



*The Royal Society  
of Edinburgh*

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22-26 George Street  
Edinburgh  
EH2 2PQ  
[dtuhtar@theRSE.org.uk](mailto:dtuhtar@theRSE.org.uk)

Dr Gill Stewart  
Director of Qualifications Development  
Scottish Qualifications Authority (SQA)

31 March 2021

### **SQA consultation: appeals**

Dear Dr Stewart:

1. I write to you as secretary of the Royal Society of Edinburgh's Education Committee. The Committee welcomes the opportunity to respond to SQA's consultation on proposed appeals models for 2021. The Committee has been actively following the many adaptations the educational sector has had to make in response to the pandemic, most notably the cancellation of examination diets and the introduction of an Alternative Certification Model (ACM) and appreciates the enormous challenge that SQA has faced in delivering service continuity and providing assurance to learners. We hope the 2021 appeals model will strike an acceptable balance between affording learners sufficient recourse to pursue appeals and avoiding placing undue additional demands on an already burdened system.
2. We provide our responses to the nine consultation questions below.

**Question 1: To allow learners to decide whether to submit an appeal, and to respect learners' rights, there is a need for centres to explain, in detail, the reasons for their judgement. How can this best be done?**

3. As it will be centres who formulate and submit grades for each candidate, it would be logical for them to also be tasked with explaining how said grades were derived. Candidates should be entitled to a clear but concise written overview of how their provisional results were calculated, including a description of how the centre chose to interpret national guidance when assessing evidence.

**Question 2. Is it appropriate that the result of the initial appeal is determined by the learner's school or college? Please explain the reasons for your answer.**

4. We agree this is appropriate. Given it will be centres who submit grades for candidates, they will naturally be best placed to clarify the rationale behind their own decision-making to the candidate in cases where their conclusions are called into question. If candidates continue to insist on an appeal, there could be scope to look to other schools/centres to provide a second opinion, as provided for under the current Alternative Certification Model (ACM) which assigns a role or responsibility to local authorities and the Scottish Council for Independent Schools (SCIS) to



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support the quality assurance process, including *engagement with schools/centres to agree a model for corresponding school/centre level checks and endorsement*.<sup>1</sup>

5. Of the three models that are described, model 2<sup>2</sup> is our preferred approach to administering the appeals process in a way that is feasible in practice while still providing avenues for escalation in those instances where it is deemed necessary.
6. In general, subjecting provisional results to a strong and transparent internal quality assurance process prior to submission to SQA, as specified by the ACM, should help to reduce the need for appeals in the first place. Additionally, it is likely that many schools will have already been in conversation with candidates throughout the year if their grades or levels have been questioned or if their early results sit very close to a grade boundary, adding an additional layer of scrutiny to the process.

**Question 3. If the result of the initial appeal is determined by the learner's school or college, is there a need for some learners to be able to further appeal to SQA? If so, under which circumstances?**

7. The option of external review should be offered, though it should be reserved for specific circumstances, such as cases where a high number of candidates within a particular subject or cohort within the centre wishes to appeal. Offering this option to all candidates as a matter of course would undoubtedly overwhelm the capacity of the system. Prior to appealing to SQA, internal quality checks and, in some cases, cross-centre moderation, should be undertaken first. An appeal to the SQA may well focus on the initial processes of quality assurance that were in place for that particular centre.

**Question 4: Do you agree that an appeal outcome should be the grade that the evidence shows ought to be awarded? This means that an appeal could result in a grade remaining the same, being upgraded or downgraded.**

8. Yes. Appeals should result in a change to an awarded grade if a reconsideration of the evidence discovers a discrepancy.

**Question 5: In the absence of fees and with limited capacity in the education system to support appeals, how can SQA ensure that appeals are only made when learners genuinely believe that they have been treated unfairly?**

9. As stated earlier, effective internal quality assurance should help to reduce the number of appeals being lodged. Centres should also be satisfied that all internal and cross-centre appeals processes have been fully exhausted before involving SQA. For those cases which escalate beyond internal appeals procedures and demand further review by SQA, priority should be given to those candidates whose progression pathways may be materially altered due to the disputed grade (for example, where a candidate may not progress to employment or further study).

**Question 6: Are the proposed grounds for appeal reasonable? Are there any others that should be included?**

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<sup>1</sup> <https://www.sqa.org.uk/sqa/96760.html>

<sup>2</sup> According to SQA, model 2 would see appeals being directed to centres, with the centre first holding a clarification conversation with the learner and/or their representative and then, if needed, followed by a formal appeal, with the centre making its own determination as to whether an appeal is upheld or not. If they are dissatisfied, candidates would then be able to make a further appeal to SQA.



10. The concept of fairness is largely subjective and so it would be extremely difficult to meaningfully determine if a candidate has been treated unfairly in practice. Indeed, it is likely that most candidates who did not receive the grades they expected will feel unfairly treated to some degree and so could choose to pursue an appeal on these grounds. In order to avoid an influx of such cases – which would be challenging to resolve and would require significant resources to address in the numbers that are likely to arise - it would seem prudent to limit appeals to cases of administrative errors or in cases where centres have failed to comply with SQA and/or local requirements. The use of a quality assurance procedure at the centre level should also help to minimise the number of cases that fall into these categories.
11. If fairness is to be retained as an accepted grounds for appeal, then it must be qualified by robust evidence in support of that conclusion (for example, if there are significant concerns that the centre did not adhere to proper quality assurance protocols).

**Question 7: What might be required to help learners understand what will and will not be considered under the grounds of a lack of fairness in assessment?**

12. As mentioned in the answer to the preceding question, if perceived unfairness is to be kept as a valid grounds for appeal, candidates should be prepared to point to specific evidence in support of this claim. Both centres and SQA should deliver clear, concise, and timely communication directly to candidates, parents and carers, and parent bodies to promote a clear and early understanding of how the appeals process will be undertaken this year. This will help candidates to judge if pursuing an external appeal is supported by their particular circumstances.

**Question 8: What positive and negative impacts can you identify in relation to appeals processes on the needs set out in the public sector equality duty? How could the positive impacts be maximised, and the negative impacts be mitigated?**

13. All those tasked with administering the appeals process must have a solid understanding of said duty and how to enact it. The centre will be best placed to understand the situation of individual candidates and can put forward appeals for individual candidates where they see an anomalous result.

**Question 9: How should the consideration of appeals be prioritised?**

*Depending on the volume of appeals received and the education system's capacity to handle them, SQA may need to apply criteria to prioritise requests. The standard approach to prioritisation is based on immediate progression to employment, apprenticeships, college or university entry. Are there other factors to consider?*

14. Priority should be given to those appeals that might unfairly limit progression as set out in the standard approach cited above.
15. I hope you have found our contribution to the inquiry useful. We would be pleased to discuss our response further should you consider that productive. To that end, I would be grateful if you could follow up with myself, Daria Tuhtar, at [dtuhtar@therse.org.uk](mailto:dtuhtar@therse.org.uk). Thank you.

Yours sincerely

Daria Tuhtar  
Secretary to the Royal Society of Edinburgh Education Committee



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