

Mr Richard Garrett
Director of Policy for General Qualifications
Ofqual
Earlsdon Park
Coventry CV31 3BH

28th April 2020

Dear Richard

Thank you for involving the Confederation of School Trusts and me in discussions about the awarding process this year.

I am writing to send you the attached paper, which is supported by the CST and a large number of the largest school trusts (listed below). While there are several things in the consultation paper we support, we are very concerned about the apparent move in this paper to de-emphasise teacher assessment grades and to place much greater weight on a statistical model based on historic data.

The paper describes an approach which ‘places more weight on centre assessment grades’ as one which ‘assumes that these [i.e. centre assessment grades] are correct unless there is evidence to the contrary’. This is quite a weak version of placing weight on centre assessment grades, but the consultation document proposes in terms to reject it. In other words, the document proposes that the process should not assume that centre assessment grades are correct, *even if there is no evidence to the contrary*. We can see no justification for this stance.

More generally, we know of no evidence that supports the idea that a statistical model based on historic data can eliminate differences in the standard applied between centres and none is presented in the paper. We are very concerned that the current approach appears to prioritise the maintenance of a national statistical profile over the need to avoid unfairly disadvantaging individual young people. The harm which would be caused to an individual who receives lower grades than they deserve exceeds the harm caused by an individual receiving higher grades than they deserve. The approach taken appears to be aiming to have equal numbers of ‘winners’ and ‘losers’ – but this is not the way to maximise equity in the system and in no way mitigates the harm to individual young people who lose out.

Worldwide House
Thorpe Wood
Peterborough
PE3 6SB

Irrelevant & Sensitive

The attached paper makes some proposals for improving on the propositions in the consultation document. I am very willing to talk to you, other colleagues and/or the Advisory Group, some members of which I know from my time as Director responsible for qualifications in the DfES (as was), with a view to supporting the development of the best possible system in the interests of young people.

I am writing in similar terms to the Chief Regulator and copying my letter to the DfE.

Yours sincerely

Personal Data

Sir Jon Coles
Chief Executive

With the support and on behalf of:

Leora Cruddas, Confederation of School Trusts

Lucy Heller, Ark Schools

Martyn Oliver, OGAT

Nick Hudson, Ormiston

Paul Tarn, Delta

Rowena Hackwood, DRET

Julian Drinkall, AET

Hamid Patel, Star

Wayne Norrie, Greenwood

Sir Steve Lancashire, Reach2

John Murphy, Oasis

Jane Millward, EACT

Paul Smith, Future

Hugh Greenway, Elliott Foundation

Sir Nick Weller, Dixons

Dean Ashton, Reach South

Diana Owen CBE, L.E.A.D.

Karen Roberts, TKAT

Tim Coulson, Unity

Steven Chamberlain, Active Learning Trust

Adrian Ball, DEMAT

Steve Taylor, Cabot