

# Consultation on exceptional arrangements for exam grading and assessment in 2020

## Your data and rights

Name

Dr Samina Khan

Position (if applicable)

Director, Undergraduate Admissions and Outreach

Organisation (if applicable)

University of Oxford

Do you wish any part of your response to remain confidential?

No

## Consultation questions

To what extent do you agree or disagree that we should incorporate the requirement for exam boards to collect information from centres on centre assessment grades and their student rank order, in line with our published information document, into our exceptional regulatory requirements for this year?

Strongly agree

To what extent do you agree or disagree that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity?

Strongly agree

To what extent do you agree or disagree that Heads of Centre should not need to make a specific declaration in relation to Equalities Law?

Disagree

To what extent do you agree or disagree that students in year 10 and below who had been entered to complete exams this summer should be issued results on the same basis as students in year 11 and above?

Agree

To what extent do you agree or disagree that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by exam boards as potential malpractice?

Agree

Do you have any comments about our proposals for centre assessment grades?

As a matter of principle, we recognise the importance of Ofqual retaining its remit to uphold assessment standards, and we support the regulator's efforts in these difficult circumstances. We are however concerned to ensure that teachers assigning the centre assessment grades have sufficient training, and are following a consistent process within subjects, across subjects and across different centres. Also, that no student should be disadvantaged because their centre does not have the resources or the experience to provide a robust and evidence-based case for their centre assessment grades.

We agree that centre assessment grades should be used as the most pragmatic option in difficult circumstances. However, we are concerned that academically talented students from disadvantaged backgrounds who do not conform to their school's historic norms, who are outliers at their school in terms of their individual performance, or who may have made significant progress since their GCSEs, will be adversely impacted by the proposals as they currently stand.

It is our experience that students from disadvantaged backgrounds who apply to and are offered places at Oxford are more likely to have lower attainment prior to A-Levels (i.e. GCSEs) than their more advantaged peers. We also observe that these students are more likely to make significant progress from one key stage to the next compared to their more advantaged peers.

It would be grossly unfair for these students to have their grades reduced as a consequence of statistical modelling. A more nuanced approach is needed for those from the most disadvantaged groups. We suggest that Ofqual puts in place a brake mechanism to ensure that disadvantaged students (e.g. those eligible to Free School Meals, from socio-economically disadvantaged areas such as POLAR Quintiles 1 and 2 and ACORN categories 4 and 5 postcodes, students with care experience, children in need, gypsy, Roma and Traveller, mature learners etc.) do not have their centre assessment grades reduced during the statistical standardisation stage without extra scrutiny and ideally a mechanism to recognise their achievements in the context of their educational experiences.

We support measures that strengthen the integrity of the grades being awarded, so for this reason agree with the proposal that inappropriate disclosure should be investigated as malpractice. We also support the proposal that headteachers (or their nominated representatives) should be required to assure for the accuracy and integrity of the information submitted. It may be helpful to clarify whether failure to do so would also be treated as malpractice.

We are not directly affected by the decision about whether students in year 10 and below should be awarded grades. However, we do use GCSE grades in our admissions process (including as a contextualising factor), so we would need to be confident that all grades awarded in 2020, regardless of the age of the student, were comparable to results in previous and subsequent years.

To what extent do you agree or disagree that we should incorporate into the regulatory framework a requirement for all exam boards to issue results in the same way this summer, in accordance with the approach we will finalise after this consultation, and not by any other means?

Strongly agree

Do you have any comments about our proposal for the issuing of results?

We anticipate that the confirmation of results by the higher education sector will be a particularly complex process this year as we cannot predict the impact of the centre assessment grades and the standardisation process on the issuing of grades on the numbers of students who meet the conditions of their university offers made this year, or (and of equal importance) the diversity of the group who achieve their required grades. This will present significant logistical challenges to Oxford and more importantly on our strong ambitions to diversify our undergraduate student body. Consequently we hope that the proposal for issuing results does not contain biases that will disadvantage students from socio-economically disadvantaged backgrounds.

We also recognise that awarding organisations and schools will be operating in an unprecedented way, and also need time to ensure the integrity of the results being issued. We note that it is currently proposed that results are issued on the same date as originally planned; if there is any change to this arrangement we would appreciate as much notice as possible so we can plan effectively.

We would also like an assurance that universities will still receive results the week prior to their publication (i.e. on or before 8 August) to enable us to take appropriate action prior to A-Level results day. Where possible the higher education sector should receive the A-level results earlier than normal this year to allow us to effectively and proficiently publicise the confirmation of offers for study at our institutions. Working effectively together we can help this year's A-Level students, who have been dealt an unenviable situation to manage.

To what extent do you agree or disagree that we should only allow exam boards to issue results for private candidates for whom a Head of Centre considers that centre assessment grades and a place in a rank order can properly be submitted?

Agree

To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to students in the rest of the UK?

Strongly agree

To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to all students, wherever they are taking the qualifications?

Strongly agree

Do you have any comments about the impact of our proposals on any particular groups of students?

As mentioned above, we are very concerned about the potential negative impact of the current situation on students from socio-economically disadvantaged backgrounds (e.g. those eligible to Free School Meals, from socio-economically disadvantaged areas such as POLAR Quintiles 1 and 2 and ACORN categories 4 and 5 postcodes, students with care experience, children in need, gypsy, Roma and Traveller, mature learners etc.) who are likely to be facing more disruption to their education than their more advantaged peers. It is our view that it is foreseeable that the proposed arrangements for issuing grades will disproportionately impact disadvantaged students, and therefore it behoves Ofqual to remedy this potential impact before grades are confirmed.

Again, it would be grossly unfair for these students from socio-economically disadvantaged backgrounds to have their grades reduced as a consequence of statistical modelling. A more nuanced approach is needed for those from the most disadvantaged groups. We suggest that Ofqual puts in place a brake mechanism to ensure that disadvantaged students do not have their centre assessment grades reduced without extra scrutiny, and ideally a means to recognise their achievements in the context of their backgrounds and educational experiences.

We also share Ofqual's concerns about the awarding of grades to private candidates, and the importance of balancing the needs of such students with the security of the overall process. It would be difficult to impose a single solution for private candidates as their circumstances are likely to be varied (including, for example, home school students, mature students, travellers and refugees); we would therefore support the proposal that they should be included in the centre's grading and rank order if the subject teachers and head teacher concerned are confident they have evidence on which to base a judgement. We would welcome any assistance which Ofqual or UCAS can provide in identifying these students.

We would also like to be assured of consistency in grading within each qualification, and also between jurisdictions where that applies. This is particularly important between England, Northern Ireland and Wales, who will be awarding A-Levels calculated in part on the basis of AS-Level grades that are not available in England.

To what extent do you agree or disagree with the aims outlined above?

Agree

To what extent do you agree or disagree that using an approach to statistical standardisation which emphasises historical evidence of centre performance given the prior attainment of students is likely to be fairest for all students?

Disagree

To what extent do you agree or disagree that the trajectory of centres' results should NOT be included in the statistical standardisation process?

Disagree

To what extent do you agree or disagree that the individual rank orders provided by centres should NOT be modified to account for bias regarding different students according to their particular protected characteristics or their socio-economic backgrounds?

Disagree

To what extent do you agree or disagree that we should incorporate the standardisation approach into our regulatory framework?

Neither agree nor disagree

Do you have any comments about our proposals for the statistical standardisation of centre assessment grades?

Oxford welcomes the inclusion of the aim “to protect, so far as is possible, all students from being systematically advantaged or disadvantaged, notwithstanding their socio-economic background or whether they have a protected characteristic” and the recognition of the potential impact of these proposals on students from disadvantaged backgrounds.

However, we are not convinced that the proposed statistical measures to correct for potential bias will be sufficiently robust and defensible to rectify the adverse impact which the statistical standardisation seems likely to have on academically talented students from socio-economically disadvantaged backgrounds. We are not convinced that the proposed statistical standardisation method is responsive and sufficiently granular to meet the needs of academically talented students who are the outliers in their centres.

Almost all students change school setting between KS2 and KS3, and there is also movement at KS4 with students moving between schools, or to FE colleges or sixth forms. Consequently, students at a single KS4 are likely to have come from a diverse range of KS2 settings, and students at KS5 may have moved schools between KS4 and KS5. Furthermore, as we mention above, it is our experience from students from disadvantaged backgrounds who apply to, and are offered places at Oxford, that students from disadvantaged backgrounds are more likely to have lower attainment prior to A-Levels hence their GCSEs are not an accurate reflection of their exceptional A-Level achievements.

We strongly support Ofqual’s commitment to ensure that students from particular socio-economic backgrounds are not systematically advantaged or disadvantaged. However, while statistical models tend to predict group results well, the results for individuals are often poor. We are therefore unclear how easy it will be for Ofqual to proactively reconcile its statistical standardisation approach with the possibility of allowing ‘technical choices’ for individual or group characteristics to be taken into account, or how the modelling will accommodate centres on an upward trajectory while ensuring that historical trends remain the same. We also have concerns about how Ofqual will combine the rankings of each centre in a way that fulfils their aim to ensure the methodology is transparent and easy to explain.

Therefore, while we appreciate why Ofqual wants to use this data in this way (speed, simplicity, and feasibility), cohort level reference data about prior attainment is not without issues and seems likely to penalise academically talented students from disadvantaged backgrounds.

To what extent do you agree or disagree 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?

Agree

To what extent do you agree or disagree that we should not provide for a student to challenge their position in a centre’s rank order?

Agree

To what extent do you agree or disagree that we should not provide for an appeal in respect of the process or procedure used by a centre?

Agree

To what extent do you agree or disagree that we should provide for a centre to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated?

Agree

To what extent do you agree or disagree that for results issued this summer, exam boards should only consider appeals submitted by centres and not those submitted by individual students?

Agree

To what extent do you agree or disagree that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student?

Strongly agree

To what extent do you agree or disagree that exam boards 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?

Agree

To what extent do you agree or disagree that exam boards should be able to run a simplified appeals process?

Disagree

To what extent do you agree or disagree that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model?

Disagree

To what extent do you agree or disagree with our proposal to make the Exam Procedures Review Service (EPRS) available to centres for results issued this summer?

Agree

Do you have any comments about our proposals for appealing results?

It is important that centres and students have a transparent and inclusive mechanism for challenging any outcome that they feel does not accurately represent their likely attainment by the end of their course. This is particularly relevant for students at less-well-resourced schools who may not be supported in having an appeal made for them. However, we also recognise the difficulties inherent in trying to do so when grades are not based on standardised tasks and mark schemes, or on judgements by assessors trained and employed by awarding organisations. We would also be wary of any form of appeal that could overturn the results of students who had not chosen to query their result.

In the current circumstances, the proposal to focus on the application of procedure seems sensible, and we support the proposal that such appeals should only be made by centres regarding the awarding organisation's application of the agreed methodology for determining correct grades. However, we would also like to see the application of the statistical model as falling within the scope of the appeal process. The limited nature of the appeals process makes it all the more important that Ofqual ensures at the outset that its statistical model does not unfairly impact any group of students, as they may have no recourse after the event.

We do have some concerns that the proposals, despite being as fair and transparent as possible in the circumstances, leave individual students with no formal mechanism to challenge their grades, or to query the basis on which their grades were calculated. In practice this means that the only option for students who do not receive the grades they were hoping for (and on which university places may depend) would be to take exams in the autumn series or the following summer. This is likely to be an easier course of action for students from more advantaged backgrounds who are able to take an unplanned gap year, and who are also more likely to receive more, or more intensive, support from their school to prepare for later examinations.

Universities may have the option to accept candidates who have missed their offers if they have any unoccupied places, but for selective universities like Oxford this is unlikely. And it would not be desirable for this to be a widespread response, as it could undermine the value of the grades issued this year by awarding organisations and overseen by Ofqual.

To what extent do you agree or disagree that entries to the autumn series should be limited to those who were entered for the summer series, or those who the exam board believes have made a compelling case about their intention to have entered for the summer series (as well as to students who would normally be permitted to take GCSEs in English language and mathematics in November)?

Agree

To what extent do you agree or disagree that we should apply the same provisions as GCSE, AS and A level qualifications to all Extended Project Qualifications and to the Advanced Extension Award qualification?

Agree

To what extent do you agree or disagree that we should confirm that exam boards will not be permitted to offer opportunities for students to take exams in May and June 2020?

Agree

To what extent do you agree or disagree with our proposals that exam boards will not be permitted to offer exams for the AEA qualification or to moderate Extended Project Qualifications this summer?

Agree

Do you have any comments about our proposals for building our arrangements into our regulatory framework?

We agree that arrangements should be formalised in Ofqual's regulations. We are of the view that given the exams have been cancelled, in the interests of fairness, there should be no scope for some students to still take them as it is likely only to benefit more advantaged groups of students.

Are there other potential equality impacts that we have not explored? What are they?

While the EIA is thorough in looking at the potential impact of teacher assessment and grading, it does not assess the extent to which statistical standardisation could have a negative impact on the outcomes for academically talented students from disadvantaged backgrounds (e.g. those eligible for Free School Meals, from socio-economically disadvantaged areas such as POLAR Quintiles 1 and 2 and ACORN categories 4 and 5 postcodes, students with care experience, children in need, gypsy, Roma and Traveller, mature learners etc.). For the reasons outlined above, we think this is a significant gap in the EIA and one which Ofqual should remedied as a matter of urgency.

We would welcome your views on how any potential negative impacts on particular groups of students could be mitigated:

We suggest that Ofqual puts in place a brake mechanism to ensure that disadvantaged students (e.g. those eligible to Free School Meals, from socio-economically disadvantaged areas such as POLAR Quintiles 1 and 2 and ACORN categories 4 and 5 postcodes, students with care experience, children in need, gypsy, Roma and Traveller, mature learners etc.) do not have their centre assessment grades reduced during the statistical standardisation stage without extra scrutiny and ideally a mechanism to recognise their achievements in the context of their educational experiences.

Are there additional activities associated with the delivery of the revised approach that we have not identified above? What are they?

We are not convinced that the proposed statistical standardisation method is responsive and sufficiently granular to meet the needs of academically talented students from socio-economically disadvantaged backgrounds and who are the outliers in their centres. Ofqual should look to include the contextualisation of prior achievement in its statistical standardisation of centre assessment grades to create better equality of outcomes for these students.

We are also concerned that teachers involved in the issuing of the centre assessment grading should feel properly prepared and supported in making their grading decisions.

What additional costs do you expect you will incur through implementing this approach?

For Oxford we are interested in admitting the most academically talented students and if these students potential is not recognised by the statistical standardisation of the centre assessment grading this will be the principal cost to us. We are not convinced that the proposed statistical standardisation method is responsive and sufficiently granular to meet the needs of academically talented students from socio-economically disadvantaged backgrounds and who are the outliers in their centres.

What costs will you save?

None.

We would welcome your views on any suggestions for alternative approaches that could reduce burden:

An appeals process that is transparent and inclusive and effectively executed by the awarding organisations. The limited nature of the appeals process makes it all the more important that Ofqual ensures at the outset that its statistical model does not unfairly impact any group of students, as they may have no recourse after the event. If appeals are not dealt effectively and fairly by the awarding organisations the burden of dealing with students who feel distressed and unfairly treated will fall to the higher education sector to deal with.

## Your details

Which nation or country are you based in?

England

How did you find out about this consultation?

Ofqual's website

Is this the official response from your organisation or your own, personal response?

This is the official response from my organisation

## Your details (official response)

Which of these options best describes your organisation?

University or higher education institution