

FAO Richard Garrett Director of Policy and Strategic Relationships, Ofqual

## Baker Dearing response to Ofqual consultation on 'Exceptional arrangements for exam grading and assessment in 2020'

Richard

The submission below complements the Baker Dearing online response to the above open consultation. Its intention is to provide the coherent narrative and contextual detail which is difficult to convey within the online format.

### Securing fair grades for students in UTCs - summer 2020

Baker Dearing supports, through its licence, 48 UTCs. UTCs are schools for 14-18 year olds and provide a specialist curriculum leading to a blend of academic and technical qualifications. We are in regular dialogue with the Principals of our UTCs and are building a 'view from the programme' in regard to the current Ofqual consultation on its proposals for calculating student grades for this summer's GCSE, AS and A Level examinations.

### Key messages

1. Baker Dearing confirms its general approval of the proposals presented in the consultation document, as a fit for purpose model for the *overwhelming majority of students*, in the current exceptional circumstances. This in terms of the published aims, arrangements for centre assessment, statistical standardisation, appeals and impact assessments. Given the significance and scale of the Secretary of State's direction, we consider Ofqual have constructed a coherent and well-founded set of proposals for these particular qualifications.
2. UTCs account for a very small proportion of the national entry at both KS4 and KS5. For example in 2019, students from UTCs represented just 0.67% of the entry for GCSE mathematics. However this was 3700 young people. Together the entry from UTCs and Studio Schools represented 0.9% of the national entry for GCSE mathematics.\*  
As a consequence we seek assurance that a national model of statistical standardisation is sufficiently cognizant of, and sensitive to the complex context of this small group of schools. \*Source DfE statistical tables Key Stage 4 Performance, 2019 (revised).
3. Due to the relatively small class sizes and cohorts in UTCs, Baker Dearing is confident that the rank orders submitted by our centres will be as valid and fair as can be possible in the current extraordinary circumstances.
4. Baker Dearing appreciates that the final model for statistical standardisation must be applied with consistency in seeking to award grades which are fair for all students. However many UTCs possess a combination of those characteristics which are likely to stress any statistical process and increase the risk of an unfair grade award. Most of these 'stress' factors are recognised by Ofqual in the formal consultation. These characteristics and the scale of their presence in UTCs are presented in the contextual narrative which follows.
5. Whilst the adopted model of statistical standardisation should provide the starting point for all students, there will be a *very small proportion* of atypical schools for which that process needs additional scrutiny in its application, in order to check that it is indeed

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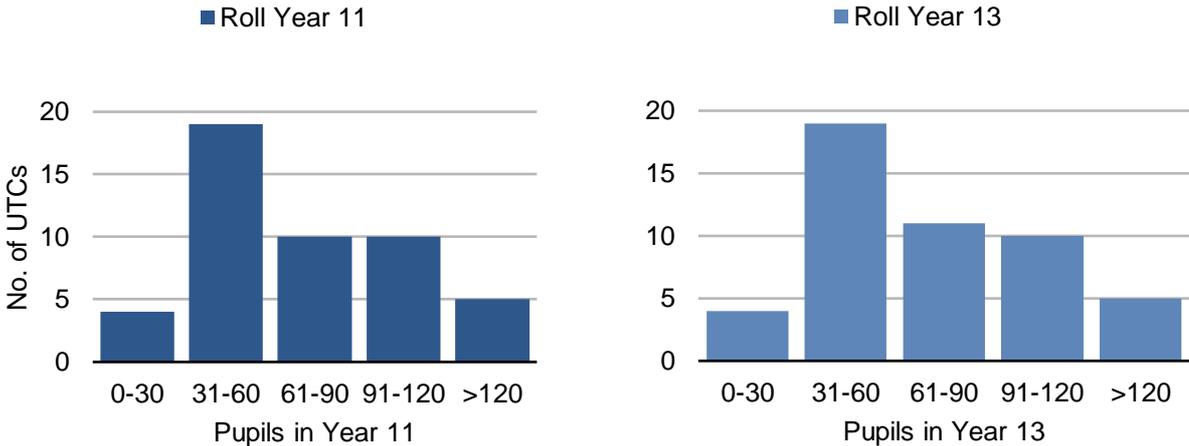
working fairly for students in those groups. Identifying UTCs in this way would be entirely consistent with the practice of publishing additional guidance adopted by Ofsted in the Education Inspection Framework and by the DfE in the annual Performance Tables.

**Baker Dearing’s primary objective is therefore to secure such additional guidance in that published by Ofqual for Awarding Bodies.**

## School characteristics likely to stress statistical standardisation in calculating fair grades

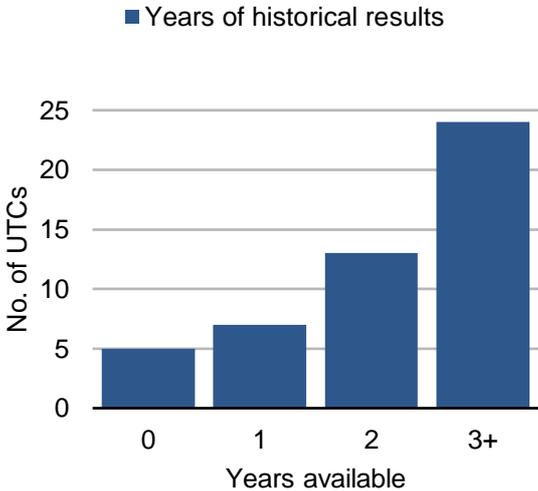
### 1. Small schools and entry cohorts

UTC cohorts are considerably smaller than average and therefore annual achievement patterns in individual UTCs are prone to greater fluctuation than exhibited in larger schools.



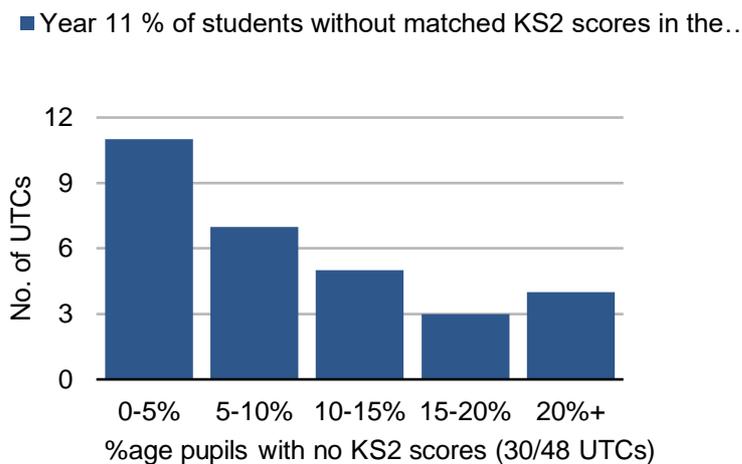
### 2. Absence of historical data sets

Only 50% of the 48 UTCs have three years of previous examination data. Five UTCs have no historical data available.



### 3. Students without matched prior attainment from KS2

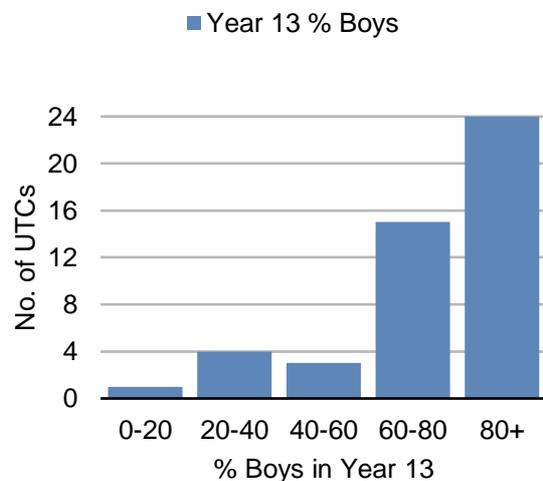
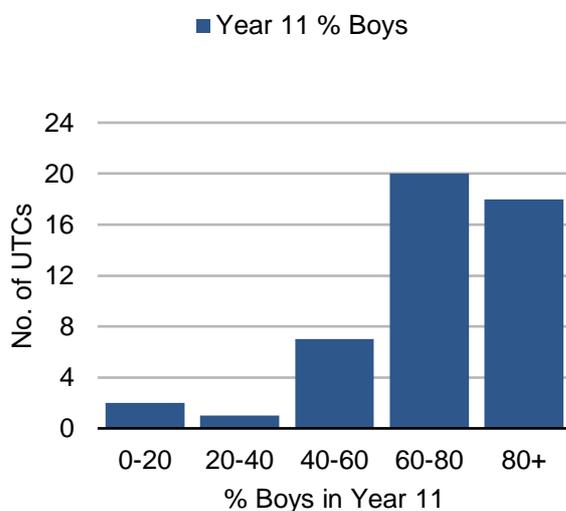
The percentage of students without prior attainment scores in many UTCs is considerably higher than the national average of around 5%.



Furthermore, it should be noted that both the DfE (through the School Performance Tables) and Ofsted (through the School Inspection Handbook) confirm that Progress 8 *'is not the most appropriate performance measure for University Technical Colleges'*. This is due to UTCs having an atypical age of entry and distinctive technical curricula which are not required to meet national EBacc targets.

### 4. Gender imbalance

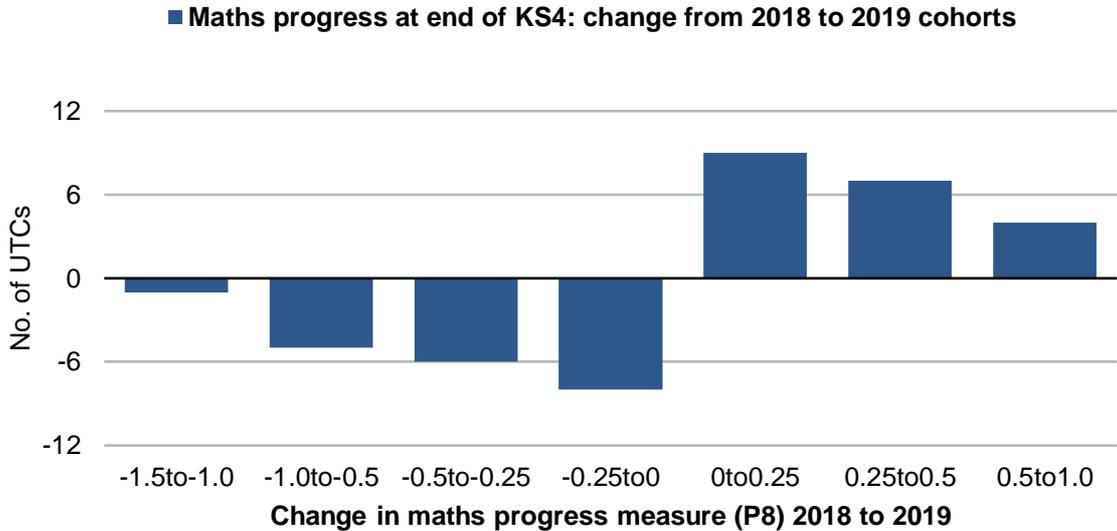
Although mixed-gender schools, UTCs have significantly unbalanced proportions of boys and girls. For example, in Year 11 for this current examination year, only 4 UTCs have a gender balance within the range 45%-55%. Furthermore, only seven UTCs sit within the range 40%-60%. Over half of UTCs have Year 11 cohorts with more than 75% boys. Such imbalance skews performance patterns when compared with national outcomes for all schools.



## 5. Annual variation in cohort entry profiles

UTCs are relatively young institutions with an atypical age of entry. All students reaching the end of Key Stage Four this year will have joined at the start of Year 10. Most UTCs draw students from across an abnormally large geographical area and number of feeder schools. For example, the current Year 11 cohort of one UTC has 90 students on roll drawn from 59 educational institutions, those being 26 schools in England, 25 schools abroad and 8 previously home-schooled students. As a consequence, UTCs commonly exhibit significant differences in the entry profile for annual cohorts. These differences are exhibited in terms of ability, attainment on entry, aptitude, behaviour and attendance. Therefore, historical trends, in terms of both attainment and progress are unreliable.

As an indicator of both the volatility and unpredictability of the Progress 8 measures for UTCs, the mean annual change in published Overall P8 for individual UTCs (up or down) over the last three years has been approximately 0.4 of a whole grade. This same level of variability occurred in their individual average English and maths progress measures. As a consequence, historical English and maths attainment and progress measures are not reliable indicators of 2020 cohort performance in UTCs.



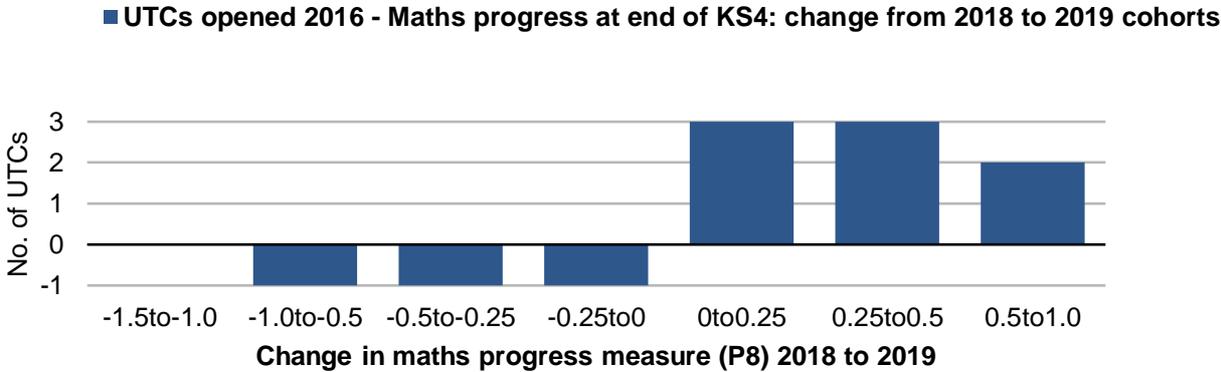
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## 6. Maturation in recently opened schools

Baker Dearing agrees in principle with the Ofqual proposal to not build performance trajectory into the statistical model for standardisation as applied to schools in general. However, we do consider that there is a case to be made for analysing the evidence of trajectory in ‘young’ schools (such as those within three to four years of opening). UTCs are relatively young institutions and Baker Dearing’s analysis of attainment and progress data suggests that the average outcomes across new UTCs shows an improving trend over the early years as these organisations mature.

UTC	End of Key Stage 4					End of Key Stage 5		
	A8 pts	Ma pts	En pts	E&M 4+ %	E&M 5+ %	Acad pts	Tech Lev pts*	App Gen pts
2016 openers(11)								
2017-18	35.5	7.6	7.7	43	23	15.2	28.3	27.0
2018-19	38.9	8.3	8.4	55	29	20.1	32.9	29.0
Gain	+3.4	+0.7	+0.7	+12	+6	+4.9	+4.6	+2.0
All UTCs								
2017-18	38.4	8.1	8.1	50	27	22.1	32.1	33.1
2018-19	39.0	8.3	8.3	52	28	24.0	33.1	31.1

\* Tech Levels include QCF and RQF points



## 7. Centre subject entries including multiple age groups

Due to their specialisms, many UTCs have large entries for GCSE mathematics in Years 12 and 10. The national distribution of maths grades for these age groups is very different to that for the national Year 11 cohort. The submission by the centre of a single rank order for all students entered for the subject would combine students drawn from populations with very different statistical profiles. It is extremely challenging to envisage how fair adjustments would be made to this single, aggregated group whilst maintaining the requested single centre ranking.

## Mitigation measures

Baker Dearing supports Ofqual in its determination to develop a sophisticated model of grade standardisation across and within centres which incorporate the statistical uncertainty introduced by schools with the contextual complexities of UTCs. Should it prove not possible to achieve such a model within the short time available then Baker Dearing would request that subsequent provision is made to secure the appropriate level of reliability for the standardisation of grades for schools in such circumstances. In preparation for such an outcome, Baker Dearing recommends the mitigation measures presented below.

**To mitigate the risk of unfair adjustment as a consequence of multiple stress characteristics, Baker Dearing requests the following steps be taken in regard to application of the statistical standardisation process to UTCs.**

1. Publication of **additional guidance** to the Awarding Bodies in regard to application of the statistical standardisation process to UTCs, in order to check that the mechanism is indeed working fairly for students in those schools. Identifying UTCs in this manner would be entirely consistent with the practice of issuing additional guidance by Ofsted in the Education Inspection Framework and by the DfE in the annual Performance Tables. Baker Dearing would be happy to engage further with Ofqual in their construction of such guidance.
2. Such guidance would require Awarding Bodies to provide for additional scrutiny of provisional grade adjustments at **individual UTC level**. This additional stage would check that standardisation has not been unduly distorted by multiple and compounding statistical stress factors.
3. Such guidance would furthermore require Awarding Bodies to scrutinise the overall adjustments to the **aggregated entries from UTCs** in the qualification, the resulting outcomes and grade distributions. We anticipate that such process would require the application of a statistically calculated tolerance.

**Ken Cornforth (Dir of Education)**  
**Sir Mike Tomlinson CBE (Trustee, Baker Dearing)**  
**Simon Connell (CEO Baker Dearing) 29<sup>th</sup> April 2020**