



**SUMMER 2021**

# Information for centres on centre reviews and appeals in summer 2021

17 May 2021 – Version 1.0

## Information for centres on centre reviews and appeals in summer 2021

### **Approved GCSE, AS and A level qualifications and the Welsh Baccalaureate Skills Challenge Certificates**

<b>1. Introduction</b>	<b>2</b>
<b>2. The centre review and appeals processes in summer 2021</b>	<b>2</b>
<b>3. Stage 1 – centre review</b>	<b>3</b>
<b>4. Stage 2 – appeal to WJEC</b>	<b>7</b>
<b>5. Stage 3 - EPRS</b>	<b>9</b>
<b>6. Support for learners</b>	<b>9</b>

## **1. Introduction**

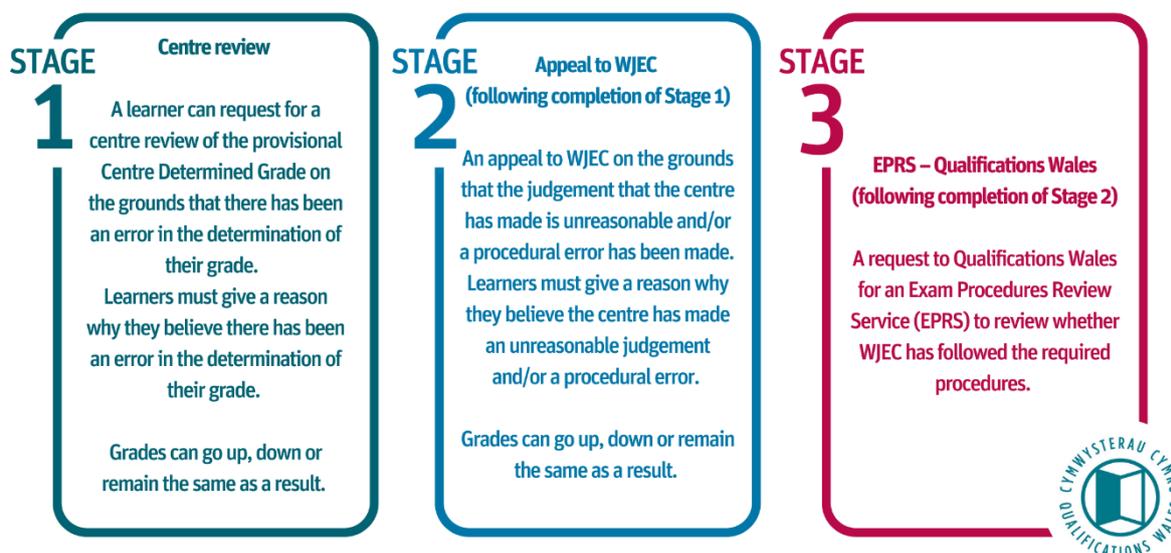
This year's alternative approach to awarding qualifications through centre determined grades has required a new approach to reviews and appeals so that there is a fair and meaningful process for learners. The approach to determining grades puts teachers, lecturers and school and college leaders at the heart of delivering a system that will enable learners to progress. Schools and colleges also have a key role to play in making sure every learner has access to fair review and appeals processes this year.

This information supports schools and colleges to understand the approach to centre reviews and appeals this summer.

## **2. The appeals process in summer 2021**

As the regulator, Qualifications Wales sets the overall requirements that WJEC must follow in delivering the appeals process. Detailed guidance on the procedures that schools and colleges need to follow is being provided separately by WJEC. We have worked collaboratively and extensively with the Design and Delivery Advisory Group members who have provided in depth and considered advice from the perspective of schools and colleges. We have also engaged with the Children's Commissioner for Wales, the Equalities and Human Rights Commission and trade unions in the development of the approach. We have sought to balance the workload implications for schools alongside the need to provide a fair and meaningful appeals process for learners. We have also taken legal advice to make sure that the framework we put in place is compliant with legal requirements and delivers natural justice for learners.

There are three stages in this year's approach.



### Bias and discrimination

There are no separate grounds for appeal on the basis of bias and discrimination this year. If learners are concerned the decision on their grade has been affected by bias and discrimination they should appeal on the basis that there has been an error in the determination of the grade, giving the reasons why they believe the grade is not an accurate reflection of the standard of their work.

### 3. Stage 1 – Centre review

#### Why there is a centre review stage

If a learner identifies that an **error has been made in the determination of their grade**, they can ask the school or college to review the decision. Learners must state clearly where they believe an error has been made when submitting the review.

There are good reasons in the context of this year's arrangements why this is important. Grades are being determined by schools and colleges using a wide range of evidence which will vary from centre to centre. The centre determined grade is a judgement based on a balance of evidence that demonstrates the learner's level of attainment.

As the primary decision maker in determining the grade, the school or college needs to have the opportunity to review its decision before any external party plays a part in the appeals process.

Centres will be best placed to review the evidence and make a judgement on whether the grade is correct. For example, having reviewed the original decision the centre could conclude that a learner awarded a grade D for their GCSE in History should have received a C i.e., an error was made in determining the original grade

If a learner wishes to progress to Stage 2, WJEC will review the reasonableness of the academic judgement (see Stage 2 – appeal to WJEC section), but there are limitations to what that part of the process can deliver this year which is why the centre review stage is important to ensure a fair and meaningful appeals process.

### Key facts on the centre review process

- The centre review is an opportunity for learners to request a review where they consider an error has been made in the determination of their grade – the focus is on the overall grade not on the marking of individual assessments. There is no expectation that centres re-mark assessments.
- Learners should briefly explain the nature of the error when requesting a centre review. WJEC will provide templates for centres and learners to use.
- Learners should only request a review where they consider that the error has had a material effect on the accuracy of the grade.
- The centre review is not an opportunity for learners to try and improve grades that have been determined fairly in accordance with the centre’s assessment and quality assurance processes and are supported by the evidence and the decision-making record.
- The centre review is an opportunity for the school or college to check they have not made any errors in the determination of the grade.
- Grades can go up, down or remain the same following the centre review.

### Requesting a centre review

If a learner considers there may be an error in the determination of their grade, they should check the decision-making record. Learners should only request a centre review if they consider an error has been made. WJEC will provide templates to support consistency and manageability for schools and colleges and to support learners requesting a review where they have identified an error. Learners should use the template to briefly outline the nature of the error when requesting a review.

These are some examples of what may constitute an error in the determination of the grade.

- The grade for the learner was incorrectly documented
- Reasonable adjustments or special considerations were not taken into consideration when they should have been
- Assessment evidence that was part of the assessment plan was not taken into account.
- The grade is not supported by the information in the decision-making record.

#### Why the Stage 1 centre review is taking place before the end of the summer term

The appeals process requires centres to provide learners with their **provisional** centre determined grades before the end of June and for the centre review stage of the appeals process to take place before the end of the summer term.

We considered whether the centre review should take place before or after results day and concluded that it should take place in the summer term for the following reasons.

- **Impact on learner well-being and progression**– we want to aim for as much accuracy as possible in grades issued on results day to reduce the anxiety for learners in August and limit the delays in admissions decisions that can occur if an appeal is raised following results day. We know that there are concerns about well-being for learners who will receive a provisional grade in June before universities have had an opportunity to communicate a confirmation decision which happens on results day. However, the early release of provisional grades means that any learners that remain unsatisfied with the grade can progress swiftly to Stage 2 on or after results day.
- **Impact on workload for schools and colleges** – holding the centre review stage after results days would have meant centres needing to have key staff in place throughout August to support learners and conduct the reviews. Holding the centre review stage during June and July will also help centres to plan for the number of likely Stage 2 appeals in August.

All provisional Centre Determined Grades must be submitted to WJEC by 2 July. The window for submission of amended grades is open **until 20 July** to allow as much time as possible for the centre review process to happen. Details of the key dates in the centre review and appeals process are available in the WJEC guidance.

### Why the decision-making record is important

The decision-making record is an important part of the alternative awarding arrangements this year. Not only does it mean that quality assurance processes are documented, supporting transparency in the system, but it also provides learners with access to information that will help them to understand why they have been awarded the grades and to make an informed decision on whether they believe there has been an error in the determination of their grade.

The decision-making record should provide learners with enough information to understand how the school or college has reached the decision on their grade, and the information or evidence taken into account in taking that decision. Along with effective communication between the school or college and the learner, the decision-making record may assist in reducing the number of reviews being requested by learners as they will have a clear understanding of the rationale for the grade. This should support learners to only request reviews where they consider an error has been made rather than a dispute as to the judgement of the centre.

The decision-making record will support the centre reviewer's understanding of the rationale behind the original grade at Stage 1 and will also ensure that the WJEC reviewer has an understanding of the rationale for the grade should the appeal progress to Stage 2.

### The timeframes and sharing of evidence at centre review

The decision-making record must be shared with the learner upon request if they are considering whether to request a centre review. Centres must allow learners 48 hours from the time the learner received the provisional grade to request the decision-making record.

At stage 1, we believe most learners will not need to see more information than the decision-making record in order to determine whether they consider an error has been made and request a review. Learners will have the opportunity to request to see the other evidence relied upon by the school or college in determining the grade before deciding to submit a stage 2 appeal to WJEC if they believe the error still remains after the centre review. If a learner does not feel able to make a decision on whether to request a centre review without seeing additional evidence, they can only ask to see the evidence that was directly relied upon by the centre in determining the grade. If a request is made for evidence that goes beyond the evidence relied upon in determining the grade, schools and colleges can refuse it on the basis that it is an unreasonable request.

There is no expectation that centres re-mark assessments.

Learners must be given 5 working days from when they have received all relevant information to decide whether to request a centre review.

Centres should consider these minimum timeframes when developing their approach to administering the centre review process and plan how they will store the relevant materials.

We are being prescriptive in setting minimum timescales and the provision of assessment evidence both in the interests of learners and to support schools and colleges avoid legal challenge on the basis of procedural fairness.

#### Who can be part of the centre review?

The school or college should appoint a member of staff who was not involved in determining the grade to oversee the centre review process. However, the original decision maker can be part of the process to check whether an error was made. There is no expectation that the centre should source an independent subject expert as part of the process.

#### Data you will need to record and submit to WJEC on centre reviews

Each year we collect a range of data on the examination series as part of our regulatory oversight of the whole awarding process. This data allows us to monitor risks in the system, publish official statistics, and to respond to enquiries from various interested parties, including Welsh Government and Senedd members.

We are requiring WJEC to collect data from all centres on the number of centre reviews undertaken and the number upheld. WJEC will confirm how and when this data will be collected. WJEC will only provide us with the data at an aggregate level (not split by centre) for us to have oversight of the end-to-end appeals process.

**We are not collecting this data to monitor how schools and colleges are running their centre reviews and will not publish any centre level data on centre reviews.**

#### **4. Stage 2 – appeal to WJEC**

In this section we will focus on Stage 2 appeals submitted to WJEC on the grounds of an unreasonable academic judgement. Appeals can also be put forward on procedural grounds. It is important to note, and to make sure that learners are aware, that a Stage 2 appeal on grounds of unreasonable academic judgement cannot be submitted unless a Stage 1 centre review has been completed.

Schools and colleges must inform learners of their right to request a Stage 2 appeal on completion of the centre review and must submit the appeal on behalf of the learner if requested. Learners are responsible for outlining the grounds and reasons for requesting the appeal, but the appeal must be submitted to WJEC by the school or college. WJEC will provide templates for learners to use when requesting the appeal via the school. The school or college must make the learner aware the grade can go up or down on appeal.

### What we mean by an unreasonable academic judgement at Stage 2

For the reasons noted in the centre review section, the school or college is best placed to review its decision on a grade and make any corrections where they believe an error has been made. The same level of finely tuned decision making is not possible at the Stage 2 appeal conducted by WJEC. This is because there aren't standardised assessments and the final centre determined grade is an holistic judgement on the learner's level of attainment. The WJEC reviewer could not overrule a centre's holistic judgement on the correct grade for the learner unless there was a clear exercise of unreasonable academic judgement. WJEC reviewers are unlikely to be able to make decisions on whether a change to an adjacent grade (a D to a C for example) would result in a more accurate grade being awarded. The centre is best placed to make those finer judgements based on all the evidence and knowledge it holds that went into determining the grade.

A centre determined grade will only be considered unreasonable if it is well outside the bounds of reasonable academic judgement and that the evidence cannot reasonably support the grade awarded. For example, a decision to award a grade B will not be unreasonable where the decision maker for the appeal considers the evidence would support either a grade A or a grade B. Both would be reasonable and therefore neither would be unreasonable. The judgement would be considered unreasonable if it were such that no other centre in the same position, and acting reasonably, could have reached the same judgement. That is the standard that we expect to be applied by WJEC in determining reviews and we do not anticipate there will be a significant number of grade changes at Stage 2.

The Stage 2 appeal on the grounds of unreasonable academic judgement is an important safety net to ensure fairness for learners who consider there has been a significant error of judgement in the centre's grading decision or that the decision by the centre has been affected by bias or discrimination.

## 5. Stage 3 - Qualifications Wales' Exam Procedures Review Service (EPRS)

The EPRS is a procedural review conducted by Qualifications Wales to check whether WJEC has complied with its own procedures and our regulatory requirements in the award of a qualification. The EPRS this year will remain focused solely on WJEC's compliance with regulatory requirements and their own procedures.

Qualifications Wales **will not** review whether the centre has complied with its own policies or procedures or those set by WJEC for it to follow. That part of the appeals process will take place at Stage 2 by WJEC.

Qualifications Wales **will not** review the accuracy of the grading decision and **will not** change any grades.

If we identify that WJEC has failed to comply in some way, we will require WJEC to consider our findings and consider whether that failure has a bearing on the accuracy of the grade. In practice, the EPRS will only identify procedural failures on behalf of WJEC and is unlikely to lead to changes in decisions on academic judgement as a result. Further details on the EPRS process will be published in June.

## 6. Learner support

Learners should be made aware of the centre review and appeals process and how to get further information and support if required. Schools and colleges should prepare to support learners during the period they receive their provisional centre determined grade and through to results day. Some learners will require information and support on the centre review and appeals process should they believe their grade is incorrect. Some A level learners may be concerned that their provisional centre determined grade may impact on their university entry. Learners should be made aware of the counselling, pastoral and well-being support services available at the school or college.

Information on external support services can be found on our [website](#).