

## Guidance for schools and colleges on results days in 2020

### 1. Introduction

Summer results days will be particularly challenging this year. Schools and colleges will have to deal both with the issues associated with the cancellation of exams and the decision instead to award calculated grades, and with the public health challenges involved in potentially bringing together large groups of young people to collect their results.

This guidance is intended to help school and college leaders to think through how to approach these issues in your own setting. It has been shared with the Department for Education (DfE) Ofqual, Qualification Wales and WJEC.

### 2. Logistics

We know that school and college leaders face a difficult decision about whether or not to invite students in to collect their results in person, as you normally would.

On the one hand, it will be more important than ever this year to be able to congratulate students on their achievements, to console those who haven't achieved the results they were hoping for, and to advise them on next steps.

On the other hand, you will obviously be concerned about bringing together large groups of young people, many of whom are likely to be emotional and so will find social distancing even more challenging than usual.

We understand that the DfE intends to publish some short guidance to make it clear how their existing guidance applies to results days. We are waiting for Welsh Government to respond to a request to publish guidance, so this may be of use in the interim. The DfE have supplied us with the text below on what this guidance is likely to say:

*“Schools, FE colleges and other skills providers planning to open their doors to pupils and students on results day should continue to follow the hierarchy of controls they have used over the summer term, and that summer holiday providers are following during August.*

*In particular this means:*

- *ensuring that those who have coronavirus (COVID-19) symptoms, or who have someone in their household who does, do not attend school and/or college or other provider*
- *cleaning hands more often than usual*
- *ensuring good respiratory hygiene by promoting the ‘catch it, bin it, kill it’ approach*
- *cleaning frequently touched surfaces often using standard products, such as detergents and bleach*
- *minimising contact and mixing as far as possible, by keeping pupils and students in small consistent groups. Schools, FE colleges and other providers should aim to practise social distancing in line with [current government guidance on social distancing](#).*

*Students, pupils and parents should follow [Coronavirus \(COVID-19\): safer travel guidance for passengers](#) when planning their travel to school, and be encouraged to walk or cycle where possible. Schools should consider the potential for broader social mixing outside school when deciding their approach and communicate with pupils about not socialising with each other in groups outside school.*

*Schools should continue to make clear to parents that they cannot gather at entrance gates or doors, or enter the site (unless they have a pre-arranged appointment).*

*Further advice can be found in [protective measures guidance for education and childcare settings](#).*

*From the start of the Autumn term, schools should follow the new [schools full opening guidance](#) and [FE colleges and providers the 2020 autumn term guidance](#).”*

The [Welsh Government guidance](#) clearly applies.

When considering whether or not to bring students on site to collect their results, ASCL would encourage members to do the following:

1. Consider the pros and cons of this in your particular context.
2. If you decide to invite some or all students in, undertake a thorough risk assessment in advance, and seek to minimise the public health risks involved as much as possible, bearing in mind the DfE advice above.
3. If you decide not to invite students in, consider how you will send results to students, and how you will support those who need consolation and advice.

Questions to ask yourself might include:

- What have you learned from having a proportion of Year 10 and 12 students on site in the summer term about how effectively you can encourage students to social distance? How much of this could be replicated in this context?
- How might you be able to keep students in small groups, and discourage mixing between those groups? What additional staff might you need, above those who would usually be involved in results days, to achieve this?
- How effectively might you be able to support students virtually, using your existing systems?

Other points to bear in mind are:

- This is not necessarily an ‘all or nothing’ situation. You could consider inviting some students in but not others, or sending results by email or post but inviting any student who wants to discuss their results to come in to school or college.
- You should be careful to ensure that, if you plan to post results, these do not arrive before results day itself.
- If you plan to give students timed slots in which to come in to collect their results, be mindful of the fact that this may disadvantage students with later time slots.
- This year, it has been agreed that results cannot be released until 8am (rather than 6am as in previous years). This year an ‘unplaced applicants list’ will be available from UCAS at 7am. This will give schools and colleges additional time to identify students who have not been given a university place and who may be particularly vulnerable as a result.
- Centres should familiarise themselves, as always, with relevant JCQ advice regarding the publication of results.

### 3. Publishing centre-assessed grades and pupil rankings

There has been a great deal of confusion over whether or not students are entitled to see their centre-assessed grades (CAGs) and the pupil rankings which centres were also asked to determine, as well as receiving their final calculated grade. Schools and colleges have been told, rightly, that they must not reveal these ahead of results days. Our understanding, at least initially, was that these would remain private, and that students would only be told their final calculated grade.

However, it has since become clear that CAGs and pupil rankings are not exempt from subject access requests (SARs) made under the Data Protection Act 2018. It now appears that CAGs and rank orders are personal data, which students have a right to know. This leaves schools in a very difficult position, having been under the impression that CAGs would remain confidential. ASCL premier partner Browne Jacobson has provided information about the legal context in this [article](#).

ASCL remains concerned that providing a student with their rank order could inadvertently reveal information about other data subjects, which could in itself constitute a data breach. There appear to be different legal views on whether or not this is the case. We are also concerned that disclosing CAGs risks undermining the integrity of the final calculated grade, and introducing unnecessary confusion and doubt.

However, given that students could now request this information through submitting a SAR, a process which can be extremely time-consuming for schools and colleges, centres need a strategy for dealing with this. There are, we believe, three approaches that you could take:

1. You could proactively tell all students their CAGs alongside their final calculated grades.
2. You could offer to release the CAGs of individual students, on request (perhaps on the following day or in the following week).
3. You could refuse to release CAGs, only doing so in response to a SAR. However, please note that any request, however informal, could be considered a SAR.

Our view is that, on balance, the best strategy is the second of these. This would enable students who believe they have been disadvantaged by this year's process, particularly those who believe this has implications for their progress to the next stage of education or employment, to find out information to which they are entitled, without introducing unnecessary confusion and doubt for other students. Waiting until the following day or week to release this information allows for a cooling-off period, and for this to take place in the context of a teacher-supported interview, talking about next steps.

We would encourage schools and colleges to discuss the approach you plan to take with other local centres, and to agree an aligned approach if possible.

If you choose to follow our suggested strategy, we would recommend you take the following actions:

- Explain your approach clearly to students and parents in advance (see section 5 below on communication).
- Consider carefully how you will require requests for CAGs to be made. You may wish to consider putting together a simple form for students to complete.
- Consider carefully who will receive and respond to these requests. This could be your Data Protection Officer if practicable. Ensure whoever is undertaking this role fully understands your agreed process, what data they are permitted to release and to whom.

- Make it clear that, for data protection reasons, requests for CAGs must be made by students themselves, rather than by their parents or carers. If you receive a request from a parent or carer, we would advise you to ask them to ask the student themselves to make this request directly.
- Consider the wording you will use when providing CAGs. We have provided a template letter in the appendix below that you may wish to adapt.

We would advise schools and colleges not to reveal a student's rank order unless a student explicitly asks for this. This would not help the individual student and may risk inadvertently revealing information about another data subject – a possible data breach. If a student does ask to know their rank order, we would advise centres to treat this as a formal SAR, and to refer the request to your Data Protection Officer.

#### **4. Supporting student progression**

Schools and colleges will want, as always, to do everything they can to support students to progress to the next stage of their education or employment. There may be cases this year where a student's CAG would have guaranteed that progression, but their final calculated grade makes this less certain.

This may particularly be the case for students in schools and colleges whose results would have improved considerably this year compared to previous years. The grades identified by teachers as their best estimates for pupils in these schools are likely to be higher than the moderated grades.

In such situations, the case for sharing CAGs with students and (with the student's permission) with receiving institutions may be particularly strong, as those institutions may be willing to offer a place to a student whose CAG meets their entry requirements, even if their calculated grade does not.

In the coming weeks, we would advise centres to liaise with local colleges and other Post-16 providers to explain the school's situation, and encourage them to look at a student's CAG as well as their calculated grade before making a decision about whether or not to offer them a place.

There is a general view that universities are likely to be more relaxed about entry requirements this year, because student numbers are lower.

#### **5. Communication**

The awarding process being employed this year is complex and has never been used before. There is a great deal of potential for misunderstanding and confusion. Clear and simple communication with students, parents and carers, and other stakeholders will help to avoid problems.

As well as the template letter to parents mentioned above and included as an appendix below, you may wish to consider the following:

##### **Ahead of results days**

##### **Your school or college website**

You could post a reassuring message ahead of results day about how the process works, how your school or college has approached this task, what will happen on results days in terms of collecting results, and what support will be available for pupils to discuss results.

You may also want to provide links to further Ofqual information. This includes:

- a [video guide for students](#)
- an [infographic](#) which explains the awarding process
- more detailed for teachers, students, parents and carers, which we understand Qualifications Wales plans to supplement over the coming weeks

The messages that ASCL has emphasised over the grading process this year are:

- Teachers know their students well and centres are able to assess grades with a high degree of accuracy.
- The grades centres submitted to the exam boards were agreed by the centre following an internal quality assurance process and are not the sole responsibility of any individual teacher.
- The standardisation model developed by Ofqual and the awarding organisations is statistical and may not reflect the grades submitted by the centre.
- The standardisation process applied by the exam boards ensures grades awarded this year are consistent with those awarded to other cohorts in other years.
- This was the fairest possible approach available under extreme circumstances. It is a rigorous process which means that grades awarded this year are as valid as in any other year.
- This will allow pupils to progress to the next stage of their lives in the normal way.

You may want to consider using these messages in your own communications. As mentioned above, we know that some members will feel that the standardisation process used this year fails to recognise a school or college that is on an upwards trajectory, and that your students might have done better if exams had taken place. However, we would advise focusing on reassuring messages to students, parents, and the wider public in your communications at this point in time.

### **Social media**

The advantage of having a message on your school or college website is that it then gives you a link that you can use on social media. You may want to do this proactively through your Facebook account, and also reactively to activity on Twitter from parents and others who are raising queries, or where misunderstandings have arisen. In the event of the latter, you may also want to consider taking the discussion offline and inviting the person involved to speak to you directly. It is advisable to avoid being drawn into a protracted dialogue on social media.

### **Printed communications**

Your message on your website could also form the basis for a printed communication to students who are awaiting their exam results.

### **Media**

You may also want to think about providing an article for your local media which draws on the same message and provides a clear and simple explanation about what to expect on results days.

It is advisable in the first instance to contact your local newspaper to suggest the idea and to ask for guidance on a deadline and word count. Go to their website and look for a 'contact us' tab at the top or bottom of the home page. This should give you an email address and phone number for the news desk.

If you decide to write for the media, bear in mind the following points:

- Communicate clearly and succinctly. Avoid jargon and acronyms.
- Test your article with somebody else for a sense check.
- Follow your protocols. You may need to clear your article with your chair of governors or local authority.

## **After results days**

### **Media**

You may be asked for information about how your centre-assessed grades compared with the final grades that your students were awarded by exam boards, the proportion that differed, and whether your centre-assessed grades were higher or lower. This inquiry may take the form of a request under the Freedom of Information Act.

We would advise that you speak with other local school and college leaders and local authorities so as agree a common approach over how you respond to these requests. You will need to be mindful of data protection laws if releasing any information to the media.

In providing an explanation of differences between centre-assessed grades and those awarded by exam boards, you may want to make the following points:

- Centres were asked to make their best assessment of what grade the student would be most likely to receive and to place candidates in rank order. The purpose of this ranking was to allow adjustments to take place to ensure the distribution of grades at a national level was similar to previous years.
- There was certain to be some mismatch between centre-assessed grades and the final grades awarded by exam boards to ensure consistency in grade distribution between years, and this was recognised in the process that was used.
- This is a process that has never been attempted before and was forced by circumstances which nobody could possibly have foreseen. Staff worked diligently to provide grades for students and to place them in rank order as fairly and accurately as possible.

As previously noted, we are conscious that some members may feel that the grades awarded by the exam boards do not recognise an upward trajectory, and that if exams had taken place their results would have been better. We would advise caution about using communication with the media to make this point, as the cumulative effect will be to undermine public confidence in the grades awarded.

## **6. Appeals and complaints**

Dissatisfaction with the grades issued by exam boards does not constitute grounds for appeal, unless there is evidence that there has been a technical error by the centre or the board. Every centre will receive instructions from the exam boards including a form for appeals if they believe there has been an error, either on their own part or that of the board.

Ofqual have indicated that a significant change in demographics could be grounds for appeal, e.g. a change to mixed sex from single sex designation. This is likely to be very rare.

Candidates can complain to the centre about the process, for example if they believe they have suffered from discrimination. Schools and colleges will have a complaints policy they can use for this, but you should check the appropriate section of your website. Candidates can also raise issues directly with the relevant exam board if they wish.

In guidance to support schools and colleges through the CAG process, ASCL suggested using an approach where teachers produced a 'mark' based on weighted assessments of pupils in each subject. Schools and colleges following that approach will have reduced the risk of unconscious bias. This approach can therefore be cited if candidates complain they have been treated unfairly. It could also be helpful if centres had a brief summary of the evidence used and the weighting attached to it for each subject. This would be helpful for conversations with governors too.

Heads of Centre are responsible for checking and declaring that results were as free from bias as possible.

It is important to remember that there are existing gaps in performance every year between pupils with different characteristics. For example, on average girls score about a grade higher than boys in English Language. Teachers were asked to produce the most likely grades and would be cognisant of these differences. This does not amount to discrimination.

*Disclaimer: The guidance provided in this document is for general information purposes only and does not constitute legal or professional advice. This guidance represents ASCL's views, but you rely on it at your own risk. For specific advice relevant to your particular circumstances, please contact your legal advisers.*

## Appendix: Template letter

(available as a [Word document](#))

Dear

I am replying to your request for information about the grade/s that our centre provided to the exam board/s in respect of the qualification/s listed below. For ease of reference, the grade awarded by the exam board is in the first column, and the grade submitted by our centre in the second column.

*List of relevant qualifications, final grade, and centre-assessed grade*

*As applicable:*

Where there is a difference, it is helpful to understand the process which has taken place. The grades that we submitted were our best assessment of what you would have achieved if you had taken exams. However, the exam boards then applied a 'standardisation model' so that the distribution of grades awarded this year is consistent with those awarded in other years at a national level, and this process inevitably results in some centre-assessed grades being adjusted.

This process is aimed at ensuring fairness and consistency between students in different years and in different schools and colleges so that, for example, it does not result in more students nationally being awarded higher grades this year when compared to cohorts in previous years. It is done to ensure that this year's grades are as valid as in any other year.

However, I understand it may feel confusing and unfair to you where there is a difference between a centre-assessed grade and the final grade awarded by the exam board. I can reassure you that your teachers approached the task of assessing grades with the utmost diligence, and that they felt the grades submitted were a fair and accurate reflection. The final grades awarded by the exam boards are the product of a nationally applied process, aimed at ensuring that your grades are consistent with those of students in other years, and therefore have equal value.

I am also conscious that this has been a difficult and anxious time for you as a result of the disruption caused by the coronavirus pandemic. If you would like any further support or information, please do get in touch, so that we can arrange an appointment for you to see a member of staff.