

Written evidence submitted by Mr Ralph Hains

## Ofqual are failing the principles outlined by minister with respect to the cancelled A-levels and GCSEs in summer 2020

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### Summary

By putting the objective “No grade inflation” as paramount above principles of fairness to students Ofqual fails both natural justice and the statements of the Education Secretary. The unfairness will particularly affect: High performing students in non-selective schools and students in schools that are improving fast. Both of which are more likely to be (though not exclusively) disadvantaged in other ways. The refusal to publish the detail of the standardisation process prior to the grades despite an explicit request from government committee indicates that Ofqual are aware that the detail will support the growing criticism. The refusal to allow appeals where the algorithm can be shown to have resulted in unfairness also supports the hypothesis that Ofqual are well aware that it will be demonstrably unfair in many cases.

### Excerpts from Education Secretary’s statement (20<sup>th</sup> March 2020)

“My priority now is to ensure that no young person faces a barrier when moving on...”

“I have asked exam boards to work closely with Teachers who know their pupils best to ensure their hard work and dedication is rewarded and fairly recognised”

### Prior Information

My interest is because my son attends a non-selective high school, and due to hard work and talent holds an offer from Oxford to study Medicine. As an outlier he is in danger of unfair “moderation” down from grades I have no doubt he would have obtained had he sat the exams. He has no right to appeal despite ample individual evidence that Ofqual don’t consider that he would get the offered grades. Exams in October just do not help: Oxford will not then honour their offer and secondly the school (in common with most state schools but not private ones) effectively stopped teaching him at the point the schools were closed, he has tried to go it alone but there is only so much he can do.

I’ve read the current output available from the Education Select Committee. I agree with much of it, though in some cases its points are too narrow – for example it asks that disadvantaged students be able to appeal against the standardisation method where it has unjustly lowered their grades. Surely any student that has been unjustly affected by the standardisation method should be able to appeal – limiting this to (some particular) group deemed disadvantaged is itself unjust (though providing extra help on navigating the appeal mechanism for students who need it most is certainly sensible).

I formed the opinions below independently. However while researching I came across one document that covers the same ground and expresses it very well. If you haven’t already please follow this link:

<https://www.hepi.ac.uk/2020/07/14/halfon-is-right-ofqual-has-more-to-do/>

Note that both the article and the comments that follow it (8 at time of writing) are unusually erudite.

## Grade inflation versus fairness

No algorithm can reliably predict the future, and this is what we are trying to do here, predict what grades students would have been given had they sat the exams. Different algorithms will be unfair to different individuals. Allowing a limited amount of grade inflation is itself unfair but this unfairness though systemic is distributed far more evenly across all students in the year and arguably other years as well (I hope you agree it is not the fault of the current year that Covid-19 arrived when it did). An algorithm with the properties Ofqual are insisting on will pile all the unfairness on a small subset of this year's students. These exams are not in general ends in themselves, they are gateways to the future. Any effect that unfairly prevents say 5% from making it through the gateway has far more negative effect than one that lets the same percentage through than expected. This principle is generally accepted by examination boards when the problems are self-inflicted. I myself got an "A" in a Geography O-level many years ago when the questions given were on the wrong syllabus. Understandably I didn't do all that well in the actual questions but the principle that the student should not lose out was followed and more not less students obtained high grades.

Most other countries appear to have accepted that the least bad option is to accept a degree of grade inflation for this year in favour of minimising the "gateway effect" above

## International Baccalaureate

There is a small storm and a blame game going on because IB applied their standardisation (presumably similar to Ofqual who specified a no grade inflation rule similar to the one they are mandating for GCSEs and A-Levels). Given the far smaller number of IB students in the UK this is perhaps a harbinger of what is to come.

## Appeals

Ofqual ignored the results of their consultation that clearly favoured a comprehensive appeals mechanism on the grounds of fairness. They seem to claim that this isn't feasible but Scotland are allowing exactly this. Meanwhile in N Ireland the standardisation mechanism already has provision to cope with improving schools and talented outlier students (Ofqual also claim this isn't feasible) and allow appeals based on fairness. I understand that many of the European countries also permit appeals on fairness. As far as I can determine England and Wales (and Ofqual) are the outliers (perhaps we should moderate them down – I might give Ofqual a "D, Significant improvement needed")

## Conclusions

Re: "My priority now is to ensure that no young person faces a barrier when moving on...". Ofqual have ignored this. A significant number of students will now face major and in some cases insurmountable barriers. The autumn series of exams will not help because most universities are not

bought into them and most state schools have not continued teaching to allow their students a fair chance in them against those in private schools.

Re: "I have asked exam boards to work closely with Teachers who know their pupils best to ensure their hard work and dedication is rewarded and fairly recognised". Ofqual have ignored this too – they have decided that past performance of a given school and the need to avoid grade inflation outweighs the opinion of teachers, and in doing so have guaranteed that in many cases hard work and dedication is neither rewarded nor recognised.

My overall conclusion is that Ofqual are now far enough off the rails that the government needs to intervene now, ordering Ofqual to both publish the details of the standardisation and to allow evidence based appeals for individuals and schools for situations where the bluntness of their standardisation mechanism fails.

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