

Consultation on exceptional arrangements for exam grading and assessment in 2020

Your data and rights

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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?
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?
Neither agree nor 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?

In a normal year, several students from a (large) centre will achieve the same mark in an examination, yet centres are required to rank their students strictly. This seems unrealistic. This is a particular problem for large FE colleges which are required to rank all students in strict order for GCSE resit in mathematics and English (there may be hundreds of students who are predicted grade 3 or 4). We suggest that where there are more than fifty students at a particular grade in any subject for a particular qualification, that centres could use repeated ranks provided that there are at least 50 distinct ranks within the grade.

Ofqual will want to consider whether different cohorts within a school should be in the same rank order. A school with a large sixth form may have students in year 10, a large cohort in year 11 and a significant cohort in years 12 and 13 sitting GCSE in Mathematics. Presumably different progression is expected from KS2 in these different cohorts, and it may be that different lists are required for different cohorts within an institution.

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?

Agree

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

The results are not to be used in performance tables. Will GCSE grades from 2020 be used as a basis for A level grades in 2022?

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?

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?

Agree

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

Head teachers should be encouraged to actively seek information about externally tutored candidates where it is available. MEI runs the DfE-funded Advanced Mathematics Support Programme to support Level 3 Maths; as part of this we provide online tuition in Further Mathematics to students in centres with very few candidates and are well-placed to give these centres advice about centre assessment grades for those students' Further Mathematics qualifications.

Children of traveller families or armed forces personnel, for whom there may be insufficient evidence at the centre where they are entered for examinations may not be awarded grades – despite in some cases being well-prepared for the examination. Centres should have an obligation to seek information from previous schools/colleges and schools/colleges should have an explicit obligation to provide it within a reasonable timescale where a student has moved institution since September 2018.

Young people who have been excluded from formal education will be affected by these proposals. Where entries have been made for such young people, schools/colleges where the students have previously been on role should have an explicit obligation to provide the relevant information, either by including them on their own rank order or by providing sufficient information to an alternative provider.

There will be an especially significant impact on students, particularly those on vocational courses, who are resitting GCSE mathematics or English for the last possible attempt within their compulsory education. Students in this position who are not awarded level 2 passes in maths and/or English could be severely disadvantaged. We suggest that they should be offered a funded opportunity to resit in academic year 2020/21.

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

Neither agree nor disagree

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

Agree

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

Our most important point is that the national distribution of grades for A level mathematics changed from a stable situation in the legacy qualifications to having lower proportions achieving grades B and C in the first and only large-entry series of the linear qualification in 2019. MEI has been in discussion with Ofqual and the exam boards about this – including at a Royal Society roundtable discussion – and we believe strongly that the proportions of students achieving grades B and C should be restored to their 2015 -18 values. Under the proposed standardisation method Ofqual will have complete control over these proportions, and it is vital that the lower 2019 proportions are not cemented into the system in 2020 without proper consideration. We have written separately to Ofqual about this issue.

We have said that we 'Neither agree nor disagree' with the aims because, while we agree the aims are laudable, we consider it unlikely that they can be achieved. Supporting unachievable aims would not be helpful.

Without knowing the detail of how the standardisation between centres will be achieved, we outline some potential and actual risks and issues.

- Achieving Aim i. is laudable but fraught with challenges. It seems as though the statistical techniques which are usually applied to a whole cohort of students across the country are to be applied to very small numbers of candidates in a centre. (page 29 '...determine the most likely distribution of grades for each centre based on the previous performance of the centre and the prior attainment profile of this year's students.') It would appear to be equivalent to setting targets at every grade for every school in the way that targets are set at two or three grade thresholds for each exam board – statistically unsafe because of the much smaller cohorts and because of the paucity of data. The targets set for exam boards are based on a relatively good correlation between a measure of achievement at KS2 and a GCSE grade in a particular subject, or between a measure of GCSE success and an A level grade in a particular subject – and this correlation is understood; how certain can we be that a sufficiently strong positive correlation exists at the level of an individual centre to apply the same techniques as are applied nationally? In centres with a small entry in a particular subject this method will become almost deterministic - consider a centre with a few entries in Further Maths each year and which, based on this limited data, produces average added-value in its Further Maths results. This year they have one FM candidate – added-value suggests that a student with this candidate's GCSE profile should get, on average, a B in A level FM. The school predicts a grade A. Across the country, the centre assessed grades produce too many grade As and A*s – what happens to this candidate? In another school there are two FM candidates – but the rank order of the teacher reverses the order of their GCSE profile – the school's rank order is to be preserved (good!) but there is no proper statistical basis for judging the reliability of the school's predicted grades. Suppose the target-setting approach predicts a grade D and a grade B. Now imagine that the student predicted grade D, but with the better GCSE grade profile, drops out. What happens to the remaining student?
- There are insufficient data to apply a common standardisation approach (Aim ii) consistently:
 - some schools (eg independent schools) may have a cohort which did not sit KS2 tests or GCSEs
 - some schools will have limited or no historical data for certain subjects (eg Further Maths)
 - some schools did not teach pupils through KS3 and KS4, but their achievements are based on the assumption that they did
 - a recent change in the qualification has disrupted the performance of many schools as well as the national distribution of grades (especially true for A level Mathematics and Further Mathematics for which 2019 was the first full year of the new qualification)
 - changes to KS2 assessments mean that the added-value calculations to GCSE have changed recently and may make producing some kind of average progression score for recent years for schools more challenging
- The method will not be easy to explain (Aim iii). Page 40 of this consultation describes the 'novel and complex statistical standardisation process which is likely to be fully understood by a more limited pool of exam board personnel than is usually the case'. It seems unlikely that this will 'build confidence' – a few anomalous-looking outcomes which become well-publicised will be much more influential than Ofqual, exam boards or schools seeking to explain how this process has worked.
- It seems as though nothing is being actively done in the process to protect students from systematic disadvantage (Aim iv), and this is also a risk. If research after the series were to show that a particular group of candidates (eg girls or an ethnic minority) did significantly worse than usual in a key subject, or overall, there is the risk of significant loss of confidence in the system.
- There is a significant risk that exam boards will not be able to develop and test robustly the systems required to deal with this complex process (Aim v). The volume of grades to be awarded requires that the process is automated with as little manual intervention as possible. It will be hard enough to develop a system to implement the model for an ideal school - all students have been in the school for two years, all students have prior data (KS2 or GCSE), good data are available about historical added-value in all subjects with no recent change in the qualification or change in how the added-value is calculated. However, the range of different situations in which centres find themselves means that the algorithm will be required to deal with a vast range of possibilities – it is hard to see that such an algorithm can be properly tested in advance. These novel algorithms are to be designed and coded and tested by an exam board workforce and contractors subject to potential illness, unable to meet together face-to-face and dealing with childcare issues.

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

One of the challenges is that A level specifications have changed recently – in the case of Mathematics and Further Mathematics there is only one year of results to build on. A change in specification has changed the national distribution of results – and it has changed the performance of schools relative to one another.

Taken together, these issues mean that a large risk is being accepted, not only with individual students' futures but with confidence in the assessment system itself. This could have unforeseen consequences. Assuming that there is no serious malfunction, the process is likely to produce the right numbers of young people going on to higher education or to level 3 courses, but seems far from guaranteeing that it will be the right young people who progress. The level of individual grievance is high enough in the current rigorous and defensible system; it seems likely that the sense of individual grievance will be greatly magnified in summer 2020.

We are confident Ofqual will do all it can to make the outcomes as fair and accurate as this process can be, but it should be made clear that it is not possible for Ofqual to achieve all its five aims for the standardisation process.

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 exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student?

Agree

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?

In many cases the argument against certain types of appeal is that the appeal process would be 'unfair'. The problem is that the initial process is far less fair than the normal process, which is subject to detailed scrutiny at every stage. In the proposed method for 2020 the process is subject to no real scrutiny or appeal at its weakest points. There is nothing to stop schools gaming the system in subtle (and perhaps as yet unimagined ways). Suppose a student suspected that some students had been shown favouritism or that the centre had acted in a discriminating way— can this be scrutinised? For example, schools may adjust rank orders according to the grades across three A level subjects which students require for their university offer rather than their attainment in each subject. A high performing student who is likely to achieve 3 grade As but who only requires two grade Bs and a C may find themselves rather lower in the list of students predicted grade A than they should be. Of course, the vast majority of schools will not act consciously like this, but what checks are in place to prevent this sort of behaviour in all schools, and what appeals are possible if it is suspected? It is the lack of an appeal process which is unfair.

It is hard to devise practical methods of instituting appeals in several of these situations. This reveals the inherent potential unfairness of the whole process. As we suggested in our response about the aims of the standardisation process, we are confident Ofqual will try to do this as well as it can be done, but it is important to acknowledge that it cannot be done well.

We note that the consultation states that students unable to obtain an assessed grade will be able to take exams in the planned Autumn series and so have an opportunity to obtain the qualification they have been studying for. This will only go some way to remedying the unfairness of the appeals process if all of the qualifications are examined in the Autumn series.

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

Do you have any comments about the qualifications to which the exceptional regulatory measures will apply?

Having read the Ofqual consultation on vocational, technical and other general qualifications we are concerned about students who are entered for one of the Core Maths qualifications. In a school teaching both a Core Maths qualification and A level Further Mathematics for the first time, with one student taking each qualification, it would seem that there is an obligation on the awarding organisation to issue results for the Further Maths candidate on results day; for the Core Maths candidate there is no obligation for the awarding organisation to issue a result and, if they do, it need not be on any particular day. This seems unfair – both candidates may be depending on the result for university entrance.

If it is appropriate that students entered for AEA and EPQ get their results at the same time as AS and A level results, the same applies to Core Maths. In order to achieve aim iii of having a method that is transparent and easy to explain to build confidence, from the centre point of view the processes they engage in to provide Core Maths results should be the same as for AS, A level and EPQ.

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

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

Students who have moved school recently eg children of travellers or armed forces personnel.

Students who have been excluded from formal education.

Students, particularly those on vocational courses, who are resitting GCSE mathematics or English for the last possible attempt within their compulsory education.

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

Children of traveller families or armed forces personnel, for whom there may be insufficient evidence at the centre where they are entered for examinations may not be awarded grades – despite in some cases being well-prepared for the examination. Centres should have an obligation to seek information from previous schools/colleges and schools/colleges should have an explicit obligation to provide it within a reasonable timescale where a student has moved institution since September 2018.

Young people who have been excluded from formal education will be affected by these proposals. Where entries have been made for such young people, schools/colleges where the students have previously been on role should have an explicit obligation to provide the relevant information, either by including them on their own rank order or by providing sufficient information to an alternative provider.

Students, particularly those on vocational courses, who are resitting GCSE mathematics or English for the last possible attempt within their compulsory education, may feel particularly aggrieved if they do not achieve their level 2 maths and English qualifications. It will be a particular challenge to award grades to these candidates in years 12, 13 or 14 – the vast majority of whom will be given centre assessed grade of 3 or 4. Perhaps Ofqual should encourage exam boards to have a process for this cohort which is less likely to alter centre assessed grades.

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?

Subject representative or interest group