

## Response to the SQA consultation on their draft Equality Impact Assessment of the alternative certification model

### **Do you have comments on the approach to certification?**

In light of the unprecedented situation the entire sector faces right now, we think the approach to certification has been well considered and offers the best chance of fairness for the majority of candidates. We think there are multiple processes in place to ensure fairness and consistency around providing estimated grades and centre moderation plays an important and objective role in the process. We are pleased to see the potential for bias has been closely considered and a variety of resources provided in an attempt to reduce bias in estimating grades.

### **Do you think there are any potential equality impacts we have not considered?**

From a disability/additional support needs perspective, we think the potential disadvantages this group of candidates could face in this process have been well considered, and we mirror the specific concerns that have been raised in the EIA. We have particular concerns about the impact of interrupted learning from illness/disability as it could be very difficult for teachers to accurately and fairly estimate grades for these candidates if there is a real lack of evidence. We are also concerned about the challenges involved in estimating grades for students who would have had reasonable adjustments, specialist support and assessment arrangements in place, as although experience can help shape ideas about the impact this support would have had on a candidate's performance, there is no fool proof way to truly determine what difference it could have made.

The issues around bias are also very pertinent in relation to disabled students, and although we expect this to only affect a small minority of cases, evidence from our disabled students' helpline suggests the following areas should be of concern:

The perceived ability and academic potential of disabled pupils/students can sometimes be underestimated, with parents and students reporting lowered levels of expectation from teachers/lecturers and reduced access to opportunities and appropriate career information, advice and guidance. Often this can be due to a lack of understanding about how an individual is impacted by their impairment or due to a lack of appropriate support.

The potential impact for bias arising from toxic relationships amid ongoing complaints and conflict between schools/colleges and parents/students in relation to

assessment, treatment and support for disabled pupils/students. Extremely strained relationships are something parents commonly report on the helpline.

**Do you have views on how any potential negative impacts on particular groups of candidates could be mitigated?**

It is very difficult to mitigate against the potential negative impacts on disabled students, and to my knowledge estimated grades were already submitted at the end of May, so this question needs to be considered in reference to awarding and the post certification review.

In particular, we would advocate for a process to allow the submission of additional evidence from parents, students and support organisations, in lieu of an exceptional circumstances procedure, and for SQA to consider this evidence alongside the estimated grades. Balance is required in this instance and it is important voices external to the school system feed into contextual circumstances where a disabled pupil has faced disadvantage.

A clearer and more robust system needs to be in place to allow parents/students to challenge estimated grades, as although there is reference to this in the EIA, it is not obvious exactly what it will look like. It needs to be as clear and simple as possible as we often support parents struggling to navigate the systems of redress available when there is conflict with the school, and the malpractice service may not be the most appropriate route in the current context. The information and process should be sent out with certificates as well as shared in My SQA and publicised widely on social media, news releases and amongst key partners.

Feedback from parents and partners amidst the current pandemic has suggested some feel the only way to mitigate against the negative impact on disabled candidates is to allow them to repeat the academic year. We would agree that this should be carefully considered where appropriate. We realise this is out with the remit and powers of SQA but would encourage this be fed back to key government and education partners.

**Do you have any research or resources you think we should be aware of?**

The EIA has referenced a number of resources related to research around bias, however just to add to that, I think it's important to acknowledge there is a real risk of this in the Scottish system. This quote from Seamus Searson, leader of the Scottish Secondary Teacher's Union on BBC news also raises concerns about prejudice and bias in predicting grades,

"Within a week or two from starting with a new class the teacher will know who is going to be top and who is going to be bottom in terms of ability. The people who know the pupils best are the teachers and they know who the A-grade students are and who looks like they are on track for a C."

This supports the evidence we hear on the helpline that teachers sometimes underestimate the potential and ability of pupils with additional support needs, and is extremely concerning when coming from a senior figure in secondary education. We would therefore again re-iterate how important it is to ensure there is a balanced view and simple routes to challenge estimated grades.

These additional sources add to the evidence you already have in relation to high achieving disadvantaged pupils being more likely to have their grades under-predicted:

<https://www.ucu.org.uk/article/10745/Disadvantaged-students-most-likely-to-miss-out-under-exam-plans-warns-UCU>

<https://www.hepi.ac.uk/wp-content/uploads/2019/12/HEPI-Policy-Note-20-Social-Mobility-Challenge-FINAL.pdf>

**Any additional comments?**

As previously advised, we would encourage more engagement with parents over both this consultation and future changes and consultations affecting disabled children and young people.