

21 May 2020

Clare Adamson MSP
Convener
Education and Skills Committee
Scottish Parliament

Dear Ms Adamson

SQA National Courses — Delivering Results in 2020

Thank you for your letter of Friday 8 May requesting further information following SQA's Committee appearance on Friday 1 May.

We were invited to give evidence at a time of the Committee's choosing and were happy to do so. The cancellation of exams has required SQA to consider, review and adapt our processes, in a very short space of time. As I highlighted to the Committee, the scale and complexity of the changes required, and at this time of year, are simply unprecedented. It is important to therefore highlight that some of our work is still in progress. I have sought to provide as much information on our work to the system, and across the breadth of our activities, as soon as has been possible.

I acknowledge the feedback that the Committee has received from the 28 teachers who took part in the three virtual focus groups on 27 and 28 April, and those who submitted written answers to the questions posed during the focus groups. However, I hope the Committee also acknowledges the extensive work we have done with teachers and the wider education system to develop our approach. SQA staff work hand in hand with Scotland's teachers and lecturers on a daily basis throughout the year, as well as with school and college management, local authorities, and representative bodies and professional associations. While there have been questions and constructive comments, there has also been widespread acknowledgement of the challenges we face this year, the speed at which change has been delivered and support for the approach we are taking in the circumstances. Schools and colleges are working positively with us to deliver for learners.

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Since I appeared before the Committee on 1 May, we have received further advice from our Advisory Council and Qualifications Committee on our approach to certification and post-certification processes, including appeals. Both the Advisory Council and Qualifications Committee, which include a wide range of stakeholders including teachers, headteachers, professional associations, employer representatives, academic advisers and young people, have been very supportive of the work to date. The work continues at pace for certification on 4 August.

I have made clear that our approach is based on three core principles:

- fairness to all learners
- safe and secure certification of our qualifications, while following the latest public health advice; and
- maintaining the integrity and credibility of our qualifications system, ensuring that standards are maintained over time, in the interests of learners

Moderation is a key part of SQA's responsibilities every year to ensure that standards are maintained across Scotland — and this year in particular across schools and colleges in the absence of external assessment. Teacher judgement is at the heart of Scottish education and every year effective professional judgements for assessments that take place in schools and colleges are supported, validated and enhanced through moderation.

The Committee has expressed concern about the use of past performance of a school or a statistical distribution curve to inform decisions on the final grades of individuals. I outlined to the Committee that we would look at a range of data. This is to ensure, as far as possible, that the standard of an A in one school is the standard of an A in another school and so on. There is no presumption that any moderation is one way; indeed, grades could be moderated up or down.

In Scotland, we have a large number of low uptake qualifications and prior attainment data is not available for National 5 candidates, and some Higher candidates. On this basis we will be looking at a range of data to inform our approach. The past attainment performance of a school, both in volume terms and across subjects, will be part of the suite of data we look at when we receive estimates, so that we can explore the reasons for any proposed changes in the pattern of attainment compared to previous years. Similarly, we believe it is sensible to consider the distribution of grades in previous years. We are recommending that schools and colleges look at a range of datasets to inform their approach to local moderation of estimates and we will also use these datasets to inform awarding decisions.

Please find below our responses to your specific, but related, questions.

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1. Moderation

Questions

1a. When will the methodology used for moderation be published?

As I outlined in my evidence to the Committee on 1 May, I would expect on Results Day this year to be very clear about the process that we have undertaken and the resulting awards that we have provided to young people. This will include the impact of any moderation process. Results Day is normally the point at which we are clear about the outcome of our awarding decisions, and we believe it should be the same this year.

1b. Will this be published in full?

Yes. We will publish full details on our approach.

1c. Will this be in advance of teachers submitting estimates to the SQA?

No.

We believe it is in the best interests of learners, if teachers and lecturers only make estimate decisions based purely on their professional judgement and their strong understanding of how their learners have performed and, based on their experience and the evidence available, what a learner would be expected to achieve in each course.

Given the importance of estimates in this extraordinary year, it is right that, at the moment, the system is focused on the estimation process, and our key focus remains on helping teachers and lecturers with that process.

[Detailed guidance](#) and an [online SQA Academy course](#) have been provided to schools and colleges to assist with the estimation process. Teachers and partners from across education helped inform the approach and the guidance. We have had positive feedback about the SQA Academy course, with many teachers and lecturers confirming that it answers their questions. The course has had over 10,000 views since its launch on 27 April.

1d. Or, as a minimum, will it be published in advance of students being given their grades in August?

Please refer to my response to 1a, above.

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2. Equalities Impact Assessment

Questions

2a. Do you consider there is a requirement to undertake an EQIA as part of the SQA's public sector equalities duties?

Yes.

I have given a commitment to ensuring we meet our legal obligations through an equality impact assessment (EQIA) of our approach to certification this year, and we take this commitment very seriously. It is also, of course, our intention to publish the assessment.

2b. As referred to in your evidence, as of 1 May what specific work had been undertaken on an EQIA and what involvement had the Equality and Human Rights Commission had? (see Official Report extracts in the annexe)

SQA is committed to ensuring we meet our obligations to the Equality Act 2010 and the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012.

As I outlined in my evidence to the Committee on 1 May, we are in discussions with the Equality and Human Rights Commission about the work that we are doing. Those discussions include our work on an equality impact assessment (EQIA). I suggested a meeting in a letter to the Commission on 23 April, in response to a letter from the Commission on 9 April, and the Commission confirmed it would like to meet in a letter of 28 April. That meeting took place with my colleagues on 1 May. Further discussions are ongoing.

As I outlined in my statement of [20 April](#), the alternative certification model is an end-to-end process of four steps. The first step, providing estimates, has been communicated and is now underway. We considered our Public Sector Equality Duty (PSED) under s149 of the 2010 Act, prior to publishing this first step in a refined process. However, in carrying out an EQIA, we are assessing the whole alternative certification model that remains in development and not just the first step. The steps are interrelated, and each is an integral element of the overall model. Considering one element in isolation would therefore not be helpful.

The 2012 Regulations require us to take account of the results of our EQIA in developing the new model. That is inevitably an iterative process, with the assessment process feeding into the development of the proposed model. The remaining steps of the proposed approach are being finalised and for that reason the EQIA is underway but not yet complete. When the model is in near final form, the assessment will be completed, and we will take account of the outputs of the assessment before publication of the finalised four-step model.

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We will also, in line with the 2012 Regulations, publish the results of our impact assessment. We are required to do that within a reasonable period of adopting the new model and we will do so.

We ask teachers and lecturers to submit estimates to us every year, and we expect schools and colleges, at every point in the process, to discharge their responsibilities under the Equality Act 2010. For the refined estimates that we require this year, we have specifically adapted our guidance and supporting training materials to stress the need for schools and colleges and local authorities to ensure that their learners are treated fairly. In our SQA Academy course, we also encourage head teachers and college principals to check that their estimates comply with their own inclusion and quality assurance policies. Advice on equalities and implicit bias was provided in our materials. To date this course has been accessed over 10,000 times.

Through the development of the estimates process, the [information document](#) and the [online SQA Academy course](#), we have consulted with and taken on board feedback from a wide range of stakeholders in the education sector, including professional associations, practising teachers and lecturers, local authorities and head teachers.

2c. Will an EQIA be undertaken?

Yes – as I outlined in my evidence to the Committee on 1 May, an EQIA is in development. Please see my response to 2b, above.

2d. Will it be published in full?

Yes.

2e. Will it be published before the methodology for moderation is finalised?

No. Please refer to my response to 2b, above.

3. Appeals process

Questions

3a. Will information on the appeals process be published before teachers are required to submit estimates?

No. Please refer to my response to 1c, above.

We are currently working through the final details of the appeals, or post-certification review process for 2020. We anticipate that the process will allow schools and colleges to request a review of the grade awarded for a learner or a group of learners. Assessment evidence must be available to support an appeal and the evidence will be reviewed by senior examiners.

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We will provide further guidance to the system on the approach and evidence requirements in early June.

3b. Will the full methodology be published?

Yes.

With regards to your final point about the 2020–21 session, I can confirm that planning for the 2021 examination diet is already underway and will continue. Both Education Scotland and SQA, together with other partners in Scottish education, are part of the Scottish Government's Education Recovery Group. This group is looking at a wide range of issues, including qualifications. We also continue to engage with Education Scotland on a regular basis.

Finally, but importantly, I can give the Committee absolute assurance that everyone at SQA is committed to delivering for learners in this extraordinary year. On 1 May, and in this letter, I have sought to provide the Committee with as much information as possible on the revised approach to certification which SQA is having to devise in the absence of exams. We have asked to receive estimates from schools and colleges by Friday 29 May. After that date it will be important for SQA to concentrate on the consideration of those estimates so that we can provide learners with the results they deserve on Tuesday 4 August. With the support of the education system, we are working hard to deliver.

Yours sincerely

Fiona Robertson
Chief Executive and Chief Examiner