

Ofqual and the Department for Education (DfE) consultations on how grades should be awarded in summer 2021

Universities UK response

Executive Summary

This document contains Universities UK's response to the Ofqual and DfE consultations on [arrangements for awarding grades for GCSE, AS and A levels](#) and on [awarding arrangements for a range of vocational and technical qualifications](#) in summer 2021.

We welcome the opportunity from Ofqual and DfE to respond to proposals on the awarding of grades for summer 2021. The pandemic has continued to create an incredibly challenging learning environment for students. It is vital that the process for determining grades this year is fair, consistent, and transparent to allow individuals to progress into higher education where they intend to do so.

Universities UK broadly welcomes the proposals being consulted on, recognising the need for alternative arrangements at a time of ongoing, substantial disruption to individuals' education. However, universities are concerned about certain proposals and possible outcomes linked to what has been proposed. These concerns lie in the following areas:

- The robustness of results themselves and the overall distribution of grades
- The timetable proposed for the release of results and the “decoupling” of results from the UCAS process
- The impact of arrangements on disadvantaged and underrepresented groups.

Performance evidence and assessment

Universities need to be confident that the evidence used by schools and colleges to assess performance standards will deliver robust grades for students.

Universities' decisions on admissions are informed by an understanding of applicants' knowledge, experience and their ability to succeed on courses. This was equally the case in 2020 university admissions and remains central to the 2021 cycle. To support this, schools and colleges should have access to clear guidance on how

The voice of universities

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to assess students and quality assure grades, so that processes are consistent. This includes clarity on the use of exam board papers, such as their comparability to results from previous years, how they are weighted within overall assessments, and how they are sat, particularly if there are ongoing issues with school or college closures. Where students have been unable to complete non-exam assessments, such as portfolios, alternative arrangements should be available so that they can be assessed fairly and enable universities to understand their performance levels.

Clarity on likely grade distributions should be made available as soon as possible, given that substantial grade inflation will have significant implications for universities' admissions and, in some cases, course capacity.

It is challenging for universities to develop offer-making strategies, and to identify the support that students need, without a clear understanding of the overall distribution of grades that students are likely to receive in comparison to previous years. Grades this year might also increase further through the appeals process that is being consulted on. Grade inflation could impact demand for specific courses and overall course capacity. In 2020, universities went above and beyond in flexibly managing capacity in response to the adoption of Centre Assessed Grades, but there are some limiting factors on course capacity that are outside of universities' control, such as courses requiring placements in the NHS.

In most cases, conditional offers will include a set of grades or tariff points as a condition of admission. From the offer stage, universities have contractual obligations to fulfil. Given the ongoing uncertainties, UUK would welcome a commitment from DfE and Ofqual to engage further with the higher education sector about any additional support universities might require in order to best navigate admissions this year in the event of substantial grade inflation and subsequent pressures on capacity.

Timetabling

Decoupling results could have negative implications for applicants and for universities' admissions.

We are concerned about proposals to decouple the point at which students are informed of their results and when universities are informed of students' formal results. Without access to formal results, universities, (including those in Scotland, Wales and Northern Ireland), might find it challenging to support students, respond to queries and provide assurances about course places. The proposed timetable could disadvantage those students who do not wish to appeal, while facing a period of uncertainty before grades are formalised. We are also concerned that the proposal to decouple results could lead to an expectation that universities might be placed under pressure to make earlier decisions, which could create anxiety for applicants and further complicate the admissions process.

For universities, a more suitable proposal would be to not decouple results, and ensure that universities receive advanced sight of these results, so that students can receive prompt decisions about their admission to higher education.

Arrangements should prioritise teaching time and a robust quality assurance process over the earlier receipt of grades.

We support the intention to maximise teaching time after a year of educational disruption. Students should continue to engage with their education for the remainder of the academic year, as continued learning will support their transition to university. However, a preferable timeline would be one that also prioritises a robust quality assurance process over the early release of results. We hope that an effective quality assurance process will reduce demand for the appeals process. With this in mind, there could also be issues with formal grades being presented very late in the summer, including resourcing pressures for staff at universities, schools and colleges.

Timetabling should be synchronised with other qualifications where possible.

As far as possible, the results timetables should be synchronised. This includes alignment with international qualifications and arrangements in other UK nations, to ensure a level playing field.

Equality for students

Further guarantees are needed on how assessment arrangements will provide a level playing field for all students.

The assessment and quality assurance processes should be mindful of the additional barriers faced by different student groups and any biases through these processes. This includes any challenges faced by students from disadvantaged backgrounds and vulnerable students in accessing their education, including remotely.

While UUK welcomes the additional teaching time proposed for students at schools and colleges, there is an important role for the DfE's proposed expert group on learning loss to explore how the impact of lost learning can be mitigated, so that universities can identify where students might require additional support. This includes an assessment of how lost learning might disproportionately affect certain higher education applicant groups and where further contextual information could be helpful for universities. The grades awarded in summer 2021 should also hold equal value to those awarded in previous years, so that students who received grades in 2020 are in a fair position. We are supportive of opportunities for private candidates to be awarded grades in summer 2021, who faced particular challenges last year.

Further engagement

While universities await the outcome of these consultations, it will be vital that DfE and Ofqual continue to engage with schools, colleges, universities and other stakeholders as arrangements are developed. Universities have operated as flexibly

as possible to support students during the COVID-19 pandemic and will continue to do so for summer 2021 arrangements.

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