

# CCEA Equality Screening Exercise

Process of generating centre assessment grades and rank-ordering by examination centres, in relation to Section 75 (1) categories

## **Table of Contents**

Introduction	2
Part 1. Scoping	3
Part 2. Screening questions	9
Part 3. Screening decision	13
Part 4. Approval and authorisation	16

## Introduction

In June 2020, CCEA Awarding Organisation undertook an equality screening exercise to assess whether the implementation of the new and temporary arrangements for Summer 2020 examinations could introduce new and/or additional bias to the system of awarding to the normal trends experienced in previous typical examination series.

The following report has been completed using an adapted Equality Commission's screening template<sup>1</sup>. The adaptations to the template are in relation to the nature of the screening exercise which focussed only on a component of the overarching policy (which is owned by the Department of Education), specifically, the process of generating centre assessment grades (CAGs) and rank-ordering (RO) by examination centres in relation to Section 75 (1), as opposed to usual examination and awarding arrangements.

The screening exercise included:

- A literature review and data analysis report containing an assessment of the relevant General Conditions of Recognition (GCOR) (for internal, restricted use only);
- CCEA Awarding Organisation's documentation *GCSE, AS and A Level Awarding Summer 2020. Technical Information. (April 2020)* issued to centres, and the feedback from members of an Equality Screening Panel to screening questions set out by the Equality Commission for NI's Guide to Public Authorities<sup>2</sup>;
- An Equality Screening Panel meeting, convened to agree decisions resulting from screening outcomes.

<sup>1</sup> Equality Commission for Northern Ireland. Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities April 2010.  
[www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/S75GuideforPublicAuthoritiesApril2010.pdf](http://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/S75GuideforPublicAuthoritiesApril2010.pdf) Accessed 8 June 2020.

<sup>2</sup> Ibid. Appendix 1. Ps. 66-69.

## Part 1. Scoping

The first stage of the screening process involves scoping the policy under consideration to help prepare the background and context.

This screening exercise is based on the generating of centre assessment grades (CAGs) and rank-ordering (RO) by examination centres in relation to Section 75 (1), as opposed to usual examination and awarding arrangements.

### Information about the policy [*and screened component thereof*]

Name of the policy

*'Awarding for GCSE, AS and A Level Qualifications Summer 2020: Head of Centre Guidance (CCEA Regulation, April 2020)'*

*The **component document to be screened**, which focuses on a process only and therefore hereafter referred to as 'process' instead of 'policy':*

*'GCSE, AS and A Level Awarding Summer 2020: Technical Information (CCEA Awarding Organisation, April 2020)'*

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Is this an existing, revised or a new policy?

*New and temporary, as directed by Peter Weir, Minister of Education, MLA (COVID-19 mitigation March/April 2020).*

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What is it trying to achieve? (intended aims/outcomes)

*The recent CCEA Regulation publication 'Awarding for GCSE, AS and A Level Qualifications Summer 2020: Head of Centre Guidance' (April/May 2020) stated that CCEA Awarding Organisation would communicate further information on the submission of data required for awarding grades in Summer 2020 to schools and colleges. CCEA Awarding Organisation issued the 'GCSE, AS and A Level Qualifications. Awarding Summer 2020. Technical Information. (April 2020)' document (to be screened in this exercise), as well as 'Technical Information – Supplementary Questions and Answers'.*

*The information in the latter two documents aims to help centres and teachers with the process of rank ordering students and generating centre assessment grades, and should be read alongside 'Awarding for GCSE, AS and A Level Qualifications Summer 2020: Head of Centre Guidance'. The information applies to qualifications offered by CCEA Awarding Organisation that are regulated by CCEA Regulation.*

*Specifically, for each subject with cash-in entries, CCEA requires the following information from centres:*

- *A centre assessment grade (CAG) for each student – the judgement submitted to CCEA by the Head of Centre about the grade that each student is most likely to have achieved if they had sat their external examinations and internally assessed components. This professional judgement is derived from evidence that is held within the centre and which has been reviewed by subject teachers and relevant heads of department.*
  - *The rank order of students within each grade – for example, for all those students with a grade C in GCSE Mathematics, a rank order where 1 is the highest attaining student at that grade, and so on.*
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Are there any Section 75 categories which might be expected to benefit from the intended temporary process?

If so, explain how.

*CCEA Awarding Organisation undertook an equality screening exercise to assess whether the implementation of this process as a component of the temporary arrangements could introduce new and/or additional bias to the system of awarding to the normal trends experienced in previous typical examination series.*

*This equality screening exercise focused only on a component of the policy (not on the policy itself), namely the process of generating centre assessment grades and rank ordering by centres, as opposed to the usual examinations and awarding arrangements.*

*With reference to Section 75 (1) of the Northern Ireland Act 1998, these new arrangements are most likely to affect candidates in the same way as normal examinations practice. However, due regard should be given to the need to promote equality of opportunity:*

- *Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;*
  - *Between men and women generally;*
  - *Between persons with a disability and persons without; and*
  - *Between persons with dependants and persons without.*
- 

Who initiated or wrote the policy?

*The policy of awarding Centre Assessment Grades is owned by DE, and CCEA and centres have been tasked with implementing it. CCEA advises and supports centres with the following lead communications:*

- *CCEA Regulation (April and May 2020): Awarding for GCSE, AS and A Level Qualifications Summer 2020. Head of Centre Guidance.*
  - *CCEA Awarding Body (April 2020): GCSE, AS and A Level Qualifications. Awarding Summer 2020. Technical Information.*
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Who owns and who implements the policy?

*Owner:*

- *Department of Education Northern Ireland*

*Implementation:*

- *CCEA Regulation*
- *CCEA Awarding Organisation*
- *CCEA Examination Centres*

### **Implementation factors**

Are there any factors which could contribute to/detract from the intended aim/outcome of the process to be screened?

**No**

If yes, are they

- financial
- legislative
- other, please specify \_\_\_\_\_

### **Main stakeholders affected**

Who are the internal and external stakeholders (actual or potential) that the policy temporary process will impact upon?

- staff
- service users (*Heads of Centre, Centre Examinations Officer, Students*)
- other public sector organisations (*C2k, EA*)
- voluntary/community/trade unions (*Teachers' unions*)
- other, please specify \_\_\_\_\_

## Other policies with a bearing on this policy

- what are they?

*Policies developed by other UK Awarding Organisations and Regulators to mitigate the COVID-19 pandemic impacting on Summer 2020 examinations.*

- who owns them?

*UK Awarding Organisations and Regulators.*

## Available evidence

What evidence/information (both qualitative and quantitative) have you gathered to inform this process? Specify details for each of the Section 75 categories.

<b>Section 75 category</b>	<b>Details of evidence/information</b>
Religious belief	<i>Previous examination series, CCEA General Conditions of Recognition (GCOR), Research, Literature review and Consultation feedback provided by Ofqual</i>
Political opinion	<i>Previous examination series</i>
Racial group	<i>Previous examination series, CCEA GCOR, Research, Literature review and Consultation feedback provided by Ofqual</i>
Age	<i>Previous examination series, CCEA GCOR, Research, Literature review and Consultation feedback provided by Ofqual</i>
Marital status	<i>Previous examination series</i>
Sexual orientation	<i>Previous examination series</i>
Men and women generally	<i>Previous examination series, Research, Literature review and Consultation feedback provided by Ofqual</i>
Disability	<i>Previous examination series, CCEA GCOR, Research, Literature review and Consultation feedback provided by Ofqual</i>
Dependants	<i>Previous examination series</i>

## Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular process?

<b>Section 75 category</b>	<b>Details of needs/experiences/priorities</b>
Religious belief	<i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of religious belief.</i>
Political opinion	<i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of political opinion.</i>
Racial group	<i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of their racial group.</i>
Age	<i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of age. However, perceived (non-) maturity can contribute to potential bias. Older students, who have had a number of resit attempts, perhaps now having been entered as private candidates, could also be perceived to be disadvantaged due to potential bias.</i>
Marital status	<i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of their marital status.</i>
Sexual orientation	<i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of their sexual orientation.</i>
Men and women generally	<i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of gender.</i>
Disability	<i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of disability, provided due consideration is given to the disability and guidance is applied. Reasonable adjustments may have been requested and centre judgements should reflect how students would have performed under ordinary circumstances.</i>

Section 75 category	Details of needs/experiences/priorities
Dependants	<p><i>Rank ordering students and awarding centre assessment grades based on internal assessment evidence and teacher judgement, should be independent of dependants.</i></p> <p><i>Parental/carer responsibilities of students should be taken into consideration by centres when providing support to their learners, for example by planning study time to facilitate child care.</i></p>



## Part 2. Screening questions

### Screening questions and feedback

The following details provide an indication of panel members' responses to the screening questions.

1 What is the likely impact on equality of opportunity for those affected by this process, for each of the Section 75 equality categories? minor/major/none		
Section 75 category	Details of process impact	Level of impact? minor/major/ none
Religious belief		<i>none</i>
Political opinion		<i>none</i>
Racial group		<i>none</i>
Age	<p><i>Feedback indicated potential risks of negative impact of timing of process:</i></p> <ul style="list-style-type: none"> <li><i>– (Some) boys mature at a later date, therefore this may impact the teacher professional judgements - CAG/ROs.</i></li> <li><i>– There may be lack of evidence and teachers may not be as familiar with students' abilities for those students in part time education, or with erratic attendance.</i></li> </ul>	<i>minor</i>
Marital status		<i>none</i>
Sexual orientation		<i>none</i>
Men and women generally	<p><i>Similar to the Age category, respondents cited perceived underperformance by boys who are taking longer to mature and a potential, subsequent bias towards girls performing better than boys at the time of rank ordering.</i></p>	<i>minor</i>

1 What is the likely impact on equality of opportunity for those affected by this process, for each of the Section 75 equality categories? minor/major/none		
Section 75 category	Details of process impact	Level of impact? minor/major/none
Disability	<p><i>The document references guidance regarding reasonable adjustments, special considerations, and access arrangements and how they apply to the current process. It advises centres to refer to the JCQ publication 'A guide to the special consideration process 2019–2020' when considering special considerations.</i></p> <p><i>There may be a risk for a small number of candidates with a recent diagnosis for whom the adjustments/consideration had not been approved in time of the new process.</i></p> <p><i>Potential teacher unconscious bias towards those with SEN was another risk raised by respondents. It has been acknowledged that, although this risk may equally exist under normal examinations arrangements, here this risk could be increased due to the absence of test-based, or moderated assessment. Respondents saw a potential to raise awareness in the sector through explanation of unconscious bias, especially to anyone involved in assessing learners' achievements.</i></p>	minor
Dependants	<p><i>The documentation does not refer to a process for centres to support candidates with additional pressures, e.g. carer/parental responsibilities. Under the current circumstances there may be impact on some candidates' potential to perform to the best of their ability if under pressure at home to be a carer or a key worker.</i></p>	minor

2 Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?		
Section 75 category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Religious belief		See Age group
Political opinion	<i>Respondents suggested that CCEA could plan to publish statistical information to demonstrate the spread of outcomes across the sector. They also suggested that the current situation offers opportunities to open further political debate about equality of opportunity in post-primary sector (policy makers) with a view to the future of the examinations process, academic selection, social disadvantage etc.</i>	
Racial group	<i>Respondents saw a potential to raise awareness through explanation of unconscious bias to anyone involved in assessment (also for categories other than racial groups).</i>	
Age	<i>Analysis of the outcomes this year compared to cohorts in previous years could promote equality of opportunity.</i>	<i>The process for temporary arrangements was seen as having insufficient impact to be a vehicle to promote equality of opportunity.</i>
Marital status		See Age group
Sexual orientation		See Age group
Men and women generally	<i>See Racial group and Age group.</i>	
Disability	<i>Respondents suggested that centres should ensure access arrangements are known from an early period and communicated with all of those preparing centre assessment grades. See Racial group.</i>	

2 Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?		
Section 75 category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Dependants		<i>Any mitigating factors should be taken into account.</i>

3 To what extent is the process likely to impact on good relations between people of different religious belief, political opinion or racial group? minor/major/none		
Good relations category	Details of process impact	Level of impact minor/major/none
Religious belief		<i>None</i>
Political opinion		<i>None</i>
Racial group	<i>If candidates, e.g. from ethnic minorities, perceive teachers having bias against them this could be an issue. The process document refers to the importance of following guidance.</i>	<i>None</i>

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Religious belief	<i>Respondents stressed the importance of key communications when results are issued in August to indicate how the outcomes reflect previous cohorts. Positive messages in August will be crucial.</i>	

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Political opinion	<i>Respondents recommended the publication of statistics (provided they exist) after the issue of grades to demonstrate the comparability to previous years between political communities.</i>	<i>The process, being mostly technical by nature, is not really applicable to better promoting good relations and should be independent of political opinion.</i>
Racial group	<i>It was thought that there was a current appetite to promote good relations and racial equality due to recent international events.</i>  <i>Respondents recommended to use statistics (provided they exist) post the award of grades to demonstrate that they are comparable to previous years between racial groups.</i>	

## Additional considerations

### Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the process on people with multiple identities?

Provide details of data on the impact of the process on people with multiple identities. Specify relevant Section 75 categories concerned.

*The majority of respondents (9 of 12; 75%) answered 'No' to this question.*

*There is no data available at this time. Respondents' points, raised for consideration, included:*

- *People from these categories have in my experience been more susceptible to mental health issues which could adversely affect their performance.*
- *[...] disability or learning needs may mean that the opportunity to do their best has seen new barriers in place due to the unseen consequences of Covid-19. This coupled with the priorities of the family unit, whatever it might be, can impact the progress of people in some of these groups.*

### Part 3. Screening decision

If the decision is not to conduct an equality impact assessment, please provide details of the reasons.

*The decision taken was in favour of 'minor' impact.*

*In the collective view of the Screening Panel, this year's process is not unlawfully discriminatory. It may present relatively minor additional impacts (on gender grounds primarily) and the mitigations detailed elsewhere in this report compensate for any potential negative impacts. As such this part of the process is screened out and a full Equality Impact Assessment is not deemed necessary.*

If the decision is not to conduct an equality impact assessment the public authority should consider if the policy should be mitigated or an alternative policy be introduced.

*The process is mostly technical in nature and in the main has minor or no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.*

*However, as potential conscious or unconscious teacher bias may impact on some individuals within the candidates' cohort of summer 2020 series, it was agreed that the implementation of the temporary process in centres could have potential minor equality implications, when compared to normal examination series practice.*

*It was decided that CCEA would ensure to have measures in place that could help mitigate any adverse impact/minor equality implications should they arise.*

If the decision is to subject the policy to an equality impact assessment, please provide details of the reasons.

N/A

## Mitigation

*The temporary process being screened during this exercise is unlikely to be repeated in its current form provided the COVID-19 pandemic is no longer requiring school closures in the future. It may therefore not require amendments or changes.*

*The screening panel acknowledged that differing practice in centres as well as potential, if unconscious, teacher bias could be identified as possible risks by the sector and therefore would need to be taken into consideration, both risks are not measurable so far. The process documentation and accompanying information available to centres and teachers as well as grades standardisation and mitigation measures aim to reduce these potential risks.*

*Currently, as of June 2020, CCEA suggests a number of measures to mitigate potential risk of discrimination against some candidates if required, such as:*

- Application of the statistical standardisation model.*
- Ongoing engagement with schools.*
- Analyses of examination series outcomes.*
- Implementation of a clear communication strategy regarding outcomes.*
- Opportunities to re-sit units and consideration of privately entered candidates.*
- Appeals process.*
- Compliance and malpractice measures.*
- Consideration of lessons learned during first COVID-19 virus outbreak.*

*For future reference, or in the case of a further outbreak of COVID-19 virus, the following measures should be taken into account as applicable:*

- Advice about retention of evidence and associated controls/ suitable environment for these assessments.*
- Timing/order of future teacher assessed units.*
- Additional awareness raising in centres about conscious and unconscious bias.*
- Further support for centres in data analysis in consideration of aspects, such as Free Schools Meals and gender, within their own setting and in relation to others.*
- Consideration of evidence from teacher assessed Key Stage 3 Levels of Progression for Communication, Using Mathematics, and Using ICT.*

#### Part 4. Approval and authorisation

<b>Screened by:</b>	<b>Position/Job Title</b>	<b>Date</b>
Esther Martin	Business Manager, CCEA	11/8/20
<b>Approved by:</b>		
Margaret Farragher	Director of Education, CCEA	11/8/20