (i.e. if you get a 5 in GCSE maths when you should have got a 4, nothing bad happens; if you get a 3 when you should have had a 4, then you may miss a sixth form place and have to retake when you should have been concentrating on your year 12 studies.) They should be building some leniency into the system (and not just for candidates in small cohorts) – balancing for this year only the need to maintain standards over time with the need to avoid prejudice to individual students who have had no opportunity to show what they can do.

Second, in disregarding the CAGs for most centres, they are discarding valuable information. There is absolutely no doubt that CAGs will be over-stated – using them unchanged would create significant inflation. So they cannot simply be used as they are. But that does not mean that they contain no usable information. It is possible to extract this information without building in the same level of inflation.

On 4 May, I shared with Ofqual officials a practical example of a model which measurably improves the fairness (and also the likely acceptability to schools) of the system. (Your officials have this too.) I had been under the impression that this was under serious consideration, but I now understand that Ofqual are adopting the system they consulted on without substantial modification. As far as I know, the model I have proposed has never been considered by the Board.

I should stress that my concern is only with fairness to students. With no accountability measures for schools this year, I don't think I can be accused of 'producer interest'. However, I think that the politics of this situation do align with the interests of justice. The current furore over IB grading is absolutely nothing as compared to what will happen in August with the current GCSE and A level grading proposals.

Having been the Director in the Department responsible for the establishment of Ofqual, I am well aware of their independence. The one thing that could change the current direction

of travel now is a transparent public direction from you to the Chief Regulator to take additional steps to avoid unfair prejudice to individual students. I know that this would be a major and unprecedented step, but in the current circumstances, I do believe it would be warranted.

The discussions I have had with Ofqual have been with the full support of the Confederation of School Trusts, on behalf of all their members, and follow explicit discussion with and support from all of the larger trusts. I have no doubt that any action you take now would receive extremely wide support in education.

Finally, I should say that I mean no criticism or lack of respect to the Chief Regulator or her staff in coming to you. She and her team have given me a good deal of time and much courtesy and have discussed matters thoughtfully and with care. On reflection, though, I continue to believe that they are mistaken and write to you because, as that is my view and fairness to children and young people comes first, I feel that I should do all I can to promote it.

I am copying this letter to Nick Gibb.

Yours

Personal Data

Jon Coles