

Glenys Stacey
Chief Regulator



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The Lord Lucas
House of Lords
London, SW1A 0PW

Via Email: lucasr@parliament.uk

Office of Qualifications
and Examinations Regulation
Spring Place
Coventry Business Park
Herald Avenue
Coventry CV5 6UB

Telephone 0300 303 3344
Textphone 0300 303 3345
public.enquiries@ofqual.gov.uk
www.gov.uk/ofqual

Our Ref GQSS
Your Ref Education and Adoption Bill

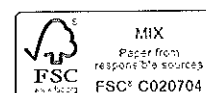
Dear Lord Lucas

During the Grand Committee debate on the Education and Adoption Bill last Thursday, Lord Nash undertook to write to you and other Peers present about the coasting definition and awarding. Ofqual has been asked to respond to you directly regarding your concerns on exams in our capacity of independent regulator. A copy of this response will be placed in the House of Commons library and is being copied to the Peers present at that debate.

You raised concerns about examinations becoming "closer and closer to norm referencing, where there is clearly a limit to the additional percentage of children who can pass in any given year" and stated that "if schools are doing well, we will therefore find GCSEs getting harder".

A norm referencing system is not used for GCSE and A level awarding in England. Rather, a principle known as 'comparable outcomes' has been used for a number of years by exam boards. This principle reflects that if the cohort taking a qualification in one year is of similar ability to that of the previous year, then the overall results (outcomes) should be comparable. This approach is particularly important for the first awarding of new qualifications. It means that the year group of students are not disadvantaged, or advantaged, by the introduction of new qualifications.

Ofqual's approach to monitoring awarding, using statistical predictions and setting tolerances around them, has halted grade inflation (improvements in results without evidence of improved performance). As a result, it is unlikely that the national level of attainment for GCSEs or A Levels will change markedly year-on-year albeit individual schools' results could vary within that picture. That said, it remains possible for an exam board to present Ofqual with evidence to justify an out of tolerance award. Ofqual approved over 50 such requests from exam boards this year and refused none; such flexibility is not a feature of a norm referencing system.



I would also like to address the concern that improved pupil performance as a result of better secondary school teaching would not be rewarded because the boundaries will be higher. This is not the case at all. Grade boundaries are based on a range of information including examiner judgement and vary between subjects and year-on-year based on the level of difficulty of the paper.

Looking to the future, following consultation in 2014, Ofqual announced the introduction of a new grading structure for the new GCSEs to be first awarded in 2017. This will see new GCSEs changing from A* to G to 9-1 (9 being the highest) while retaining the grade system for A Levels. This will allow greater differentiation at the top of the GCSE banding and ensure fairness to learners during the transition to new qualifications. Clear anchor points are being set between the old and new grading structures so that in 2017:

- Broadly the same proportion of students will achieve a grade 4 and above as currently achieve a grade C and above
- Broadly the same proportion of students will achieve a grade 7 and above as currently achieve an A and above
- For each examination, the top 20 per cent of those who get grade 7 or above will get a grade 9 – the very highest performers
- The bottom of grade 1 will be aligned with the bottom of grade G
- Grade 5 will be positioned in the top third of the marks for a current Grade C and bottom third of the marks for a current Grade B. This will mean it will be of greater demand than the present grade C, and broadly in line with what the best available evidence tells us is the average PISA performance in countries such as Finland, Canada, the Netherlands and Switzerland

Ofqual also consulted on how grade standards for the new GCSEs should be set in the first year of awarding (2017). Of the options explored, norm referencing attracted little support and criterion referencing would also be difficult to use in a way that would be consistent, meaningful or fair. Consequently, in November 2014, Ofqual announced decisions that statistical predictions would be used to award the new GCSEs in English Literature, English language and mathematics in 2017 – a development of the comparable outcomes approach.

In 2017, awarding organisations will draw heavily on statistical evidence of how well the cohort performed in Key Stage 2 tests to predict the proportion of students that are likely to achieve, say, a grade 4 in GCSE mathematics, given previous experience of the statistical relationship. The predictions are intended to guide awarding at the cohort (national) level and do not predict the grades that individual candidates will receive; individual students may do better or worse, than their prior attainment would suggest for a number of reasons.

As you highlighted, this introduces a potential tension with how these qualifications are used for accountability. Government have raised the level of a 'good pass' for accountability purposes from what was a C under the old grading system to a 5 in the new system. However due to the anchor points used for awarding purposes, Grade 5 will be positioned two thirds higher than a C was. This is likely to mean that fewer students will achieve this accountability measure.

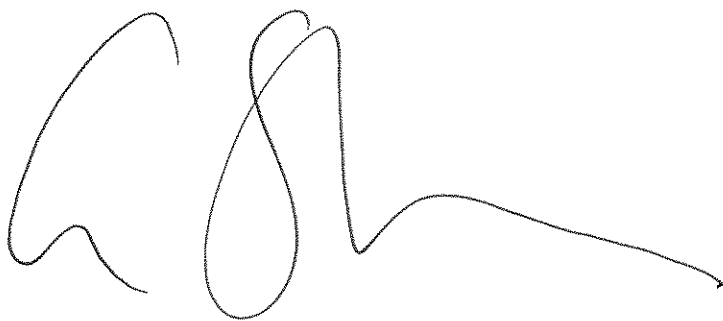
Ofqual is also looking at ways in which improvements to awarding might be made over time. Some teachers are concerned that their efforts to raise standards, year by year, may not be fully reflected in the awards made at GCSE because of this

approach in awarding. Therefore Ofqual is developing and piloting the National Reference Test to see whether GCSE awarding can be made able to recognise changes in student performance over time in England at the end of year 11. You may find this article informative <http://schoolsweek.co.uk/coming-to-a-school-near-you/>

The first full scale trial of the National Reference Test will be in March 2016, with the first proper test in March 2017. Selected pupils will take the test in early March, before they take their GCSEs that summer. The tests should show, over several years, if there is a change in how pupils perform at the national level; this information could be used, alongside existing sources of data and evidence, to inform the awarding process. The first time that it will be able to compare performance between years will be in 2018 but it is much more likely to be in subsequent years that test results can be more fully taken into account in GCSE.

I trust that this information is helpful to your deliberations on the Education and Adoption Bill.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized 'G' followed by a series of loops and a long horizontal stroke extending to the right.

Glenys Stacey
Chief Regulator