



Ref. FOI/20200721/5

18 August 2020

| Reply to request for information under the Freedom of Information Act | |
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| Your ref | Email of 21 July |
| Request | <p>You have mentioned that you calculate contextualized GCSE grades using data comparing each applicant to the cohort. In the case of IGCSE examinations, please be kind enough to clarify:</p> <ol style="list-style-type: none">1. Whether the data of the cohort is also available to the university2. How the university calculates the contextualized IGCSE grades of each applicant |

Dear Smith Jones,

I write in reply to your email requesting the above information.

The University confirms that it holds the information requested. However, we will not disclose it, as we believe that it is exempt from disclosure under section 43(2) of the Freedom of Information Act (FOIA).

Section 43(2) of the FOIA provides that information is exempt where its disclosure would, or would be likely to, prejudice the commercial interests of any person. For the reasons given below, we consider that disclosure of the information requested would be likely to prejudice the University's commercial interests.

All universities who wish to charge the maximum fee for undergraduate students are required to agree with the Office for Students (OfS) an Access and Participation Plan (APP), setting out their targets for attracting more students from historically under-represented groups, including those from disadvantaged backgrounds. If the OfS is not satisfied that sufficient progress is being made towards a university's targets, it has the power to reduce the fee that the university is able to charge its undergraduates. Universities are therefore in competition with one another to attract and admit students from specific target groups.

This competition is particularly intense for Oxford and other leading universities (such as the Russell Group), because they have higher entrance requirements: Oxford generally requires A*A*A to AAA at A-level (or other equivalent qualifications) depending on the course. This means that Oxford and similar universities are competing to recruit and admit only the highest-performing students from the specific target groups.

As part of its undergraduate admissions process, the University collates contextual information which is relevant to the assessment of its applicants. These data concern both the socio-economic context of an applicant's home address and also the educational context of the schools they have attended.

Oxford provides a contextualised GCSE score for all applicants with at least five GCSE results. This allows admissions tutors to get a sense of whether applicants have performed well, given the performance of the school where they took their GCSEs. The score is based on how well applicants have performed at GCSE compared to other applicants from schools with similar KS4 performance.

IGCSE grades are available for individual applicants and their schools, and are treated in the same way as GCSE grades. Oxford contextualises GCSE grades based on school performance at Key Stage 4, so that if an applicant has been relatively high performing, given the attainment of others from similarly performing schools,



this would yield a positive cGCSE score. If an applicant has been underperforming, this would yield a negative cGCSE score.

This system enables Oxford to identify more effectively high-performing students from the target under-represented groups, who would be most likely to thrive on an Oxford degree course. Details of this system would be of significant value and interest to Oxford's main competitors, who might introduce similar changes to their own admissions processes, offsetting any competitive advantage that Oxford might gain.

Section 43(2) is a qualified exemption that requires the University to weigh up the public interest in disclosing the information requested, which is presumed under FOIA, against the public interest in withholding it. The University recognises that there is a public interest in the disclosure of the information requested. Generally, there is an interest in openness and transparency in the conduct of the University's affairs. More specifically, there is an interest in information relating to the efforts of the University to diversify and broaden its undergraduate student body. However, we consider that this interest can be met without impairing the University's ability to compete with other institutions, and to do so on a level –playing field. The University already publishes a considerable amount of information on its efforts to widen participation, including its APP¹. This information includes statistics on progress in meeting access targets, as well as details of the University's outreach activities across the collegiate University, including projects undertaken by individual departments and in collaboration with colleges. In our view, this information is more than sufficient to meet the public interest in disclosure. In addition, it would be contrary to fair competition if one institution were required to disclose commercially sensitive information separately from other institutions. We therefore consider that the balance of public interests lies in favour of maintaining the exemption.

INTERNAL REVIEW

You may request an internal review of this response by e-mailing foi@admin.ox.ac.uk. A request for internal review should be submitted no later than 40 working days from the date of this letter.

THE INFORMATION COMMISSIONER

If, after the internal review, you are still dissatisfied, you have the right under FOIA to apply to the Information Commissioner for a decision as to whether your request has been dealt with in accordance with the FOIA. You can do this online using the [Information Commissioner's complaints portal](#).

Yours sincerely

Information Compliance Team

¹ <https://academic.admin.ox.ac.uk/app>