

---

**Ed Humpherson, Director General for Regulation**

Lynne Neagle MS  
Chair, Children, Young People and Education Committee  
Welsh Parliament  
Cardiff Bay  
CF99 1SN

02 March 2021

Dear Ms Neagle,

Today the Office for Statistics Regulation (OSR) published a review into the approach for developing statistical models for awarding grades in 2020<sup>1</sup>. As your Committee will be aware, the grade awarding context in 2020 was challenging and had a profound impact on the lives of young people.

As the regulator of official statistics in the UK, it is our responsibility to uphold public confidence in statistics. In this context, we were concerned that public confidence in the use of statistical models by public bodies has been damaged and this may reduce the use of such models in future. However, statistical models and algorithms used by government and other public bodies are an increasingly prevalent part of contemporary life. As technology and the availability of data increase, there are significant benefits from using these types of models in the public sector.

To address these concerns, we have been exploring the approaches taken to awarding grades in 2020. Our focus in doing so has been to identify the important lessons for other public bodies working with statistical models and algorithms. Our review found that achieving public confidence in statistical models is not just about the technical design but is supported by the end to end process of developing them. We have identified 3 key principles that we believe can support public confidence. They are:

- Be open and trustworthy
- Be rigorous and ensure quality throughout
- Meet the need and provide public value

To help ensure statistical models command public confidence, we are calling on the centre of government, in collaboration with the administrations in Scotland, Wales and Northern Ireland to improve the support, guidance and professional oversight for those working with statistical models and algorithms.

In the exams case, we found that the public bodies responsible for designing the models all acted with integrity. We identified that there were inherent challenges in the task which made it difficult to deliver exam grades in a way that commanded public confidence. We

---

<sup>1</sup>[Learning lessons from the approach to developing models for awarding grades in the UK in 2020](#)

conclude that many of the decisions made supported public confidence, while in some areas different choices could have been made. In particular, we consider that they could have done more to convey publicly the limitations to the use of models to award grades.

I hope this review is of interest to the Committee, and please let me know if any further questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ed Humpherson', written in a cursive style.

Ed Humpherson  
Director General for Regulation