



The Norwegian Data Protection Authority

Att: Tobias Judin

Copy of this letter is submitted to:
The Norwegian Ministry of Education and Research
International Baccalaureate Organization

Ansvarlig advokat
Arve Føyen

Oslo,
03.09.2020

Vår ref.
511976

Deres ref.

We refer to our previous letters in this matter, dated 20.08.2020.

1. INTRODUCTION - PREVIOUS OBJECTIONS ARE VALID

Our clients have now had some time to further assess IBOs new IA-method and the results. We underline that all arguments from our letter and complaint to IBO dated 20.08.2020 remain, even with increased weight. It is not fair processing to let a work that was supposed to count for 20-30% of the final grade, count 100% for many students when a more representative alternative exists to show the overall competence of the student.

Further, the students and parents have looked into the results of the IA-method for students being outside the "band of +- 1 grade from IA" and this is commented on below.

2. ESPECIALLY ON STUDENTS OUTSIDE THE "BAND OF +- 1 GRADE FROM IA"

For students outside the band of "+- 1 grade from IA" there are also anomalies in the result, which strongly suggests that external factors beyond the student's own performance (PG and IA) are still at play. Please see the below tables that illustrate this.

There is seemingly no obvious logical explanation to the results our group of clients have in their cohort and it is impossible to say that this processing is neither transparent nor fair. To our knowledge these students have not had their grades changed by any type of complaint, just the IBO changing their model.

Tabell 1: Select examples of IBO grades May 2020 with annotations.

Example #	Student	IBO grade July 2020	PG	IA	IBO grade August 2020	Comments
Student 1:						
1	Maths	6	7	5	6	Grade might be averaged based on PG and IA. Still, this example illustrates the lack of transparency. IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.
2	Physics	5	6	5	7	Final grade according to the 2nd method is better than and not in accordance with the student's own performance (IA and PG). The fact that the grade is adjusted (raised) in August may indicate that external factors beyond the student's own performance (PG and IA) are still at play.
3	Subject	6	7	6	6	In accordance with the August 2020 IBO grading principles. Still invalid as a 20-30% task shall not count 100%.
4	Subject	5	5	5	6	Final grade according to the second (August) method is better than and not in accordance with the student's own performance (IA and PG). The fact that the grade is adjusted (raised) in August may indicate that external factors beyond the student's own performance (PG and IA) are still at play.
5	Subject	5	6	5	6	Inconsistent with the August 2020 IBO grading principles.
Student 2						
6	Subject		3	5	3	This example illustrates the lack of transparency. IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.
Student 3:						
7	3 equal subjects	5	6	5	5	In accordance with the August 2020 IBO grading principles. Still invalid as a 20-30% task shall not count 100%.
8	2 equal	6	7	6	6	In accordance with the August 2020 IBO grading principles. Still invalid as a 20-30% task shall not count 100%.
Student 4						



Example #	Student	IBO grade July 2020	PG	IA	IBO grade August 2020	Comments
9	Subject	3	4	6	3	This is an exceptional example. The July as well as August 2020 grades are both set lower than the student's own performance (IA and PG). This is a clear indicator that external factors beyond the student's own performance (PG and IA) are still at play.
Student 5						
10	Subject	4	6	4	4	This example illustrates the lack of transparency. IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.
11	Subject	4	5	3	4	Grade might be averaged based on PG and IA. Still, this example illustrates the lack of transparency. IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.
12	Subject	4	5	4	4	In accordance with the August 2020 IBO grading principles. Still invalid as a 20-30% task shall not count 100%.
13	Subject	5	6	5	5	In accordance with the August 2020 IBO grading principles. Still invalid as a 20-30% task shall not count 100%.
Student 6						
14	Subject	3	5	2	3	This example illustrates the lack of transparency. IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.
Student 7						
15	Subject	7	6	7	7	In accordance with the August 2020 IBO grading principles. Still invalid as a 20-30% task shall not count 100%.
16	Subject	4	7	4	4	This example illustrates the lack of transparency. IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.
17	Subject	4	7	4	4	This example illustrates the lack of transparency. IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.
18	Subject	4	5	4	5	Inconsistent with the August 2020 IBO grading principles.



Example #	Student	IBO grade July 2020	PG	IA	IBO grade August 2020	Comments
Student 8						
19	Subject	4	6	4	4	This example illustrates the lack of transparency. IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.

Colour codes:

 In accordance with the August 2020 IBO grading principles, from what we know of them. Still invalid as a 20-30% task shall not count 100%.

 Lack of transparency as IBO has not exposed any information on how final grade is set when there is a discrepancy of 2 or more between PG and IA.

 Inconsistent with the August 2020 IBO grading principles from what we know of them.

 Final grade according to the second (August) IBO method is not in accordance with the student's own performance (IA and PG). The result indicates that external factors beyond the student's own performance (PG and IA) are still taken into consideration, possibly including school context.

Table 2: The data in table 1 additionally indicates inconsistency in how IA and PG relates to the revised final grades (August 2020). Below is an excerpt from the above table, displaying data only for students with initial final grade set to 5. This table illustrate how students with PG = 6 and IA = 5 differs in final adjusted degree (August) from 5 to 7. **In several of these examples the August grade has been adjusted in ways that conflicts with how IBO explains that August adjustments were to take place. It further illustrates the continuing lack of transparency in IBO grading and suggest that external factors beyond the students' own achievements are still taken into consideration, possibly including historical data and school context.**

Example #	Student	IBO grade July 2020	PG	IA	IBO grade August 2020
2	Subcjet	5	6	5	7
4	Subcjet	5	5	5	6
5	Subcjet	5	6	5	6
7	3 subjects like this	5	6	5	5
13	Subcjet	5	6	5	5



Table 3: Similar overview to Table 2 of all examples that initially were given the grade 4 by IBO, illustrating similar questionable issues as in Table 2.

Example #	Student	IBO grade July 2020	PG	IA	IBO grade August 2020
Student 1:					
10	Subcjet	4	6	4	4
11	Subcjet	4	5	3	4
12	Subcjet	4	5	4	4
16	Subcjet	4	7	4	4
17	Subcjet	4	7	4	4
18	Subcjet	4	5	4	5
19	Subcjet	4	6	4	4

3. FURTHER INFORMATION ON IA-ASSESSMENTS

For your information, we also draw attention to the fact that IBO have engaged many new censors for revising the many IAs they extraordinarily decided to review themselves this year instead of letting the teachers do this. Internationally this is increasingly criticised. One experienced censor, have even publically been strongly critical to the process because as many as close to 1 000 000 IAs had to be corrected within few weeks.¹ There are over 174 000 graduates this year, and they have 6 IAs each – giving a total of slightly over 1 000 000 in all. There is great suspicion that the quality of the work is uneven, faulty and unfair.

We have also been made aware that internationally, there seems to be a market for buying help with IAs. We attach some links that show this. We have no knowledge of any student actually making use of this, which would of course be against the rules depending on the degree of help. At the same time, it does go to illustrate that letting the IAs count for 100% for many students, does not seem to be a decision reflecting what is the capability of the student, and using the PG set by the teachers would be a far more reliable source of assessing the real capability.

<https://writingmetier.com/ib-internal-assessment-writing-service/>
<https://writersperhour.com/ib-internal-assessment>
<https://www.helpforassessment.com/ib-internal-assessment-writing-service>

The above only goes to aggravate the graveness of letting the IAs count for 100% for very many of the students.

You are of course welcome to contact us, should you have any questions to the above. For the sake of good order, the IBO is copied on this letter and so are the relevant Norwegian educational authorities.

¹ See Dr. Hans-Rütiger Zimmermann aka @HansZim03399683 on Twitter with many posts on this.