

# Decisions Report

Consultation on an appeals process for Summer 2020 awarding of GCSE, AS and A level qualifications offered by CCEA Awarding Organisation

Version 1

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## 1 Introduction

- 1.1 As a result of the current COVID-19 pandemic, the decision was taken by the Education Minister Peter Weir on 19 March to cancel GCSE, AS and A level examinations this summer. On 16 April he announced that students will receive GCSE and AS/A level qualification grades this summer using a combination of teacher estimated grades and statistical data.
- 1.2 The way in which grades will be awarded this summer means that the normal appeals process cannot be used. Recognising that it is important that students continue to have a right to appeal, the Minister asked CCEA to develop an appeals process that could be used for the exceptional arrangements that have been put in place this summer.
- 1.3 In setting out our proposals for an appeals process we have taken account of the steps being taken by Ofqual and Qualifications Wales in developing their appeals mechanism.
- 1.4 CCEA Regulation consulted between 7 and 21 May on proposals for an appeals process to be used for this summer's GCSE, AS and A level awards. We set this short timeline to provide early certainty for students, teachers and those who will use the 2020 qualification results as to what arrangements will be in place, and to allow sufficient time for these to be put in place.
- 1.5 We set out 11 proposals in total, covering different aspects of the awarding arrangements put in place this summer and which of these we felt would be appropriate and possible to appeal. We received 753 responses in total. In addition to this, we received six free written responses sent by email.
- 1.6 The vast majority of responses to the consultation were provided by individuals, with the remaining responses primarily made on behalf of organisations. Four responses were made by groups of individuals. 93.6% of organisational responses were made by post-primary schools, whilst the remaining responses were comprised of University/ Higher Education Institutes, teacher representative bodies and government departments/ public bodies. Parents and students made up 55.1% of the individual responses to the consultation, whilst most of the remaining percentage was comprised of educationalists.
- 1.7 In this document we now set out the decisions we have taken following our consultation and explain how we have taken account of the feedback we received. Alongside this document, we have also published the analysis of consultation responses.

## 2 Summary of decisions

The decisions set out in this report have been approved by the CCEA Council. We have taken decisions on the aspects of an appeals process for grades awarded to students this summer which were set out in the consultation document. These decisions relate to:

- Appeals on the basis of the awarding organisation's procedure
- Who can make an appeal
- Obtaining the consent of candidates not directly involved in an appeal; and whether their grades should be affected by the outcome of an appeal
- Who in the awarding organisation can be involved in evaluating an appeal; and running a different/simplified appeals process
- The statistical standardisation process
- Professional judgements, including rank order position
- Appeals on the basis of centre procedure
- Exam Procedures Review Service (EPRS).

We set out a number of proposals for consultation and, taking account of the consultation responses, we have decided to adopt all but one of the proposals. The exception is the proposal to allow for a change in rank order, and potentially grades, of students within a centre who have not been directly involved in an appeal. Given the strength of opposition to this proposal we have amended our approach and decided to protect those students' grades from being lowered. Further detail on this is set out in Section 5 of this report.

### 3 Appeals on the basis of CCEA Awarding Organisation (AO) procedure

3.1 We proposed that a centre could appeal to CCEA AO on the grounds that:

- CCEA AO used the wrong data through an administrative error on its part when calculating the grade of all, some or just one of a centre's students; and/or
- the calculated grades generated by the model were incorrectly allocated because of an AO administrative error or incorrectly communicated to all, some or just one of a centre's students

(Question 1).

3.2 The vast majority of respondents agreed with this proposal. 96.1% either agreed or strongly agreed, with only 2% either disagreeing or strongly disagreeing.

3.3 Although there was strong support for this proposal, some respondents felt that more information needed to be provided on how the statistical model would be used by CCEA to assign grades. We have noted this and CCEA will communicate further on the statistical model in due course. Concern was also expressed about whether erroneous data would have impacted more widely on the grades awarded. The adoption of this proposal would incorporate a need for the AO to correct any adverse impact of an error it made in the awarding process.

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#### Our decision

3.4 We have decided to adopt our proposal to allow a centre to appeal to CCEA AO on the grounds that:

- CCEA AO used the wrong data through an administrative error on its part when calculating the grade of all, some or just one of a centre's students; and/or
  - the calculated grades generated by the model were incorrectly allocated because of an AO administrative error or incorrectly communicated to all, some or just one of a centre's students.
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## 4 Who can make an appeal?

- 4.1 We proposed that for results issued this summer, CCEA AO should only consider appeals submitted by centres and not those submitted by individual students (Question 2).
- 4.2 42% of respondents either agreed or strongly agreed that CCEA AO should only consider appeals submitted by centres. A larger proportion (54.1%) either disagreed or strongly disagreed. An analysis of category of respondents within each response percentage showed that organisations and educationalists typically agreed with this proposal whilst students and parents typically disagreed.
- 4.3 Arguments put forward in favour of allowing students to appeal focused on the right of individuals to appeal, and also a concern that centres, due to the role they have in the process, are not impartial enough and therefore cannot provide students with a genuine opportunity to appeal.
- 4.4 As we stated in our consultation document, normal practice is for CCEA AO to only accept requests for a review of marking or an appeal from a centre and only directly from an individual candidate where that candidate is a private candidate. In a normal review and appeal process, CCEA AO would require a centre to have an internal process in place through which a student can challenge the centre's decision not to appeal to CCEA AO on its behalf.
- 4.5 To address the concerns put forward in the responses regarding the facility for students to have a form of direct access to an appeal, and the opportunity to challenge the centre's decision on whether or not to appeal, we have decided to include a similar requirement for this summer's process. In other words we will make it a regulatory requirement for CCEA AO to require centres to operate an internal process which would allow students to challenge a centre's decision not to appeal on its behalf.

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### Our decision

- 4.6 We have therefore decided to adopt our proposal to allow appeals to be made to CCEA AO from centres only. We have also decided to include a regulatory requirement that CCEA AO must require centres to operate an internal process whereby a student can challenge the centre's decision:
- not to seek from CCEA AO information CCEA AO holds that the student considers would be needed for an appeal; and/or
  - not to appeal to CCEA AO.
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## 5 Obtaining consent and grade changes affecting candidates not directly involved in an appeal

- 5.1 We proposed that we should not make it a regulatory requirement for CCEA AO to ensure consent has been obtained from all students who might be affected by the outcome of an appeal before that appeal is considered (Question 3).
- 5.2 We also proposed that should an appeal result in a change of rank order, the rank order position and potentially the grades of other candidates in the centre should also change (Question 4).
- 5.3 A majority (47.7%) believed it was not necessary to obtain consent whilst a substantial minority (39.5%) felt that consent should be obtained.
- 5.4 Some comments in favour of requiring consent to be obtained focused on the need for students to be informed at all stages of the process and the importance of consent being obtained particularly if a student's grade can be affected by an appeal they are not involved in.
- 5.5 This type of comment/concern links with our proposal 4, to allow for the rank order to be changed following the successful appeal of a candidate thus potentially changing the grades of other candidates within the centre cohort. 76% of respondents disagreed with this proposal, with around half of all respondents strongly disagreeing (49.8%).
- 5.6 The strength of disagreement in this proposal is reflected in the substantial percentage of respondents feeling that obtaining consent from all candidates should be required by the regulator.
- 5.7 One teacher representative body felt strongly that changing grades of those not directly involved in an appeal should not be allowed, stating:  
*'The appeal process should retain the essence of the normal appeals process. Students in previous years have not been adversely affected when a student in their centre was awarded a higher grade as a result of a successful re-mark.'*
- 5.8 In light of the strong opposition to our proposal to allow the rank order position and potentially the grades of other candidates not directly involved in an appeal to be changed, we do not feel we can adopt this proposal. We have also taken into account the decision of our fellow regulator Ofqual to protect the grades of other candidates in a centre being lowered as a result of a successful appeal. This approach is also being proposed by Qualifications Wales, which has yet to publish the decisions from its consultation. We feel it is in the best interests of students in Northern Ireland to align on this with our fellow regulators in order to ensure that Northern Ireland students experience the same rights in an appeal process regardless of the awarding organisation with which they are taking their qualification.

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**Our decision**

- 5.9 We have decided not to adopt our proposal to allow for the rank order and thus potentially the grades of candidates not directly involved in an appeal to be changed. Instead we have decided to protect the grades of those candidates not involved in the appeal from being lowered.

In light of this decision we have decided to adopt our proposal in relation to obtaining consent. In other words, we will not make it a regulatory requirement for CCEA AO to ensure centres obtain consent from all students before submitting an appeal.

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## 6 Who can be involved in evaluating an appeal and running a different/simplified appeals process?

- 6.1 We proposed that CCEA AO should be permitted to ask persons who were involved in the calculation of results to be involved in the evaluation of appeals in relation to those results (Question 5).
- 6.2 Almost two-thirds of respondents (64.9%) were in agreement with this proposal. The majority of the remainder (26.9%) disagreed.
- 6.3 It should be noted, based on the qualitative comments obtained, this question appears to have been misinterpreted by a significant number of respondents. The question itself referred specifically to statistical staff involved in the calculation of results; however, many responses assumed that the persons in question were teachers involved in the issuing of rank orders and predicted grades. This is not the case.
- 6.4 However, those qualitative comments that referenced statistical staff felt that there was a need to ensure that expertise is consistent throughout the appeals and awarding process. It was felt that involving additional (potentially) less qualified persons to scrutinise highly specialised work in which they have limited expertise could cause issues and potentially serve to disadvantage candidates.
- 6.5 Other respondents, whilst agreeing with the proposal, expressed concerns about the extent of the involvement of statistical staff, whether other staff with no involvement in awarding will also be available and assurance that staff will have no personal interest. Respondents felt that more information was needed on this. Our regulatory proposal is to give CCEA AO the option to include statistical staff in the consideration of an appeal should it feel it is appropriate. Other staff with no involvement may also be involved and we are retaining the regulatory requirement for all staff involved in the consideration of an appeal to have no personal interest in it. These are the parameters we will set CCEA AO upon which it must develop its process. The finer detail around this will be available in CCEA AO's published appeals process.
- 6.6 Linked to proposal 5, we also proposed that CCEA AO should be able to run a different appeals process (i.e. compared to the normal process) this summer (Question 6).
- 6.7 The majority of respondents (82.9%) either agreed or strongly agreed with this proposal.
- 6.8 The principles behind these two proposals are to allow for obvious errors in the way calculated grades have been generated to be found quickly and corrected, whilst still allowing for a full and formal appeal facility to be available should the centre feel it is necessary.
- 6.9 We recognise the operational challenges in meeting the proposal and therefore prioritisation to ensure that learners are able to progress may be considered.

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**Our decision**

6.10 We have decided to adopt both our proposal to allow CCEA AO to ask persons who are involved in the calculation of results to be involved in the evaluations of appeals in relation to these results and to run a different from normal appeals process.

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## 7 The statistical standardisation process

- 7.1 We proposed that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model (Question 7).
- 7.2 Just under two-thirds of respondents disagreed with this proposal, with 20.7% either agreeing or strongly agreeing. The level of agreement across the different respondent types varied, with the parents/students group having the lowest percentage of agreement (8.7%). There was a greater degree of support for this proposal from educationalists (34.9%).
- 7.3 In many cases the responses from those who disagreed reflected concerns about how the statistical standardisation process would work or a lack of information/understanding of it. CCEA will issue, once approved, the approach of the statistical standardisation model to be used for the awarding of CCEA qualifications this summer.
- 7.4 The statistical standardisation model that is agreed and published must be applied uniformly in order to ensure the process is fair and equitable for all centres and their students. Those disagreeing suggested other data, which a centre could put forward in an appeal, could be included in the statistical standardisation of its students. We are concerned that CCEA AO would not be able to draw on the same level of data for all centres. This would create an inconsistency of process between centres, which would in turn risk inconsistency in the standards applied and thus less fair and reliable results.
- 7.5 The consistent application of the statistical standardisation process is central to the maintenance of standards in the qualifications being awarded this summer. To vary the application of the statistical standardisation model for one student or for a centre's cohort of students, as a result of an appeal, would be unfair to other students at other centres and would undermine standards. In normal awarding circumstances, the setting of grade boundaries in a subject is a process by which standards are maintained and which has a consistency in its application to all students. Having carefully considered the response to our proposal, we continue to consider that the statistical standardisation model should be treated as something broadly comparable to the setting of grade boundaries in normal years, against which no appeal is permitted.

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### Our decision

- 7.6 We have decided to adopt our proposal not to provide for appeals in respect of the operation or outcome of the statistical standardisation model.
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## 8 Professional judgements and rank order position

- 8.1 We proposed that we should not provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre's assessment grades are determined (Question 8).
- 8.2 In addition to this we proposed that we should not provide for a student to challenge their position in a centre's rank order (Question 9).
- 8.3 Strength of opinion for our proposal not to provide for an appeal premised on a teacher's professional judgement was finely balanced. 45.4% agreed or strongly agreed with this proposal and 45.1% disagreed or strongly disagreed, with 6.9% neither agreeing nor disagreeing. Students, parents and carers were more likely to disagree with this proposal.
- 8.4 Response to our proposal not to provide for a student to challenge their position in a centre's rank order was similar. Again the responses were finely balanced – 48.7% either agreed or strongly agreed, 47.2% either disagreed or strongly disagreed with 2.9% neither agreeing nor disagreeing.
- 8.5 Concern was evident in comments from those disagreeing about the potential for teacher bias and the ability of a student to ensure fairness.
- 8.6 For a student to appeal against the professional judgement exercised in assigning a Centre Assessment Grade, the student would need to know the Centre Assessment Grade assigned in their case. To appeal against a rank order position, the student would need to know their rank order position and would need to know at least the identities of the students placed immediately above and below them in rank order.
- 8.7 In our Head of Centre guidance issued in April we advised that the Centre Assessment Grade and rank order information will not be disclosed to students as a matter of course, in order to protect the integrity of the process and enhance the reliability of the data. The disclosure of data about other students' places in rank order would also clearly raise issues of confidentiality.
- 8.8 In any event, an appeal against teacher or centre professional judgement would require someone to evaluate the professional judgements underpinning the centre assessment grades and rank order decisions made by the centre. In our consultation document we explained that given the nature of the process for awarding grades this year – in the circumstances of the Covid-19 pandemic – there is no common assessment to inform the necessary professional judgements. As such there is no common benchmark or standard against which those judgements can be evaluated by a decision maker on appeal. No workable solution to this issue has been identified. In the circumstances, we remain of the view that an appeal against a matter of professional judgement – that is, against the student's assigned centre assessment grade and rank order – should not be provided for.

- 8.9 There may be rare cases in which a student considers that the determination of centre assessment grade/rank order was demonstrably affected by bias or that they were discriminated against. If there is evidence of bias or discrimination, then this would be a matter for the centre to address in the first instance. Evidence of bias could, regardless of any appeal mechanism, be raised by a student with their centre as a complaint that would require to be investigated. If an investigation found that there had been an attempt to undermine the process put in place this summer for the determination of awards, this would be a matter of alleged malpractice. Our existing conditions allow CCEA AO to correct results where it finds that these are incorrect as a result of malpractice/maladministration.
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### **Our decision**

- 8.10 We have decided to adopt our proposal not to provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre's assessment grades are determined and also not to provide for a student to challenge their position in a centre's rank order.
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## 9 Appeals on the basis of centre procedure

- 9.1 We proposed that we should not provide for an appeal in respect of the process or procedure used by a centre (Question 10).
- 9.2 As with proposals 8 and 9 the response to this proposal was split. 40.9% of respondents agreed with our proposal not to allow for an appeal in respect of the process or procedure used by a centre. 51.7% disagreed with this proposal.
- 9.3 A divergence of opinion was apparent as between organisations/educationalists and parents/students, with parents and students being much more likely to disagree with the proposal of students not being able to appeal on the basis of a centre's process/procedure.
- 9.4 As noted in our consultation document<sup>1</sup>, in the exceptional circumstances of this summer we have not required CCEA AO to specify in detail the evidential basis on which individual centres must arrive at their judgements. This is for a number of reasons, including the flexibility such a process requires, the timeframe within which the process had to be implemented, and the variation in evidence that will be available to be considered in different centres. There will inevitably be a lack of uniformity in the evidence considered by centres in making their judgements, and as there is no common benchmark or standard against which those judgements can be evaluated, in line with Section 8 above, no appeal against a centre assessment grade or centre rank order will be provided for. This Section is however concerned with process and procedural error on the part of the centre in respect of data/information processed and submitted by the centre.
- 9.5 In our consultation, we proposed that any error in the data submitted that was found by the centre or student, could be addressed as part of an appeals process. We want to ensure that students and centres have a right to recourse should an error be found in the way in which data is processed and submitted by a centre as part of the awarding arrangements for summer 2020. To protect the integrity of the process, we consider it necessary to make provision for any such alleged error to be investigated and, as necessary, corrected.
- 9.6 We have given further consideration to existing regulations and processes, which are outlined below in 9.7–9.9. Procedural error by a centre is currently addressed through such regulations and processes, and we are of the view that these are sufficiently robust and fair to allow any student or centre the opportunity to address potential error in centre procedure and process. Moreover, the existing regulations and processes will see errors in centre process and procedure addressed and corrected in a more timely way than would be the case with an appeal procedure, and thus better serve the interests of any potentially adversely affected students.

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<sup>1</sup> CCEA Regulation Consultation on Summer 2020 Appeals, page 12.

- 9.7 Under the JCQ General Regulations for Approved Centres, centres are required<sup>2</sup> to have a written complaints procedure which addresses general complaints regarding the centre's administration of a qualification. Using this complaints process, a student who believes that an error has been made by the centre which has affected their result, can raise this with the centre to be considered and resolved. If it is found that an error was made, the centre should then ask CCEA AO to rectify this (if required) on the student's behalf.
- 9.8 In the event a student is of the view that the alleged error they have raised has not been appropriately investigated by the centre, the student can contact CCEA AO directly to report their complaint, and the centre's handling of it.
- 9.9 In these circumstances, the alleged error and the centre's response to it will be treated by CCEA AO as a potential complaint of maladministration<sup>3</sup> by the centre, and may be the subject of an investigation by CCEA AO. In the event an investigation by CCEA AO determines that an instance of maladministration has been identified, CCEA AO may require the centre to reconsider the matter afresh<sup>4</sup>. CCEA AO can also apply sanctions<sup>5</sup> to the centre.
- 9.10 It is important to emphasise that given the clear expectations for centres to ensure that the data submitted is accurate and supported by a Head of Centre declaration, we believe that cases raised with CCEA AO in respect of errors in centre process and procedure, if any, will be exceptional cases. Where such cases do arise, centres will be expected to produce high standards of robust evidence to CCEA AO.
- 9.11 Through these processes students can obtain appropriate recourse in the event that an administrative error has been made by the centre in the process and procedure it has followed. By way of practical examples:
- *Jennifer is an A-Level student at School Y. On receipt of her results, she was dissatisfied with her grade in Mathematics, and wanted to ensure there had not been an error in the way her school (the examination centre) had handled the process of providing CCEA AO with her information about Mathematics. Using her school's complaints process, she asked the school to confirm that the information submitted by the school about her was accurate. The school investigated, and found that incorrect information about Jennifer had been transmitted in error. In rectification of the error School Y identifies a Grade B (Rank 9), instead of C (Rank 2), should have been submitted. The school contacted CCEA AO to inform it of its error, detailing*

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<sup>2</sup> Regulation 5.8(e), *General Regulations for Approved Centres*, JCQ, available at: <https://www.jcq.org.uk/exams-office/general-regulations/general-regulations-for-approved-centres-2019-2020>

<sup>3</sup> Maladministration, as a subset of malpractice, is defined as: "Failure to adhere to the regulations regarding the conduct of controlled assessments, coursework, examinations and non-examination assessments, or malpractice in the conduct of examinations/assessments and/or the handling of examination question papers, candidate scripts, mark sheets, cumulative assessment records, results and certificate claim forms, etc".

This definition can be found at page 37, *Suspected Malpractice Policies and Procedures*, JCQ, available at: <https://www.jcq.org.uk/exams-office/malpractice>

<sup>4</sup> Condition A8.2, *General Conditions of Recognition*, CCEA Regulation, requires an awarding organisation, in cases where maladministration has given rise to adverse effect, to "mitigate and correct it".

<sup>5</sup> For a list of potential sanctions, see Section 11 and Appendix 4, *Suspected Malpractice Policies and Procedures*, JCQ, available at: <https://www.jcq.org.uk/exams-office/malpractice>

*the mistake that had been made, and CCEA AO, having reviewed and accepted the error, corrected the error by issuing the centre with a revised Mathematics grade for Jennifer.*

- *Dan is an A-Level student at School Z. Using his school's complaints process, he asked the school to confirm that the information submitted by the school about him was accurate, and no error had been made in procedure. The school failed to acknowledge Dan's complaint and it was not investigated. Dan was not satisfied with this and contacted CCEA AO to report his concerns. CCEA AO contacted the centre to initiate an investigation into the handling of the complaint. School Z accepted that the complaint had not be handled correctly and proceeded to investigate the complaint. The school identified that the process by which the information was provided to CCEA was correct.*

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## Our decision

9.12 We have decided to adopt our proposal that we should not, within the summer 2020 appeals process, provide for an appeal in respect of the process or procedure used by a centre.

It is considered that the availability of the processes referred to above at 9.7–9.9 meets the substance of the concerns of those who disagreed with this proposal.

In any case where a student is of the view that an error has been made by the centre in its procedure or process, those processes provide that:

- The student can make a complaint to the centre under the written complaints process a centre is required to maintain;
  - If upheld, the centre must inform CCEA AO of the error and request the error is corrected;
  - If the student remains dissatisfied with the centre's handling of the complaint, the student can report their complaint and the centre's handling of it to CCEA AO;
  - CCEA AO may investigate this complaint, and if an error is identified in the procedure or process used by the centre, a sanction may be imposed on the centre, in addition to a requirement that the Centre correct its error, such that CCEA AO can then, if appropriate, issue a revised grade.
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## 10 Exam Procedures Review Service (EPRS)

- 10.1 We proposed to make the EPRS available to centres for results issued this summer and that its functions will be to consider:
- whether CCEA AO properly considered the appeal in line with its published process; and
  - whether any administrative error on the part of the AO used to generate the calculated grade(s) issued was properly identified during the appeal and corrected (Question 11).
- 10.2 The majority of respondents (85.3%) agreed with this proposal.

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### **Our decision**

- 10.3 We have decided to adopt our proposal that the EPRS, operated by CCEA Regulation, should be available to centres for results issued this summer.
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## 11 Equality Impact Assessment

- 11.1 We considered the potential impact of the proposals on people who share protected characteristics<sup>6</sup> and did not identify any such impacts (positive or negative).
- 11.2 We asked respondents whether there were any potential impacts that we had not already identified and, if so, whether there were any additional steps we could take to mitigate those impacts (Question 12).
- 11.3 95.2% of respondents agreed with the Equality Impact Assessment included in the consultation document, specifically that the impacts of the proposals (positive or negative) outlined in the consultation document on persons who share protected characteristics have been appropriately considered.
- 11.4 For those who did not agree with the Equality Impact Assessment, concerns were raised primarily in regards to the following groups:
- Students with special access arrangements and how this is taken into consideration with regards to calculations;
  - Pupils from disadvantaged backgrounds and the impact of resources on the ability to appeal;
  - Male students who typically perform better in exam conditions; and
  - Secondary schools who tend to have greater variation in cohort performance.
- 11.5 These concerns are largely directed at the awarding arrangements in place rather than the proposed appeals process. CCEA will release the approach agreed regarding the statistical standardisation model to be used for this summer's awards. CCEA AO is carrying out equality impact assessments on the models being considered and, with CCEA Regulation, will agree the best model, taking account of any impacts (positive or negative) that the model may have on persons with protected characteristics. Concerns raised through this consultation in relation to the awarding process this summer have been passed to CCEA AO for its consideration.
- 11.6 Some responses recorded a potential for bias in the awarding arrangements with regard to males performing better in examination conditions. However, the Head of Centre guidance is clear to teachers that in making their assessment, it should be on what the student would have attained should they have sat the exam as normal in Summer 2020.
- 11.7 Equally the Head of Centre guidance advises teachers that where students have agreed reasonable adjustments or access arrangements (for example a reader or scribe), the judgement should take account of likely achievement with the reasonable adjustment/ access arrangement in place.

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<sup>6</sup> As set out under Section 75 of the Northern Ireland Act 1998

- 11.8 There was also some concern around potential for discrimination in teacher professional judgements. Ofqual conducted a literature review on the nature and extent of any bias that might arise in using centre assessment grades for this summer's cohort of GCSE, AS and A level students. We have taken cognisance of this research and have amended the Head of Centre guidance issued to centres for determining centre assessment grades this summer. The literature review is available on the Ofqual website.
- 11.9 We have decided that CCEA AO should accept appeals only from centres. This is the case in the normal appeals process. The concern about the ability of students from disadvantaged backgrounds to appeal and having the resources to do so exists in the normal review and appeals process. Our regulatory requirements allow for the awarding organisations to choose to charge a fee for review of marking and appeal applications. We do not intend to amend or remove this. We expect CCEA AO and in turn centres to take account of students with protected characteristics when setting such fees.

## 12 Next Steps

- 12.1 The decisions taken and set out in this document will form the principles and framework for an appeals process to be used by CCEA awarding organisation (AO) for this summer's awards.
- 12.2 We will suspend some of our regulatory requirements for appeals relating to GCSE, AS and A level qualifications which are set out in the General Conditions of Recognition and the GCSE and GCE Qualification Level Conditions. In their place we will introduce temporary Special Conditions which will set out the requirements for this summer's awards. These Special Conditions will reflect the decisions taken following this consultation and will be published on our website.
- 12.3 CCEA Awarding Organisation will develop a new appeals process for this summer's awards in line with the new Special Conditions we have introduced.
- 12.4 We will require CCEA AO to make its appeals process publicly available in a timely manner to allow both centres and students to familiarise themselves with the detail.



