



Ethnic Minorities  
& Youth Support  
Team Wales

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## Qualifications Wales: Consultation on Summer 2020 Assessment Arrangements

- The following text was submitted via online form to Qualifications Wales. Consultation questions are in italics questions and EYST response is in non-italic.
- Submission date: 15 May 2020

*4. Learners for whom a qualification-level centre assessment grade and rank order are submitted will receive a grade.*

*a. To what extent do you agree with this aim? (Strongly agree, agree, partly agree and partly disagree, disagree, strongly disagree, unsure)*

*b. Please clearly explain the reasons for your answer in the space below. (If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

### **Agree**

We do agree that pupils should receive grades where possible. However, as explained below, we caution that centres must receive guidance and support to equality impact assess their grades/ranks, and there must be an appeals process for an individual who feels they have experienced discrimination to question a centre assessment.

We do think that every effort should be made for home schooled students who may have weaker links with centres do have the opportunity to be assessed for grades. This will be particularly important for Gypsy Traveller pupils who are over-represented in home-schooled pupils and may have weaker links with centres in comparison to other home-schooled pupil groups.

It will also be very important to make every effort for pupils who have recently moved to Wales and may not have previous attainment history in Wales to be able to be assessed and not have their progress to the next level impeded. There is likely to be an equality impact dimension for recent migrants to Wales.

Likewise, we think it is very important to capture data on protected characteristics of students who are awarded or not awarded grades in order to measure if there is any particular group of students, including relating to SEN or socio-economic status that is disproportionately affected in not being awarded grades this year because centres could not provide an assessment grade/rank order.

5. *The outcomes for summer 2020 will be broadly similar to those in previous years.*

*a. To what extent do you agree with this aim? (Strongly agree, agree, partly agree and partly disagree, disagree, strongly disagree, unsure)*

*b. Please clearly explain the reasons for your answer in the space below. (If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

### **Partly agree**

National outcomes are often broadly similar year to year. However, certain learners or institutions may drastically improve (or decrease) in exam performance in a year.

We would not agree with the premise that learner outcomes should be assumed to be the same year on year. Education is an aspirational endeavour and some students may make huge gains (or experience setbacks) due to changes in their personal study efforts, their environments, or relationships with teachers/educators. Likewise, pupils with English or Welsh as an additional language will have made great gains in performance relating to their mastery and improved ability to communicate in an English or Welsh medium classroom.

In reference to this assumption, in absence of data from an exam cohort, and realising that individual pupil or institutional performance can make great improvements within a year, we argue in the response below that any statistical standardisation model is robustly equality impact assessed both before and after the final grades are given.

6. *A statistical standardisation model which uses historical evidence of centre performance and the prior attainment of learners, along with the centre assessment data, is likely to be the fairest approach and produce more accurate calculated grades.*

*a. To what extent do you agree with this aim? (Strongly agree, agree, partly agree and partly disagree, disagree, strongly disagree, unsure)*

*b. Please clearly explain the reasons for your answer in the space below. (If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

## Partly disagree

It is unclear how the statistical standardisation model will affect the grades of individual students. The fact that the model privileges previous institutional performance will likely have a poor impact on high achieving students who live in deprived areas. It will likely have a poor impact on aspirational students who have worked very hard since September 2019 to improve upon grades they received in Summer 2019.

Likewise, numerous research studies have shown that educators are more likely to under-predict grades for Gypsy, Roma, Traveller and Black pupils as well as pupils from low socio-economic backgrounds. We do not think that proposed statistical standardisation models will correct any educator bias (whether at individual teacher or institutional level) in assessing the performance of ethnic minority and/or low socio-economic status students.

Considering the unprecedented nature of the use of such a statistical washing, and regarding its Public Sector Equality Duty, WJEC must equality impact assess any statistical standardisation models. It must then report on and investigate any discrepancies relating to protected characteristics, socio-economic status, or SEN in the results.

WJEC must work with the Minister for Education in ensuring that schools understand how to provide necessary information for such equality impact assessment and how to perform their own equality impact assessments for Summer 2020 grades. Schools can provide WJEC with anonymised pupil data on assessments disaggregated by ethnic group and other protected characteristics, including socio-economic status and SEN in order to allow WJEC to undertake equality impact assessments across Wales, considering its standardised modelling.

*7. As far as possible, we should ensure that the process for awarding grades in summer 2020 will not disadvantage groups of learners, including those with protected characteristics, relative to previous years.*

*a. To what extent do you agree with this aim? (Strongly agree, agree, partly agree and partly disagree, disagree, strongly disagree, unsure)*

*b. Please clearly explain the reasons for your answer in the space below. (If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

## Unsure

We strongly agree with the premise that no group of students should be disadvantaged in relation to previous year. However, we do not agree that your proposal robustly outlines how you intend to achieve this outcome. We strongly disagree with the wording "As far as possible." WJEC and Qualifications Wales have a Public Sector Equality Duty to ensure that

groups of learners with protected characteristics are not disadvantaged and to take active steps to achieve that goal.

During April 2020, EYST conducted weekly forums regarding the impact of COVID 19 on BAME people and communities in Wales, including one specific to the impact on pupils, children and young people. The topic of bias in pupil assessment was discussed at two of those forums, which had a collective 63 attendees. There is a significant body of research showing that teachers are less likely to predict test outcomes for specific ethnic groups including research by Dr. Gill Wyness and evidence presented on England's Dept of Education Website 2011 research by the Department for Business, Innovation and Skills. Several attendees at our forums had experienced or knew someone who had experienced low predicted grades in comparison to actual exam outcomes. One parent shared her child's previous experience of passing with As, Bs and Cs, despite being predicted to fail at GCSEs. This same child is having the same experience of low predicted grades at A-levels and the current situation is "very distressing." It was noted at EYST's forum that the phenomenon of teacher and institutional bias in the assessment of ethnic minority and low socio-economic status students may impact an entire cohort of BAME young people, potentially affecting their ability to enter university, with a risk of rise in NEET young people from BAME backgrounds in coming years. This is an incredibly high stakes policy change literally replacing high stakes exams for which young people have trained. It is the legal responsibility of WJEC and Qualifications Wales to abide by requirements of the Public Sector Equality Duty.

We recommend the following:

- Work with the Minister for Education to provide teachers with guidance and support on how to ensure more accurate assessments and ranking of students in order to reduce inconsistencies across groups of pupils in schools and across schools;
- Work with the Minister for education to provide schools with guidance and support to undertake equality impact assessments before and after final exam grade assessments as part of their Public Sector Equality Duty;
- Remind schools of their Public Sector Equality Duty;
- WJEC must use anonymised and disaggregated data on protected characteristics, including SES and SEN from schools to undertake equality impact assessments and investigate discrepancies in outcomes;
- There must be an avenue of appeal for any individual student who feels they have been underestimated or feels they have experienced bias or discrimination in their assessment, no matter what the reason for that bias.

*8. Processes for issuing grades in summer 2020 will use results from any qualifications and units already completed and awarded. As such, the evidence used may differ across qualification types.*

*a. To what extent do you agree with this aim? (Strongly agree, agree, partly agree and partly disagree, disagree, strongly disagree, unsure)*

*b. Please clearly explain the reasons for your answer in the space below. (If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

## **Agree**

We agree that using previously completed qualifications and units will be needed and that as such the evidence may vary across qualification types. However, we would encourage that WJEC and Qualifications Wales carefully watch this dynamic and assess if specific courses and pupils are adversely affected. Likewise, as with all aspects of sudden policy changes relating to Summer 2020 grading WJEC and Qualifications Wales have a Public Sector Equality Duty to assess the impact of all policy changes on groups with protected characteristics.

*9. Learners who are dissatisfied with their results this summer will not be able to appeal against the professional judgement made by their centre, or the procedure used by their centre to arrive at this judgement.*

*a. To what extent do you agree with this proposal? (Strongly agree, agree, partly agree and partly disagree, disagree, strongly disagree, unsure)*

*b. Please clearly explain the reasons for your answer in the space below. (If you have disagreed or strongly disagreed, where possible, please outline what you consider to be a suitable alternative or solution.)*

## **Strongly disagree**

To ensure the legitimacy of any Summer 2020 grading system, there must be an accessible and transparent appeals procedure for individual students to appeal their given grade. There was clear consensus on this point to two recent EYST forums (collectively attended by 69 people).

We understand that WJEC wants to ensure that no pupil or family unduly pressure a teacher or an institution in the period grades are being assessed. However, considering evidence that some pupils do experience discrimination in assessments and evidence of unconscious bias in some teacher assessments, there must be an avenue of appeal for pupils who feel they have experienced discrimination.

It is possible to strike a balance between setting rules to protect teachers and institutions from influence yet also providing pupils with an avenue to question why they have received a particular grade. In the event that a pupil questions their given grade, they should be able to appeal and to learn the grade given by WJEC and also by the centre. In the event, they feel a centre has under-assessed their grade, they should be able undergo an accessible, fair and transparent appeals process.

One person at a recent EYST forum summed this up in a discussion about under-prediction of grades for ethnic minority pupils: “For young people who have put everything into preparing for high stakes exams to gain university entrance – there is a huge mental health impact as, all of a sudden, they now feel gaining that entrance is beyond their control.”

Understanding that there is a robust system of Equality Impact Assessments and an accessible and transparent appeals procedure will go a long way to building back confidence in the Summer 2020 grading system.

*10. Centres will be able to appeal to WJEC on the grounds that they used the wrong data when calculating a grade, the calculated grades generated by the statistical standardisation model were incorrectly allocated or communicated and/or there was some other procedural failing on the part of WJEC.*

*a. To what extent do you agree with this proposal? (Strongly agree, agree, partly agree and partly disagree, disagree, strongly disagree, unsure)*

### **Partly agree**

Of course, we agree that centres should be able to appeal to WJEC to correct any wrong data. We do also think it is important that centres have the right to appeal in instances where a WJEC final grade is lower than that provided to WJEC by the centre and the centre thinks an unfair outcome has resulted from WJECs statistical standardisation model. Likewise, we think it is very important that centres work with pupils who feel they have been unfairly assessed by WJEC on their behalf.

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