

To: Kirsty Williams
Minister for Education
Via email only

18 August 2020

Dear Minister,

I welcome yesterday's decision to award the summer examinations on the basis of centre assessment grades. I thank you for taking the right decision; for me it is evidence that young people are active citizens in Wales whose voices and experiences as individuals are important.

As you are aware, my office raised several concerns about the awarding and appeals process with yourself, your officials and with Qualifications Wales. The details of my initial concerns are laid out in my letter of the 22nd May, sent jointly with the EHRC, and explained more fully in my response to Qualifications Wales' 13th May consultation.

Whilst I have been in regular contact in the period since May both with Government and Qualifications Wales around my ongoing concerns, I deliberately did not publish any criticism of the awarding process prior to the 13th August, so to avoid any implication that undermined the achievements of young people receiving results.

However, on results day it became clear that the standardisation model was not working. Far too many young people were receiving unjust results. As I called for in [my statement on the morning of the 17th August](#), using centre assessment rapidly became the only fair step to take.

Throughout this process I have accepted that decisions are being taken quickly, in response to unanticipated challenges. However, I must do all I can to ensure that these decisions prioritise the best interests and human rights of children and young people. With this in mind, I would like to highlight the following key steps and actions that must now be taken to ensure this in the immediate, medium and long-term future.

Immediate actions in relation to summer 2020 awards:

- that Qualifications Wales review an equalities analysis of the centre assessed grades and publish this to enable transparency of any bias in centre assessment;
- that evidence of any bias in centre assessment that is shown by this analysis can be used by candidates as part of the basis of an appeal of their grade;



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- that young people have accessible, clear information about how to appeal a centre assessed grade and that centres and Governing Bodies have clear information about their role in this appeal;
- that Welsh Government work with the other UK administrations to ensure flexibility of university admissions as called for in my [joint statement with the other UK Commissioners](#);
- that any candidate wishing to re-take qualifications should be informed that they are able to do so without any personal financial cost;

Medium term actions in relation to 2021 examination series:

- there must be a contingency plan in place for examinations being called off this academic year and this should involve building teacher assessment milestones into this academic year;
- in the event of examinations being cancelled, there needs to be a requirement for a clear process of any centre level assessment that is submitted. This must involve internal moderation of centre assessment within centres supported by clear guidance and there must also be external moderation of this process conducted by the awarding body in a manner equivalent to the usual process of coursework assessment;
- an Equalities Impact Assessment and a wellbeing assessment must be completed to inform the planning for 2021 and this should be taken into account when determining the structure and content of assessment for qualifications. I also strongly recommend that Government complete a Children's Right's Impact Assessment of the advice given by Qualifications Wales about how to proceed next year. I am pleased to see announcements that Qualifications Wales is requiring the WJEC to adapt some examinations and this consideration must extend across all courses. Young people that have already missed out on significant teaching should not face undue pressure to complete full courses and there should instead be a focus on quality of learning. My office has already made an offer to review impact assessments to Qualifications Wales and I reiterate this offer here;
- Qualifications Wales must provide their own guidance and training specific for Wales around how to avoid conscious and unconscious bias in assessment. Again my office is willing to offer advice or review materials, and other bodies in Wales such as the EHRC would also offer invaluable support;
- as for this year, young people have faced considerable disruption to their education and any candidate wishing to re-take qualifications should be able to do so at the soonest available opportunity without any personal financial cost.



Longer term implications:

We must recognise that the awarding of qualifications is imperfect this summer, but that actually the usual system of examination is also imperfect. As is well documented, school accountability and performance measures have not historically prioritised the best interests of individual children and young people. [My 2019 nationwide consultation](#) also showed that examinations and assessment are a key wellbeing concern for young people, and can undermine the efforts of schools and colleges to safeguard young people's wellbeing and mental health.

It is also the case that a significant proportion of young people in Wales, as in other UK nations, are awarded GCSE grades that neither support their self-esteem and confidence, nor enable them to progress in education.¹ In fact, the standardisation of the exam system in effect requires a percentage of young people to fail every year, and with the age of compulsory schooling ending at sixteen, some of these young people do not receive any further opportunities to develop their learning.

This exceptional summer should be used for us to re-think some of the elements that were assumed as given before this period. The proposals laid out in response to the [phase 1 Qualified for the Future consultation](#) should be re-visited in light of the challenges to the system this year, and the Curriculum and Assessment (Wales) Bill should also be scrutinised as an opportunity for Wales to put in place a legislative framework that requires external assessment to operate in the best interests of children and young people. A due regard duty to the UNCRC would be one way to achieve this.

I will also send this letter to CYPE Committee to inform ongoing discussion on these matters.

Yours sincerely,



Sally

Sally Holland
Comisiynydd Plant Cymru
Children's Commissioner for Wales

¹ https://www.ascl.org.uk/ASCL/media/ASCL/Our%20view/Campaigns/The-Forgotten-Third_full-report.pdf



cc. Philip Blaker, Chief Executive, Qualifications Wales

Ian Morgan, Chief Executive, WJEC

