
Ymateb i Ymgynghoriad / Consultation Response

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Background information about Estyn

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

About you

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Consultation Questions

Aims to underpin the statistical standardisation model for the issuing of grades for the summer 2020 exam series

In section 2 of the consultation document, we outline a set of aims that we propose will underpin the statistical standardisation model for issuing grades for the specified qualifications in the summer 2020 exam series. For each aim, please indicate the extent to which you agree with it and clearly explain the reasons for your answer. If you disagree or strongly disagree with any of the aims, please outline what you think could be a suitable alternative.

4. Learners for whom a qualification-level centre assessment grade and rank order are submitted will receive a grade.

a. To what extent do you agree with this aim?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- 2.1 - When ensuring that national outcomes for summer 2020 will be broadly similar to those in previous years to reduce the risk of unfairness for learners over time, we should take into consideration that schools do have 'weaker' and 'stronger' cohorts. It would be helpful for centres to indicate why grade profiles may differ this year to previous years, i.e. to account for the weaker/stronger cohort. This may also provide some reassurance to centres who are concerned that they may not be credited for having a stronger cohort this year.
- 2.2 - It will be important for centres to make sure that their entries are complete and accurate.

5. The outcomes for summer 2020 will be broadly similar to those in previous years.

a. To what extent do you agree with this aim?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- 2.12 - The statistical standardisation model used by WJEC will need to combine a range of evidence, including expected grade distributions at national level as well as results in previous years at individual centre level, and the prior attainment profile of learners. Standardisation is important to ensure that outcomes are fair for individuals and cohorts of learners.
- 2.15 - Clarity is needed regarding what is meant by 'previous national performance'. If this point refers to prior national attainment of pupils before

key stage 4, such as teacher assessments at key stage 2 and key stage 3 or national test data, this should be made clear with a strong rationale.

6. A statistical standardisation model which uses historical evidence of centre performance and the prior attainment of learners, along with the centre assessment data, is likely to be the fairest approach and produce more accurate calculated grades.

a. To what extent do you agree with this aim?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- 2.16/7 - The use of historic profile over the last three years is important. There needs to be some room for adjustment where hard data is available (national tests etc. – mostly core subjects therefore) for schools to show that this year's cohort is better than the previous three years' cohorts' (if predictions are higher).
- 2.17 - What is the situation regarding a very small number of schools that have been recently opened/federated etc that are unable to provide historical centre information? Will the value-added analysis still be possible at a pupil level?
- We agree strongly with the principles underlying the standardisation process. Inspection evidence suggests that good schools usually know their pupils well and can accurately predict their pupils' outcomes and are therefore likely to provide WJEC with accurate estimated grades. On the other hand, weaker schools may provide more inflated predictions of pupils' outcomes.
- 2.19 – Should centres be found to be submitting more generous grades than expected, investigations should take place with a need for centres to explain the reasons for their grade profile. A window of opportunity could be given for schools to provide extra hard data (as noted above) to justify their judgements although this could lead to inconsistency of approach or pressures on teachers to gather and present additional information.
- 2.20 – The research suggesting that teachers can accurately rank order candidates was undertaken under different circumstances to those currently faced by teachers. The rank ordering that will take place now will be done virtually and will involve many members of staff, some of whom may not be able to be present. There may be variations in the evidence for teachers to use for moderation purposes and to assist with accurate rank ordering. Therefore some caution should be exercised when considering rank ordering, particularly in large centres.

7. As far as possible, we should ensure that the process for awarding grades in summer 2020 will not disadvantage groups of learners, including those with protected characteristics, relative to previous years.

a. To what extent do you agree with this aim?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- 2.28 - Caution needs to be taken with some groups of learners – particularly pupils eligible for free school meals. As the numbers within this cohort vary annually, trends and patterns are not as clear, especially in schools where the number of pupils eligible for free school meals is very low, eg lower than 10% of the cohort.
- 2.2.8 - How will Qualification Wales assure that pupils entitled to access arrangements have actually received these for internal school tests, mock examinations and examinations [including NEA], as per guidance. Despite Qualifications Wales' position around being unable to challenge schools on grades, this is potentially open to challenge.
- 2.34 - Consideration should be given to probable improvements some candidates would make from AS to A level and this would therefore affect their rank order from previous tests. This is where a centre's knowledge of pupils is crucial.

8. Processes for issuing grades in summer 2020 will use results from any qualifications and units already completed and awarded. As such, the evidence used may differ across qualification types.

a. To what extent do you agree with this aim?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- 2.36 - Consideration should also be given to probable improvements some candidates would make from AS to A level and this would therefore affect their rank order from previous tests/examinations. This is where a centre's knowledge of pupils is crucial.
- 2.36 – If GCSE candidates have been entered early for some units, a few of these pupils would have been allowed to re-sit the paper to improve their results in the summer, and improvements are likely to be seen in these circumstances.

A specific appeals process for the summer 2020 exam series

In section 2 of the consultation document, we outline the features of the specific appeals process that we propose introducing for the specified qualifications for the summer 2020 exam series. For each question below, please indicate the extent to which you agree with the proposal and clearly explain the reasons for your answer. If

you disagree or strongly disagree with any of the proposals, please outline what you think could be a suitable alternative.

9. Learners who are dissatisfied with their results this summer will not be able to appeal against the professional judgement made by their centre, or the procedure used by their centre to arrive at this judgement.

a. To what extent do you agree with this proposal?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- 2.50/51 - Communication of this message to parents is vital - they need to be aware of the situation to avoid Heads of Centre being put under pressure.
- 2.61 – Operational errors when submitting data may be an issue especially with large cohorts.

10. Centres will be able to appeal to WJEC on the grounds that they used the wrong data when calculating a grade, the calculated grades generated by the statistical standardisation model were incorrectly allocated or communicated and/or there was some other procedural failing on the part of WJEC.

a. To what extent do you agree with this proposal?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- The arrangements for centres to appeal to WJEC appear fair and appropriate.

11. For results issued this summer, we should require WJEC to only consider appeals submitted by centres, and not those submitted by individual learners.

a. To what extent do you agree with this proposal?

Strongly agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- 2.69 - If a pupil's grade changes (or a number of pupils' grades change), centres need to make sure that this has not led to the adjustment of other pupils' grades in line with the rank order.

12. If an appeals process identifies an error that would result in a lower grade for learners other than those cited in the appeal, then WJEC should not lower these grades.

a. To what extent do you agree with this proposal?

Strongly agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- 2.73 – We advise that a change in one learner's grade does not lead to the adjustment of other pupils' grades in line with the rank order and communicate this.

13. WJEC should be required to take all reasonable steps to ensure that all appeal decisions are taken by people who were not involved in the process leading to the issue of those results.

a. To what extent do you agree with this proposal?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

- We support the approach of keeping a distance between those involved in appeals and those involved in the process leading to the issue of the results.

14. WJEC should be permitted to run a simplified appeals process whereby the decision-maker considers a report by the member of staff conducting the administrative review and any representations made by the centre in light of that report.

a. To what extent do you agree with this proposal?

Agree

b. Please clearly explain the reasons for your answer in the space below. *(If*

you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)

- We support this approach - it will be essential to manage the communication of this message carefully to make sure that it is understood to be fair and robust.

15. The only functions of the Exam Procedures Review Service (EPRS) this summer will be to review:

1. the extent to which WJEC was compliant with our requirements and with their own policies and procedures, or

2. if any error was identified in the data used to generate the calculated grade(s) and/or in the grade(s) issued, whether that error was properly corrected.

a. To what extent do you agree with this proposal?

Strongly agree

b. Please clearly explain the reasons for your answer in the space below. (If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)

- The EPRS functions suggested should provide stakeholder and general public assurance that the arrangements for Summer 2020 examinations have been implemented fairly and consistently.

Integrated Impact Assessment

Regulatory Impact Assessment

In section 3 of the consultation document, we have set out the regulatory impacts we anticipate from the proposals in this consultation. *When responding to the following questions, please make it clear which proposal(s) and/or impacts you are referring to.*

16. In relation to the regulatory impacts that we have identified in this section, are there any additional steps that we could take to reduce them? If so, please outline these steps in the space below.

Communication with, and support from, stakeholders, including parents will be an important consideration during this period. The impact on parents has not been considered in this section.

- 3.15 – While centres will be delivering the activity in place of the usual range of examinations activity, the personnel involved will be different. It will directly impact on teaching staff more than the usual processes.

17a. Are there any **other** positive or negative regulatory impacts (intended or unintended) that we have not already identified? *(If you have identified both positive and negative impacts, please select both options in the list below)*

ii. Yes, there are other negative impacts

17b. Please explain your answer in the space below, clearly outlining what other impacts you have identified and any steps we could take to reduce this impact.

- The impact on parents has not been considered. Much of the impact is the same as that for learners. Parents may have to deal with the emotional and practical consequences of their child being disappointed with their results in the absence of any appeals process for individuals.
- Clear communication with parents and guidance or FAQs could help parents and manage any concerns they may have. The language used should take into account the fact that some parents are not as familiar as their children are with the language of education and examinations, and may not speak English.

Equalities Impact Assessment

In section 3 of the consultation document, we have considered the potential impacts of the proposals in this consultation on individuals or groups who share protected characteristics under the Equality Act 2010. *When responding to the following questions, please make it clear which proposal(s) and/or impacts you are referring to.*

18. In relation to the impacts that we have identified in this section, are there any additional steps that we could take to reduce them? If so, please outline these steps in the space below.

- The proposals must ensure that pupils of all abilities are considered and that all groups of learners are given equal and fair opportunities when placed in rank orders.

19a. Are there any **other** positive or negative impacts (intended or unintended) for individuals or groups who share protected characteristics that we have not identified? *(If you have identified both positive and negative impacts, please select both options in the list below).*

iii. No, there are no other impacts

19b. Please explain your answer in the space below, clearly outlining what other impacts you have identified and any steps we could take to reduce this impact.

- We have no further comments to add.

Welsh Language Impact Assessment

In section 3 of the consultation document, we have also considered the potential impacts of the proposals in this consultation on the Welsh language.

When responding to the following questions, please make it clear which proposal(s) and/or impacts you are referring to.

20a. Are there any positive or negative impacts (intended or unintended) on **opportunities for people to use the Welsh language** that we have not identified? *(If you have identified both positive and negative impacts, please select both options in the list below)*

iii. No, there are no other impacts

20b. Please explain your answer in the space below, clearly outlining what other impacts you have identified and any steps we could take to reduce this impact.

- It will be important that all learners/centres can access bilingual documentation and guidance on both the standardisation and appeals processes.

21a. Are there any positive or negative impacts (intended or unintended) in relation **to treating the Welsh language no less favourably than the English language** that we have not identified? *(If you have identified both positive and negative impacts, please select both options in the list below)*

iii. No, there are no other impacts

21b. Please explain your answer in the space below, clearly outlining what other impacts you have identified and any steps we could take to reduce this impact.