

INDEX OF ENCLOSURES

No.	Description	Date	Explanation of redactions	Clause
1	Email: Draft Priestley Review	30 September 2020 12:10	-	-
1.1	Attachment: SQA Fact Check on 'Rapid Review of National Qualifications Experience 2020' Final Report, September 2020 (see separate pdf attachment)		-	-
2	Email: RE: Draft Priestley Review	30 September 2020 18:07	-	-

Enclosure 1 – Email: Draft Priestley Review

From: Fiona Robertson <fiona.robertson@sqa.org.uk>
Sent: 30 September 2020 12:10
To: Pentland MK (Malcolm) <Malcolm.Pentland@gov.scot>
Cc: Director of Learning <DirectorofLearning@gov.scot>; David Middleton <David.Middleton@sqa.org.uk>
Subject: Draft Priestley Review

Malcolm

I attach SQA's fact check on the Priestley Review. These are quite extensive, but I think it's important that the Review is in receipt of the facts, and provides a balance of evidence in its reflections and conclusions.

Happy to speak.

Fiona

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Enclosure 1.1 – Attachment: SQA Fact Check on ‘Rapid Review of National Qualifications Experience 2020’ Final Report, September 2020

[See separate pdf attachment]

Enclosure 2 – Email: RE: Draft Priestley Review

From: Pentland MK (Malcolm) <Malcolm.Pentland@gov.scot>
Sent: 30 September 2020 18:07
To: Fiona Robertson <fiona.robertson@sqa.org.uk>
Cc: Director of Learning <DirectorofLearning@gov.scot>; David Middleton <David.Middleton@sqa.org.uk>
Subject: RE: Draft Priestley Review

Thanks Fiona, just to confirm that I passed these to Professor Priestley for his consideration early this afternoon.

Best wishes
Malcolm

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[See Enclosure 1 for remainder of email chain]

SQA Fact Check on ‘Rapid Review of National Qualifications Experience 2020’ Final Report, September 2020

Page Reference	Extract from Report	Comment	Suggested change
Executive Summary			
P4	The statistical approach to moderation could be more transparent, and moreover it has led to anomalies in grade adjustment, especially at the level of subject cohorts within centres and individuals.	<p>A technical report, published on 4 August sets out the technical approach.</p> <p>The appeals process was an integral part of the process and was intended to deal with anomalies.</p> <p>The report highlights it has not looked at the dataset, and does not make clear the quantity of such anomalies.</p> <p>This statement needs to be qualified.</p>	The report may wish to qualify this statement to provide balance.
P4	There is widespread criticism of SQA for a perceived lack of transparency and a failure to engage in participative development of solutions with stakeholders.	The Review team did not ask SQA what engagement it undertook, so no evidence- based conclusion.	Text needs qualified.
P5	The commissioning of independent research into the development and application of the 2020 ACM, involving full access to anonymised attainment data and the statistical algorithms used to moderate grades.	This is beyond the scope of the Review.	Consider this recommendation
The Review			
P6	In March 2020, in the face of the disruption caused by the COVID-19 pandemic, and	The Review needs to reflect that SQA was asked by Scottish Ministers to certificate qualifications in	Append text: “to maintain standards.”

	following the cancellation of the 2020 examinations diet, the Scottish Qualifications Authority (SQA) was commissioned.....	2020 whilst maintaining standards.	
Methodology			
P7	1. Review of documentation, including published materials, emails and other communication between Government officials, SQA, local authorities and other stakeholders.	Review of documentation was very limited.	Amend text: “Limited review of documentation, including published materials, emails and other communication between Government officials, SQA, local authorities and other stakeholders”
P7	5. The time scale and resources available for the Review have not permitted an in-depth analysis of the statistical approach used for moderation, and we have not had access to the algorithms or anonymised datasets necessary to undertake such a review.	Access to the dataset was not requested. The broader point should be emphasised later in the report when the authors make judgements about the data.	Amend text: The time scale and resources available for the Review have not permitted an in-depth analysis of the statistical approach used for moderation, <i>and did not request access</i> to the algorithms or anonymised datasets necessary to undertake such a review.
Findings			
P9	A well established system of awarding qualifications based on exams	The Review should reference coursework. Scotland does not have a wholly exam-based system.	Amend text: “A well-established system of awarding qualifications based on both exams and coursework”
P9	A new computer system to operate ACM	We are not clear what system this refers to. SQA developed a new system to receive estimate and rank information from centres. Not a new computer system.	Clarify or remove reference to ‘new computer system’
P10	On the same day, the examinations were cancelled by the Government. On 20th March, SQA call to	The timeline in this paragraph is incomplete, additional dates should be added	Add to text “ 24 March SQA announces that due to public health advice

	<p>schools to collate evidence, including.....</p> <p>These examples illustrate the difficulties in making decisions at this stage, when the COVID-19 pandemic had many unknown dimensions, when concerns about safety were paramount and when the situation was changing daily.</p>		<p>coursework for H and AH and some N5 not yet uplifted, will not be considered or submitted for marking.</p> <p>2 April statement announcing estimate model and that no National 5 coursework will be considered.”</p>
P 10	On 2nd April, it was announced that National 5 coursework would not be marked	Explanation of why that decision taken should be included	See below
P10	One might question, however, the subsequent realisation of the principles in the ACM, and particularly whether the first principle was ultimately undermined by an emphasis on the third.	This sentence is conjecture	Remove text or add text to make clear this is the opinion of the Review.
P10	We have found more disagreement with the decision not to continue with marking and submission of coursework. Many respondents would like to have seen more consideration of how coursework could have been completed, marked and used to contribute to grading/estimation.	<p>There were issues of equity and fairness to learners as well as insurmountable practical issues. This was discussed and agreed with stakeholders at the time – this needs to be explained in the report.</p> <p>Firstly incomplete evidence for all N5 candidates from 2 pick ups</p> <p>18 March (119k out of expected 126k)</p> <p>23 April – expected 46k.</p> <p>From an equity perspective, to use coursework we need to have that data for all (or</p>	<p>Add text:</p> <p>“However, SQA were in practice unable to use coursework in the 2020 awarding model. This was because SQA did not have a significant proportion of all coursework available – so to have marked some candidates’ material and not others would have added an inequity to the process.</p> <p>In addition, SQA’s courier service could not guarantee safe and secure delivery and pick up of coursework from markers due to the COVID situation during April.</p>

		<p>the majority) of candidates which we did not.</p> <p>Secondly our courier service could not meet service level agreement for safe and secure delivery and pick up of materials from and to markers due to concerns about their own workforce during the early peak of COVID-19</p>	<p>This was discussed and agreed with stakeholders at the time.”</p>
P10	<p>Despite this broad in-principle support for the stance laid out by SQA and the government, the widespread view of most respondents in our review is that many of the subsequent problems encountered could have been mitigated had different decisions been made. We wish to emphasise here that many of these observations are made with the benefit of hindsight; it may not have been possible to act differently, given the circumstances, and it is also not always clear that different forms of action advocated would have made a huge difference</p>	<p>This point is underplayed significantly throughout the remainder of the report.</p> <p>Specific mention needs to be made here of the time constraints, which had a huge impact upon what was possible.</p>	<p>Amend text:</p> <p>“We wish to emphasise here that many of these observations are made with the benefit of hindsight; it may not have been possible to act differently, given the circumstances and the very limited time available to develop and implement the model for moderation of estimates.”</p>
P10	<p>The statistical approach to moderation could be more transparent, and moreover it has led to anomalies in grade adjustment, especially at the level of subject cohorts within centres and individuals.</p>	<p>See comment above on same reference on page 4.</p>	

P10	there is widespread criticism of SQA for a perceived lack of transparency and a failure to engage in participative development of solutions with stakeholders;	See comment above on same reference on page 4.	
P10	while the application of the appeals process offered an in-principle technical solution to address these anomalies, it paid insufficient attention to the severe impact on those students obliged to undergo it	This statement refers to PCR and not to appeals. The PCR process was evidence based and individualised.	Consider amend for balance of evidence.
P10	missed opportunities to transition into Higher Education, etc.);	There was a priority service available to those for whom their HE or FE place was dependent upon outcome of the appeals process – so this was built into the service offered. This is in place every year and works well.	Remove text – not factually correct.
P11	protocols governing the relationship between SQA, the Scottish Government and Local Authorities, which make perfect sense in normal times (e.g. arrangements around data sharing), appear to have impeded the development of actions that might have led to an earlier anticipation and mitigation of subsequent problems;	Data sharing is not governed by ‘protocols’ but by GDPR and the Data Protection Act 2018. SQA considers that it does not have a sound legal basis for routinely collecting information about protected characteristics given its functions of delivering qualifications.	Append: “It must be noted that data sharing is governed by GDPR and the Data Protection Act 2018. SQA considers that it does not have a sound legal basis for routinely collecting information about protected characteristics given its functions of delivering qualifications.”
P11	The equalities implications of an over-reliance on a statistical approach, premised on comparison with	The Review would benefit from some additional context and qualification here.	Amend text: “the equalities implications of an over-reliance on a statistical approach,

	<p>historical cohort data, had been raised repeatedly from April onwards (e.g. CYPSC and NASUWT position papers), but seem to have been under-emphasised by both the government and SQA until late in the process;</p>	<p>SQA deliberately undertook the moderation in a manner, so as not to advantage or disadvantage any groups or introduce biases to the model.</p> <p>As a consequence, we purposefully did not look at school type or demographics.</p> <p>In addition, SQA had no coursework or exam data; partial prior attainment data (none for National 5, c70% for Higher and 99% for Advanced Higher).</p> <p>The only data available was the historical data and the estimates and rank order.</p>	<p>premiered on comparison with historical cohort data, had been raised repeatedly from April onwards (e.g. CYPSC and NASUWT position papers), but seem to have been under-emphasised by both the government and SQA until late in the process;</p> <p>SQA explained this on the basis that they purposeful undertook the moderation based solely on the estimates and historical information about the centre, with no information about centre or student demographics. This was to ensure, in SQA’s view, fairness and that no centre was disadvantaged or advantaged.</p> <p>This was the most equitable way of using the data – which was the only data available from which to make any awarding decisions.”</p>
P11	<p>many stakeholders believe that, subsequently, opportunities were missed (or dismissed) to engage in qualitative moderation of the statistical process;</p>	<p>This statement is not balanced by the facts.</p>	<p>Remove text:</p> <p>Additional text:</p> <p>“However, SQA’s view is that there were two key difficulties with this approach.</p> <p>Firstly, fairness: if SQA asked centres for a rationale for a change from historic attainment, how would SQA judge that fairly across all such rationales?</p> <p>Also: practicalities: there were 22,000 course-centre combinations. If 24% of those sat outside historic</p>

			attainment patterns, how would SQA conduct dialogue about over 5,000 potential differences from historic attainment - all over the month of June?"
P11	there has been an erosion of trust/confidence in SQA amongst teachers and young people, and damaged relations in some cases between young people and their teachers.	Needs qualified by the facts.	
P11	Para beginning "We note here..." General points.	<p>SQA highlighted to the Review team that we were clear that there was a clear and unequivocal case for moderation.</p> <p>SQA also indicated that the appeals process - which was individualised and evidence-based - was integral to the process and we expressed regret that this was not operationalised, because we believed it would have addressed perceived anomalies around moderation.</p> <p>We do accept that statistical moderation undertaken across the UK in 2020 will not deliver public confidence going forward.</p> <p>Sharing of estimates ahead of results in England (by Ofqual) did not impact on the reception of these results.</p> <p>The decision not to share details, was about the sharing of estimates, not</p>	Drafting notes in rows below.

		the model. We could not share, upfront the details of the model because it was being developed. We did not, at any point, hold back information about the model itself.	
P11	We note here that SQA has stated to us that there is no regret in respect of the moderation approach used this year (in terms of its technical application)	This section requires some context and in particular reference to the requirement to maintain standards which formed part of the Ministerial direction. In this context SQA used the data it had available to carry out technical moderation with integrity.	Amend text: “SQA has stated that the case for moderation was clear and unequivocal – and should be seen in the context of commission from Ministers and the unprecedented position the system was in, including the time constraints within which they were working.”
P11	and the role of the appeals stage as an integral rather than a bolt-on part of the process	The appeals process was always an integral part of the four-stage process. It would also be helpful for clarity to consistently refer to this as PCR	Amend text “and the role of the appeals stage as an integral part of the process”
Estimation and Local Moderation			
P11	Perceived Strength Some excellent practice in some local authorities to support and moderate estimation	There was indeed some excellent practice however without a counterbalancing weakness -to reflect there also some poor practice, as evidenced in the report – it will present an imbalanced view of the strengths and weaknesses of estimation and local moderation.	Consider amendment
P11	Perceived weaknesses Over-estimation and/or inaccurate estimation in some centres.	The facts are that this was significant.	Amend text: “Over-estimation and/or inaccurate estimation in a significant number of centres.”
P11	Perceived Weakness	SQA consulted fully on the guidance with ADES, SCIS,	Remove bullet.

	Lack of engagement by SQA with the teaching profession.	EIS, SLS and Colleges Scotland. Teachers were also involved in the process directly.	
P12	Indeed, we have seen evidence of the converse, as schools were cautious in their allocations, and as local authorities in many cases moderated estimates downwards. This is encouraging given previous research indicating that cultures of performativity may lead to grade inflation in school-based assessment (e.g. Cowie, Taylor & Croxford, 2007; Priestley & Adey, 2010).	The Review refers to evidence but does not present it. It is not fully supported by the facts.	Consider further qualification of text
P12	It is likely that stronger messages about the need for some form of national moderation would have been helpful at the outset	This is not factually correct. The need for moderation was highlighted in communications throughout. The <i>level</i> of moderation was not- see above	Remove text.
P12	Existing research (e.g. Everett & Papageorgiou, 2011; UCU, 2015; Wilson, 2015; Wyness, 2016; Anders, et al. 2020; Murphy & Wyness, 2020) indicates that estimates (or predicted grades) have tended to be historically inaccurate (or at least different from eventual exam results), something backed up	It would be beneficial if the Review also included SQA's data on accuracy of estimates.	Additional text: "SQA's 2019 data comparing estimates versus actual grade achieved using matched candidate data, shows the following level of accuracy 48%of grades estimated at National 5 matched the resulted grades; at Higher 44% and at Advanced Higher 43%"

	by SQA's own data (SQA 2020).		
P12	<p>yet we were told by SQA that, until the teachers' estimates were analysed after submission on 29 May, there were 'hopes' that teachers' estimates might be close to historical grades and therefore no (extensive) moderation would be needed.</p>	<p>Further context and rewording here would aid understanding of SQA's position.</p> <p>Significant patterns of divergence came as no surprise to SQA – and was highlighted in early papers, including to Qualifications Committee.</p> <p>SQA provided additional guidance to centres and historical estimate and results data, the purpose of providing the data was to allow centres to review at dept level whether they got it about right or that they had a tendency to over or under estimate.</p> <p>SQA was trying to support centres to improve their estimation accuracy. So: it was an aim not a hope, backed up by taking specific actions to help centres.</p>	<p>Append text:</p> <p>“This is because SQA provided additional guidance to centres and their historical estimate and results data. The purpose of providing the data was to allow centres to review at department level whether they got estimates about right or that they tended to over- or underestimate. SQA was trying to support centres to improve their estimation accuracy and, as such had aimed through this support to bear down on the amount of moderation required.”</p>
P12	<p>We saw some grievance in LAs that higher estimates were not necessarily the result of over-estimation, but rather a more accurate picture of student achievement than that provided by exams – an evidenced-based approach, which focuses on more than just exam performance, and ensures that the achievements of those pupils, for whom an examination is a barrier, are recognised. Many students felt</p>	<p>The commission was to maintain standards of SQA qualifications.</p> <p>Schools were not asked to provide 'a more accurate picture' than exams.</p> <p>Centre moderation was fundamentally about fairness.</p>	<p>Remove text.</p>

	frustrated that their wider achievement and contribution to the school was not recognised in their awarded grades.		
P12	‘The SQA Future Report 2018 committed to developing assessment, which captures life skills and contribution to the wider school community.’	Helpful to include this reference and to be accurate about what it said. The report was published by Young Scot rather than SQA	Include a reference to the report in the References in Appendix 1 with attribution to Young Scot. Add text: “SQA’s response to the report committed SQA to working with young people and other stakeholders to ‘Co-designing a new approach to assessing competence in the skills highlighted in the report, particularly in the area of life skills’.”
P13	With some strongly expressed exceptions (notably teachers in the independent sector), the majority view of our respondents is that the SQA guidance for centres on estimations was clear and helpful. One subject association stated that the guidance was clear, but would have been useful earlier (MSA position paper)	In response to the assertion that we were late, it’s important that the report highlights that we provided communications to centres on estimation on 2 April and guidance on 20 April.	Add text: “It should be noted SQA provided communications to centres on estimation on the 2 April and 20 April.”
P13	First, while the paper suggested a wide range of evidence, it did not preclude limiting estimation to the prelim grade (which some schools seem to have done).	SQA’s Information for Centres Producing Estimates document made reference to more instruments that simply prelims, highlighting that we were not expecting that estimation would be about prelims only	Make clear or remove text.
P13	The sign off system provided only a limited	Centres also have established quality	Add text:

	form of moderation, and a more comprehensive set of guidance around local moderation would have improved school-based processes for estimation	assurance responsibilities – they have responsibility for quality assuring any centre assessment decisions they make.	“However, quality assurance is a longstanding responsibility of centres”
P13	The enhanced banding scale and ranking processes were found to be complex and stressful by many teachers, including the subject associations (e.g. SATE) and the teacher unions.	SQA consulted stakeholders on this, including those who are quoted. SQA wanted both a relative judgement (rank order) and an absolute estimate vs a more refined grade scale to allow for more refined decision making in moderation if required. We could not have awarded without more granular information on estimates.	Consider qualification to the balance of evidence in the text.
P14	In some cases, LAs submitted rationales for variance to SQA (we do not have evidence that this was looked at by SQA).	SQA cannot identify any submissions of this nature at local authority level. SQA did not intimate at any stage that they would contact schools or Local authorities to discuss estimates – it was considered, but was never part of the process.	Remove text.
P14	Local Authority support The role of the local authorities appears to be crucial in respect of local moderation of the estimation process. We have found evidence of highly variable approaches to local moderation (e.g. SLS position paper, analysis	This should be caveated with the fact that nearly 100 centres are not within LA control	Suggest amendment to highlight that LA support would not apply to C 100 centres.

	of LA documentation) – in some cases exemplary, in other more minimal.		
P15	Cancellation of coursework has been contentious, with many stakeholders suggesting that a greater effort could have been made to assess it, to both contribute to final grades and to form a more robust evidence base for estimation (e.g. ADES position paper, NPFS position paper).	Cancellation of coursework was discussed and agreed with stakeholders, including ADES. We did not have all the coursework and there was a very strong view, agreed by us, on equity grounds, that it should not be marked. Safety of marking was an issue.	Either remove first paragraph text, or make clear this was agreed with stakeholders at the time.
National Moderation			
P15	Perceived Weaknesses 1. The moderation based on a purely quantitative approach. There was no engagement in a qualitative discussion with centres and/or local authorities in order to understand and cases where there was variance from historical attainment.	Although SQA did not hold dialogue with centres it is not correct to say there was no qualitative aspect to the moderation model. The moderation was not based on a ‘purely quantitative’ approach. There was qualitative input from SQA’s subject Principal Assessors, Qualifications Managers and Heads of Service into defining the Starting Point Distributions and reviewing the model outcomes. Furthermore, external appointees were involved in National Awarding Meetings to review the moderated outcomes at national course level.	Remove text
P15	Perceived Weaknesses 2. Equality and equity issues could	Equality issues were considered at this stage; the EqIA was being developed in concert with the	Remove Text.

	<p>have been also considered more fully at this stage</p>	<p>development of the ACM and were a consideration throughout.</p> <p>That the development of the EqIA should be an iterative process is justified by the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. Regulation 5 which deals with equality impact assessments requires an organisation to "in developing a policy or practice, take account of the results of any assessment made by it under paragraph (1) in respect of that policy or practice". The process of keeping equality issues under review as the ACM was developed is a legitimate practice.</p>	
P15	<p>Perceived Weaknesses</p> <p>Despite the early warning about potential equality impacts, there was little evidence of systematic data analysis to identify anomalies, drawing on government and local government expertise in statistics.</p>	<p>The approach taken was national, system-wide approach. Analysis of data to find anomalies was antithetical to the approach taken, so to intimate this should have happened is to imply a wholly different approach.</p> <p>To include any considerations of socio-economic status into the model and/or seek to validate with Local Authorities, would have made the approach subjective and introduced 'bias' and perceptions of bias into the process.</p>	<p>Consider revision for balance.</p>
P15	<p>Perceived Weaknesses</p> <p>Although the appeal system was in place, SQA did not appear to fully appreciate the impact that the</p>	<p>The Post Certification Review process was in place from the outset precisely because SQA did understand the impact that moderated results would have.</p>	<p>Remove text.</p>

	<p>moderated results would have on individual learners, their families, teachers, public opinion, et cetera.</p>	<p>Also: this looks out of place in the Moderation section and is addressed elsewhere.</p>	
P15	<p>Overall Assessment</p> <p>After examining this evidence we believe that more systematic engagement between SQA and different stakeholders in a process of co-construction might have resulted in developing a moderation system that was more equitable to individual candidates. This could have mitigated the impact that the publication of the results had on young people, their families, teachers and general public.</p>	<p>This section omits any reference to the considerable time constraints SQA were under.</p> <p>It would be useful if the Review could develop its position on how it proposes SQA would have engaged in more systematic engagement on the model within the very short timelines, and with the capacity and resources available to it.</p>	<p>Either develop the point or remove text.</p>
P16	<p>As we observed in a previous section of this report, existing literature on the accuracy of teachers' predictions highlights issues of accuracy. This, combined with the fact that many centres had a limited amount of evidence upon which to base their estimation (e.g. limited information about prior attainment and limited access to coursework) suggests that the accuracy of the estimates could have been problematic.</p>	<p>This point should be developed to make clear that SQA needed to moderate.</p>	<p>Append text:</p> <p>"Consequently, it was inevitable that SQA would have to undertake moderation of centre estimates"</p>
P16	<p>Furthermore, use of ranking was justified</p>	<p>Note, SQA provided data to all centres on prior</p>	<p>Remove text.</p>

	based on rather out-of-date literature not based on the context of Scottish secondary education system (e.g. Baird, 1997).	attainment and prior estimation Ranking was used in Scottish education until 2012 – under the previous appeals system	
P16	A centre’s estimates (per grade per course) were assessed against that centre’s own historical attainment on the same grade on that course with allowance for variability	This would usefully be more fully explained.	Append text: “beyond the previous years’ historic attainment.”
P17	To ensure that the cumulative result of centre moderation was broadly consistent with historical attainment by grade for each course nationally starting point distributions (SPD) were used. SPDs were created, based on: 1) proportional national attainment level for each grade in 2019 (with some adjustments) for Higher and Advanced Higher qualifications; and 2) taking averages of attainment data per course for years 2018 and 2019 for National 5 qualifications.	This point requires expansion.	Append text: “The SPDs for each course were further sense checked by the Principal Assessor and Qualification Manager for that subject. This was to bring additional intelligence to setting of the SPD. Modifications were made to some SPDs light of feedback from Principal Assessors.
P17	‘The ACM has been repeatedly stated (by the government and SQA) to be a mixture of both quantitative and qualitative approaches and said not to rely wholly or even mainly	Whilst we did not engage with centres or local authorities after receiving the estimates for the reasons referred to above, we did make use of subject expertise from Principal Assessors, Qualifications	Include reference in the report to involvement of SQA’s subject experts in the decision-making process.

	on historical comparisons at the level of whole cohorts.’	Managers and Heads of Service in informing decisions: this was the qualitative input to the process that our comments referred to.	
P17	Yet subsequently, after analysing centre estimates, a decision was made not to enter dialogue with centres and use a purely quantitative approach to the moderation.	<p>This needs more explanation and this erroneous point recurs across the report.</p> <p>A decision on centre dialogue was considered very seriously. We also discussed with the Qualifications Committee and Advisory Council.</p> <p>Note the process followed was not an entirely quantitative model</p>	<p>Remove preceding quote from Qualifications Committee.</p> <p>Amend text:</p> <p>“Subsequently, after serious consideration, a decision was made not to enter dialogue with centres and use an alternative approach to moderation.”</p>
P17	‘The sledge hammer was because of the estimates and how different they were from historic distributions.’ (SQA panel).	<p>This verbatim quote from one individual should not be used.</p> <p>The scale of the national moderation task only became clear once SQA received the estimates from all centres.</p>	Remove text
P17	SQA maintains that this was the best approach in the circumstances and that any problems with this approach would be resolved through the appeal process.	<p>This section would benefit from some contextualisation as the current text doesn’t paint the full picture.</p> <p>At present it disregards the fact that we have always acknowledged that there would be some anomalies, hence PCR as an integral part of the ACM from the outset. This type of approach of an evidence-based appeals system has been used successfully in Scotland’s previously.</p>	<p>Amend Text:</p> <p>“SQA maintains that whilst this was the best approach in the circumstances, it was always recognised that there would be some anomalies at a candidate level. The purpose of the Appeals process, in SQA’s view, was to resolve such anomalies.”</p>

P18	<p>We would argue that equality and equity issues should have been also considered more fully at this stage, and reflected in the methodology, not least because the research literature questions the accuracy of the prediction of attainment, which varies not just between different types of schools, but also by students' prior attainment, socio-economic background and other characteristic (gender and ethnicity). For example, after controlling for prior attainment and socio-economic background, students from state schools are actually less likely to be over-predicted than those in independent and grammar schools (Wyness, 2016).</p>	<p>It would be helpful to highlight how the Review considers how SQA could have done that.</p>	<p>Consider expanding the text.</p>
P18	<p>Comparison</p> <p>‘For example, after controlling for prior attainment and socio-economic background, students from state schools are actually less likely to be over-predicted than those in independent and grammar schools (Wyness, 2016).’</p> <p>‘Existing research shows that there is a large variation in the accuracy of the predicted grades</p>	<p>SQA is criticised on p16 of the report for referring to research ‘...not based on the context of Scottish secondary education system’.</p> <p>As far as we can tell this is also a feature of Wyness’s research which is based exclusively on ‘A’ Level grades.</p>	<p>There should be consistency in the treatment of these pieces of research: the same caveat should be applied to both.</p>

	between different types of schools and by student socio-economic background (Wyness, 2016).'		
P18	some Local Authorities told us that their centres submitted rationales for variances between the 2020 centre estimates and the centre's historical attainment to SQA.	As above.	Remove text.
P18	Many respondents have suggested that it would have been possible to undertake qualitative moderation to complement the quantitative approach used, for example dialogue with centres, and this was initially considered by SQA, before being rejected on two stated grounds: 1] the sheer scale of the task would be impossible given limited resources and short time scales; and 2] to attempt to do so would create inequity if not all centres could be involved in dialogue.	<p>The two stated reasons for not undertaking dialogue are correct: it would have been impossible to hold dialogue with every centre, potentially about every candidate entry.</p> <p>To do so would have created an inequity; any moderation process that relies on conversations with some centres and not with others could not be equitable - nor would it be seen as such, especially by centres with whom dialogue had not taken place.</p> <p>This is a key point: it is our strong view dialogue with centres in a way that was equitable was impossible.</p> <p>This was about fairness.</p>	Append text: "As such, a moderation approach that involved dialogue with selected centres would have been – and seen to have been – inequitable by the wider system."
P18	A decision to move from centre produced estimates to a purely quantitative moderation procedure created, according to our respondents, a huge gap.	We did not move from one to the other: centre-produced estimates were always intended to be at the heart of a 'quantitative moderation procedure': this procedure was based on the estimates and could not	Remove text.

		have operated without them.	
P18	ADES continued to communicate with SQA over a willingness to support the moderation process. They offered that every local authority would make themselves available to discuss a 'first draft' of grades where patterns at departmental level, school level or authority level were not in line with previous trends.	As stated, we considered engagement on moderation with schools and local authorities very seriously.	Consider balance of text.
P18	As we have already described in previous sections, some local authorities (although there was a considerable variation in these practices) told us that their centres submitted rationales for variances between the 2020 centre estimates and the centre's historical attainment to SQA. Other local authorities collected such data from the centres and expected to be contacted by SQA.	As above.	Remove text.
P19	We have not had access to the student datasets and detailed methodology	The Review has had access to the methodology and has not requested access to the datasets.	Remove reference to 'methodology' and clarify the position on datasets
P20	The SQA is going to change pupils' grades to ensure attainment is in line with "prior attainment" of that centre. This will disproportionately punish schools in more	Additional tolerances were built into take account of year on year variances The level of moderation reflected the estimates received.	Remove text.

	deprived communities whilst simultaneously over rewarding schools in more affluent communities. This is because the pass rate in the former is historically lower than that of the latter. (letter from Johann Lamont MSP, copied to the DFM, 15 th July, 2020)		
P20	Although, this year, the results of schools in areas of socio-economic deprivation were overall better compared to previous years, individual level injustices have happened, with 'outliers', such as high performing pupils in these low performing schools, who were arbitrarily downgraded.	This is not supported in the report by any factual analysis.	Remove or amend text.
P20	The second problem that became apparent was that some centres were extensively moderated and ended up with attainment levels lower than they expected or had achieved in the previous four years.	This is not supported by factual analysis in the report.	Remove or amend text.
P21	Yet, it seems that the latter still did not solve the problem of year-on year variability.	This is not supported by factual analysis in the report	Remove or amend text.
P21	What we have seen in the local authority data analysis looked more like an avalanche effect.	The report has not presented any evidence or analyses of the data, to support this statement.	Remove or amend text.
P22	The inequity of this approach lies in the arbitrary nature of the	The Review has not presented any evidence to support this statement.	Remove or amend text.

	<p>approach; its inability to deal with cohort by cohort variation and particularly its effects on individuals.</p>		
P22	<p>Email correspondence suggests that this issue and its explosive implications for public opinion appear to have not been fully grasped by SQA, other than through its recourse to appeals, until the EQIA was undertaken in July</p>	<p>We are not sure what email correspondence is being referred to.</p> <p>Also note the EqIA was not undertaken in July, it was begun in March and continued to be developed until publication on 4 August 2020.</p> <p>To suggest it was undertaken in July implies the totality of the work was carried out in July. . This is factually incorrect.</p>	<p>Remove text.</p>
P23	<p>We accept that it was not possible, as was initially suggested by SQA, to engage in dialogue at a centre level. We do, however agree with many stakeholders that the following would have been possible:</p> <p>Analysis of data to identify anomalies, drawing on government and local government expertise in statistics.</p>	<p>The approach taken was national, system-wide approach.</p>	<p>Consider amending text.</p>
P23	<p>We accept that it was not possible, as was initially suggested by SQA, to engage in dialogue at a centre level. We do, however agree with many stakeholders that the following would have been possible:</p> <p>Dialogue with local authorities to discuss</p>	<p>The two stated reasons for not undertaking dialogue are correct: it would have been impossible to hold dialogue with every centre, potentially about every candidate entry.</p> <p>To do so would have created an inequity; any moderation process that relies on conversations with</p>	<p>Remove text.</p>

	<p>and moderate in a qualitative sense (for example engaging with the rationales for cohort variance collected by local authorities.</p>	<p>some centres and not with others could not be equitable - not would it be seen as such, especially by centres with whom dialogue had not taken place.</p> <p>To include discussions with Local Authorities, and subjectively considering the merits and demerits of their 'justification', would have introduced subjectivity and potentially bias into the approach.</p> <p>This is a key point: dialogue with centres in a way that was equitable was impossible</p>	
P23	<p>After examining this evidence we believe that more systematic engagement between SQA and different stakeholders in a process of co-construction might have resulted in developing a moderation system that was more equitable to individual candidates.</p>	<p>This requires some explanation and development.</p> <p>If it is acknowledged that dialogue with all centres was impossible then how would other 'systematic engagement' have led to outcomes 'more equitable to individual candidates'?</p> <p>Also needs to reflect the time and capacity constraints under which the model was developed as referred to in earlier comments.</p>	<p>Consider text.</p>
P23	<p>'A stronger commitment to genuine partnership working may well have headed off the subsequent debacle. It would certainly have eliminated the bulk of individual discrepancies' (EIS position paper)</p>	<p>The Review Team did not explore how we worked in partnership. This is not fully evidenced.</p> <p>It is not clear how this would have eliminated the bulk of discrepancies, without recourse to individual evidence, which is what the PCR process was for.</p>	<p>Unless further explanation, suggest remove text.</p>

		EIS and other stakeholders were consulted on the PCR process.	
Appeals			
P23	Appeals	There would be greater clarity if PCR and Appeals (post 11 August) were treated separately and that consistent use of language to refer to them was used.	Editing point, potentially moving all discussion of appeals into a separate section.
P23	Appeals (PCR) Perceived Strengths	Strengths need to reflect the discussion with SQA. This was an individualised and evidence-based approach. It was an integral part of the awarding process and was described as such from the start. Not sure how PCR took insufficient account of equity? How would qualitative moderation have worked during the 4 week window, across 20,000 data sets?	
P23	Perceived Strengths	There should be references here to the PCR being based on a review of individual candidate evidence Also a reference to is being free-of-charge and thus there was no cost disincentives to centres	Consider balance of evidence
P23	Perceived weaknesses PCR was presented as an appeals process, rather than an integral part of the awarding process.	From the outset, SQA described a four-stage process, of which stage four was PCR – thus an integral part of the awarding process.	Consider balance of evidence
P23	Perceived weaknesses While technically appropriate, the PCR took insufficient account of equity,	PCR was based on reviews of individual’s evidence, so this point is difficult to understand. It showed no advantage or disadvantage to any individual.	Remove text.

	especially the impact of the process on individuals.		
P24	Clearer messaging about the role of the appeals system, and discussion prior to results day about the ACM model and its implications would have helped mitigate the subsequent political furore	<p>Our document ‘Post-Certification Review – Information for centres’, issued first in June and updated in July contains the following paragraph in the brief Context section:</p> <p><i>‘The alternative certification model is based on teachers’ and lecturers’ estimates, which have been moderated by schools, colleges and SQA. The process may lead to a candidate or group of candidates being certificated with a grade that’s different from their estimated grade. To be as fair as possible to candidates, we are providing a post-certification review (appeals) service to allow centres to request a review of the grade awarded for a candidate or a group of candidates.’</i></p> <p>We have covered the point about our inability to provide more information on the ACM model before results day. The key point is that we were working on the technical report and associated supporting communications right up until results day.</p>	Remove text.
P24	Nevertheless, the appeals process lies at the heart of the fundamental problem with the ACM, and is subject to a number of caveats raised by different stakeholders.	The report needs to explain why this is the case.	Consider further explanation.
P24	The view of many respondents (local authorities and teachers) – and one we	At that point, we did not have the full details of the moderation process in place.	Consider text for balance of evidence and facts.

	share – is that expectations could have been different, had there been publication in June of more detail about the national moderation process, as called for by the Scottish Parliament Education and Skills Committee.		
P24	Clear understanding highlighted to the country that the awarding of grades was only a step of the overall process. It should have been communicated that this was not the final step to determining grades and that the appeals process both at authority and school level was the final process. (ADES position paper)	This was done.	Needs clarification
P24	The second point relates to the likely number of appeals that would have been necessary had the original PCR system being carried to its conclusion – numbering in the tens of thousands.	SQA had always prepared to manage a potentially large volume of PCRs.	
P25	We share the view that addressing anomalies at the level of individuals was not possible given the pressures on the system, but agree with ADES and other respondents that the number of appeals could have been reduced greatly had	SQA had c100 presenting centres that were not local authority schools. Also, the implication here is that a centre/local authority would explain why their cohorts had performed in a way that was outwith historic performance and tolerances. On what basis would that dialogue have	Needs to consider implications here – and the basis on which revised decisions could have taken place on the basis of a dialogue.

	there been more analysis of data trends in June, relating to anomalies and dialogue at local authority level (for example to explain variance at cohort and subject levels).	taken place: based on candidate evidence? In which case the number of conversations required returns to a volume which is acknowledged as unmanageable.	
P25	The decision to exclude academic judgment (e.g. where new evidence questions the original estimation) from the revised appeals process has removed recourse to students to pursue appeals where estimates were inaccurate, and placed large pressures on schools.	<p>The Ministerial direction obliged SQA to award on the estimates centres provided in May 2020.</p> <p>This direction gave primacy to the original estimation made by a centre so it would have been contrary to the direction to have opened appeals up to reviews of academic judgements.</p> <p>SQA would not have been able to verify or otherwise quality assure any revised academic judgement so this would have allowed the possibility for any centre to decide to re-award for any reason.</p> <p>This would have placed an even larger pressure on schools as all candidates and parents would be aware that the head of centre was in effect able to decide the grade for any and all entries.</p>	<p>Add text:</p> <p>“However, the Ministerial direction on the 11 August 2020 meant that any appeals process that did not award based on the original centre estimate was contrary to that direction”</p>
P25	Many respondents have stated that where schools accept the right to appeal on the grounds of bias/discrimination in the original decision, this places schools at risk (e.g. litigation). This in turn may create conditions where appeals are denied because they are not in	Schools are also obliged to meet duties under equalities legislation. The SQA appeals model simply requires them to do so. They should have their own mechanisms for handling such claims and there are external regulators able to make determinations on adherence to equality law.	<p>Add</p> <p>“However, centres are required to abide by their own equalities duties and as such any centre acting lawfully must duly consider any challenges from candidates in this regard.”</p>

	the school's interest to pursue them	<p>SQA does not and cannot make judgements on centre's adherence to equality law. SQA does not have such powers, so it is not appropriate for SQA to do so.</p> <p>This would be a learning point for future if centres shared the estimates and had a challenge process in place for young people to use if they do not agree with the estimate.</p>	
P25	Head teacher and local authorities have reported issues arising from the revised PCR	<p>The Review is referring to appeals here.</p> <p>Mixing up PCR and Appeals – 2 separate processes</p>	Clarify text.
P25	<p>The decision to limit grounds for appeal seems to us to be both unnecessary and counter-productive. First, following the decision to revert to estimated grades appears to place only a small number of students – schools report typically 3-4 cases – at a disadvantage, and yet these small numbers have created a great deal of controversy, out of proportion to the number of cases. Second, SQA has repeatedly emphasised to us that many centre estimates were inaccurate; and yet, the system put in place by SQA denies students an avenue to appeal against inaccurate estimates.</p>	<p>The decision to limit appeals was necessary under the conditions of the Ministerial direction. The direction is clear that primacy has been given to centre estimates as provided to SQA for the May 2020 deadline.</p> <p>We believe the Review should acknowledge that it is actually impossible to know how many grades might have been appealed if there was a wider right of appeal based on student perceptions that their original estimates were inaccurate.</p> <p>The report earlier criticises SQA for adjusting teacher estimates; but here is criticising SQA for not adjusting teacher estimates?</p> <p>It would aid understanding if the review was consistent in its view on the desirability</p>	Consider text

		of adjusting teacher estimates.	
P25	<p>A related issue raised by some stakeholders, especially young people, is that the appeals process continues to deny young people the option to personally instigate appeals. Only a school can lodge an appeal. According to CYPCS,</p> <p>‘Being denied a direct right of appeal, where they believe they have experienced discrimination, breaches not only the young person’s right to an effective remedy under Article 13 and the prohibition on discrimination in Article 14 of the ECHR, and Article 2 of the UNCRC and in the case of disabled young people Article 23 of the UNCRC. (CYPCS position paper).’</p>	The question of what the UNCRC actually requires in terms of appeal is a matter of interpretation.	Remove text, or append: “Compliance with the UNCRC is not to be viewed solely be reference to the right of candidates (or not) to bring appeals directly in their own right but in the context of the other rights available to candidates (which they have under the law to tackle discrimination directly by way of complaint to the centres said to have discriminated).”
Equalities			
P26	<p>Perceived Weaknesses</p> <p>EQIA and CRIA documents were produced very late in the process, with little evidence that equalities issues had been systematically considered at the development stage of the ACM.</p>	It is not accurate to suggest the equalities issues were not considered at the development stage of the ACM. We provided the review with documents tracing the development of the EqIA.	Remove text.
P26	Perceived Weaknesses	Data sharing is not governed by ‘protocols’ but by GDPR	Remove text.

	<p>Protocols about data usage appeared to impede analysis of data in relation to equalities issues.</p>	<p>and the Data Protection Act 2018.</p> <p>SQA do not consider that the use of the language of 'protocols' is appropriate when describing the requirements of the GDPR and Data Protection Act 2018 and that as a matter of fairness the review should record that SQA considers that it does not have a sound legal basis for routinely collecting information about protected characteristics given its functions of delivering qualifications</p>	
P26	<p>A meeting note on 11 July indicated that 'SQA have committed to completing and publishing an EQIA to support the certification model, but have not given an indication of a likely date yet' (2020 Awarding Presentation to the Deputy First Minister, 11th July).</p>	<p>This is this is a Scottish Government meeting note and not from SQA.</p>	<p>Clarify text</p>
P26-27	<p>The EQIA and accompanying Children's Rights Impact Assessment (CRIA) documents appear to have been largely developed post-hoc after the main work of moderating grades had been completed.</p>	<p>This is not factually correct.</p> <p>These were being worked on throughout the summer, as evidenced by the seven-page timeline provided to the review.</p> <p>Note the EqIA covered all four stages of the ACM and was completed and published prior to stage 4.</p>	<p>Amend text:</p> <p>"The EQIA and accompanying Children's Rights Impact Assessment (CRIA) documents were developed alongside the development of the ACM."</p>
P27	<p>The draft CRIA was not considered by the SQA Board until 30th July and the published document does not address the full range of rights engaged or</p>	<p>This is CYPCS's view, but not a finding of the report so should not be in the review without qualification as to whether they discovered evidence to prove that there were 'predictable</p>	<p>Remove this quote, as the report has not presented any evidence for it.</p>

	<p>properly assess the impact of decisions. This meant that the predictable negative impacts of the alternative certification model were not identified and no mitigations were put in place. In particular, the application of a statistical modelling approach at school level resulted in clear and obvious unfairness and disadvantage for many young people. The CRIA should have identified this. (CYPCS position paper)</p>	<p>negative impacts' or/and 'obvious unfairness and disadvantage for many young people'.</p>	
P27	<p>The EHRC has also been critical of SQA for its lack of attention to equalities issues:</p>	<p>The extract that follows this statement does not support a conclusion that EHRC criticised a lack of attention to equalities issues.</p>	<p>Reword to remove a reference to a lack of attention.</p>
P27	<p>EHRC extract</p> <p>They do not routinely collect ... the views and lived experiences of people with protected characteristics</p>	<p>This is not correct.</p> <p>Pages 7 to 10 of the EqIA explain the ongoing engagement activity SQA carries out.</p>	<p>Remove text.</p>
P27	<p>A lack of access to equalities data, along with the facility to analyse it, is evident in correspondence between SQA and the government in July 2020 – 'a request to perform analysis to support an Equalities Impact Assessment they are performing on their Alternative Certification Model' (email from government official to John Swinney, 24 July; again pointing to the</p>	<p>It is only possible to analyse the outputs of a process 'post hoc'.</p> <p>As such, this is not and should not be taken as evidence that the EqIA process was an afterthought as this is incorrect.</p>	<p>Amend text</p>

	post hoc nature of this exercise).		
P28	Our data (interviews with teachers and parents) indicated that some protected groups were disadvantaged more than others, for example children with learning difficulties, and yet the full extent of this was unknown at the time due to a lack of analysis by SQA and the government.	Needs more fully evidenced.	
P28	This is good example of a situation where existing protocols, entirely justified in normal circumstances, seem to have impeded action that would be legitimately justifiable in the emergency situation created by the pandemic.	Data sharing is not governed by 'protocols' but by GDPR and the Data Protection Act 2018. SQA do not consider that the use of the language of 'protocols' is appropriate when describing the requirements of the GDPR and Data Protection Act 2018 and that as a matter of fairness the review should record that SQA considers that it does not have a sound legal basis for routinely collecting information about protected characteristics given its functions of delivering qualifications	Remove text.
P28	The circumstances outlined above seem to have led to a situation where some of the impacts of the moderation model were not fully anticipated or mitigated. We have, for example, found little evidence in email communications between or public statements by SQA and the government that	We were not asked to share email communications with the Review team so this is unfounded. We do not consider this to be factually correct.	Remove text.

	the equality nuances had been anticipated or publicly acknowledged (even fully understood) prior to the furore that erupted after the publication of results.		
P28	but the focus on this, combined with a lack of systematic statistical analysis at a fine grained level, seems to have obscured other effects (e.g. negative effects on high performing students in low performing schools).	The report has not presented any evidence or analyses of the data, to support this statement that there were 'negative effects on high performing students in low performing schools'.	Remove text.
P28	Although estimates were largely based on the evidence submitted prior to the closedown, there is evidence that, in some centres, later evidence was taken into account , which to cite one respondent was 'incredibly unfair' (local authority panel). Moreover, the evidence for appeals was considered up to 29 May (teacher panels) – this created an issue of inequity since there was a huge variation in the ability of young people to work from home and submit additional evidence (and there was a variation between schools in the amount of available support, virtual teaching, etc.). According to one Director of Education,	<p>Guidance was provided to teachers on this issue, as follows:</p> <p>Extract from Information for Centres Producing Estimates, p4</p> <p>“For session 2019–20, there is no requirement to set additional mock or prelim exams or homework tasks for the purpose of determining a candidate estimate. You are not required to mark non-question-paper components that would have been externally marked by SQA, but you may use any work completed by candidates as evidence to help inform your estimates.</p> <p>Given the timing of the announcement to cancel the 2020 exam diet, we recognise that centres will have incomplete evidence and that the range and</p>	<p>Append:</p> <p>“However, SQA’s Information for Centres Producing Estimates did contain guidance on this issue.”</p>

	<p>there needed to be a clear statement that evidence should not be generated after lockdown – this caused ambiguity and unfairness – but neither SQA nor the government provided such a statement</p>	<p>amount of evidence will vary between different subjects. Judgements should be made on the available evidence. No candidate should be disadvantaged if they are unable to complete any work set after centres were closed.</p> <p>Where candidates have completed additional work after school and college closures, teachers and lecturers should exercise caution where that evidence suggests a change in performance. In many cases, it is likely to reflect the circumstances and context in which the work was done.”</p>	
Communications & Transparency			
P29	<p>Perceived Weaknesses</p> <p>SQA did not take up offers of partnership working.</p>	<p>This is incorrect.</p> <p>There was partnership working on key aspects of our approach.</p>	Remove text.
P29	<p>Many respondents (teacher and local authority panels) complained about a tendency to send out important updates on a Friday evening after schools had closed, especially when these generated high numbers of parent queries over the weekend.</p>	<p>SQA issued 31 separate communications and 22 newsletters during Awarding 2020.</p> <p>Of these 10 were issued on a Friday.</p> <p>Of these 5 were directly related to NQ.</p> <p>These were timed: Friday 20 March - 4:15pm Friday 19 June – 3:45pm Friday 7 August – 12:15pm Friday 14 August - 3:45pm Friday 14 August – update on revised appeals service following Ministerial Direction on 11 August –</p>	Remove text.

		5:45pm (note this was a direct ask from Scot Govt to publish immediately following their approval of the revised appeal service which we only received late on the Friday afternoon)	
P29	<p>We note here SQA’s stated position of withholding some information to avoid causing undue confusion and stress, but emphasise that the majority view of young people and parents in our panels was that they wished for clearer and more comprehensive information on the awarding processes and their implications. For example, young people stated that they would have welcomed communication regarding the SQA timeline/development process; even if the SQA did not have the answers in a shifting landscape they would have appreciated being kept up-to-date with the thought process behind decision-making and ongoing developments.</p>	<p>This was only about estimates, SQA did not withhold information about the model because it was still being developed.</p> <p>SQA only withheld information about the spread of estimates versus historic performance. All other material was published when it was finalised and ready.</p>	<p>Amend text:</p> <p>“We note here SQA’s stated position of withholding detailed information about the spread of estimates versus historic performance to avoid causing undue confusion and stress...”</p>
P30	<p>Had SQA provided stakeholders with early sight of its proposed methodologies as had been recommended by the Scottish Parliament’s Education and Skills Committee, this would have provided an opportunity to consider</p>	<p>As above, SQA did not withhold information about the methodologies, these were made available when they were ready.</p>	<p>Remove text.</p>

	<p>the extent to which they were fit-for-purpose and to put in place measures to address any unintended consequences. (Learned Societies position paper)</p>		
P30	<p>I wonder if we should have been more overt about the profile of estimates versus historical distributions. It would have been difficult and it would not have been popular, but it would have certainly managed expectations. But it could also have unsettled teachers and young people. (SQA panel interview)</p>	<p>This was about estimates, not methodology.</p> <p>Ofqual did this and it had no material impact on how results were received.</p>	
P30	<p>Nevertheless, evidence presented to the review paints a picture of an organisation that is resistant to working with stakeholders.</p>	<p>There is a distinction here between the views of stakeholders and evidence.</p> <p>SQA was not asked to provide evidence on working with stakeholder. We are happy to provide further information on this.</p> <p>As this review specifically covers activity during what is recognised earlier in this report and by stakeholders as a uniquely challenging and demanding set of circumstances, is it fair to make this generalisation to SQA's activities more generally?</p>	<p>Consider amendment for balance of evidence.</p>
P30	<p>A meeting was brokered by ADES at beginning of April attended by SQA, EIS, SLS and ADES representatives to discuss methodology</p>	<p>The meeting took place, but we did not decline to work with stakeholders.</p>	<p>Remove text.</p>

	<p>for determining grades. Support was offered from experienced practitioners across the system to help determine an appropriate methodology. SQA listened to the offers being put forward but felt they had the expertise and knowledge required within their own organisation. (ADES position paper)</p>		
P31	<p>Inconsistent approaches to the Alternative Certification Model were described at school level. Different approaches were noted between teachers within and across departments. Some students reported that approaches varied between subjects, with traditionally academic subjects such as STEM subjects being more rigorous in their estimates than Arts based subjects. Students felt more confident in subjects where their teachers had a comprehensive record of their coursework (e.g. folders of evidence, tracking). Some students reported that their estimated grades would be based solely on prelims, and others on a mixture of evidence that had been</p>	<p>This is presumably referring to estimation at centres, and this sentence should correctly reflect this.</p> <p>This report appears in places to conflate 'estimation' and 'moderation' and could usefully clarify the distinction.</p>	<p>Clarify text.</p>

	collected. Moreover, some students reported that they had been told their estimated grades or there was an intimation of a grade band, whereas others were told this was not permissible.		
P31	The fact that young people experienced inconsistent moderation processes regarding their estimated grades matters, when they experience the pressure that grades matter.	This is presumably referring to estimation, and this sentence should correctly reflect this.	Amend text for clarification “The fact that young people experienced inconsistent estimation processes matters, when they experience the pressure that grades matter.”
P31	Equity section	We think this is about estimation at centres, and that needs to be clear.	First sentence should read... “Many young people felt that extenuating circumstances were not taken into account by centres in the estimation process.” Other sentences in that section also needed to be updated.
P31	Many young people felt that extenuating circumstances were not taken into account. For example, students reported that extended periods of illness around the time of the prelims were not considered.	SQA guidance stated that where a candidate was ill or other personal circumstances then alternative evidence should be used.	Remove text – or clarify that guidance covered this.
P32	There was a feeling that SQA had not considered the personal impact of the ACM on young people’s lives, for example their school subject choices,	This is not correct. SQA was well aware of the impact on transitions. All SQA timelines were correlated with the HE sectors needs and SQA works closely with UCAS to do so.	Remove text.

	university offers, college places, et cetera.	Note that these effects are also seen every year; it is not unique to the ACM.	
P33	Moreover, the young people were clear that telephone helplines do not suit all children and young people. The young people felt that instant messaging is often a less threatening medium rather than a telephone line.	SQA has a range of ways it engages with candidates: phone; email; Facebook; Twitter; MySQA Sam; Candidate Enquiry Webform	Add text: “SQA does offer a range of ways in which candidates can make contact including phone; email; Facebook; Twitter; MySQA Sam; Candidate Enquiry Webform”
Discussion	To be considered more broadly in the context of the points made earlier in the report		
P35	That said, we believe that certain decisions could have been taken differently, and that this may have led to different outcomes, and prevented the subsequent negative reaction that led to this review. These decisions relate to the following: ... A greater level of embeddedness of equalities impact assessments in the development of awards systems, at the outset	The timeline provided to the Review for the development of the EqIA demonstrates that activity to develop the EqIA was underway throughout the spring and summer. That development of the EqIA should be an iterative process is justified by the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. Regulation 5 which deals with equality impact assessments requires you to "in developing a policy or practice, take account of the results of any assessment made by it under paragraph (1) in respect of that policy or practice". The process of keeping equality issues under review as the ACM was developed is legitimate.	Remove text.

P35	<p>That said, we believe that certain decisions could have been taken differently, and that this may have led to different outcomes, and prevented the subsequent negative reaction that led to this review. These decisions relate to the following:</p> <p>...</p> <p>Greater levels of cooperation between agencies, including between the SQA and Scottish/local government, for purposes including analysis of data and national moderation .</p>	As explained above, the issue was not simply about levels of cooperation but about adherence to data protection law.	Consider amendment, to reflect the legal position
P36	<p>This has been exacerbated by the lack of clear processes for: 1] embedding thinking about equalities into the initial design of the ACM; 2] a lack of willingness to engage in collaborative decision making and co-construction at the outset in the development of the model; and 3] a lack of targeted analysis of emerging data trends at key points in the process (compounded by a lack of equalities data at SQA and protocols that obviated closer working between the government and SQA).</p>	To include any considerations of socio-economic status into the model and/or seek to validate with Local Authorities, would have made the approach subjective and introduced 'bias' and perceptions of bias into the process.	Consider text.
P36	Does a shape of the distribution that follows the historical patterns deliver	<p>This is not the case.</p> <p>The data inputs into the model were 'information</p>	Remove text.

	<p>fairness to individual learners and ensures that their grades reflect their effort and achievement? We do not think so. In fact, there was no way to achieve this task, because the statistical procedure did not use any information whatsoever about the individual candidates.</p>	<p>about individual candidates', namely an individualised absolute value (refined band) and relative value (rank order position).</p> <p>So the statistical procedure did use information about individual candidates.</p>	
P36	<p>But the solution is 'optimal' only in terms of total distribution, not because it reflects any attributes of individual learners; therefore, the solution could be unstable in terms of individuals. This is why there should have been adequate procedures for sense-checking of data at the level of centres and even subjects, and manual adjustments based upon the qualitative information in the system (e.g. local authority rationales for variance).</p>	<p>It would be helpful if the Review were clearer about what it means in practice by 'sense checking of data'. Against what is it being checked?</p> <p>The implication is that SQA should have entered into a dialogue – or possibly a negotiation – with each local authority (and presumably all c100 other centres). This would have been a much more significant inequity than the approach used.</p>	Consider text.
P36	<p>Section beginning:</p> <p>In our view, the main problem....</p>	<p>This entire paragraph seems to be arguing that moderation of teacher estimates is not necessary and possibly impossible, as SQA does not know the 'individuals'.</p> <p>Therefore, is the Review recommending that SQA does not undertake moderation in the future? If so, this should be explicitly stated.</p>	The Review should explicitly state what they are advocating for in this section.

		<p>Furthermore, the Authors have provided an Appendix B with an alternate approach to optimisation.</p> <p>How does Appendix B sit with this section?</p>	
P37	<p>The proposal seems to be premised.....</p> <p>Related to this, it has been communicated to us that the proposals may impact negatively on attainment, particularly for disadvantaged students who might perform better in coursework.</p> <p>Several respondents have suggested that the issue with the divergence of estimates and historical performance this year may not be due entirely to inaccurate estimation by centres (as SQA have consistently stated), but instead may also be influenced by a combination of recent policies to close the attainment gap and a possibility that teacher estimation actually provides a more accurate assessment of achievement than exams (which are said to disadvantage some learners).</p>	<p>The consultation is premised on this, as agreed by CERG. That is the current position as stated by Ministers. Contingencies are being developed on this.</p> <p>This is a consultation, and SQA is gathering views.</p> <p>SQA was asked to deliver an approach to maintain standards and we made that clear to centres. That was only basis on which we were working.</p>	Add clarity to this position.

Rationale for Recommendations	To be considered in the context of the points made in relation to the above.		
P40	statistical moderation to identify variance from trends, accompanied by further qualitative verification (with clear messaging that this will focus on candidates not the system). We note here that such a system needs to be 'owned' by teachers, including teacher unions (due to concerns about workload and professional trust in teachers).	We agree that that support of the system is very important, but the SQA has a statutory role to fulfil – and had a clear commission from Ministers this year.	Suggest this is rewritten for clarity.
P40	<p>4. A commitment to embedding equalities in all aspects of the development of qualifications systems.</p> <p>Considerations of principles of equity, ensuring just decisions for all individual students, should inform all processes for the award of qualifications.</p>	<p>A 'just decision for all individual students' has to be predicated on a system with integrity and rigour.</p> <p>The Review echoes some commentators in seeing 'fairness to individuals' and a credible system as being atomised however fairness relies on credibility.</p> <p>It gives no candidate – past, present or future – any benefit to have a qualifications system that lacks credibility. So it is wrong to conclude that a focus on credibility was at the expense of fairness; it was in fact central to it.</p>	Consider text.
Appendix B		The purpose of this appendix is unclear. The Review team did not ask for	Amend or remove reference to SQA's approach.

		<p>access to SQA analysis or data, so we are not sure on what basis it is arrived at.</p> <p>This appendix misrepresents SQA's approach (as shown in scenario 1).</p> <p>Under SQA's approach, if entries are moved from grade A to B, entries are only moved out of B if B is outwith its tolerable range. Entries are not automatically moved out of B, irrespective of its attainment level.</p> <p>Furthermore, the analyses ignores different refined band sizes for different centre/course combinations, which might mean that the outcomes for both approaches might be the same.</p>	
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30 September 2020