

Russell Group response to the DfE/Ofqual consultation on how GCSE, AS and A level grades should be awarded in summer 2021

1. Summary

- 1.1 The Russell Group represents 24 leading UK universities which are committed to maintaining an outstanding teaching and learning experience and world-leading research. Our universities teach a quarter of all undergraduates and four out of five doctors, and support over a quarter of a million jobs across the UK.
- 1.2 We welcome the opportunity to contribute to this important consultation launched by DfE/Ofqual on assessment conditions in the summer of 2021. It is vital that the process for determining grades this year is fair, consistent, transparent and allows individuals to progress into higher education. Our response to this consultation focuses on those elements which affect university admissions and the onboarding of new students directly. Our key recommendations are as follows:
- (a) The Department for Education (DfE) and Ofqual should set out how they intend to mitigate the impact on students from disadvantaged backgrounds of the proposed changes to the normal exams-based assessment system. **As part of this, DfE should provide as much contextual information as possible to universities, including Free School Meal data, so this can inform their admissions decisions.**
 - (b) Additional contextual information from schools around the subject content that has not been covered, and therefore does not form part of the grade awarded, will also be important to enable universities to have appropriate measures in place to support students. **We would welcome further information from DfE on how such information can be captured and provided to universities in a timely manner.**
 - (c) The proposal to decouple when students are informed of their results from when universities are informed of them could have unintended consequences for applicants, schools, and higher education providers. **We therefore urge Ofqual and DfE to ensure there is a single results day, across all UK nations, and that this is moved forward from 24th August to an earlier date in that month.** Bringing the results day forward would still allow for appeals and give universities more time to process results and arrange onboarding activities to support students.
 - (d) **We support option A for private candidates, which would provide them with the opportunity to complete the papers set by the exam boards for use in schools and colleges.** Arrangements for these students should be communicated clearly and in a timely manner so that both schools and candidates are able to prepare.
 - (e) **We seek urgent clarity on what the grade distribution is likely to be this year.** Given that grade inflation will have implications for universities' admissions and, in some cases, course capacity, we would welcome engagement with DfE and Ofqual to **consider the additional support universities might require in order to navigate admissions this year. This would be especially important in the event of substantial grade inflation and subsequent pressures on capacity.**

2. Internal quality assurance

- 2.1 We believe exam boards should provide support and appropriately detailed information to schools and colleges on the requirements for assessing their students to ensure as much consistency as

possible, both within a school or college and between schools and colleges. To enable this, it will be important to have the right internal quality assurance processes in place.

- 2.2 Teachers are best placed to comment on appropriate methods of internal quality assurance. However, we would suggest that any approach seeks to reduce unnecessary burden on teachers, and the potential for schools to experience undue pressure from parents/guardians and students.
- 2.3 We agree with the suggestion to have a declaration from Heads of Centre as a means of signalling their commitment to undertaking fair assessment.

3. External quality assurance

- 3.1 Russell Group universities are supportive of the decision not to award grades until an external quality assurance process has been undertaken, and that standards have been met. We further support the proposal that grades would only change as a result of human intervention given the challenges of moderation last summer in ensuring fairness, particularly for groups under-represented in higher education, and the instability it caused in the sector.
- 3.2 It is crucial that where an exam board finds that a school or college has not used appropriate quality assurance arrangements, or that the exam board's requirements have not otherwise been followed, it works closely with the school or college and that the process of making any changes to students' grades is fair and transparent.

4. Appeals

- 4.1 Internal and external quality assurance measures should aim to ensure that there are only a small number of applicants who appeal, and the process should be as quick and conclusive as possible. **Timely communication around what can and cannot be appealed, and why, will be critical to the delivery of an appeals process.** We are concerned that the two-stage procedure suggested will elongate decision making and, without clear communication, could give students false hope.
- 4.2 **Ofqual and DfE should also consider the support that schools and colleges might need to run the first stage of the proposed appeals process** and how they can ensure some students aren't placed at a disadvantage because their school has less capacity and resource to cope with appeals.

5. Timelines

- 5.1 **Russell Group universities have expressed serious concerns around the proposal to decouple when a student is informed of their results, from when universities are informed of their formal result for the purpose of admissions decisions.** These include:
 - (a) the potential for applicants to experience increased stress and anxiety as a result of not knowing if they have a confirmed place at university
 - (b) increased pressure on teachers and schools to manage an inflated appeals process given universities will be delayed accepting students with 'near miss' grades, which would otherwise reduce the need for appeals
 - (c) the possibility of an unmanageable administrative burden for universities responding to queries from applicants and parents about their place without access to results data
 - (d) the risk of an unofficial confirmation and clearing period outside of the UCAS scheme in July and then an official one in August, causing huge volatility in the sector.
- 5.2 We believe that the 'coupling' of results is very important, particularly for student wellbeing. An appeals period after results day, with universities honouring changes to grades, would be a preferable alternative to the model suggested in the consultation document.
- 5.3 Whilst we agree that the alternative approach to awarding grades this summer should seek to encourage students to continue to engage with their education for the remainder of the academic year, it is important that this does not lead to a delay in the collation of results by awarding bodies.
- 5.4 **We ask DfE and Ofqual to move the proposed results day forward from 24th August to an earlier date in that month (in line with previous years). This time is needed for universities to**

process applications and begin onboarding activities for successful applicants, which will be challenging and complex this year. Onboarding activities include accommodation arrangements, provision for disabled students and transitional arrangements for care experienced students, which is particularly important given the increased educational inequality and numbers of vulnerable students as a result of the pandemic¹. Early confirmation on the timetable for results would help universities to plan and mitigate against a lack of capacity in the busiest period of the admissions calendar.

- 5.5 **As well as an earlier results day, universities require a sufficient window to process the results to ensure robust and fair decision making.** Institutions normally receive results on Friday, and candidates are notified the following Thursday. This timeframe should be retained.
- 5.6 **As far as possible, any timeline for the proposed arrangements for A Levels should align with plans for vocational, international, and alternative qualifications, as well as timelines set out by the devolved administrations.** In particular, the release date should be agreed for each qualification or group of qualifications. If single release date/s are not agreed, there will be significant confusion among groups of students across the devolved nations who will face differing advice and guidance.

6. Private candidates

- 6.1 In the last cycle of assessments, private candidates were disadvantaged by the approach to assessment as it required a relationship with a school or college. This meant many were given inaccurate grades or were unable to receive a result. Therefore, we welcome the options presented by the consultation to ensure private candidates are awarded grades in this upcoming cycle, particularly as there is likely to be high demand for this provision.
- 6.2 **Russell Group universities have suggested that option A would be the best method to assess private candidates. However, we are concerned that schools and colleges may not have the capacity to take on the additional burden. Therefore, we recommend that schools are given the notice and resource to support private candidates with their assessment.**

7. Impact on particular groups

- 7.1 Our members have expressed a particular concern the proposals may disadvantage students who already face multiple barriers on their life journey to selective higher education. Under-represented applicants often come from schools/colleges with lower attainment levels and support. It is likely they will also have had less access to technology, space to study, and ongoing assessment during the last 18 months that teachers would be able to draw on for setting their marks.
- 7.2 There is a concern that there will be a risk of unconscious bias towards those with one or more protected characteristics when assessments are not exam based. Evidence has shown that high attaining disadvantaged students are more likely to have their grades under-predicted than their richer counterparts.² This will particularly impact BAME (including Gypsy, Roma and Traveller) applicants, where there are high rates of students in receipt of free school meals. Even with additional training and guidance, this unconscious bias is often very difficult to mitigate against. To ensure universities can factor this into their decisions on offer making, **DfE should make available as much contextual information as possible – including free school meals data.**
- 7.3 Universities will also need additional information this year on the course content that has not been covered, and therefore does not form part of the grade awarded. This is needed to enable universities to put appropriate measures in place to support students, for example, building additional learning opportunities and academic support into the onboarding process. This will be particularly important for students who have experienced a significant amount of lost learning. **We would welcome further information from DfE on how such information can be captured and provided to universities.**

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¹ <https://www.bbc.co.uk/news/education-55138429>

² G. Wyness, *Rules of the Game* (2017)