



Mr Afzal Khan MP
House of Commons
London
SW1A 0AA

30 June 2020

Dear Mr Khan,

PQ 59882: To ask the Secretary of State for Education, what steps his Department has taken to ensure that unconscious bias against BAME students is not a factor in predictive (a) GCSE and (b) A Level grades in 2020 exams.

We have worked at speed to put in place arrangements for the awarding of GCSE, AS and A Levels in what are unprecedented circumstances. Our over-riding aim is to make sure that the arrangements in place are as fair as possible to students this summer and allow as many students as possible to progress to the next stage of their lives without further disruption. We publicly consulted on aspects of our proposed assessment arrangements for GCSEs, AS and A level¹, and on 22 May, we confirmed our arrangements for awarding GCSEs, AS and A levels this summer and published a series of updated guidance and information². This information is relevant to all students and exam centres in England using GCSE, AS and A levels, Extended Project Qualifications (EPQ) and Advanced Extension Awards (AEA) in maths regulated by Ofqual and offered by AQA, OCR, Pearson, WJEC Eduqas, ASDAN and City & Guilds.

We believe the process of calculated grades we have set out is fairest in the circumstances. Nonetheless, we recognise, and take seriously, concerns about the potential for some students to be disadvantaged by the approach being taken this summer. We have considered these carefully when developing the arrangements, alongside the published literature, the views of interested groups with whom we have engaged during this process and the many consultation responses we received.

¹ <https://www.gov.uk/government/consultations/exceptional-arrangements-for-exam-grading-and-assessment-in-2020>

² <https://www.gov.uk/government/publications/awarding-qualifications-in-summer-2020>

Within the consultation on our arrangements for awarding in summer 2020, we produced an Equality Impact Assessment, and as part of this we reviewed research literature on bias in teachers' judgements of the grade worthiness of student performance³. The evidence is mixed and the context in which judgements are made seems to affect whether or not bias occurs. Studies of bias tend to show small but unsystematic effects. In addition, there is no research evidence regarding bias in centre assessment grades as the approach we are taking this year is novel.

We have spoken to a wide range of stakeholders and groups representing different groups of students, including those with protected characteristics. We have also taken into account in our work the views of the Social Mobility Commission and the Equalities and Human Rights Commission. To mitigate the risk of bias, in our guidance⁴ we asked centres to use their professional experience to make an evidence based, objective, holistic judgement of the grade they believe a student would have achieved had teaching and learning continued and they sat their exams as intended.

We provided information for centres about the importance of objectivity in the judgements needed to submit centres assessment grades and rank order information⁵ to address concerns about the potential for bias. This includes how they might use data for their centre to identify potential bias that they could take into account before submitting their judgements. There are also safeguards against bias in the process for submitting centre assessed grades, as the grades and rank order information are signed off by a second teacher and must be approved by the Head of Centre, who submits a declaration to confirm that they are a true representation of their students' performance.

We also plan to mitigate the potential impact of bias through the standardisation process. Firstly, through the proposed choice of the overarching approach to statistical standardisation of centre assessment grades, outcomes for centres will be largely maintained from previous years. The relationship between results and any centre-level demographics would also be largely maintained from previous years, when assessment occurred in the normal way, through this statistical standardisation model.

Secondly, in finalising the technical detail of the statistical standardisation model, we have carefully considered and evaluated the relative impact on centres with different characteristics (such as ethnicity, socioeconomic status, special educational needs and/or disabilities (SEND), gender) by comparing differences in outcomes to those observed in previous years. Where possible, we are making technical choices to ensure so far as is possible, that students are not systematically advantaged or disadvantaged on the basis of their protected characteristics or socioeconomic status. We will also evaluate the impact of this year's

³ <https://www.gov.uk/government/consultations/exceptional-arrangements-for-exam-grading-and-assessment-in-2020>

⁴ <https://www.gov.uk/government/publications/awarding-qualifications-in-summer-2020>

⁵ <https://www.gov.uk/government/publications/awarding-qualifications-in-summer-2020>

arrangements on students with particular protected characteristics, including BAME students.

A student who has evidence of bias or discrimination would be able to raise this with their school or college or directly with the exam board. An exam board could then investigate such evidence as indicating malpractice. We, and exam boards, are committed to helping students and their families understand how to access an appeal or make a complaint about bias, discrimination, or another concern. We will provide accessible information and have a helpline available to students and their parents or carers to talk about the appeals process and any other questions they may have about their results this summer.

I do hope this information is useful.

Yours sincerely,

A handwritten signature in black ink that reads "S Collier". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Sally Collier
Chief Regulator