



7 April 2020

Sally Collier  
Chief Regulator  
Ofqual  
Sanctuary Buildings  
Great Smith Street  
Westminster  
London SW1P 3BT

Dear Sally

I am writing to you in response to the announcement on Friday of the arrangements for awarding grades for GCSE and A Levels this summer 2020. I write with the greatest respect for the near impossible job you and your team have had of finding a sensible and pragmatic way forward for students at this time.

In many ways I and my team believe that the suggestions laid out offer the best alternative for many, albeit with known issues that will need to be carefully guarded against for the disadvantaged and those in improving schools. These potential issues have been noted and it appears there are intended measures to safeguard these students and schools, which is positive.

However, I write on behalf of my community in hoping to urge Ofqual to urgently reconsider one aspect of the proposals which will have far reaching consequences. This is in relation to the point on Page 4 of the *Information for Heads of Centre, Heads of Department and teachers on the submission of Centre assessment grades: Summer 2020 grades for GCSE, AS and A level, Extended Project Qualification and Advanced Extension Award in maths* which states:

“We propose that exam boards should **not issue grades to Year 10 students** (or lower year groups) as their progression will not be hindered if they do not receive a grade in summer 2020”.

I must argue that this is absolutely not the case, as Year 10 students will be significantly hindered by the proposal in ways I do not think have been intended. I will seek to



outline these briefly and ask that this is considered as part of the consultation which is alluded to in the same paragraph.

When the notice to close schools was issued from the 20<sup>th</sup> March, it was done on the understanding that all summer exams were cancelled. This announcement and all other announcements from the Department for Education have been in terms of *all summer exams*, there has been no notice of any exceptions to this. Exam entries for summer 2020 closed in mid-February, before school closures were being seriously considered. Therefore, Year 10 students who have been entered for GCSEs this summer will have been managed by schools in exactly the same way as those in Year 11 and Year 13. It is important to note that these Year 10 GCSE results are included every year when allocating grades nationally, they form part of the national picture of outcomes; creating a national grade distribution this year without them will surely skew the national picture compared to previous years. This compromises the intention to maintain comparable outcomes for this year's results. It would also represent a significant change for students and schools, with both immediate and lasting impact.

There are a vast number of Year 10 students who, as part of a planned principled curriculum, have been following a curriculum pathway for the last four years that is designed for them to sit one or two GCSEs at the end of Year 10. This model maintains a breadth of curriculum throughout KS3 and 4, while at the same time supporting students' mental well-being by much reducing pressure on their exams in Year 11, enhanced by the confidence of having already gained some academic success. Year 10 students entered for the 2020 summer series will have had the same learning hours, and the same examination planning and preparation, as Year 11 students; to treat them differently at this stage is to isolate those students in a way that will be disproportionately damaging to their long term education and mental health.

While their GCSE position remains unclear, we have directed our Year 10 students to continue studying towards the exams they were going to take this summer. In many schools this will not be the case as they would have operated under the impression that they would be managed in the same way as "all summer exams". In either case, if these Year 10 students are not to be assessed and graded this summer, they will be significantly disadvantaged in any attempt to keep their study maintained remotely until September. This immediately places them in a worse position than both the current Year 11 cohort and all other Year 10 students who will continue all their courses under a different curriculum model in a pre-planned timescale to completion in summer 2021.

It is even unclear when Year 10 might sit any future examinations in lieu of the summer series they were expecting. If students are now forced to sit exams in either an autumn series or summer 2021 series, this will greatly disadvantage them as they will have had no formal teaching in those subjects since March 2020. In order to mitigate this, schools will have to narrow the curriculum significantly in 2020-21, carving time out of the curriculum at the expense of other subjects in order to facilitate the revisiting necessary to prepare them for examination. This would represent a further unintended disadvantage, causing their education in all other subjects to be compromised in ways that could not be assured to be equitable across schools, or when compared to other students in the same cohort.

The current Year 10 are potentially the most disadvantaged cohort in the current circumstances, missing maybe months of their planned curriculum and instruction in all subjects with significant gaps emerging, which will need time to address. I can

understand a concern that awarding grades now would create complexities within the 2021 outcomes if they are to be blended with a return to an examination series in summer 2021. Given both of these factors and the innate inequality of not doing so, our proposal would be also to not publish 2021 performance data and tables. Inequality is in danger of widening due to school closures, and certainly in 2021, will disproportionately affect schools with more disadvantaged students.

Therefore, we would urge that Year 10 students already entered for the summer 2020 series are treated in the same way as Year 11, with the same process of teacher assessment and with the same right to appeal or to sit again in the future, and for this to be confirmed as soon as possible. Ofqual's usual adjudication for national distribution will then mean parity of grade regardless of whether awarded in 2020 or 2021.

Additionally, we would urge, although I accept this may not be in Ofqual's gift, that therefore the performance tables of 2021 should not be published until the education system has had a chance to recalibrate in the light of a still unknown future return to schools, irrespective of any further closures that may be needed in the autumn or winter.

We believe there are compelling reasons at a student, school and national level why Year 10 grades should be managed in the same way as proposed for Year 11. I do not believe Ofqual or the Department for Education would intend for the consequences apparent to transpire, even in a best-worst-case approach to the current circumstances.

Therefore, I urgently ask you to re-consider the proposed approaches to ensure the best possible equity for all students entered, as promised, for "all summer exams" in 2020.

Yours sincerely



**CAROLINE BARLOW**  
Headteacher

cc: Huw Merriman (MP Bexhill & Battle)  
Geoff Barton (ASCL)