

Okaved

From: Dennis Opposs
Sent: 24 August 2012 09:24
To: Fiona Pethick; Adrian Long; Glenys Stacey; Jeremy Benson;
Subject: Re: Leighton Andrews story

Follow Up Flag: Follow up
Flag Status: Completed

Very happy to support that
Dennis

From: Fiona Pethick
Sent: Friday, August 24, 2012 09:18 AM
To: Adrian Long; Glenys Stacey; Jeremy Benson;
Subject: RE: Leighton Andrews story

Dear all

I have now heard the Leighton Andrews pieces on the BBC. He says he is launching a review into the English results and I think the regulatory decisions. I am inclined to drop a line to Chris Tweedale (senior civil servant – who was not around when we were trying to direct WJEC) in very friendly and measured tones offering to discuss and explain where we are and noting that the comparable outcomes approach was a three country agreement.

Any problems with this? ✓

Fiona

Fiona Pethick
Director of Regulation, Ofqual

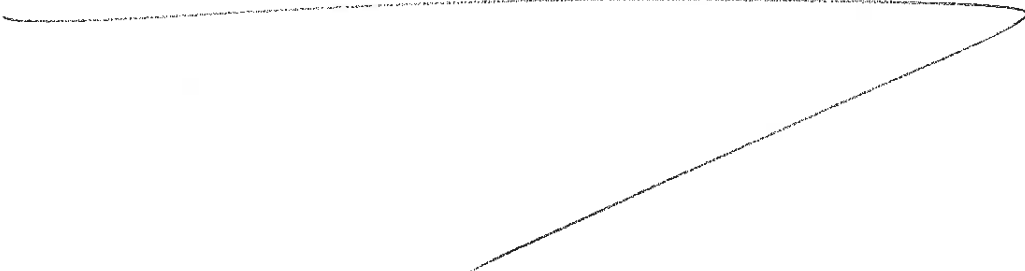
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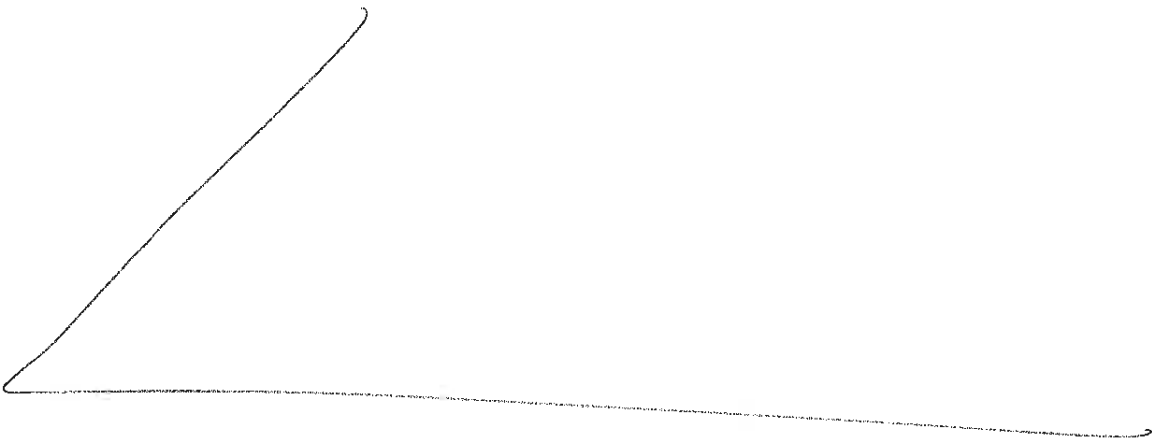
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Olav

From: Dennis Opposs
Sent: 24 August 2012 09:52
To: Olav - CRC
Cc: - Media Relations
Subject: Re: Couple of enquiries

Follow Up Flag: Follow up
Flag Status: Completed

Olav

First line looks fine. Should we encourage BBC to have a link to the comparable outcomes document on our website?

Fiona is planning to contact the Welsh Govt. Line looks good to me. They were signed up to this approach no question

Dennis

From: Olav
Sent: Friday, August 24, 2012 09:45 AM
To: - CRC
Cc: - Media Relations
Subject: Couple of enquiries

Hello,

I need to confirm our lines on a couple of issues from yesterday, after an enquiry from the BBC website:

Calls for an investigation in English grade boundaries –

Suggested line:

It is vital that the grades awarded for overall qualifications are right, and that standards are comparable year-on-year and across the exam boards.

Where students take exams in different units spread across a couple of years, the exam boards have to consider all of the evidence available for each exam series and make decisions to make sure that the right qualification standards are achieved.

We are confident that standards have been maintained and that the grades awarded are right. We will be happy to discuss our approach to the awarding of GCSEs with those who want more information.”

Comments by the Welsh Minister – said his officials raised concerns about our methodology on English Language GCSE. I had a brief conversation with Glenys about this, but did not get opportunity / need to draft a line or answer questions. (See below for comments in full):

“The approach to the awarding of GCSEs and A levels was agreed with the regulator in Wales. We meet regularly with our regulatory colleagues and will continue to discuss with them the regulation of qualifications and maintenance of standards where there are shared interests that cross the border.”

HAS ANYONE SPOKEN TO THE WELSH REGULATORS ABOUT THESE COMMENTS:

Education and Skills Minister, Leighton Andrews said,

“We care about high standards in Wales. We have not approved the new combined GCSE English now taken in many schools in England, which has a reduced coverage of aspects of English Language as set out in the programme of study for English at Key Stage 4. We believe it is important that learners follow the fuller programme of language learning that is covered by GCSE English Language. What is clear now is that we are no longer comparing like with like when looking at results in Wales and England.

“We had concerns about the methodology being used by **Ofqual** in relation to English Language GCSE, and my officials raised these with **Ofqual** two weeks ago. There will be further meetings with **Ofqual** on this in the autumn.

“In relation to English Language, a majority of WJEC English GCSE candidates are based in England, so there was no option but to agree a compromise with **Ofqual** in relation to the WJEC English Language GCSE sat on both sides of the border.

“Last month the Northern Ireland Education Minister and I met and then wrote to Michael Gove because of our concerns at his unilateral statements and actions on GCSEs and A Levels. It is clear that we now need to consider whether our own system can be in hock to "Gove-it-alone" policies.

“These issues will be considered in relation to our current review of qualifications. We have already reviewed the work of the WJEC and I will give further consideration this autumn as to whether the WJEC should continue in its present form, or whether we should move in the direction of Scotland or Northern Ireland.”

Okwel.

From: Tweeddale, Chris (Director - SYPG)
Sent: 24 August 2012 11:28
To: Fiona Pethick
Cc: Jeremy Benson; Okwel = Welsh Aunt.
Subject: RE: GCSE results etc

Follow Up Flag: Follow up
Flag Status: Completed

Categories: printed, On call director

Fiona,

I hope you are well. Sorry I was away when you tried to get in touch.

We have been given a remit by the Minister and have an internal meeting booked for this afternoon to scope out and plan the review. I know that we will be asking to see all the correspondence between Ofqual and the AOs, and (if any exist) any communications between Ofqual and the Secretary of State or officials regarding standards and / grade boundaries on the decision process for grade boundaries etc on English [I say this because the Minister has already asked me to contact Glenys to say that a request will be coming from us for this information]. Obviously Cassy is already involved in the usual scrutiny work with you already. Perhaps we could get back in touch with you after our meeting this afternoon and have a conversation about the proposed scope of the review we intend to undertake?

Best wishes,

Chris

Chris Tweedale
Director / Cyfarwyddwr
Schools and Young People Group
Grŵp Ysgolion a Phobl Ifanc
Welsh Government/ Llywodraeth Cymru

Tel / Ffôn:
Fax / Ffacs:
Mob / Ffon symudol
email/e-bost: chris.tweedale@wales.gsi.gov.uk

From: Fiona Pethick
Sent: 24 August 2012 09:53
To: Tweeddale, Chris (Director - SYPG)
Cc: Jeremy Benson; Okwel
Subject: GCSE results etc

Chris

I hope you have had a good holiday - you were away a couple of weeks ago when we tried to get in touch before.

I am aware from the media coverage of yesterday that Leighton Andrews wants to look into the GCSE results and the English in particular. I am not sure, you may not be either, what the scope of this work is. Will it include looking into the comparable outcomes approach which was agreed by exam boards and the regulators at the end of 2011? How can we help you and the team? Would it be sensible to have a conversation?

Best wishes

Fiona

Fiona Pethick
Director of Regulation, Ofqual

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Okavul

From: Okavul
Sent: 24 August 2012 12:15
To: Dennis Opposs; - CRC
Cc: - Media Relations; Cath Jadhav
Subject: RE: BBC Wales

Follow Up Flag: Follow up
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Better? – Just helps me ahead of speaking to them.....

All exam boards and the regulators agreed to the comparable outcomes approach

Under this approach, wherever there were initial outcomes that look different to expectations, the regulators would discuss these with the exam board. If we were not satisfied with the explanation they would ask them to look again at their grade boundaries.

If pushed – the regulators did discuss the English language grade boundary with WJEC to make sure that the grades awarded for the subject were comparable.

From: Dennis Opposs
Sent: 24 August 2012 12:13
To: Okavul - CRC
Cc: - Media Relations; Cath Jadhav
Subject: Re: BBC Wales

This is beginning to irritate. If we had any discussions with WJEC they were on the basis of what we agreed in advance with the Welsh Govt. Let's not give the impression this was all about the evil Ofqual acting alone. I really think BBC Wales should be asking the Welsh Govt what it did. They had more conversations with WJEC than we did. So lines basically OK - but not Ofqual acting alone.
Dennis

From: Okavul
Sent: Friday, August 24, 2012 12:07 PM
To: - CRC
Cc: - Media Relations
Subject: BBC Wales

Following the Welsh Government announcement, BBC Wales is asking for information about any actions we took that would have caused WJEC to change its grade boundaries.

I intend to respond along the lines:

All exam boards agreed to the comparable outcomes approach

Under this approach, wherever there were initial outcomes that look different to expectations, we would discuss these with the exam board. If we were not satisfied with the explanation we would ask them to look again at their grade boundaries.

If pushed – we did discuss the English language grade boundary with WJEC to make sure that the grades awarded for the subject were comparable.

Can you let me know your thoughts asap

Ok

Okaved

From: Fiona Pethick
Sent: 24 August 2012 18:09
To: - CRC; Julie Swan
Cc: Okaved
Subject: Welsh Government and GCSEs

Follow Up Flag: Follow up
Flag Status: Completed

After a couple of email exchanges with Chris Tweedale this morning he rang to tell me the outcome of their deliberations at their end.

First they are not expecting Leighton Andrews to say anything more publicly and LA is about to go on holiday until 10 September.

Officials are proposing an internal enquiry in Wales into GCSE English results - to be led by Owen Evans (Chris Tweedale's equivalent with responsibility for HE and FE).

He recognises that we jointly regulate GCSEs.

The enquiry will look at

1. The process that got us to where we are today. He will want to find all the correspondence there is between us and Welsh Government on these matters, and any correspondence we have had with the SoS (this will not be an FOI request - not appropriate)
2. The implications of the results for "banding" of schools - the equivalent of league tables
3. The role of WJEC - I checked and Gareth Pierce is aware of this enquiry
4. Lessons for future work as a joint regulator.

The timescale is unclear but they will need to have made some progress on this by the time the Minister is back on 10/9.

I said we would want to help them in any way we can. The ball is in their court to ask.

Fiona

Fiona Pethick
Director of Regulation, Ofqual

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From: Glenys Stacey
Sent: 29 August 2012 13:27
To: Fiona Pethick; Jeremy Benson; Amanda Spielman; Amanda Spielman
Cc: Tweedale, Chris (Director - SYPG); Dennis Opposs
Subject: RE: GCSE English Language - Wales - urgent

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

Ok - let us convene at some point over this please.

Glenys Stacey
Chief Regulator, Ofqual

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From: Fiona Pethick
Sent: 29 August 2012 13:26
To: Jeremy Benson; Glenys Stacey
Cc: Tweedale, Chris (Director - SYPG); Dennis Opposs
Subject: FW: GCSE English Language - Wales

Jeremy/Glenys

To see the latest from Wales. See penultimate paragraph – they propose changing grade boundaries for WJEC (and just in Wales if necessary!). I have already shared this with Dennis.

I have spoken To Chris. He will not take any action until we have looked at this. We are to speak again at 5.30 and not raise this in the call with AOs. He has not shared this with Gareth.

I will work through the questions we need to answer for ourselves on this.

I know we would all like to put the Welsh regulation issue to one side but we can't.

Fiona

Fiona Pethick
Director of Regulation, Ofqual

Early in 2012, Ofqual proposed that WJEC should report their outcomes against KS2 predictions for the first award of the new GCSEs in core subjects. Initially this was suggested as a methodology for *review* only, not necessarily as a method of adjusting the results. We expressed concern about this and argued that it would not be appropriate to do so where WJEC had a majority of Welsh candidates. This was the case for Maths. However, where WJEC had a significant majority of candidates in England, as in the case of GCSE English Language, we accepted that there was a stronger argument in favour of using the England methodology. In addition, we were not aware, neither did WJEC appear to anticipate, that there would be a difficulty in meeting the predictions for this subject or that in doing so, there would be a resultant significant for in outcomes for candidates in Wales. It was therefore agreed that for GCSE English and English Language (only), WJEC would report against the KS2 predictions.

In late July, exam boards raised concerns that there was a difficulty in meeting the predictions for English/English Language due to the split in the candidature in England. A fix to the methodology was contrived, basing predictions for English on those candidates in 2011 who had not taken Eng Lit and for English Language on those candidates who had taken both. This fix introduced **another level of non-comparability into the methodology for candidates in Wales**. WJEC based its awarding on these amended predictions but were unable to confirm outcomes which came within tolerance of the revised predictions. The outcomes that WJEC proposed, in trying to meet these predictions, in themselves led to a considerably reduced outcome for Wales - but **Ofqual insisted, against the advice of the Welsh Government that the outcomes should be further reduced**, thereby increasing the fall for candidates in Wales.

The comparative outcomes are as follows:

2011 WJEC Wales outcomes A* to C at awarding: 62.5 (this *excludes* partial absences and the final all-Wales outcome then became 61.3)

2012 WJEC Wales outcomes A* to C at awarding: 59.1 (this also excludes partial absences) (this figure, at awarding, was arrived at in aiming to reach the KS2 predictors)

2012 WJEC Wales outcomes A* to C adjusted in response to Ofqual's requirement to amend: 58.4 (57.4% once partial absences are included)

We accept that the outcomes against KS2 predictions *may* indicate a difference in the level of demand of the WJEC specification when compared with other specifications – but in following the methodology regard has only been given to comparability across awarding organisations, with no account being taken of comparability of outcomes for candidates in Wales over time. We do not believe that any such significant change in one year, would be acceptable to Ofqual – or that a similar degree of increase in WJEC's outcomes would have been to Ofqual. Indeed, for some A levels, a required drop in outcomes of only 2 per cent has been staged, with the regulators' agreement, over 2 years. While we are committed to reviewing the standards of WJEC's English Language specification in comparison with those of other awarding organisations, we would wish to see any necessary adjustment to standards implemented appropriately and in a way which is fair to candidates – and, if necessary, incrementally.

The cohort in Wales, taking GCSE English Language, is probably the most constant variable of all those across the UK: last year all candidates took GCSE English, this year all candidates took GCSE English Language. The difference in outcomes might usefully be considered by Ofqual as an indicator that the adjusted predictor methodology has **not** resulted in comparable outcomes over the two years.

Outcomes at grade C for English Language are a critical measure and form a key indicator in our schools' performance measures, in consideration of learners' progression routes, and in a wide range of other gate-keeping situations. It is essential for Wales that these outcomes are comparable over time and that they not distorted by a much questioned methodology which only takes into account the performance (5 years earlier) of learners in England and which, even in England, is unproven as a reliable indicator. For such a drop in performance to be justified on this basis is unacceptable.

In considering the final GCSE outcomes for Wales we have concluded that it is entirely unjustifiable and indefensible to let the WJEC outcomes stand as they are. We therefore intend to ask WJEC to adjust the outcomes of awarding for GCSE English Language using the 2011 Wales candidature as the basis for comparability and with a tolerance of 1% at grades C and A. This level of tolerance reflects the regulators' level of tolerance for performance against predicted outcomes for a cohort of this size. We hope that Ofqual will agree for this adjustment to be made for all candidates, but if Ofqual do not agree, then we will ask WJEC to make the adjustment for Wales candidates only.

We are mindful of the risks to public perception of these proposed courses of action (particularly a Wales-only adjustment) but feel that these are outweighed by the risks of continuing with an unsecure, indefensible and inconsistent set of outcomes for Wales with severe negative consequences for institutions and for learners that could last for many years.

Chris

Chris Tweedale

Director / Cyfarwyddwr
Schools and Young People Group
Grŵp Ysgolion a Phobl Ifanc
Welsh Government/ Llywodraeth Cymru

Tel / Ffôn: 029 20 82 5686

Fax / Ffacs: 029 20 80 1044

Mob / Ffon symudol 07530 283 546

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From: Jeremy Benson
Sent: 29 August 2012 22:03
To: Fiona Pethick
Cc: Dennis Opposs; Glenys Stacey
Subject: RE: Welsh issues

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Fiona

Thanks. I don't think this quite works diplomatically, because we're telling him that the changes in the pass rate are as a result of Welsh policy decisions (possibly true from our point of view but it doesn't help, or make much sense, from Wales perspective), and also we're not really in a position to tell him that there is no logic to adjusting the standard – there is a strong political logic if you're sitting in Cardiff...

An alternative suggestion:

We have been thinking about the discussion we had earlier. We do understand the political concerns round the reduction in the pass rate in Wales in GCSE English language compared to predecessor qualifications. However these are separate issues to the broader issues we are looking at for GCSE English as a whole.



For that reason, I suggest that we do not draw attention to the issue in our report to be published on Friday. The report is not about Wales, it will not be a 3-country report, and you would not expect it or want it to be. We will confine any comments about the WJEC qualifications to the way they have played out at the 3 country level. We will aim to share with you the relevant sections during the course of tomorrow. We are of course still looking at the WJEC data being supplied to us and we will be back to you quickly if there is anything to say about this.

On the broader point, Ofqual is committed to working as part of the three country regulatory framework, even though that is increasingly difficult with the different policy imperatives in the different countries. However, as we said earlier, we could not sign up to any decisions, in relation to students in England, which we could not justify from a regulatory perspective, and in terms of our statutory objective to secure qualifications standards. If the analysis that you are now setting in hand, as part of your internal review, provides evidence that the processes or the awarding decisions in relation to WJEC English were flawed, then we would of course need to consider our response in relation to candidates in England. But we could not agree to a change, for students in England, for which such evidence was not available. As you know, the reason we were set up as a regulator independent of Ministers was to allow us to make whatever decisions were needed to secure standards, even if that were unpopular or uncomfortable with the education sector and politicians.

We will of course want to work with you to provide the evidence you need for your review and to consider how to work better together in future.

Jeremy

Jeremy Benson
Deputy Director, Policy, Ofqual

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From: Fiona Pethick
Sent: 29 August 2012 21:34
To: Jeremy Benson
Cc: Julie Swan; Dennis Opposs; Glenys Stacey; Tim Leslie; *Ofqual*
Subject: Welsh issues

Jeremy

A suggested way forward - views please?

Potential email to Chris Tweedale

Chris

We have been thinking about the discussion we had earlier. We do understand the political concerns round the reduction in achievement in Wales in GCSE English language compared to predecessor qualifications. However these are separate issues to the broader issues we are looking at for GCSE English as a whole.

What has happened is a consequence of the combinations of policy decisions around programme of study and regulatory decisions (see attached 3 country letter).

The policy decision in Wales to offer English Language, and for some English Literature, rather than the policy here to offer either English Language and English literature or English, combined with the use of the same exam board and the same qualification both sides of the border means that the nature of the cohort taking the exam is likely to be different. This has played out in the pass rate.

There is no logic for adjusting the standard now in either or both countries. What we think is needed is a more thorough analysis of the impact of the policy and a consideration of the cohort in Wales. This is something you are going to investigate in your internal review of the GCSE English results. Our report to be published on Friday is not about Wales, and you would not expect it or want it to be. I suggest therefore that we do not draw attention to the issue. We will confine any comments about the WJEC qualifications to the way they have played out at the 3 country level. We are of course still looking at the WJEC data being supplied to us and we will be back to you quickly if there is anything to say about this.

We will of course want to work with you to provide the evidence you need for your review and to consider how to work better together in future.

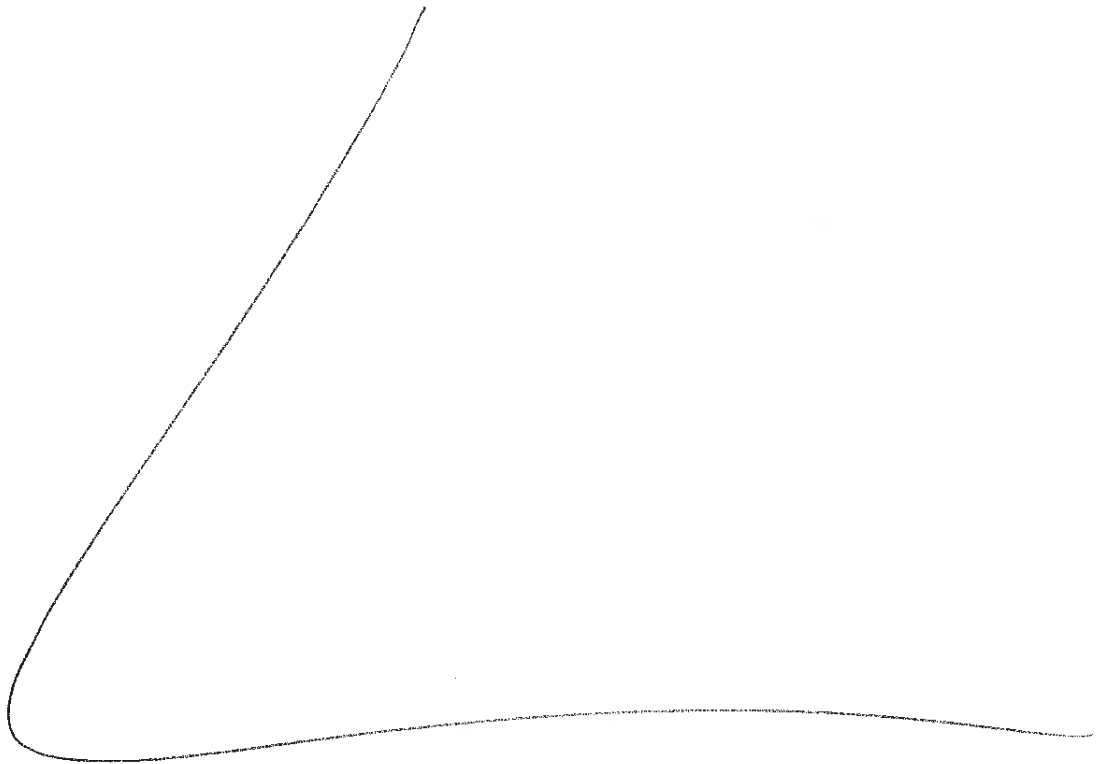
Thanks

Fiona

Fiona Pethick
Director of Regulation, Ofqual



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professional privilege



From: Fiona Pethick
Sent: 30 August 2012 12:38
To: *the Ofqual*
Subject: FW: WJEC and last night's telephone meeting

Hi *Ofqual*

Will you please cast an eye over this. Fiona and Jeremy will need to talk as soon as she comes out of her Telekit.

Many thanks.

r, Ofqual

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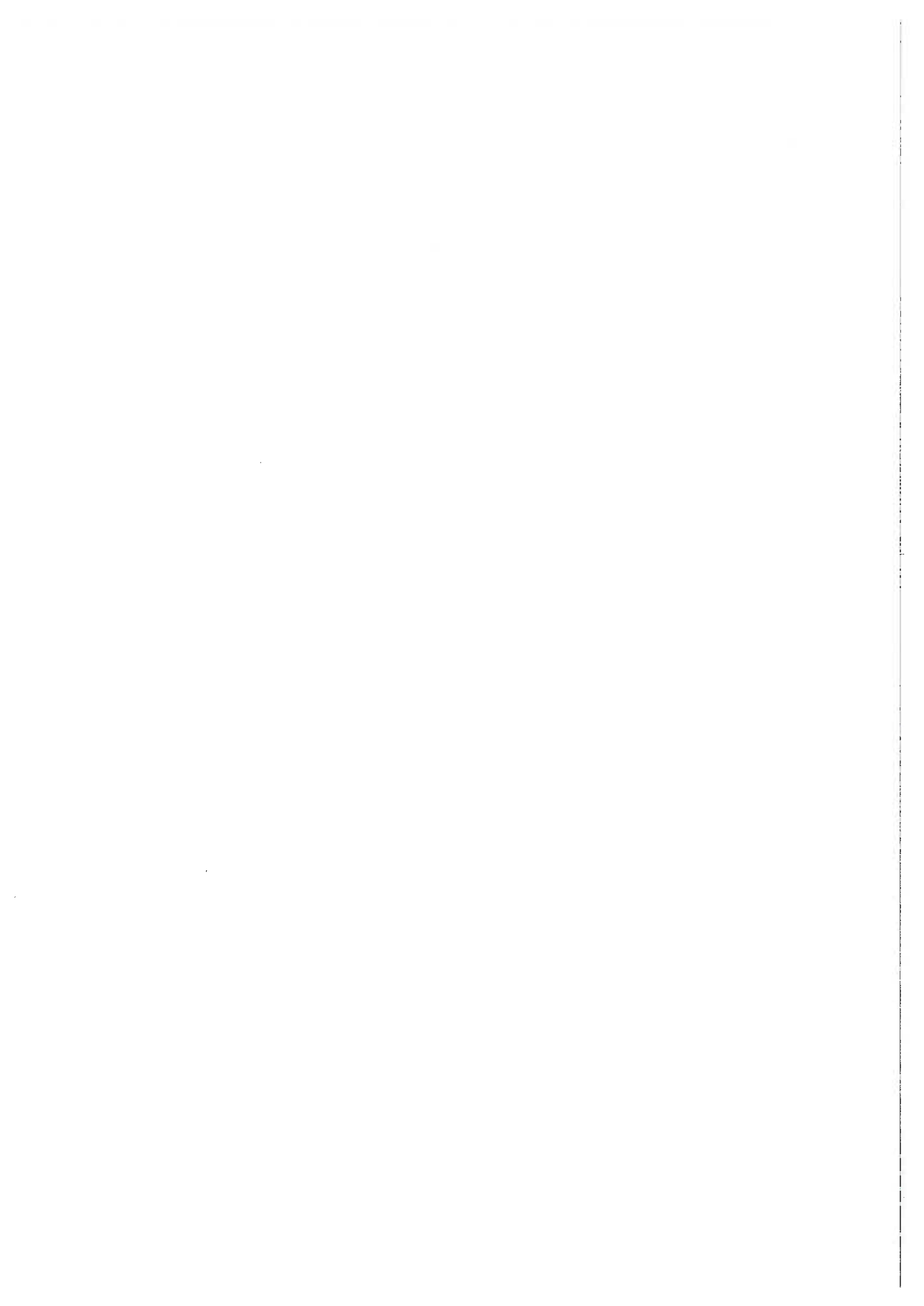
From: Tweedale, Chris (Director - SYPG) [<mailto:Chris.Tweedale@Wales.GSI.Gov.UK>]
Sent: 30 August 2012 12:34
To: Jeremy Benson; Fiona Pethick
Cc: *Welsh*
Subject: WJEC and last night's telephone meeting

Jeremy and Fiona,

Thank you for sparing the time to meet last evening. We subsequently, as requested, asked WJEC to model the possible changes we discussed for England, Wales as well as England & Wales. I spoke with Gareth Pierce on the phone last night and he is aware, in general terms, why we are asking him to undertake the modelling. We have just received this work and we'll aim to get you a copy together with a short commentary from us by 1.30 p.m. Can I suggest that we talk again at 2.00 p.m.?

I thought it may be helpful if I was to put down a few thoughts having reflected on the conversation we all had as regulator to regulator last night and reading some of today and last night's press coverage.

I should start by saying that I do not in any way profess to have the expert regulation knowledge that you, and my team here in Wales, have in this area but I do have many years experience across the education sector, including as a secondary teacher and headteacher. I am seeing a huge amount of direct evidence from Centres in Wales as well as seeing evidence from, for example, parties such as ASCL and the powerful article about Jo Shuter's, Quintin Kynaston school, that we have some real issues that need to be resolved with this summer's English Language GCSE awards. Jeremy, last night you made the point that you were happy with how the outcomes across awarding organisations were playing out, including those from WJEC, using the KS2 to 4 model. I just cannot see how, at centre level in either Wales or England, your confidence is supported by the evidence we are seeing. As we have noted on several occasions in discussions and correspondence with Ofqual, the KS2 to 4 model is untried, untested and it now seems clearer than ever seems to me that it is unreliable for Wales (and possibly for England too). A 3.9% fall in C's and above in a high entry, high stakes, gateway qualification would be unacceptable to regulators in any nation or other series of exams and so I cannot understand why it could be seen as acceptable now. It is morally indefensible to the young people of Wales and plainly unfair.



You also asked us yesterday if we were exploring re-awarding grades for regulation purposes or due to "political interference" from Welsh Ministers. The suggestion is repeated in Fiona's e-mail from this morning which I have just read. Speaking frankly, I reject the implication of this suggestion. Throughout our discussions we have been speaking and acting as regulators. I found your suggestion ill judged and inappropriate. Should we ask any education professionals or members of the public which of our two respective organisations was being driven by political pressure or political ideology I suggest Ofqual would be at the top of the list.

I look forward to further professional discussions today and over the coming days. It is vital that we do all we can to maintain the three country agreement for the benefit of all learners in the different countries. However, I wish to reiterate that a 3.9% reduction in Cs and above for English Language in Wales in the first year of a new specification and in one year change is unacceptable to us as regulators. Should you not accept this we are, in extremis, prepared to go with a Wales only approach.

Regards,

Chris

Chris Tweedale

Director / Cyfarwyddwr

Schools and Young People Group

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From: Tim Leslie
Sent: 30 August 2012 07:59
To: Fiona Pethick
Subject: FW: Welsh conundrum - 2nd hypothesis

Follow Up Flag: Follow up
Flag Status: Completed

Fiona

Further thoughts overnight:

Is there a difference in the distribution of candidates across the grades between Wales and the 3 countries in total? If more of the Welsh candidates are around the C/D grade boundary, an increase in the grade boundary would have a disproportionate effect on the Welsh pass percentage.

Tim

Tim Leslie
Director of Risk and Markets, Ofqual

• Direct: [redacted] • Office: 0300 303 3344 • Mobile: [redacted] ing Place, Herald Avenue,
Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Tim Leslie
Sent: 29 August 2012 23:26
To: Fiona Pethick
Subject: Welsh conundrum

Fiona

Not sure I understand the issue: are we looking at the difference in the percentage of the total cohort achieving a C grade or better in English between 2011 and 2012 across all AOs or only WJEC? And how that differs between overall change for E,W and NI (-1.5%) and only for Wales (-3.9%)?

Have we considered the % of Welsh candidates entered for the earlier series (when we suspect grade boundaries were lower) compared with the % in England? WJEC didn't offer earlier series so Welsh candidates may have been less able to benefit from this? (I'm assuming WJEC has a bigger market share in Wales.)

Tim

Okaval

From: Fiona Pethick
Sent: 06 January 2014 22:00
To: Okaval
Subject: FW: GCSE report
Attachments: 2012-08-31-gcse-english-awards-2012--a-regulatory-report.docx

For FOI

Fiona

Fiona Pethick
Director of Regulation, Ofqual

• **Direct:** 02 • **Office:** 0300 303 3344 • **Mobile:**
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Fiona Pethick
Sent: 31 August 2012 15:37
To: Roger McCune; Tweedale, Chris (Director - SYPG); *Welsh Gwent*
Subject: GCSE report

Please find attached our report. I am sending this out under embargo until we issue it in the next hour or two. I will let you know when it has gone public.

Thanks

Fiona

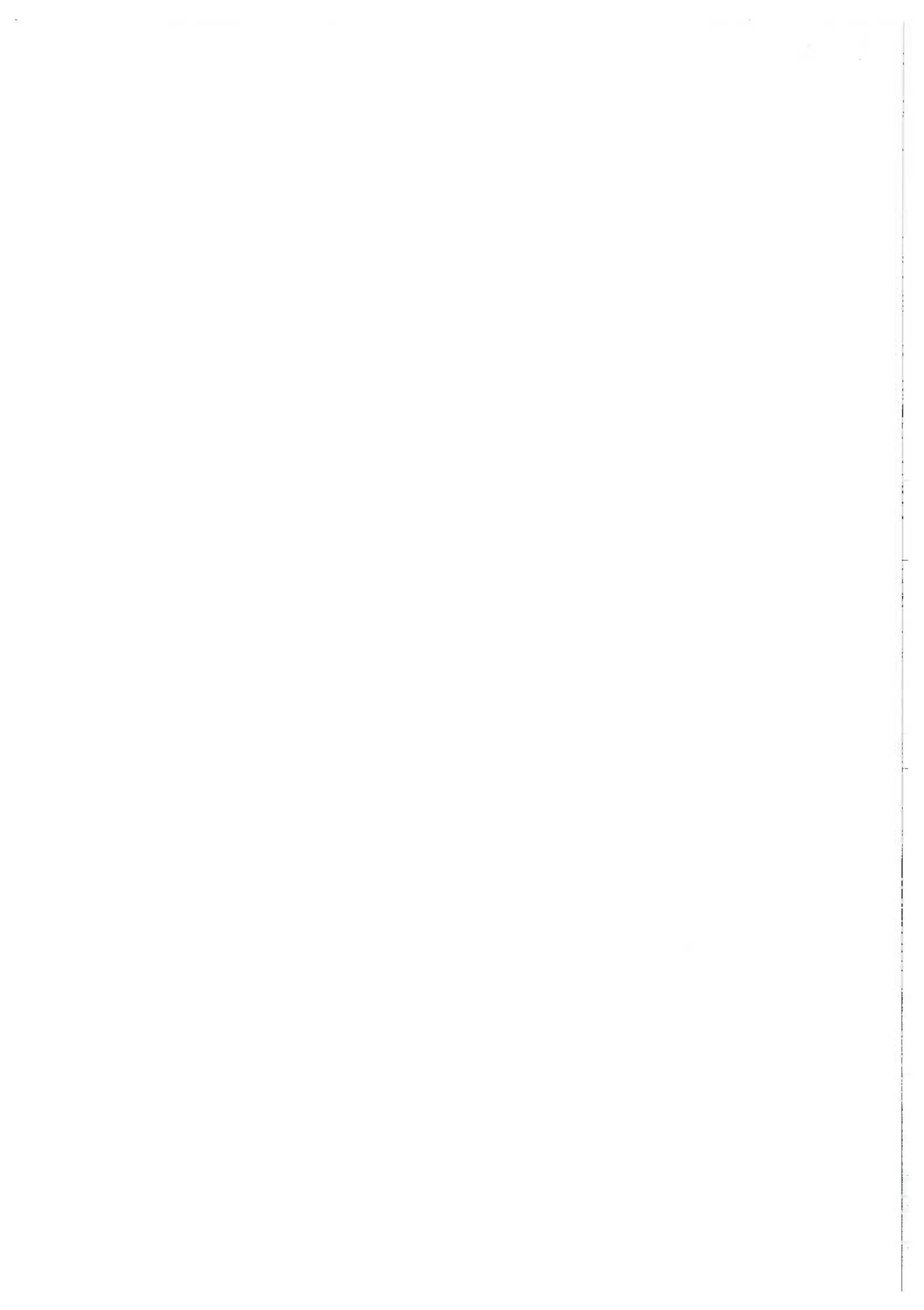
Fiona Pethick
Director of Regulation, Ofqual

• **Direct:** • **Office:** 0300 303 3344 • **Mobile:**
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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**GCSE English Awards 2012:
A Regulatory Report**

Draft - under embargo



August 2012

Ofqual/12/5211

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Foreword by the Chair and Chief Regulator

We present our initial report on this year's GCSE English results in England.

We are grateful to everyone who has provided information and helped us, at very short notice. This list is long and includes many teachers, schools, colleges and their representative groups, particularly the Association of School and College Leaders (ASCL), as well as all the GCSE exam boards.

Ofqual was created in 2008, and became fully operational in 2010. We have the statutory responsibility for maintaining standards in qualifications, including standards over time. We bring rigour into the control of qualifications standards, using the strongest technical approaches in the field, agreed by experts. It has taken time for this rigour to feed through the system as it should: the implementation of these policies began with AS levels in 2009, with A levels in 2010, with most GCSEs last year and with English and maths GCSEs this year.

A level results stabilised in 2011 – there was little year-on-year change at national level – and they stayed steady this year. Those results have been accepted, and indeed welcomed by many. GCSE results stabilised this year, after two decades of grade inflation, and the reaction has been quite different. Many schools and colleges have been surprised by GCSE English results that have been well below their expectations. This led some to believe that the standard has been reset without their knowledge.

In this initial report readers will see that stable A level and GCSE results have been achieved through painstaking and expert work in exam boards over the last three years. However, the main focus of this report is the school concerns about GCSE English results this year. We explain as far as we can at this stage the patterns of GCSE English results, and why we think they have come as a surprise to some schools, colleges and students.

Those unfamiliar with the present school and exam systems may be surprised to see just how complicated GCSEs now are. Schools and colleges are increasingly sophisticated in their efforts to make sure that every student capable of achieving GCSE English grade C does so.

It is so important to students' future prospects that they achieve at least grade C English if they can. It is also extremely important to schools and colleges, because they care about their students' prospects, and also because student achievement at grade C English is so central to how schools, colleges and teachers are themselves judged.

Maintaining standards, so that GCSE outcomes stabilise, does of course have consequences for how schools, colleges and teachers are assessed, and we have

drawn this to the attention of both the Chief Inspector for Schools and the Secretary of State for Education.

Maintaining standards is rarely straightforward. The three English subject GCSEs (English, English literature and English language) are all completely new qualifications. The way they are structured and the way they overlap are complicated. Maintaining standards in the face of this level of change is very difficult indeed, as this initial report shows.

Signed:

Amanda Spielman

Amanda Spielman

Chair



Glenys Stacey

Chief Regulator

Draft - under embargo

Executive summary

The 2012 GCSE results for England, Wales and Northern Ireland were announced by exam boards on 23rd August. The results were broadly in line with the results in 2010 and 2011.

In total more than 5 million GCSEs were awarded this summer. Amongst these a new set of GCSEs has been introduced – English, English language and English literature.

On 23rd and 24th August some schools and colleges brought their concerns about GCSE English and English language to us. We immediately started to look carefully at how exam boards managed the awarding of these GCSEs this year.

We are not aware of any significant issues for other GCSE subjects. Our review, reported here covers only English and English language.

The standard in English GCSE was maintained although changes in the mix of students meant that results were down overall by 1.5 percentage points. This was in line with expectations. That is not the issue. The issue is that for some schools and colleges their results are not what they expected and the differences in some cases were hard to understand.

These qualifications are different from previous English qualifications in a number of ways. Part of each qualification is done as a controlled assessment (coursework carried out under the supervision of a teacher), worth 60 per cent of the marks. The qualifications can be taken in stages or modules during the year, but at least 40 per cent of the assessment must be taken at the end of the course.

We secure the standards of qualifications. If we were to compromise on this, we would undermine the integrity and rigour of the qualifications we regulate.

In maintaining qualification standards across exam boards and over time we consider fairness to students past, present and future.

We set out in this initial report what we think people need to know about qualification awarding in general, and how it worked for GCSE English subjects this year. We explain what we have been doing to understand and evaluate the concerns being expressed about the GCSE English subjects results, outline what we have found, and what we intend to do next.

The GCSE English suite was first taught in 2010, and awarded in 2012, with the inevitable challenges any new qualifications bring to teachers, schools and examiners. Examiners, of course, are used to dealing with new qualifications.

For GCSE English this summer a complex set of circumstances came together to create an unusual situation for schools, colleges and their students.

On the basis of the work we have done so far, our initial findings are:

- **The standard set for these English GCSEs is comparable with the standard in previous years.** That means that a candidate awarded a C grade this year achieved the same standard as a candidate awarded a C grade last year in the same subject.
- **On thorough investigation we can confirm that each exam board set standards for the qualifications in the manner expected and at the appropriate standard.**
- We have looked carefully in each exam board at how their examiners set the June 2012 grade boundaries for all units. We found that they acted properly, and set the boundaries using their best professional judgement, and taking into account **all** the evidence that was by then available to them. We have seen evidence of how it was done. **The June boundaries have been properly set, and candidates' work has been properly graded.**
- **The issue is not June, but January grade boundaries.** A minority of candidates sat their units in January, and again we have looked at how grade boundaries were set then. Again, examiners used their best professional judgement, but they had less information to go on, less hard data to help them come to a judgement. This was both because most candidates were not sitting at that time and, because these were new qualifications, examiners could not rely absolutely on how standards were set in past years.
- **Three things came together, and made the job of setting standards difficult in January 2012:**
 - First, changes to the syllabuses themselves
 - Second, the nature of English as a subject. English subject examiners have found that setting standards in English, in new qualifications, is difficult.
 - Third, the structure of the qualifications. They are made up of a combination of modules **and** they have a high proportion of controlled assessment (60 per cent).

In short, grades awarded for the June modules were right, but it is hard to square them with the January results.

- There were different written papers set in January and June for the AQA foundation tier. It is wholly appropriate that the grade boundaries for these papers were different. For some of the controlled assessment units, principally Edexcel and AQA, the grade boundaries did move between January and June for the same pieces of work. In retrospect the January grade boundaries were generous. This will have had a minimal direct impact because most schools submitted written controlled assessment in June. For example only 2 per cent of AQA candidates were awarded grades on their written controlled assessment in January. Most students took the written exams in June and completed their controlled assessment at the same time.
- **Some schools were over reliant on the January 2012 grade boundaries particularly in relation to written controlled assessment.** Exam boards published the grade boundaries set in January 2012, and although these had a caveat, many schools used these to set expectations. For schools, as for exam boards, this will have been their first experience of dealing with modularised GCSEs for most English departments. Both could have shared a better understanding of the use made of grade boundaries.

Looking forward

First we want to go through our analysis and evidence with the representative groups for schools and colleges, so they can see it for themselves. We also want to talk with schools, exam boards and assessment experts about the lessons to be learnt here and what can be done better in the future. One clear lesson is that if changes are made to what teachers teach and how it is tested, the maintenance of standards over time gets very difficult.

The GCSE system is complex. A system of this complexity is difficult for schools and colleges to understand, and it increases the risk of problems such as those we have seen this year. Modularisation creates a particular difficulty with maintaining standards in graded qualifications. We have already announced that we will be moving away from a modular system for GCSEs in England after the forthcoming school year. We believe that this year's experience shows that this was the right decision for students in England.

Students starting new English GCSE courses this autumn will not be doing modular exams. They will be preparing for exams and controlled assessment at the end of their course in June 2014.

How we have approached this work

Our aim in this work has been to:

- confirm and explain what has happened to GCSE English results this summer
- take swift action if problems are found
- maintain confidence in the exam system
- identify broader questions for further work by us and others.

To do this, we have gathered data and evidence from a range of sources to help us understand what happened with awarding. We have had meetings and input from exam boards, teacher associations, individual schools and others. More details of what we have done and the questions we asked exam boards are in Appendix 4.

In considering how to respond to the concerns of teachers and others, we have applied the principle that underpins all that we do. We secure the standards of qualifications. If we were to compromise on this principle, we would undermine the integrity and rigour of the system.

This means that we maintain standards: students should get the grade that their work deserves. When issues like this occur we need to maintain standards over time. We need to consider fairness to students past, present and future.

Standards in GCSE English in 2012

A new set of English GCSEs, first taught in September 2010, was awarded for the first time in 2012. There are three subjects, English, English language and English literature, together known as the “English suite”. Students in England chose either English, or English language and English literature.

Across English and English language GCSEs, the proportion of candidates getting grades A*–C fell from 65.4 per cent in 2011 to 63.9 per cent this year. This may suggest that the qualifications were made harder. However, our aim in setting standards year-on-year is to keep standards the same. The evidence suggests that we succeeded. This section explains this.

The principle applied in setting standards for a new GCSE is that a student should get the same grade as they would have done if they had taken the old version. We call this approach “comparable outcomes”. It aims to prevent “grade inflation” – that is, increases in the proportion of students achieving higher grades without evidence of real improvements in performance. It also adjusts for the dip in performance that can arise when a new qualification is first taken. It is more sophisticated than “norm

referencing" where fixed proportions of candidates would be awarded a grade without reference to candidate achievement. More detail of our approach to setting standards is in Appendix 3.

New modular GCSEs were awarded for the first time in most subjects in 2011, and we used comparable outcomes to help maintain consistency between years. The outcomes for the new subjects, where we were aiming for comparable outcomes, were broadly consistent between 2010 and 2011 – grade A* fell by 0.2 percentage points compared with 2010, grades A*–A fell by 0.4 percentage points and grades A*–C fell by 0.3 percentage points. Meanwhile in the other subjects, including English, grade A* rose by 0.4 percentage points compared with 2010, grades A*–A rose by 1.4 percentage points and grades A*–C rose by 1.6 percentage points.

The comparable outcomes process will produce similar results year-on-year if the cohort for the subject is similar, in terms of ability, in each year. The initial expectation for summer 2012 was therefore that the overall change in English results should be close to zero. We checked this by comparing the predictions made by the exam boards of results for each GCSE, based on prior attainment data, with the actual profile reported by the exam board.

English/English language – 2012 comparison of predicted and actual grade distributions

	AQA predicted	AQA actual	All boards predicted	All boards actual
A*	7,571	8,319	12,954	13,819
A*-A	39,528	38,690	66,167	65,778
A*-C	171,435	169,547	290,110	288,788
A*-F	249,687	248,698	421,984	421,018

Source: information from exam boards

At national level, predictions fitted fairly closely to actual results.

The headline grade A*–C figure fell this year by 1.5 percentage points from 65.4 per cent to 63.9 per cent. This movement related to the changes between 2011 and 2012 in the profile of candidates, rather than to a change in the grade C standard. Overall, as the table below shows, there were more candidates taking English and English language in 2012 than in the previous year.

English/English language 2011 and 2012 – numbers of UK candidates

	2012	2011
	'000	'000
English	171	650
English language	498	-
Total	670	650

Source JCQ

In the exam control processes, results are compared with prior attainment for “matched” candidates, that is, those for whom there are known Key Stage 2 results. These include most pupils in the state system. It is the change in the Key Stage 2 point score of these matched candidates that needs explanation. There were two significant changes to the mix of the English GCSE entry in 2012.

First, there were about 23,000 fewer candidates from selective and independent schools, about 3.4 per cent of the total, who will probably have migrated to the international GCSE or other qualifications. These candidates will typically have relatively high Key Stage 2 point scores, so their departure will have lowered the attainment profile of the cohort.

Second, there were about 43,000 more candidates from non-selective state schools and colleges, even though the number of 16-year-olds in the national cohort fell slightly. These extra candidates are 6.4 per cent of the GCSE entry. Some of these will be re-sit candidates, who generally have lower Key Stage 2 point scores than average. Others will be candidates who in the past would have been entered early for a winter exam: these early entrants also tend to have lower Key Stage 2 point scores than summer entrants.

So to summarise, for candidates with a given level of prior attainment at Key Stage 2, the comparable outcomes policy has ensured that their expected outcome has not altered. But because of cohort changes, the reported national result is down.

The awarding process for English GCSEs in 2012

Having established that standards have not altered at national level, we have reviewed exam board and regulatory processes for GCSEs in the English suite in January and June 2012 to identify any abnormalities in the details of the awarding. We address first, the June awarding and secondly, the January awarding, since some concerns relate to comparisons between January and June grade boundary marks.

We have reviewed in detail the awarding for the GCSE English suite by the four main exam boards (AQA, Edexcel, OCR and WJEC), but since public attention has focused on two AQA assessment units, the foundation tier written paper and the written controlled assessment, we set out details of our review of the awarding only of those two units, in June and in January.

Written controlled assessment submissions were overwhelmingly made in the summer. Across all boards 719,000 submissions were made in the summer, against 51,000 in January, which is only about 7 per cent of total entries. Only 2 per cent of AQA submissions were made in January.

AQA foundation tier written paper assessments were less skewed towards the summer: about 135,000 in January and about 298,000 in June, so just over 30 per cent of foundation tier entries were in January.

When exam boards set boundaries and award grades, they use qualitative and quantitative evidence. This includes samples of candidates' work, reports from senior examiners, grade descriptions and also statistical information about the groups of candidates ("cohorts"). They must also have reference to the comparable outcomes approach which aims to ensure that standards are maintained at qualification level (see Appendix 3). Despite the best efforts of senior examiners, written papers can vary in demand and boundaries are set each year based on a combination of senior examiner judgement and statistical data about how well candidates perform.

For summer awards, we monitor the awarding process, including attending some awarding meetings and reviewing data on outcomes, and this year we observed some unit level awards as well. When making unit awards during the early stages of a qualification, examiners' judgements have to be relied on more heavily, because much less evidence is available about the cohort's overall performance than when the whole qualification is being awarded.

Summer awarding

Based on our initial review, summer awarding was carried out properly and examiner judgements were made reasonably in all exam boards. The evidence from our regulatory monitoring at the time and from our reviews over the last week show that

the outcomes were appropriate. On that basis, we have no reason to ask the exam boards to revisit their awarding decisions.

While we discuss the AQA units in detail below, as they have attracted most attention, we did not find anything substantively different here from our review of any other exam board.

Examiners in all boards had to take account of a number of things in setting boundaries.

First, the awards that had already been made in completed units (modules). Students completed units at a number of points in the course. Controlled assessments could be taken in January 2011, June 2011 or January 2012, and awards were made shortly after they were marked. Students could, though, choose to submit a replacement assessment with the aim of getting a better result. Written exams are also available in January and June of each year.

Second, they looked at the units (both exams and controlled assessments) taken in the summer. Forty per cent of the assessment must be taken at the end of the course.

Third, they considered the expected pattern of outcomes at qualification level. The comparable outcomes approach requires exam boards to make explicit expectations for what the pattern of results will be at qualification level. Balancing these factors is always a challenge when awarding modular, graded qualifications.

In reviewing the awarding process, we looked at both the process – how decisions were made – and the outcomes, the level at which grade standards were set and the awards that were made. We reviewed in detail the steps AQA took to set an appropriate grade boundary for each of the units, including looking at: the chair of examiner's reports and proposals to change grade boundaries, AQA's technical reports on awarding and the principal moderator's reports. We had already observed some of the stages of the awarding process first hand as part of our normal monitoring process.

It is apparent from the records of AQA meetings and decisions taken that examiners were aware of and tried to address the range of challenges they faced. Their difficulties were compounded by uncertainties about the relative ability of the cohorts for English and English language and the value of the predictor information that was available to them. They reviewed and recommended revising grade boundaries as more candidates' work became available to them during each awarding exercise.

The reports we looked at record that AQA staff had been at pains to explain to teachers that grade boundaries could change, but that teachers continued to press staff for information about grade boundaries. Concerns are expressed in the records

about teachers over-rewarding controlled assessments they had marked. This was explained in part by teachers' lack of familiarity with controlled assessment, which had replaced coursework. But the reports also record concerns that teachers' and examiners' expectations of speaking and listening quality, in particular, were sometimes misaligned.

We have looked unit by unit at AQA's approach that resulted in AQA's responsible officer signing off the awards for the January units on 22nd February 2012 (following an awarding meeting on 21st and 22nd February) and for June units and the whole qualification on 9th August 2012 (following an awarding meeting on 21st and 22nd July). The awarding meetings cover all the relevant units, which allows foundation and higher tier papers to be considered together.

We set out below the facts and history of awarding of each of the relevant units and discuss the main issues arising from each.

Foundation tier paper

The foundation tier written paper (unit ENG1F) was first offered in January 2011 and was offered in June 2011 and January and June 2012. In January 2012, 54,000 candidates sat the paper. In June 2012, 141,000 candidates sat this unit.

As is usual practice, for both series the mark schemes were finalised by the principal examiner for this paper at standardisation. For each series the principal examiner prepared a report for the awarding meeting on the way candidates had responded to the paper. This report for the June paper noted that: "the overall demands of the paper were very similar to previous series".

At the awarding meeting in July, senior examiners reviewed scripts at a range of marks and the chair's report notes that: "The tier F agreed C boundary, initially 52, was moved up to 53 on revisiting the [evidence] in the light of further statistical information. Although this mark was significantly higher than the mark for the reference year [June 2011] it was felt that this mark was a truer reflection of the quality of candidates' work in relation to the C grade criteria".

Controlled assessment unit

The controlled assessment writing unit (unit ENL03) was first offered in January 2011 and then in January and June 2012. In June 2012, 287,000 candidates entered this unit. The principal moderator's report for summer 2012 noted that the majority of folders [work] for controlled assessment were within the marking tolerance but had been over-marked by teachers, particularly at the grade C/D borderline.

The July awarding meeting considered a range of evidence. The initial recommendation for the grade C boundary was 47. However, in light of the evidence

of the level of performance seen in the archive work (from previous series), the chief examiner recommended a revised boundary mark of 46.

Following the awarding meeting, the outcomes were reviewed within AQA by senior technical staff. The approver's report noted that changes to the controlled assessment boundaries since the January series were likely to cause disquiet in schools, but also noted that the committee had been unanimous in endorsing the controlled assessment boundaries as there was "evidence of significant teacher over-marking". The boundary mark of 46 was confirmed.

Issues arising for June awarding

In the case of the AQA foundation tier paper, it was suggested that the change in the boundary mark between January and June was abnormal, and that the grading of the June candidates might have been over-severe to compensate for more generous grading in January.

In the case of the controlled assessment, there was clearly a risk of confusion from the fact that the June awarding meeting reached a different decision on the grade C boundary mark from the January meeting. The grade C boundary mark was in fact raised between January and June by all three of the boards (AQA, Edexcel and OCR) which had offered a January controlled assessment submission opportunity.

Out of 19 units offered by these three boards, in only two was the grade C boundary not higher in June than in January.

January awarding

We reviewed January awarding across all boards and English/English language units to ensure that all awarding processes were properly carried out and awarding judgements were properly made.

On controlled assessment, we found in all boards that grade boundaries were set properly in the context of small entries with limited historic and other data to provide context: it was only with hindsight that it was possible to see that these boundaries were too generous.

AQA foundation tier written paper

In January 2012, 54,000 candidates sat the foundation tier written paper. In June 2012, 141,000 candidates sat this unit.

The awarding meeting was chaired by the AQA Chair of Examiners for GCSE English.

The awarding meeting considered a range of evidence, including:

- reports from senior examiners
- the principal moderator's report which included information on how well teachers had followed the mark scheme
- appropriate samples of candidates' work; this is needed to give a sound basis to key grade boundary decisions
- detailed technical and statistical information, including the mean mark for the unit, the distribution of marks, entry types and information about how well candidates had responded to individual questions.

During the meeting, issues such as the contrasts in the entry profile and the mark distribution between this unit and the equivalent unit for GCSE English were explored.

The proportion of students achieving a grade C on the foundation tier paper dropped from 37 per cent in January 2012 to 10 per cent in June 2012. If the June results were right, that might suggest that AQA's award in January 2012 was too generous. However, the evidence that AQA had at the time – the data on expected awards – suggested that they might have been too severe, and the grade boundary that was set was higher than the data would have suggested. It is now clear that they had limited evidence from a relatively small entry, but our view is that the judgements made at the time were sound.

Following the January award, AQA's internal accountable officer's report noted that one of the emerging issues was the relatively low boundary marks (as a proportion of the maximum mark) and the fact that the grade C boundary marks were similar on both tiers. Since C is the highest available grade on the foundation tier, we would usually expect the C boundary on the foundation tier to be higher than the C boundary on the higher tier paper. The June paper boundary mark of 53 is much closer to what we would expect.

AQA controlled assessment – writing

In January 2012, 7,000 candidates entered this unit. A summary of the evidence considered in the awarding meeting is set out above. The boundaries were considered in the order of grade C, then A, and then F. For each of the A, C and F grade boundaries, controlled assessment work was reviewed by the senior examining team. The marks were out of 80. They reviewed work marked in the range 41 to 45 for grade C, 62 to 66 for grade A, and 14 to 18 for grade F.

Having reviewed the full range of evidence, for each boundary awarders came to a collective view on the boundary mark to recommend. At C, there was no change to the boundary mark (43) from the June 2011 unit, though there was a range of views expressed about this. The report from the AQA support officer noted that the marks for the controlled assessment appeared to be very high but that there were very low numbers of entries, which might cause difficulties when setting grade standards for the qualification as whole.

Our observation of the meeting concluded that it had been conducted in line with AQA processes and the relevant regulations – the recommendations were made with the aim of ensuring the comparable outcomes required at overall subject level.

Conclusions

Our review shows no grounds for re-opening the awarding, at AQA or elsewhere, of the foundation tier paper. The records of the awarding process show that due weight was given to the various factors we would have expected. In retrospect, the January grade boundaries were generous, but they were less so than the data had suggested they should be.

For the controlled assessment, the outcomes of the January awards were generous. Some of the small number of January candidates will have been over-graded on this module. With more evidence available in June, it was clear that the grade boundaries had been set too low, though in the time available, we have not been able to calculate the numbers of students affected. While logically these grades would now be adjusted downwards (and indeed this option was considered when June awards were being finalised), we have considered whether that would be the fairest option, and have concluded that it would be unfair to those candidates to take away the grade they thought they had earned, more than six months later. There is also no precedent in the exam system for such a retrospective adjustment to grades.

It is regrettable that the publication of grade boundaries for the January assessments could have led schools to assume that the boundary would remain constant, and we will review with the exam boards any lessons from this. We are working with exam boards to provide an additional early controlled assessment submission opportunity for candidates to retake this unit.

Our final two observations on the awarding process are these. First, the differences between the grade boundaries in different series arise from a system that is complex and difficult to understand. Maintaining standards will be much easier when we do not have modular GCSEs in England.

Second, had the grade boundaries for January carried through to June, there would have been very significant grade inflation at qualification level: there would have been a big increase in the proportion of candidates getting grades A*–C at English

GCSE which was not justified by the evidence. As the regulator, we could not have defended such an increase. It would have put us in breach of our statutory standards objective.

Pressures on schools and colleges

The pressures on schools and colleges have a significant bearing on school reactions to the GCSE English results. We have listened to schools and their representatives over the last week. We want to understand their concerns and perspectives, and to consider whether there are things we can do to respond to them. In this section, we discuss some of the issues that are faced by schools, particularly around predicting results.

All state-funded schools in England have a range of accountability measures reported in school performance tables. They are also expected to show improvement over time in the context of Ofsted inspections. Both of these are high stakes for the relevant schools.

Schools also are responsible for preparing students for the next stage of education. Admission to A level courses will often require a B grade or even an A grade at GCSE. Colleges may have a general admission requirement of five C grades. However, it is clear that the C/D borderline is the boundary of strongest interest in most schools, and that most schools therefore invest considerable resources in getting borderline candidates up to or just above this level. For schools whose intake is skewed towards lower prior attainment, a substantial minority of students are likely to be "borderline" candidates.

In practice this means that most schools have a very strong need to know "what grade C looks like" in the context of each type of assessment. To quote one school Head of English: "Central to the design of any new syllabus must be absolute clarity on the board's part over what standards of work look like. For example, what a C grade controlled assessment is or what a C grade performance in an exam looks like."

Schools also use the pathways through qualifications that give the greatest possibility of achieving an overall C grade. In some cases candidates have completed controlled assessments in January, but not "cashed in" the grades, choosing instead to submit further controlled assessments in June, even where the grades have been as good as they could reasonably expect. One reason for this is to make it possible for candidates to re-sit the written paper in June in the hope of a better grade, but to keep the option of cashing in the earlier grade on the written paper while still being certain of fulfilling the requirement that 40 per cent of marks must come from a terminal assessment. The multiplicity of pathways means that candidate outcomes

have sometimes come to depend too much on school choices as well as their own performance. This is another aspect of the complex system that is in place.

As a new GCSE beds in, the collective understanding of C grade performance improves, and schools become increasingly confident about it. But in the early years, schools rely heavily on exam board sample materials and on the boundary marks in early sittings. Unfortunately this is the period in which boundary marks are most unstable as examiners find the right level at which to pitch and grade assessments. At this stage exam board sample materials are not real candidate work for the new specification: they are either written by examiners or borrowed from previous versions of the GCSE.

In this first year of awarding the new English specifications, schools have reported being heavily reliant on the grade boundaries from earlier units, probably more so than would normally be the case. For example, some schools made sure that students worked on controlled assessment preparation until they reached a mark that the school believed would correspond to a grade C.

Many of the discussions we have had with schools have centred on student and school outcomes relative to their predictions. Most schools track predicted outcomes: some from as early as the first externally assessed or moderated unit, some just for the last three months of the GCSE course. Schools submit predictions to exam boards in May, shortly before the final assessment.

Predictions may be made holistically, or they may be calculated very directly from student results on practice assessments in the context of exam board sample materials and previous grade boundaries. Predictions inform senior management of expected overall outcomes for their school. They are also used by teachers to decide whether a student should continue trying to improve their likely controlled assessment mark, and whether a unit grade should be cashed in or not.

The significant changes to the boundary marks in the two AQA units between January and June might therefore have contributed more than they normally would have done to creating a big gap between school predictions and their outcomes.

However this needs to be looked at in context. The ASCL has recently surveyed member schools on this year's AQA English outcomes. Schools believe that they are able to predict grades fairly accurately at cohort level if not at individual student level, and their representatives are suggesting that the gap between school predictions and this year's outcomes must indicate an exam board problem.

The following table records the disparities reported to ASCL in the past few days by just under 750 schools.

School outcome	AQA %	Total %
more than 10% worse than expected	42%	42%
5.1 to 10% worse than expected	32%	32%
1 to 5% worse than expected	14%	13%
Broadly as expected	8%	9%
1 to 5% better than expected	3%	3%
5.1 to 10% better than expected	1%	1%
more than 10% better than expected	0%	0%

Source: ASCL and OCR

Two things emerge from this data.

First, given that national results were only marginally down, it shows that schools in aggregate must have been expecting substantial rises in English GCSE outcomes this year. We know from exam board data that schools do tend to over-predict, but the school reaction this year suggests that the gap between expectations and outcomes was wider than usual.

We found some confirmatory anecdotal indications that school expectations of improvement in their English/English language grades were particularly high this year, perhaps in part because of the change in structure of the qualifications. As one senior English adviser put it, "we would expect students to do better than on the old specification if their controlled assessment was of sufficient quality".

Secondly, in the ASCL survey, despite the media focus on AQA, the gaps between predictions and actual outcomes are very similar for AQA and for other exam boards.

We acknowledge that this year's English results have come as a shock to some schools, and some of the school-level outcomes are hard to explain. We have received very little school-level data this week so more will be needed to resolve some of these questions. However in this report we have tried to set out for schools what happened and why, and to explain the decisions that we and the exam boards have made. We have also considered carefully whether there are any specific actions we should take in relation to this year's candidates.

Conclusions and next steps

This work we have done over the last week has been a valuable exercise for us and the exam boards. It has forced us to confront some serious challenges to the way we have approached the maintenance of standards. It has shown how complex the system has become. It has shone a light on the way that schools engage with the exam system and the pressures they face. It has demonstrated that many people do not understand the system. Through this document we hope that those who are working with qualifications will be able to get a better understanding of how the system works and the reasons for the issues this year.

Overall, we think that our approach to qualifications has stood up well. Some of our hypotheses about what might have happened have turned out not to be the case. Exam boards – who have co-operated well with this work – have been able to demonstrate that they followed the awarding processes we expected, and that the standards judgements they made were robust.

We know that schools and colleges will be disappointed with our conclusions. Many will have been hoping that we would conclude that the June grade boundaries were too harsh, and that we should return to the January grade boundaries. We have considered this option, but as a standards regulator it would be impossible to justify doing so: it would undermine standards and damage confidence in the system. Nonetheless, we hope that schools and colleges will be reassured by the thoroughness with which we have approached this work, and the detailed explanations we have set out of what happened and why.

On the basis of the work we have done so far, our initial findings are:

- **The standard set for these English GCSEs is comparable with the standard in previous years.** That means that a candidate awarded a C grade this year achieved the same standard as a candidate awarded a C grade last year in the same subject.
- **On thorough investigation we can confirm that each exam board set standards for the qualifications in the manner expected and at the appropriate standard.**
- We have looked carefully in each exam board at how their examiners set the June 2012 grade boundaries for all units. We found that they acted properly, and set the boundaries using their best professional judgement, and taking into account **all** the evidence that was by then available to them. We have seen evidence of how it was done. **The June boundaries have been properly set, and candidates' work has been properly graded.**

- **The issue is not June, but January grade boundaries.** A minority of candidates sat their units in January, and again we have looked at how grade boundaries were set then. Again, examiners used their best professional judgement, but they had less information to go on, less hard data to help them come to a judgement. This was both because most candidates were not sitting at that time and, because these were new qualifications, examiners could not rely absolutely on how standards were set in past years.
- **Three things came together, and made the job of setting standards difficult in January 2012:**
 - First, changes to the syllabuses themselves
 - Second, the nature of English as a subject. English subject examiners have found that setting standards in English, in new qualifications, is difficult.
 - Third, the structure of the qualifications. They are made up of a combination of modules **and** they have a high proportion of controlled assessment (60 per cent).

In short, grades awarded for the June modules were right, but it is hard to square them with the January results.

- There were different written papers set in January and June for the AQA foundation tier. It is wholly appropriate that the grade boundaries for these papers were different. For some of the controlled assessment units, principally Edexcel and AQA, the grade boundaries did move between January and June for the same pieces of work. In retrospect the January grade boundaries were generous. This will have had a minimal direct impact because most schools submitted written controlled assessment in June. For example only 2 per cent of AQA candidates were awarded grades on their written controlled assessment in January. Most students took the written exams in June and completed their controlled assessment at the same time.
- **Some schools were over reliant on the January 2012 grade boundaries particularly in relation to written controlled assessment.** Exam boards published the grade boundaries set in January 2012, and although these had a caveat, many schools used these to set expectations. For schools, as for exam boards, this will have been their first experience of dealing with modularised GCSEs for most English departments. Both could have shared a better understanding of the use made of grade boundaries.

Looking forward

First we want to go through our analysis and evidence with the representative groups for schools and colleges, so they can see it for themselves. We also want to talk with schools, exam boards and assessment experts about the lessons to be learnt here and what can be done better in the future. One clear lesson is that if changes are made to what teachers teach and how it is tested, the maintenance of standards over time gets very difficult.

The GCSE system is complex. A system of this complexity is difficult for schools and colleges to understand, and it increases the risk of problems such as those we have seen this year. Modularisation creates a particular difficulty with maintaining standards in graded qualifications. We have already announced that we will be moving away from a modular system for GCSEs in England after the forthcoming school year. We believe that this year's experience shows that this was the right decision for students in England.

Students starting new English GCSE courses this autumn will not be doing modular exams. They will be preparing for exams and controlled assessment at the end of their course in June 2014.

Appendix 1: Background to the 2012 results

The 2012 GCSE results for England, Wales and Northern Ireland were announced by exam boards on 23rd August. Across the 47 GCSE subjects and almost 300 different specifications in use, the percentage of candidates achieving A*–C grades fell slightly, from 69.8 per cent in 2011 to 69.4 per cent this year. Results were broadly on a par with the results in 2010.

We set out an overview of GCSE and specifically GCSE English results for recent years in Appendix 2 to this report. In 2012, there were slight variations in GCSE results, subject by subject, as might be expected, but achievement fell noticeably in two subject areas: science, and the English subjects (English, English literature and English language), known as the “English suite”. If we look at GCSE results without taking into account science and the English suite, then results rose by 0.5 percentage points. But the changes in results for science and for the English suite were noticeable, and pulled down the aggregated figure, so that results fell by 0.4 percentage points overall.

Schools, colleges and students were generally expecting changes to achievement levels in GCSE science, and so were the regulators and exam boards. GCSE Science specifications were strengthened in response to the regulators’ concerns about the demand of the previous qualifications¹. That means that standards were changed purposefully and quite properly. Teachers were aware of the change and the reasons for it.

Teachers have been teaching the new science specifications in schools since September 2010. This is the first full award for them, and achievement at A*–C has fallen by 2.2 percentage points, from 62.9 per cent last year to 60.7 per cent this year, in line with expectations. We are not experiencing unusual levels of inquiry about GCSE Science results, or indeed about results in any subject other than those in the English suite.

In the English suite, regulators were not necessarily expecting outcomes to be exactly the same, year-on-year. This is not because standards have changed, as they have in science – standards have stayed the same. But there were a number of different factors – most especially, changes to the cohort, to the specifications and to the combinations of subjects and units taken by candidates – that could lead to different outcomes this year. A*–C achievement in English and English language

¹ See www.ofqual.gov.uk/news-and-announcements/130/336 [accessed on 31st August 2012]

(combined) fell by 1.5 percentage points. Achievement in English literature fell by 2.1 percentage points.

In particular, a new set of GCSEs has been introduced – English, English language and English literature. The expectation is that students in England would choose either English, or English language and English literature.

Also, the qualifications from all exam boards were modularised for the first time. Assessments can be taken and awarded at different times during the course, and the final grade depends on achievement across all the units. However, at least 40 per cent of the assessment must be taken at the end of the course.

The new qualifications criteria for the English suite provided for what is known as controlled assessment to replace the coursework that was part of the old qualifications. Coursework was done by candidates during the school year, and there were legitimate concerns about whether in every case coursework was genuinely the candidate's own work. Controlled assessment makes sure that coursework is done by candidates in controlled conditions, in their schools and colleges.

Qualifications in the English suite must be made up of 60 per cent controlled assessment and 40 per cent external assessment. The external assessment can be taken at one of two levels – the foundation tier and the higher tier.

For controlled assessment leading to a written outcome, awarding organisations receive a sample of teacher-marked candidate work from each school and college. For the speaking and listening controlled assessment no written outcome is produced. Moderation of the teacher's marking is via a visiting moderator from the exam board who will observe candidates completing assessment tasks and evaluate the standard of the teacher's marking.

There are issues with controlled assessment. We reported on early teething problems in October 2011, two years after it was introduced². At that stage we were concerned about the complexity of the delivery arrangements, and exam boards have since streamlined arrangements to make them more consistent between exam boards, and also easier to understand. More fundamentally, we launched a second review in April this year³ in response to what we were hearing from schools about the impact of controlled assessment on teaching and learning.

² www.ofqual.gov.uk/downloads/category/136-other-research?download=1164%3Aevaluation-of-the-introduction-of-controlled-assessment [accessed on 31st August 2012]

³ www.ofqual.gov.uk/news-and-announcements/83-news-and-announcements-news/885-changes-to-seminars [accessed on 31st August 2012]

Subject by subject, schools and colleges generally predict or estimate GCSE results for their students as a group and for their students individually. This year, in some schools and colleges, the English suite results are much better than they expected. In others, they are much worse than they expected. The impact has been noticeably different, school by school, when they compare their results with what they were expecting. This is not comparing this year's results with what was achieved in each school or college last year, or in earlier years. We believe there is a much better reconciliation there – although we need to explore this further – but even so, some schools have seen year-on-year changes that they cannot comprehend.

Exam boards are obliged to maintain standards, to make sure that, each year, students get the results they deserve. This involves making judgements on grade boundaries – on what mark in an exam constitutes a C grade, for example. Grade boundaries are different for different units within qualifications and are different year-on-year as well. This reflects the fact that different exams have different questions and are therefore at different levels of demand; a paper that is harder will need lower grade boundaries⁴. That is the nature of things, so that standards are maintained even though other things change, and schools and colleges understand that.

There are a number of units – including, but not only, controlled assessment⁵ units – where the grade boundaries set in June 2012 were higher than those set when the units were assessed earlier in the course. In some controlled assessments, this was the same unit; that is, the same task undertaken by students under controlled conditions.

In many cases, we know that teachers used their knowledge of the grade boundaries in previous units to make estimates of likely student performance in their GCSEs in June 2012. Because of the changes, those estimates proved wrong, which meant many students did not get the grades they expected.

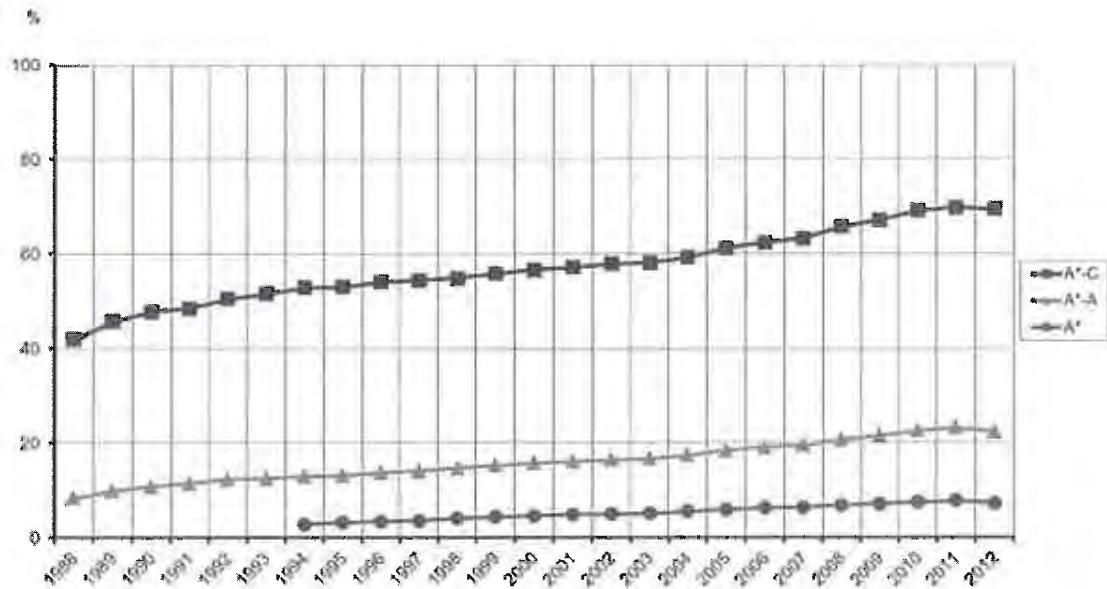
In Appendix 3 there is a more detailed explanation of how we maintain standards.

⁴ www.ofqual.gov.uk/files/2007-comparability-exam-standards-c-chapter1.pdf [accessed on 31st August 2012]

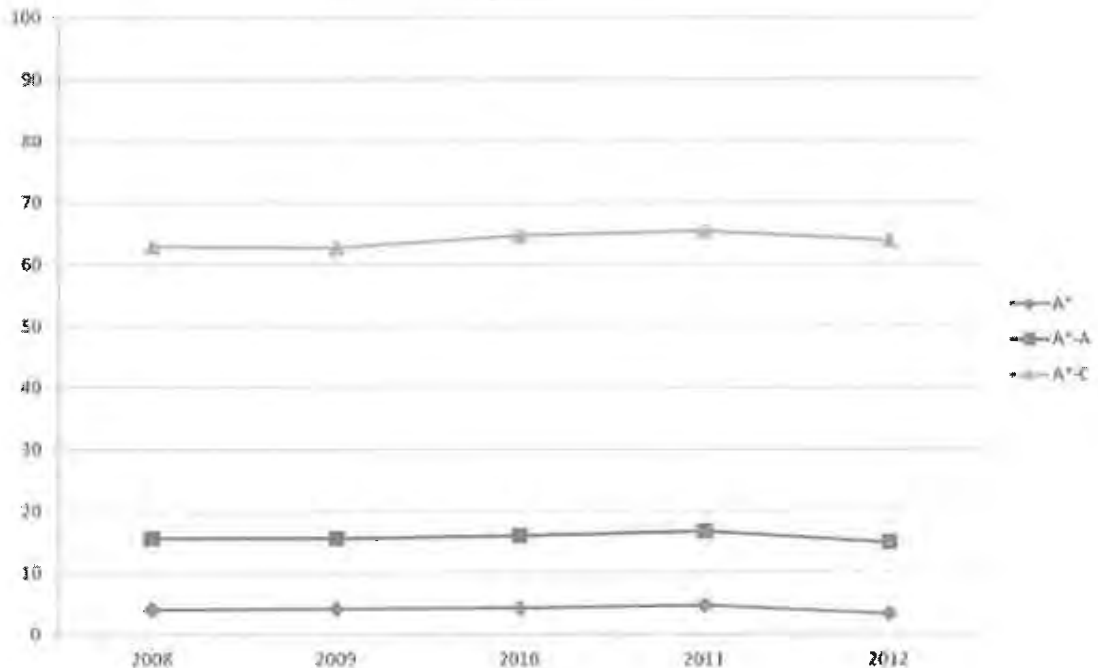
⁵ Controlled assessments are supervised and marked by teachers. They include both written work and an assessment in speaking and listening. Exam boards moderate the marks given to the assessments by teachers, using a sample of assessments. If an exam board finds a teacher has not given the work an appropriate mark it can change the marks.

Appendix 2: Summary of GCSE results over time

GCSE grades 1988–2012



GCSE English grades 2008–2012



GCSE English grades 2010–2012

Year	Total Cohort	% of candidates achieving grade					A*-C
		A*	A	B	C	D	
2010	709,831	4.4%	11.6%	20.0%	28.7%	19.7%	64.7%
2011	649,047	4.7%	12.0%	20.1%	28.3%	20.1%	65.1%
2012	674,202	3.3%	11.5%	20.2%	28.1%	20.6%	63.0%

Year	Total Cohort	Number of candidates achieving grade					A*-C
		A*	A	B	C	D	
2010	709,831	31,205	82,254	142,037	203,523	139,984	459,019
2011	649,047	30,407	78,039	130,730	183,485	130,326	422,661
2012	674,202	22,353	77,408	135,919	189,128	138,836	424,808

Figures are based on JCQ data, covering GCSE English specifications for 2010 and 2011 and GCSE English or English Language specifications for 2012, in England, Wales and Northern Ireland

All figures for 2012 GCSE results are published on the Joint Council for Qualifications website at:

www.jcq.org.uk/attachments/published/1727/GCSE%20Results%202012.pdf

[accessed on 31st August 2012]

Appendix 3: Maintaining standards – details of this approach

Awarding – what is it?

Awarding starts with the development of exam papers and assessment tasks. Examiners try to write question papers and mark schemes that are of similar demand in each exam series and year by year. The exams have to be different each time, of course, to avoid candidates knowing what they will be tested on – but each year's candidates should face equally demanding tasks. However, assessment experts accept that it is not possible to know the exact difficulty of the papers for candidates until they have answered the questions and had them marked.

A paper may turn out to be slightly more difficult or slightly easier than previous ones. The demand of the paper may be different and/or the marking may be more severe or more generous. This means that although the same mark might be given for different exams, those marks might be translated into different grades.

The lowest mark which will be awarded a particular grade on each exam is known as the "grade boundary". Because the same mark may represent a different standard in different exams, grade boundaries must be reviewed and if necessary adjusted for each series. Awarding is the process by which this is done. Similar arrangements apply for controlled assessments.

How grade boundaries are set

The decision of where to set grade boundaries is made using all the information awarders have available to them at the time.

If the awarders set the A boundary at 70, C at 54 and F at 33, the boundary for B would be 62 – half way between the A and C boundary. The boundary for A* would be 78 and for D and E it would be 47 and 40 respectively.

Table 1: example grade boundaries

Grade	A*	A	B	C	D	E	F
Mark	78	70	62	54	47	40	33

Having agreed the grade boundary marks for the raw marks (the marks the candidates actually scored on the paper) those raw marks are converted into uniform marks (UMS marks). Those UMS marks for each unit are added together to give the overall grade.

There are particular challenges with setting grade boundaries and maintaining standards in modular qualifications. The standard needs to be maintained at the qualification level. But awarding decisions need to be made at the level of individual units, before full information is available about the performance of all candidates.

In modular schemes, relatively few candidates normally enter units early in the course, and these candidates might not be typical of all candidates who will take the units at later dates. Statistical information available at the awarding meeting held by the exam board is limited. Where a qualification is new, it is also more difficult for awarders to make judgements about the quality of work that candidates have produced in response to a new style of question paper. That makes it hard for the awarders to be certain exactly where to put the grade boundary for a unit so that it will reflect qualification level standards. In later awards much more information will be available to assist the awarders in their judgements.

When qualification awards come to be made, awarders have to work with the unit awards that have already been made. If those unit awards have not been made at the right level, then the exam boards need to review units which have not yet been awarded to try and secure standards at qualification level.

How standards are maintained

The comparable outcomes approach to maintaining standards was applied in 2009 to AS levels, in 2010 to A levels, and in 2011–12 to the new GCSEs (which were introduced over two years). We agreed our comparable outcomes approach for GCSEs in 2010. It has been the key factor in the stabilisation of results over time.

Full details of the comparable outcomes approach are set out on our website⁶. We discuss this approach regularly with our fellow regulators and with assessment experts and we keep it under review⁷. So far, experts generally agree that it is the “best practice” approach – the best way, currently, for standards to be maintained when qualifications change. We review and evaluate the approach regularly⁸. No system is perfect, but there is no known better approach to maintaining standards at the moment.

⁶ See www.ofqual.gov.uk/files/2012-05-09-maintaining-standards-in-summer-2012.pdf [accessed on 31st August 2012]

⁷ A review of our approach and how it has played out in summer awarding is set for discussion at the September meeting of our Standards Advisory Group. Membership of the Standards Advisory Group is set out in Appendix 5.

⁸ See, for example www.ofqual.gov.uk/files/2011-09-29-investigating-the-relationship-between-a-level-results-and-prior-attainment-at-gcse.pdf [accessed 31st August 2012].

There are particularly good reasons to aim for comparable outcomes in the first year of a new syllabus. Maintaining grade standards is most difficult when qualifications change. Teachers and students may have fewer resources and will have to rely on sample papers rather than actual past papers. Syllabuses may include new topics and teachers will have no direct experience of what is expected in the actual exams. Regulators and exam boards need ways in which they can be as sure as possible that when things change, standards are nevertheless maintained and students get the results they deserve.

Students taking their A levels or GCSEs in any particular year will be competing with those from other years for access to further and higher education and employment. Students have an undeserved advantage if they get better results simply because they were taking a familiar qualification. Our aim is that students should not be advantaged or disadvantaged simply because they were the first to sit a new set of exams. The only exception to this would be when a new syllabus is designed to be at a different standard – as with GCSE Science.

The principle applied in setting standards for a new GCSE is that a student should get the same grade as they would have done if they had taken the old version. We call this approach “comparable outcomes”. It aims to prevent “grade inflation” – that is, increases in the proportion of students achieving higher grades without evidence of real improvements in performance. It also adjusts for the dip in performance that can arise when a new qualification is first taken. It is more sophisticated than “norm referencing” where fixed proportions of candidates would be awarded a grade without reference to candidate achievement.

Before settling the grade boundaries, examiners use data on the prior attainments of the cohort of students to check the outcomes. This enables examiners to consider whether, for example, the awards are too generous, or whether they have not allowed sufficiently for the introduction of unfamiliar exam features. We expect exam boards to set standards within a certain tolerance, and we will challenge them if they are outside that tolerance.

The comparable outcomes approach should lead to just that – comparable outcomes, year-on-year, all other things being equal. As set out above, things are not always equal; there are sometimes changes to the cohort, for example. That is why we would expect to see small differences from year to year.

In modular qualifications, the number of candidates normally entering units early in the course is small, and these candidates might not be typical of all those who will take the units at later dates. Statistical information available at the awarding meeting held by the exam board is therefore limited. It is also more difficult for awarders to make judgements about the quality of work that candidates have produced in response to a new style of question paper. That makes it hard for the awarders to be

certain exactly where to put the grade boundary for a unit so that it will reflect qualification level standards. In later awards much more information will be available to assist the awarders in their judgements.

A modular system which includes controlled assessment together with changes to the cohort and frequent changes to qualifications themselves all make awarding a demanding business. Maintaining standards and ensuring students get the grades they deserve becomes more difficult than we would wish. 2012/13 will be the last year in which GCSE qualifications in England have modules – after that, all assessment will be at the end of the course. Then the system will be simpler and it will be easier to maintain standards.

The role of the regulator

We were established in 2008, becoming fully operational in 2010, and we regulate school qualifications in England. Arrangements are different in Wales and in Northern Ireland. (We work with the regulatory bodies in Wales and Northern Ireland with the aim of securing comparable standards in school qualifications across the three countries.)

Unlike our predecessor body, the Qualifications and Curriculum Authority, we are accountable to Parliament, not to ministers. When our enabling legislation was going through Parliament there was a political consensus that it was important to separate ministers from decisions about standard-setting, as standards measure the success of students and of the wider education system. It was agreed that being independent in this way would make it easier for us to take decisions that would secure the rigour of the system, and that over time, public confidence in qualifications – which had been damaged by allegations of dumbing down – could be improved.

Ministers rightly take an interest in our work, which has a significant impact on the wider education system. But ministers have not attempted to influence our decisions on standards, results, grades or grade setting – and if they tried to do so, we would say publicly that they had done so. Their discussions with us have been appropriate and transparent.

We were originally given an objective to secure qualification standards – to make sure that qualifications give a reliable indication of knowledge, skills and understanding and indicate a consistent level of attainment over time. The objective was amended last year to require us to consider additionally whether standards need to be raised to bring them into line with qualifications awarded overseas. We have to use our powers to try to secure this, and our other objectives. Our powers allow us to set requirements (“conditions”) which exam boards must meet, and to intervene if they do not do so. For example, we can direct them, and the direction is enforceable in the courts.

If we are to achieve our standards objective we need to have the power to intervene if an exam board is proposing to do something which does not secure standards. This may include directing an exam board to change its grade boundaries if we think that is right in order to secure standards. We would, of course, rather not have to direct: we would rather that exam boards made the right decisions themselves. But when Parliament debated our establishment, they were clear that this was a power we should have. As yet, we have not had to direct in this way.

We also have specific equality duties that we have to take account of. As a public body, we are subject to the public sector duty under section 149 of the Equality Act 2010. We have published our Equality Objectives 2012–13⁹.

⁹ www.ofqual.gov.uk/downloads/category/139-information?download=1367%3Aequality-objectives-2012-2013 [accessed 31st August 2012]

Appendix 4: Summary of meetings and actions over the last week

As part of our work we considered a wide range of information and spoke to many people from different organisations. We required each exam board to provide us with specific data about GCSE English and GCSE English language qualifications in the January and June 2011 and 2012 series. We talked to schools and teacher associations to understand their views and concerns. All of this information has informed our conclusions as set out in this report.

Data requests to exam boards

We are grateful to each exam board for providing us with the following information:

1. For each unit, for each tier (where appropriate), for each series in 2011 and 2012, the entry, the maximum mark, the grade C/D boundary mark and the proportion of candidates scoring at or above that boundary mark.
2. Copies or transcripts of the reports principal examiners presented to awarding meetings and any additional analysis made available to those meetings the recommendations from these meetings and any concerns raised by examiners in reaching the recommendations.
3. Details of any changes made to grade boundaries between the recommendations of awarding meetings and those signed off by responsible officers.
4. Analysis of the prior attainment of those certificating this summer (using either Key Stage 2 results or other methods, as appropriate) who were at or just above the C/D boundary for (a) the foundation tier and (b) the higher tier, how this compares with predictions and how this compares with performance on externally assessed papers taken in earlier series.
5. Definitive data for the qualification as a whole showing:
 - (a) for all candidates, total entry and proportions in each grade from each tier and overall in the summer 2012 series;
 - (b) for matched candidates, numbers matched and for grades A*, A, C and F, predicted cumulative percentages of candidates against actuals.
6. Identification of the particular schools with a substantial entry where the change in results from last summer has been dramatic (at least a 15 per cent change in the proportion awarded a grade C or better) and then an analysis of how this relates to entry in summer 2012/earlier and which tier paper was taken.

7. Numbers and grade distributions of any qualification awards for these new specifications made before June 2012.
8. Analysis of when candidates were entered for each unit: those entering all units in the same series, compared with those entering units in more than one series, and how this varies across the different units and series.
9. Analysis of the pattern of re-sits by candidates who certificated this summer: for each unit, the number of candidates re-sitting units – the series when they were first entered for the unit and the series when the re-sit occurred, and the distribution of grades in the unit (for example, a D in the original entry was converted to a C at the re-sit).
10. Where grade boundary changes from series to series were material, why this change was considered necessary.
11. An assessment of the accuracy of teachers' marking, based on moderation of controlled assessment units. And whether there is any evidence to indicate whether teachers' marking was influenced by the grade boundaries that had been set in the previous series.
12. Awarding committee judgements (known as the tick charts) for all units in English and English language for the January and June 2012 series.

Investigation meetings

As part of our investigation we held meetings with the organisations listed below. All meetings listed were attended by either our Chief Regulator or a Director.

Schools and school representative groups

Belle Vue Girls' School

Boston Spa School

Buttershaw Business and Enterprise College

Carr Manor High School

Dixons Academies

Horsforth School

Independent Academies Association

Landau Forte Charitable Trust

The Morley Academy and The Farnley Academy

Woodkirk Academy

Teacher associations

Association of School and College Leaders

NAHT The Association for All School Leaders

Other groups

Leeds City Council

Exam boards

AQA

CCEA

Edexcel

OCR

WJEC

We also met the Wales regulator (the Welsh Government) and the Northern Ireland regulator (CCEA).

Appendix 5: Membership of the Ofqual Standards Advisory Group

Jo-Anne Baird, University of Oxford

Paul Black, King's College London

Robert Coe, Durham University

Mike Cresswell, University of Bristol

Jannette Elwood, Queen's University Belfast

Tina Isaacs, Institute of Education

Jerry Jarvis

Sue Kirkham, Association of School and College Leaders

Barnaby Lenon, Independent Schools Council and Ofqual Board Member

Sarah Maughan, National Foundation for Educational Research

Michelle Meadows, Assessment and Qualifications Alliance (AQA)

Roger Murphy, The University of Nottingham

Paul Newton, Cambridge Assessment

Alastair Pollitt, Cambridge Exam Research

Amanda Spielman, Chair, Ofqual

Glenys Stacey, Chief Regulator, Ofqual

Gordon Stobart, Institute of Education

Peter Tymms, Durham University

Julius Weinberg, Kingston University and Ofqual Board Member

Alison Wolf, King's College London

Appendix 6: Glossary

Awarding – Where the marks candidates have been given for all units/components of a qualification are converted into overall grades.

Awarding committee – The group of people responsible for setting the grade boundaries for an exam or controlled assessment. The group comprises a chair of examiners, chief examiner and one or more principal examiners. The committee will also review overall grade outcomes for a qualification.

Cashing in – The process of claiming for certification – indicating that a candidate wishes to submit the results for a unit towards the award of a qualification. Sufficient units must be cashed in in order for the exam board to aggregate the unit results and make an award. At least 40 per cent of a GCSE assessment must be taken in the exam series in which the qualification is cashed-in.

Centre – An organisation (such as a school or college) undertaking the delivery of an assessment to candidates on behalf of an awarding organisation.

Chair of examiners – An individual responsible to the awarding organisation for maintaining standards across different specifications in a subject within a qualification and from year to year.

Chief examiner – An individual responsible to the chair of examiners for ensuring that the exam as a whole – including both internal and external assessment – meets the requirements of the specification and maintains standards from one year to the next. The chief examiner also acts as a principal examiner or moderator for at least one component.

Comparable outcomes – This is explained in Appendix 3.

Controlled assessment – Coursework carried out by students under controlled conditions in their school or college (introduced in 2009).

Exam board – Also referred to as an awarding organisation or an awarding body. An organisation recognised by us for the purpose of awarding regulated qualifications. We generally use the term 'exam board' to refer to awarding organisations offering GCSEs and A levels.

Examiners – Individuals with subject expertise who are responsible for marking candidates' responses.

Foundation tier – For some subjects, all candidates will sit the same exam, but in other GCSE subjects there are two tiers: "higher" or "foundation". Each tier leads to a

different range of grades: higher tier exams lead to grades A*–D, foundation tier exams lead to grades C–G.

GCSE (General Certificate of Secondary Education) – Generally taken as a two-year course by students aged 14–16. GCSEs sit in the National Qualifications Framework (NQF) in England, Wales and Northern Ireland. GCSEs are graded A* to G, grades D–G being at level 1 and grades A*–C being at level 2 in the NQF.

Grade boundary – the minimum uniform mark that a candidate needs to score to achieve a particular grade for an exam or controlled assessment

Higher tier – See Foundation tier.

Mark scheme – A scheme detailing how credit is to be awarded in relation to a particular assessment unit or component; a mark scheme normally characterises acceptable answers to questions or tasks or parts of questions or tasks and identifies the amount of credit each attracts.

Moderation – The process through which the marking of assessments by schools or colleges is monitored to make sure it meets required standards and through which adjustments to results are made, where required, to ensure that results are based on the required standard.

Modular GCSE – Modular GCSEs are broken down into units which are tested individually throughout a GCSE course. They are also known as unitised GCSEs. Breaking the course into modules means that candidates are able to sit assessments throughout the course. However, candidates must be entered for at least 40 per cent of the assessment for a GCSE subject in their final sitting.

Principal Examiner – An individual responsible for the setting of the question paper or task and the standardising of its marking.

Raw marks – What candidates actually scored for a unit/component. The raw marks are converted into uniform marks for use in awarding.

Responsible Officer – The person in each awarding body who is ultimately responsible for the standards of all exams offered by that awarding body, as required by our General Conditions of Recognition.

Tolerance limits – Part of the comparable outcomes approach to standard setting. Tolerance limits are set around predicted qualification outcomes to take into account the number of entries and other statistical factors for particular subjects. The tolerance limits act as triggers for exam boards to report differences from expectations.

Uniform marks – Uniform marks are given using the Uniform Mark Scale (UMS). The UMS balances out differences between exams/controlled assessments which are used for different sittings of the same unit.

Draft – under embargo

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Any enquiries regarding this publication should be sent to us at:

Office of Qualifications and Examinations Regulation	
Spring Place	2nd Floor
Coventry Business Park	Glendinning House
Herald Avenue	6 Murray Street
Coventry CV5 6UB	Belfast BT1 6DN

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346

Julie Swan

From: Julie Swan
Sent: 10 December 2013 15:14
To: Ofqual FOI
Subject: FW: On behalf of Chris Tweedale re GCSE English Language

Julie Swan
Head of Regulatory Development, Ofqual

- Direct Office: 0300 303 3344
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Julie Swan
Sent: 03 September 2012 14:45
To: Fiona Pethick
Subject: RE: On behalf of Chris Tweedale re GCSE English Language

Fiona

A draft response, for discussion

Dear Chris

You will now have had an opportunity to read our initial report on GCSE English and English Language. You might also have seen our 'myth busting' note on our website: <http://www.ofqual.gov.uk/help-and-support/94-articles/973-myths-about-ofquals-report-into-gcse-english-2012>

We are aware of your strength of feeling about the results in Wales this year.

GCSEs are taken across Wales, Northern Ireland and England. If they are to be of value to colleges, higher education and employers their currency must be the same wherever they are taken. The comparable outcomes approach is applied across the three countries – to secure an outcome that is comparable for the entire cohort with previous cohorts. It does not and is not intended to secure a comparable outcome year on year on a country, or a county or a local authority or a school basis. At whatever level (country, county, local authority and school) we look we can find upward and downward changes for this year on last. Fluctuations may be explained at any of these levels – for example with changes in policy, funding, school staffing, annual variations in the local cohort etc.

We are undertaking further analysis of the data we have and we are continuing to talk to schools and teacher representatives to help us understand why some schools in England were so disappointed with their results whilst others were not. If you are asking similar questions it would be interesting to know what you are finding about individual schools' performance in Wales and for us to explore our respective hypotheses of the reasons, as these develop.

We have seen reports suggesting that grades were up on previous years in some regions of Wales but down in others. Has any explanation for regional differences been put forward? We have also seen WJEC's suggestion that issues might have arisen with the switch from coursework to controlled assessment with a significant weighting of the controlled assessment element. It would be interesting to know whether the feedback you are receiving supports or challenges this suggestion.

A particular area we'd like to understand more fully is the impact in England of the choice between English and English Language & English Literature which wasn't available to candidates in Wales. Are you exploring the possible impact of the approach in Wales?

This week we are giving teachers' groups an opportunity to review the evidence that has informed our initial report. We'd be pleased to share this with you too if you would like to see it. It would be easier to review the information from our offices in Coventry.

I look forward to learning more about your investigations.

Best wishes

Fiona

Julie Swan
Head of Regulatory Development, Ofqual

- Direct: ~~0300 303 3344~~ Office: 0300 303 3344
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Fiona Pethick
Sent: 31 August 2012 13:30

To: *Welsh Govt*

Cc: Jeremy Benson; Tweedale, Chris (Director - SYPG); *Welsh Govt* & 5

Subject: RE: On behalf of Chris Tweedale re GCSE English Language

Welsh Govt.

Thank you for this.

We will respond next week.

Thanks

Fiona

Fiona Pethick
Director of Regulation, Ofqual

• Direct: _____ • Office: 0300 303 3344 • Mobile: _____
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Welsh Government
Sent: 31 August 2012 13:21
To: Fiona Pethick
Cc: Jeremy Benson; Tweedale, Chris (Director - SYPG); Welsh Government x 5
Subject: On behalf of Chris Tweedale re GCSE English Language
Importance: High

I am sending this on behalf of Chris Tweedale:

Dear Fiona

We look forward to receiving your report on GCSE English and English Language which we will read with interest. We would like to place on record, however, our deep concern that you appear likely to have come to a conclusion that the 2012 results for GCSE English Language are secure when there has been a clear, substantial, unexpected and detrimental effect on an entire cohort of learners in Wales. As we have repeatedly stated, a 3.9% drop, in one year, when a new specification has been introduced for such a high stakes, high entry qualification is unacceptable and indefensible.

Your endeavours to establish a series of November resit opportunities for candidates indicate to us that it is also clear to you that this cohort has been uniquely disadvantaged. It is our view that November examinations, when many candidates will be in different learning settings and when results will not be available until January, are an inadequate response and too late to mitigate the harm that has been caused to the life chances of many young people.

I note that when first discussing the principles of maintaining standards over changed specifications, Ofqual put on record an agreement that:

"on a national level, overall there is no reason to believe that outcomes in terms of grade distribution in the first year should be very different from those before the changes" Ofqual, Maintaining Standards Meeting, 28 Oct 2008.

As you are aware, we are continuing our own investigations and will be reporting in due course.

Regards

Chris

Welsh Government / Llywodraeth Cymru
Qualifications and Learning Division / Is-adran Cymwysterau a Dysgu
Department for Education and Skills (DfES)/ Yr Adran Addysg a Sgiliau (AdAS)
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Wrth adael Mewnwyd Ddiogel y Llywodraeth nid oedd unrhyw feirws yn gysylltiedig â'r neges hon.

Mae'n ddigon posibl y bydd unrhyw ohebiaeth drwy'r GSi yn cael ei logio, ei monitro a/neu ei chofnodi yn awtomatig am resymau cyfreithiol.

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Okaved

From: Adrian Long
Sent: 06 September 2012 16:36
To: *Okaved*
Cc: - CRC; Cath Jadhav *Okaved x 3*
Subject: NOTE FOR SELECT COMMITTEE - Approved
Attachments: SC Update note.docx

Follow Up Flag: Follow up
Flag Status: Completed

Okaved.

Glenys and I have made some small amendments. This is now signed off.

Thanks for your help.

Adrian

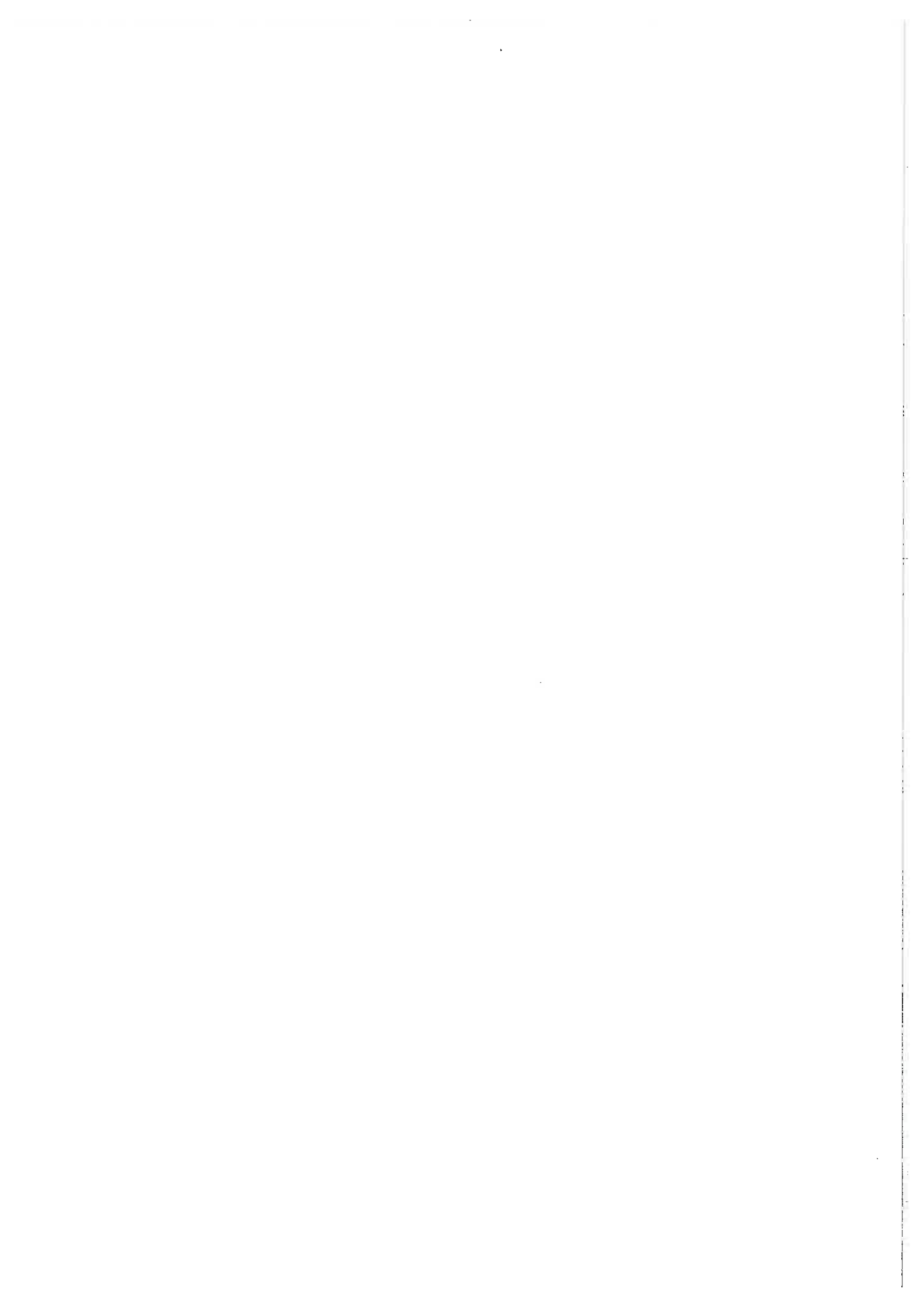
Adrian Long
Director of Policy and Engagement, Ofqual

- Office: _____ Mobile: _____
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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Education Select Committee Update

GCSE English



Background

GCSE results were announced on 23 August 2012. On 25 August Ofqual announced that we would look closely at concerns raised by schools and colleges into outcomes in GCSE English and English Language. On 28 August we published a list of questions and answers about GCSE English 2012 which set out the concerns being expressed, the work we intended to do, and provided additional background information.

Ofqual worked with representatives of schools and colleges, exam boards and other stakeholders to gather and analyse evidence to inform its work. Ofqual's findings were published on 31 August in its initial report '*GCSE English Awards 2012: A Regulatory Report*'.

This note sets out the actions and meetings that have taken place since the publication of the initial report.

Communications

The initial report was published on Ofqual's website on 31 August along with a press release.

On 1 September we published *Myths about Ofqual's report into GCSE English 2012*. This document deals with a number of common concerns, and misunderstandings, to help people understand better how things work.

Helpdesk

Since the release of GCSE results on 23 August, and up until 16:00 on 5 September, the Ofqual Helpdesk has received 46 phone calls and 270 emails relating to GCSE English results¹. Three calls have also been received which relate specifically to the

¹ Some callers have also emailed and these figures are included in the total therefore it should be noted that there may be some overlap within this figure.

November re-sit opportunity. All calls and emails are being dealt with within our usual turnaround times.

Awarding organisations

On Monday 3 September, we met with the chief executives and responsible officers of AQA, CCEA, Edexcel, OCR and WJEC. The purposes of this meeting were:

- to give exam boards the chance to challenge our initial report and findings
- to make swift progress in establishing arrangements for resits and to consider how Enquiry About Results (EARs) are being handled across awarding organisations
- to discuss plans for GCSE English 2013

On Wednesday 5 September we spoke to the Chief Executives of AQA, CCEA, Edexcel, OCR and WJEC to clarify our expectations around the processing of EARs and the preparations required for re-sits in GCSE English.

Stakeholders

On Wednesday 5 September we met with representatives of NUT to allow them the opportunity to review the evidence which we used in reaching the decisions in our report, and to raise any concerns with us. Similar meetings were held with AOC, ASCL, IAA and NAHT on Thursday 6 September

Further actions

We are continuing to oversee exam board plans for resits. We need to make some changes to the detail of the usual regulatory rules around resits.

We will reach decisions soon about whether we should make any changes to the GCSE English arrangements for 2013, to secure standards.

We are actively considering two questions:

- I. GCSE English A*-C results fell by 1.5% overall, in line with expectations given changes to the student mix. But some schools and colleges have been surprised by their results – with significant and unexpected variations as against their predictions. Why?
- II. These were new qualifications. They were the first full suite of modular GCSE English qualifications and the assessment included controlled assessment, a relatively new concept brought in across the range of GCSEs to replace coursework. To what extent did these factors – or other factors – mean that some schools got the results they expected and others didn't?

We are developing hypotheses, and we will be taking advice from our Standards Advisory Group on them, and the best methodologies for getting to the root of things. This work will take a little while, perhaps 4-6 weeks. We will publish a second report.

We have made additional data and analyses requests of exam boards, to help us get to the root of things, and we expect to make more. We will continue to liaise with representative groups of schools, colleges and students.

Ofqual

5 September 2012



From: Cath Jadhav
Sent: 09 September 2012 22:02
To: Tim Leslie; Glenys Stacey; - CRC; Amanda Spielman; Amanda Spielman; Julie Swan
Subject: RE: Select Committee Glenys lines
Attachments: Glenys Stacey note TL and CJ comments.doc

Follow Up Flag: Follow up
Flag Status: Completed

[And some more comments from me.](#)

Cath

From: Tim Leslie
Sent: 09 September 2012 17:53
To: Glenys Stacey; - CRC; Amanda Spielman; Amanda Spielman; Julie Swan
Subject: RE: Select Committee Glenys lines

Glenys

[I've made some comments in the attached.](#)

Tim

Tim Leslie
Director of Risk and Markets, Ofqual

• **Direct:** [0300 303 3344](tel:03003033344) • **Mobile:** [0300 303 3344](tel:03003033344)
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Glenys Stacey
Sent: 09 September 2012 16:42
To: - CRC; Amanda Spielman; Amanda Spielman; Julie Swan
Subject: Select Committee Glenys lines

[I have more to do on this tomorrow, but please do take a look now and let me know of any concerns.](#)

Best wishes

Glenys

Glenys Stacey
Chief Regulator, Ofqual

- Office: 0300 303 3344 • Mobile: 
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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Key messages/phrases

It is the role of the three regulators to ensure standards. Left to its own devices the system will produce grade **inflation**. We have powers given to us by Parliament to manage that, and so ensure standards. We acted properly alongside our other regulators.

Comment [TL1]: What is the argument to substantiate why grade inflation will occur if not checked by regulators? Is it competition between AOs? Or school marking of CA? Or the tendency of examiners to give the benefit of the doubt when applying their judgement, year-on-year, when setting grade boundaries?

The qualifications system is at its most vulnerable when things change. When the structure of a qualification changes, there are implications for standards.

There is an inherent tension. The regulators and exam boards are required to maintain standards in qualifications where the qualification outcomes are determined by unit outcomes. We need to maintain the standard of the composite qualification as well as its constituent parts.

Modularisation is not necessarily the problem, on its own. It works in other types of qualification, and at AS level as well. If you value/accept the modular approach – and clearly, schools welcomed it and appreciated the flexibility – then you have to balance that against the technical difficulties that inevitably come with it.

The philosophy underpinning modularisation was 'permissive'. Students are permitted to build up their qualification. This has consequences.

Choices, routes through GCSEs are unduly complex and make it hard to maintain standards. An 'institutional' rather than individual student-centred approach to routing students through has grown in recent years. The institutional approach to navigating students through the system has become prevalent, and **problematic**.

Comment [TL2]: You could bring out, here, the particular complexity of the English Suite: schools choosing between the 'single' English GCSE or the 'double' Language and Literature GCSE's; papers – and some CA being available at both foundation and higher tiers; when modules should be taken; the opportunity to re-sit each module.

The weight of expectation placed on the system is far too great. A huge weight of accountability is placed on the system, and it cannot meet all expectations, in the perfect **sense**.

Comment [TL3]: This particularly applies to English / English Language because this GCSE features so prominently in school accountability measures.

There is some confusion, in controlled assessment, as to who owns the standard. There are problems with the integrity of controlled assessment, just as there were with **coursework**.

Comment [TL4]: Speaking and listening units are particularly difficult to moderate. There are no records kept of pupils' work. Moderation is through AOs' visiting schools to observe a sample of pupils performing their work – typically schools are visited once every 3 years (to be checked with Cath).

It is difficult for examiners, for subject and assessment experts to make fine judgements about the quality of work – for grade boundary setting – most especially in subjects that are not hard edged, and where the qualification is new. For new qualifications it is particularly important that the regulators apply a framework – that examiner judgements are made within a framework, to ensure standards over time.

What do we mean by 'maintaining standards'?

Our enabling legislation – the Apprenticeship, Skills, Children and Learning Act refers to standards as 'a consistent level of attainment (including over time)'.

It is perhaps more helpful, more understandable to think of standards in a particular qualification in terms of the level of skills, knowledge and understanding that a candidate would be expected to demonstrate. All things being equal, we could expect a candidate to achieve the same outcome, the same result in a qualification if he or she demonstrated the same level of skill, knowledge and understanding, regardless of when the qualification was taken.

You could apply a more 'general public' view of this: for example, it's about 6th forms, FE colleges and employers being able to rely year-on-year that pupils with a particular grade in a GCSE will be capable of broadly the same. Then, you could distinguish this from schools getting better, year-on-year in preparing their pupils to succeed in the GCSE assessments? Teaching to the test?

The comparable outcomes approach is discredited by this fiasco.

We think not. We have been applying this approach to AS level since 2009, A level since 2010, and to most GCSEs since 2011. That is, some xx qualifications and specifications, in all.

We have not experienced the same problems in any A level or AS level in the English subjects. And we have not experienced it in any of the 45 or so other GCSE subjects, and over 250 specifications/units sat for GCSE 2012.

That doesn't mean that the approach is perfect. But it is regarded by experts as the best known approach to maintaining standards.

We have been open about the approach, and about the need to keep it under constant review. Indeed our Standards Advisory Group was scheduled to review its application following this year's results, at its Autumn meeting.

Comparable outcomes would never work for modular qualifications and you should have seen it coming.

Need to know

Number of quals/specs we have applied comparable outcomes to.

Comment [c13]: We used it formerly. 200 AS specs in summer 2009, and the same number of A level specs in 2010, 2011 and 2012.

No of GCSEs and specs this year

Comment [c14]: Just over 250 GCSE specs this year

(The NFER report; our SAG group).

Comment [TL5]: Later, you refer to a predictor model that has been used for a decade. Was that different from comparable outcomes?

Check the SAG agenda please

We need to be able to be clear about the rate of variation and how it compared to what we might expect with a new qualification – drama for example.

What's the normal variation span – for established English qualifications?

Comment [c15]: I'd say they're differently modular! AS and A2 are separate halves, with AS at a lower standard. And because there's an AS results halfway through, it's easier for AOs to know where they're sitting for. Plus the structure is more uniform. The GCSE criteria didn't specify the number of units, just a minimum size, so you get different structures between AOs. AS and A2 structures tend to be constrained by the rules in the criteria so you end up with more uniform structures in a subject.

Are A levels as 'modular' as GCSEs?

AS levels, A levels and GCSEs are all modular. It is working at AS and A level, and has done since 2010. And it has worked for all other GCSE subjects, on the evidence we have so far.

Changes in the mix of students meant that GCSE English suite results were down overall by 1.5 percentage points. This was in line with expectations, because of changes to the mix of students. That suggests that comparable outcomes works to maintain standards when qualifications change, and when there is little else to anchor awarding.

The issue is that for some schools and colleges, their results are not what they expected and the differences were hard to understand. And those differences, the extent of variability if you like, tells us something about how these qualifications are working.

Variations happen between schools – that is normal. And we are used to seeing greater variations, between schools, most especially in those subjects that are not hard edged, not predominantly factually based. In the factually based subjects – Maths for example, learning and assessment is to some extent more clear cut. We are dealing here with a new suite of English qualifications. Of the three, English Literature is the most factually based. The concerns being expressed to us are about English and English Language.

The usual variation span for all subjects is about +/- . For English subjects on the other hand, we would expect +/- .

We need to do more work on this, but looking closely over recent days, we have found, looking at results patterns from when changes have been made to GCSEs in the past, variations between schools tend to be more pronounced than usual, and more pronounced still in those subjects, like English and English Language that are not hard edged.

We have found that the rate of variability for English and English Literature this year is (higher/slighter higher/broadly the same) as in other cases when new qualifications are introduced. CHECK/AMEND IF NECESSARY.

These qualifications are modular. Students can be assessed on individual units at various points over the two years. They can resit some or all units. They can take all units at the end of the two years. The route that individual students take through these and other qualifications is generally determined by individual schools.

How 'odd' is the variability'

Is it the case that variability is more prevalent in the arty subjects?

Comment [c16]: English is one of those subjects that is always on the list of problematic subjects for marking and EARs

We need more here on variability expectations – we really need much more to show whether or not the sort of variation we have seen is odd, and if so, just how odd.

Is this so for all exam boards?

Comment [c17]: yes

Comment [TL6]: Do you mean language?

We think that the key variability issue is not that results were different from one school to another, although we need to do more work there. The key issue is that individual students' results varied, depending in some cases on the route they took through the qualifications.

Students who took a modular route did better than those that waited until the end. One wouldn't expect them to do exactly the same. On our calculations, those taking the modular route were more successful. HOW MUCH?

Under the comparable outcomes approach, students are penalised at the end – if the units don't add up, exam boards have little choice but to apply unfair grade boundaries to the final units, to control grade inflation.

With modularised qualifications, awarding would be safer – in the technical sense – at the end of each qualification. But it would also be against the philosophy underpinning modularisation.

This permissive philosophy allows a student to build up their award, their qualification over two years. It allows students who perform poorly in one area to be compensated by excellent performance elsewhere.

GCSE and A levels have to meet design rules that allow for a sufficient chunk of the total assessment to be 'terminal assessment' – that is, it takes place at the end of the qualification, not along the way.

That's the case even if a GCSE student completes the whole qualification early – in January, say - as students can, under the rules.

In all GCSE subjects, the terminal rule provides that at least 40% of the assessment must take place at the end. So awarding takes place along the way, but with 40% at the end of the qualification.

The GCSE terminal rule, and the proportion of assessment (40%) were set by GCSEQCDA, another organisation that had the responsibility at that time. We have searched what we have of the QCDA archive but we cannot find a statement of the rationale for the rule, or how the proportion - 40% - was arrived at. We are interested in that, and to

What can we find out about the rationale for the terminal rule, and for 40%. How was 40% agreed and did schools teachers have any opinion? How different was this to what went before – and when did this terminal rule come about? I think the terminal rule is new for this specification. In the legacy specifications, although several papers and coursework contributed to the assessment, grading only applied to the total qualification – each component paper/coursework was not separately graded but please check this is right!

Comment [c18]: the terminal rule was applied (for the first time) in the new GCSEs last summer. Before that most specs were linear so it wasn't needed. The legacy science didn't have a terminal rule and most legacy modular specs, I believe, had a terminal unit that had to be taken at the end, rather than the current more flexible approach.

Comment [TL7]: Sorry to complicate it, but there appears to have been a move allowed in the English units, away from what you have described, to a candidate that had completed all their units in January being awarded the qualification grade on the unit grades applying at that time. They didn't receive their certification until June. This change appears to have crept in at some point over the last 2 years - Janet or Cath may be able to explain more.

what extent there was a sufficiently inclusive discussion.

We can see though that a clear reason for the terminal rule is to make sure that there is sufficient headroom in the total assessment; to make sure that assessment and grade boundary setting in terminal units are not subject to undue pressure.

In the case of this year's GCSE English and English Language qualifications, the suggestion is that final units were put under pressure, to bring the qualifications within tolerance. We have looked carefully at each exam board

Statistical modelling is a bad thing/stats should have no role in setting grade boundaries

You should have known that linear students would do better/worse, and that would be unfair.

We have been monitoring and reporting on the differences, so far as we can. In March this year we published a study comparing outcomes in [the old GCSEs – in subjects where there were both](#) linear and modular qualifications. We found that there were differences, that it was different subject by subject, and that in most of the subjects examined, the impact of the difference is small, typically around 0.2 of a grade.

The analysis showed noticeable differences between the subjects. So for example, in we found that English Literature showed a small tendency towards higher grades through linear assessment, while candidates taking English were more likely to achieve higher grades through modular assessments.

We can see then that if you value the modular approach, and the flexibility and the building up of the results for each student that comes with it – then you have to balance that against the technical difficulties that inevitably come with it, the fact that it plays out a little differently subject by subject.

You should have paid special attention to these new qualifications – the English suite.

We did. Across the 45 or so GCSE subjects we paid particular attention to those where we judged there to be most risk to standards.

Comment [c8]: I think the point here is that if you're asking examiners faced with a new spec to compare performance of candidates against work for a different set of assessment, the stats can help ensure a degree of continuity/comparability.

Comment [TL9]: I'm not sure why linear might be considered a harder route than modular? Is it because, in a modular structure, re-sits of individual units are permitted therefore the candidate can have a second 'go'?

Comment [c10]: There is a common perception that modular must be easier, and AQA certainly believe that candidates do better with modular, because of the re-sitting. Yet we know that there are good educational reasons for linear, and of course all GCSEs in England will be linear for 2014 assessment.

Was there anything else we were giving special attention to?

Was it just Science and the English suite?

Comment [c19]: Plus maths, and we were also keeping a close eye on the A-level results.

<p>We focused on GCSE Science, because there, exam boards had introduced new specifications designed purposefully to raise the standard. And that carries particular technical challenges, and risks. Our efforts were successful – the standard has been raised, and the fall in A* to C of xx% shows that.</p>	<p>Did we see any evidence at that point to assure ourselves of the awarding?</p>
<p>We focused on the English suite, because of the changes to the suite and to the entry profile of the cohort – the students sitting the qualifications.</p>	<p>What exactly did AQA say was it over marking – reference back to our initial report?</p>
<p>We met regularly with exam boards to discuss technical matters relating to the suite, and – exceptionally – we required them to report to us formally in relation to the January 2012 series of assessments, and to report any difficulties they experienced or foresaw.</p>	<p>Has our recent work evidenced this?</p>
<ul style="list-style-type: none"> • They told us that they had been cautious in making unit-level awards for GCSE English subjects and didn't foresee any problems for the first subject awards in the summer. • AQA reported that, as in summer 2011, they had concerns about the quality of controlled assessment marking by teachers, even though they had put more effort into giving schools detailed feedback and advice to improve the quality of their marking. • AQA also reported that they were seeing evidence that teachers' marking was being influenced by the grade boundaries set in previous series. 	<p>Should we have done anything about these things at the time.</p> <p>We need to show we know a bit more about what the predictor model is based on.</p>
<p>You knew they were having problems in June. But you persisted in following through your flawed notion of comparable outcomes, to the detriment of students. It was unfair, and wrong.</p>	<p>Cath to complete</p> <p>What were the problems with it?</p>
<p>Exam boards use a predictor model to predict what results should look like, subject by subject. They have done so for over a decade, and it generally works well. It uses Key Stage 2 data – a known, reliable predictor of whole cohort achievement, and xx?</p>	<p>How come exam boards didn't foresee these problems?</p>
<p>In this case, two established qualifications were replaced by three new qualifications. It was not possible for exam boards to see ahead of time how the cohort would split as between the new qualifications. They agreed (the two buckets).</p>	<p>Need to be clearer here.</p>
<p>In July, exam boards told us that the predictor they were using for English and English Language was proving</p>	<p>To what extent were</p>

Comment [TL11]: You might also want to say that schools were well prepared for this change, accepted the need to raise standards and have not complained at this summer's results.

Comment [c20]: I've asked Linda to review the reports the AQA submitted to us after the Feb awards.

Comment [c12]: That's all it uses.

problematic. It was over predicting English achievements to a very significant degree, and under predicting in English Language.

They also reported that they would be setting grade boundaries differently for Controlled Assessment – moving the grade boundary as it has come to be known in the press. We were not surprised, given what we had been told by AQA about their concerns about CA.

Two regulators' awarding meetings happen each year – one for A and AS levels and one for GCSEs. They are significant meetings, a key part of the process, a key check and balance to make sure that awards are comparable across exam boards and across subjects, and that standards are being maintained. They are attended by the exam board heads and by the three regulators – us, and the regulators in Wales and Northern Ireland.

The regulators' role is to challenge any results that look out of line – out of tolerance – either way, and we have powers, given to us by Parliament to direct exam boards to change their grade boundaries, to ensure standards. We are ready and willing to use those powers should we need to, to protect standards for A levels, AS levels and GCSEs.

At the regulator's GCSE awarding meeting, the regulators considered with exam boards their provisional results for all GCSEs for all exam boards.

AQA and OCR had comparable results for the English suite. We had no further discussions with them about their English suite results. The majority of concerns about this year's English suite are about the AQA results.

Edexcel's provisional results were out of line – out of tolerance. We asked them to consider their results. And there were particular issues with WJEC's English suite for us to work through with our Welsh regulator colleagues. There were particular difficulties there because of policy differences between England and Wales about how the subjects were to be combined in schools, because of differences in prior attainment, and prior attainment measures between the English and Welsh cohort and because WJEC's candidature was mostly from English schools, but they were the awarding body for most Welsh schools.

After an exchange of data and information between WJEC and the two regulators (Ofqual and the Welsh Government),

Edexcel out of line?

Did we write to Edexcel?

Comment [c21]: The issue first arose in Edexcel, but I think that's largely because their award was the earliest of all AOs, rather than because the problem was more acute in Edexcel.

How out of line?

What was the position on WJEC's English suite?

Comment [c22]: The tolerances vary according to the size of the entry and there is judgement involved - we wouldn't insist on changes for specs just out of tolerance, but neither would we expect AOs to be always generous to the extent of the tolerance.

Comment [c23]: The question I don't think anyone understood then (or now?) was how EDEC were showing as generous against predictions, based on KS2 England-only candidates, but that seemed to be producing much lower year-on-year outcomes in Wales.

Did we order the grade boundary change, and if so, by how much?

Comment [c24]: See correspondence in the SC file - we pushed them to consider moving, and we considered sending Edexcel a notice of intention to direct.

the two regulators wrote to WJEC ...

These were all proper actions on the part of the regulators. In the case of WJEC it was not the only change made: in 43 of their 46 awards, the provisional results were up on last year's results, and as their cohort base includes a good number of students in England this was out of line with results overall.

Accountability measures

We have what Jon Coles has recently described as a “seriously over-responsive schools system”.

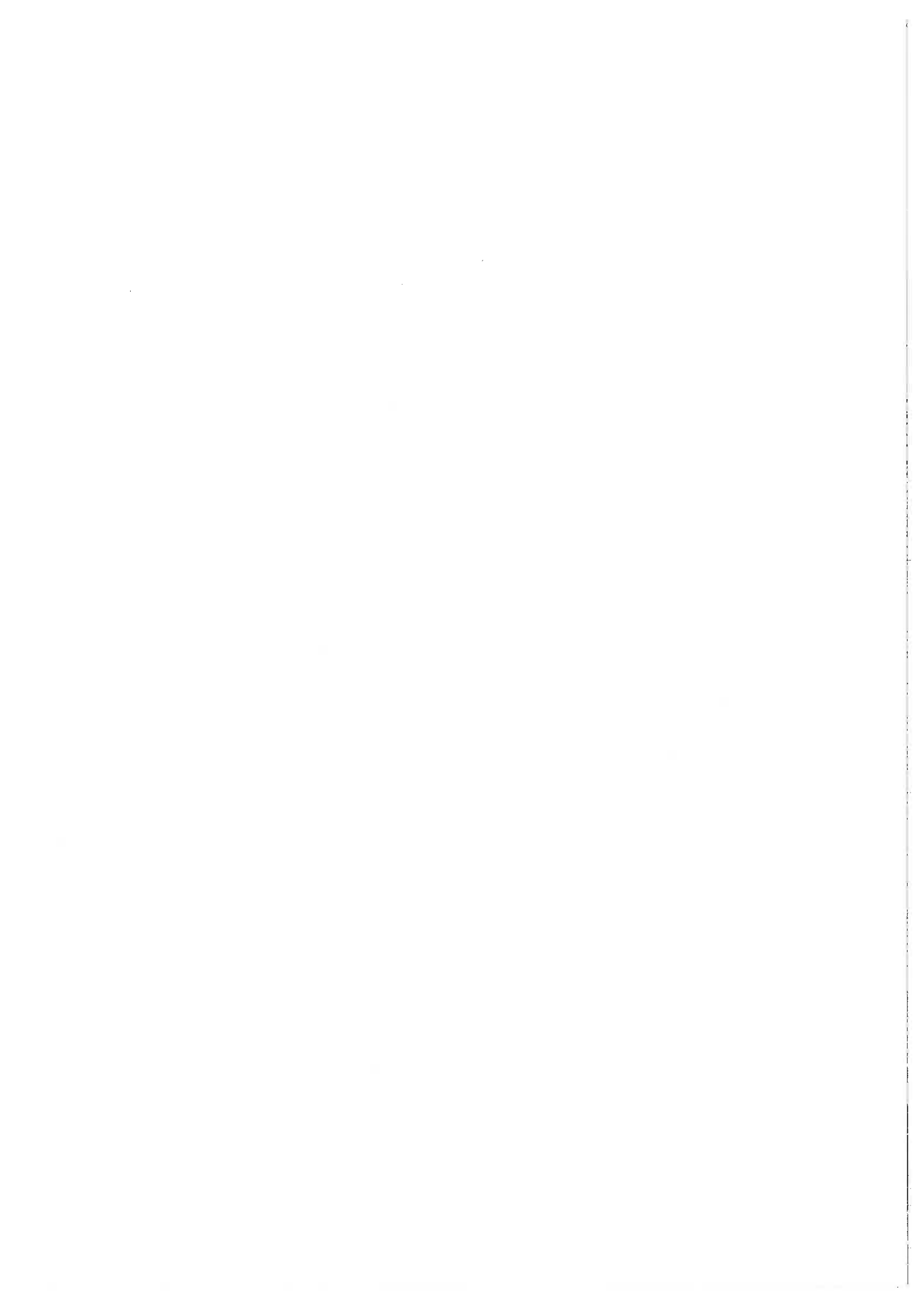
In an ASCL study, staff claimed they were being put under more pressure to manipulate test scores, re-write pupils' homework and help them complete coursework projects.

Figures showed that more than a third of teachers admitted using tactics that could undermine their “integrity”.

Many teachers said they were increasingly required to drop parts of the curriculum to concentrate on exam practice, stage after-school coaching sessions and offer rewards in an attempt to bribe pupils into getting better results.

The study – by the Association of Teachers and Lecturers – also found that more than a quarter of teachers had been required to attend seminars run by examination boards to get vital tips on passing GCSEs and A-levels. One told how examiners hosting one event “strongly hinted which topics would come up” in the test.

[There is also the IPPR Study, published last Friday, that registers the concern that schools divert the pupil premium funding from pupils who have the greatest need to those who can have the greatest impact on improving the school's accountability measures.](#)



Okaval

From: Glenys Stacey
Sent: 10 September 2012 08:23
To: - CRC; *Okaval*
Cc: *Okaval*
Subject: FW: Draft memo for SC.doc
Attachments: Draft memo for SC MJC.doc

Follow Up Flag: Follow up
Flag Status: Completed

There are some very helpful comments from Mike here.

We need to take stock on the fairness point - can we do so later this morning please - Diane to sort a time.

Glenys

Glenys Stacey
Chief Regulator, Ofqual

- Office: 0300 303 3344 • Mobile: ~~_____~~
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: *Third Party*
Sent: 10 September 2012 00:04
To: Glenys Stacey
Cc: Amanda Spielman; Amanda Spielman; Jeremy Benson
Subject: RE: Draft memo for SC.doc

Glenys,

I have made a number of detailed comments and suggestions on the attached version.

From all the material you have sent me, the main new thing which occurs to me (and which I have commented on at length on the attached) is the issue of the significant disparity (hardly "marginal" as the current draft says!) between linear and modular entries in terms of their differences between predictions and outcomes. This is a perennial problem which is endemic to modular schemes but may become problematic in this particular case from a fairness angle. I discuss it at length in my note 4 on the attached but, basically, allowing some candidates to have more goes at each assessment than others, inevitably leads to rough justice for those who choose not to. As I went through the draft, I saw several implicit references to this issue and perhaps you need to bring those into one coherent place/discussion? Alternatively you may feel this is not the document or moment in which to raise this complex and potentially divisive issue. Whether it can, or should, be avoided in the investigations you are still doing is more moot.

I hope this helps and good luck on Tuesday.

Regards,

3rd Party

From: Glenys Stacey [<mailto:Glenys.Stacey@ofqual.gov.uk>]

Sent: 09 September 2012 17:16

To: *3rd Party* Jeremy Benson

Cc: - CRC; Amanda Spielman; Amanda Spielman; Julie Swan

Subject: Draft memo for SC.doc

3rd Party Jeremy

Here is the draft so far. We have a way to go, we know.

3rd Party comments to me and to Jeremy and Amanda please by the end of the evening. Keep in mind that we are not trying to provide all the detail, all the answers - but to help the Select Committee to shape its thinking, and frame its questions.

Mike - I have one or two other things to send you, by way of background, that might help.

Best wishes

Glenys

Glenys Stacey
Chief Regulator, Ofqual

- Office: 0300 303 3344 • Mobile:
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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Draft memo for SC - GCSE English and English Language

Introduction and background

We recognise that a number of serious concerns have emerged from schools and colleges¹ about the overall-grades awarded in the new English and English Language GCSEs this summer. These fall into three main groups:

- that the 'comparable outcomes' approach applied to GCSEs this year has operated to give some young people Ds overall who should actually have received Cs
- that young people who sat all or most of their units in June 2012 have done worse than those who sat some units earlier
- that there are inexplicably large variations in results at school/college level.

Flowing out of all these is a suggestion that fairness to individuals has not been assured by the system, and that the remedy is to go back and increase some grades.

We take all of these concerns and suggestions very seriously. Unpredictable outcomes from a system which is intended to provide stable and reliable qualifications are clearly undesirable. Our job is not only to ensure that standards are maintained but also that public confidence in qualifications is maintained.

We have already established that for these GCSEs, the processes and controls at exam board level and at national level seem, based on the work we have done so far, to have worked as they are meant to and within normal tolerances, ~~based on the work we have done so far~~. We know that this is hard for some schools and colleges to accept, and that better explanations are still needed on all of the concerns noted above. We are therefore continuing our work to look more deeply into the operation and also the nature of these processes and controls in the context of these new specifications, and at the same time to extend and continue the analysis of the outcomes until the concerns can be more satisfactorily explained. We hope to issue a final report in four to six weeks addressing all of these questions.

The purpose of this note is to supplement our report of last week with some additional context on progress in investigating each of these issues.

1. Comparable outcomes

The meaning of 'comparable outcomes' is best understood from the perspective of the young person sitting the exam. The basic principle is that other things being equal, that young person should have the same chance of achieving a given grade, no matter which exam board their school uses and no matter which year they take the exam.

The statistical methodology relates GCSE grade outcomes to Key Stage 2 point scores, for the majority of GCSE entrants who have a Key Stage 2 score in the system. So the predictions are adjusted if the mix of candidates changes. This year

¹ We have had many meetings and discussions including with ASCL, NAHT, AoC, senior English advisers

there were several changes in the entry cohort that affected the mix, as we noted in our report last week. Furthermore this check applies at national level, not at school level, so does not limit any one school's performance.

'Comparable outcomes' are used by exam boards as a check at qualification level. Examiners see a comparison between the grade outcomes predicted by candidates' Key Stage 2 test results and the proposed actual outcomes. At AQA for example, about 0.3% more of this year's matched candidates reached Grade C or better in English/English Language combined than predicted. There are tolerance limits agreed between exam boards and Ofqual which allow for some divergence [how much], and beyond this exam boards can justify grade improvement by reference to underlying educational improvement or deterioration.

Comment [MJC1]: Yes, be specific

This approach has been used for some years to improve comparability between exam boards, and also within exam boards to contextualise their judgements. [Can we mention it being a Tomlinson recommendation from Curriculum 2000 enquiry] – I don't have the report to check, all I can find is this <http://www.guardian.co.uk/education/2002/dec/03/alevels2002.schools>

Comment [MJC2]: I very much doubt if Tomlinson was an enthusiast for examiner judgement and the regulator at the time actually strengthened the relative power of the examiners vis-a-vis the accountable officers thereafter. Much of the legs of the 2002 A-level issue were because the AO in use AB was fairly cavalier about changing examiners' boundaries, especially, the coursework boundaries. Those changes, analogous to the CA boundary changes this year, were hard to defend and opened the flood gates for complaint. The current approach is simply a more sophisticated version of the raw outcome comparisons which were a feature of GCSE and GCE awarding from the very beginning – certainly since the mid 1950s. It is worth remembering that, even without modern outcomes analysis involving KS2, the procedures used in the old days would also have indicated that boundaries should move up in Summer 2012. There was a period in the 70s and 80s when outcome comparisons were not allowed to sway boundary setting which saw several celebrated disasters to show that is not a good idea. Most recently, the GCSE Science standards rose in 2008 was the result of allowing examiner judgement to predominate in some boards, and you are still rowing back from that!

The change that has coincided with the introduction of this qualification is the strengthening of the requirement for exam boards to justify increases beyond tolerance to the regulator. This change was made in November 2010, before any units were graded in these new GCSEs and well ahead of the first final awards in 2012. This approach has also been applied in both this year's and last year's A level awarding and, in the A-level context, has been the subject of a positive independent evaluation (NFER, 2011?).

Questions have been asked about the appropriateness of the application of comparable outcomes in the first awards of a completely new GCSE. This is actually the point at which it is most important to have something to anchor examiner judgement. Their job is to carry forward over time the collective understanding of the level of educational achievement that deserves an A, C or G grade, and to interpret that in the context of changing assessments and other contextual factors.

Furthermore we know that in any education system, national outcomes change only slowly, even though variations may be quite significant at school level. In the context of English/English Language GCSE, we know that schools, teachers and the National Curriculum are all much as they were in preceding years. If there had been dramatically different outcomes in this year's GCSEs as compared with last year's, they would almost certainly have been attributable to the changes in the form of assessment rather than to any underlying improvement in young people's knowledge of and ability to use English. We think it is right to have a strong framework for the operation of examiner judgement in the first years of a new qualification to help carry forward the standards.

Comment [MJC3]: 10/10 – absolute gold star for this paragraph!

In aggregate, therefore, we do not concur with the view that the overall results do not reflect candidate performance.

2. Effect of timing of unit entries [Cath]

[January/June set-up needed]

(a) Estimation of numbers affected

There are many reasons why some students may not get the result they had expected, including performance on the day of the exam. It is therefore difficult for us to quantify the number of students that may have been affected in summer 2012 by the generous awards in January 2012. [Our initial estimates based on data from the exam boards suggests that up to 14,000 students who might have expected to achieve a C may instead have got a D, and that up to 12,000 students who might have been expected to achieve a D instead got a C, largely as a result of the combined effect of generous January awards and the effects of re-sitting. This represents approximately 2% of the cohort.] [should we use]

(b) Difficulties with revisiting unit-level grading

In a modular syllabus there are many different ways to achieve the same qualification – taking one or more units along the way, with or without re-sitting, or taking them all at the end. As a result, the students taking each unit can be a mix of school years and the ability profile of the entry can vary from one exam series to the next. We know this makes it more difficult for examiners to judge where the standard should be in terms of the quality of work, particularly in a subject like English where maturity is a factor.

The modular nature of these syllabuses also means that the impact of grade boundary decisions in one series is seen over a number of series. For example, year 10 students who entered units in January 2012 will not be cashing in their qualification until summer 2013. So the effect of a generous award in January 2012 can still have an effect in summer 2013. And we know that in at least one large unit sat this summer, nearly a quarter of the entry were year 10 students not cashing in the qualification.

[In the first unit awards in 2011 the entries were relatively small. In January 2011 the number of unit entries was only 43,000 – less than 2% of the number of unit entries in June 2012 (2.74 million).] [relevance?]

3. Abnormal variations at centre level [raw - to be edited]

Some schools are disappointed with their English and English Language awards this year while others are very content. Understandably, we have less feedback from the latter than we have had from the former.

AQA has the largest share of the market for English GCSEs

. For the centres that it used its English qualifications this year, AQA has analysed the difference in A* - C grades between 2010 - 2011 and 2011 - 2012. Its findings are represented in the charts below.

[The following charts show the differences ~~in~~ between the percentage of candidates achieving A*-C grades for centres over the two year periods (2011 vs. 2010 and 2012 vs. 2011) for centres with more than 100 candidates]

Comment [MJC4]: The disparity between the modular and linear routes' candidates in the differences between outcomes and predictions which is shown in the data you sent me is a serious problem. The awarding has averaged these out – a practice which I have followed in the past, so I am not being critical of the AEB or Ofqual. (Indeed, there is no credible alternative, given that the present failure is nothing compared with what would happen if you used different boundaries for modular and linear candidates taking precisely the same assessments at the same time! And, of course, the linear vs modular comparison is only one of the many you could make, eg modular and lots of re-sitting vs modular without much re-sitting. The problem is endemic in any assessment in which some candidates are allowed more goes than others – it's a downside of modular exams generally.) (However, to the extent that re-sitting gives candidates an opportunity to improve their results, this averaging out is unfair to linear candidates. If you believe that re-sitting modules gives some candidates improperly inflated results, then you are certainly penalising the linear candidates unfairly by making the composite outcomes look right. An alternative option would be to fine this bullet, set boundaries which don't penalise the linear candidates, and let the modular candidates get the "unfair" advantage their choice of route gives them. I can imagine you would want to think very long and hard before doing this, which would be a very leave major climb-down but maybe truly is the result of "further analysis"? Of course, this unfairness is endemic in the awarding of all modular specs, so once this door is opened it would logically (though perhaps not in practice) lead to demands for other subjects to be re-graded. You would ... [11]

Comment [MJC5]: It also makes comparable outcomes analysis at the module level tricky because the point in comment MJC4 also applies within each module – not just at the qualification level

Comment [MJC6]: In English or another subject?

Comment [MJC7]: This is relevant if the point being made is that it was NOT the case that the summer was made excessively severe to compensate for leniency in January – a mere 2% leniently graded wouldn't have much effect on the overall summer outcomes. It is NOT relevant as an excuse for awarding January leniently – 43,000 data points and scripts really are plenty.

Comment [JB]: Might need to acknowledge this is AQA's data and analysis and reproduced with its permission?

Comment [AMV59]: May be better to summarise than use charts: still a bell curve with about as many schools up or down, but fatter at both ends of the tail; more centres with much better results and conversely more with much worse results

maintaining standards year to year is based on an overriding concern at times of change in the system to be fair to students from one year to the next.

Fairness is also difficult because however much we might wish it otherwise, assessment has an element of subjectivity, and in English, ~~where there is little specific subject content to test~~; this element of subjectivity is greater than in ~~most some~~ other subjects.

Comment [MJC15]: I really don't think this is true and it will be a red rag to some bulls!

Lastly, perceptions of fairness are affected by expectations ~~which – and these~~ appear to have been higher than usual this year [insert data about E/EL predictions this year when received – CJ]

Comment [MJC16]: This para is really about marking reliability anyway – is it relevant?

~~comment~~

The fairness questions ~~being~~ raised this year are about within-year fairness, between those who took ~~most~~ units early and those who did not. We are considering whether the modular English/English Language GCSEs have operated fairly this year as between young people who were put on different pathways through the system.

Comment [MJC17]: You COULD put something here about the intrinsic difficulty of awarding modular schemes fairly which I discuss in Comment MJC4, although it is problematic to do so, perhaps. It is, however, clearly part of the problem this year in English.

We recognise that if some students were generously graded for earlier modules, they have had some advantage. But this is not ~~necessarily~~ 'unfair', ~~at least~~ to the ~~great~~ majority who have been awarded the right grade against a properly set standard in June: they still have the grade they deserve.

In relation to the written controlled assessments, about which many complaints have been made, ~~we have established that the proportion of entrants who could have been advantaged by early entry is very small, because (apart from one small Edexcel controlled assessment) the vast majority of controlled assessments were submitted in June, at the end of the course. However,~~ we are considering whether the changes to grade boundaries ~~between January and June,~~ while legitimate, acted to create unfairness, because ~~they the January grade boundaries~~ could have led some schools to rely on preparing candidates to collect insufficient marks on ~~a the~~ controlled assessment ~~mark scheme. However we have established that the proportion of entrants who could have been advantaged by early entry is very small, because (apart from one small Edexcel controlled assessment) the vast majority of controlled assessments were submitted in June, at the end of the course.~~

The position is ~~less clear out~~ ~~different~~ in relation to the written paper, where the grade boundary moved significantly between January and June. ~~In itself, such a move is unexceptionable,~~ because one of the functions of grade boundary setting is to adjust for ~~changes in~~ the level of demand of ~~the a~~ particular paper ~~from occasion to occasion.~~ If the June paper was easier, the boundaries ~~iesy~~ should have risen, ~~and vice-versa.~~

But at the end of the day, different pathways have different pros and cons; and a school's choices may also work better for some of its students than others. Linear entry allows for more teaching time and less disruption from assessment through the year. On the other hand progression through a series of modules gives students opportunities to resit and improve their marks. Experience in other exams [which] shows that candidates taking modular exams usually do slightly better than candidates taking linear exams and this pattern has been repeated this year. At AQA, about 40% of this year's candidates taking a modular route benefitted from multiple attempts at the written paper. But 'modular' candidates appear to have done only ~~marginally~~ better than linear candidates overall, when results for matched candidates are compared with predictions.

Comment [MJC18]: Hardly marginal – for AQA Eng Lang, the linear candidates' outcomes were down by about 5% and the modular candidates' up by 3%, compared to predictions, making an 8% difference in all. This paragraph is close to the issue I raise in Comment MJC4 again. Perhaps this whole issue needs discussing in one place?

Conclusions and next steps

At this stage some important points emerge:

- The possible consequences of the extensive changes to English GCSE do not appear to have **been** fully considered at the time that the new set of English qualifications was designed at QCA
- Modularisation has increased the difficulty for exam boards of maintaining comparability across all specifications and pathways through English GCSE: this is problematic given the particularly high significance placed on Grade C in English (and mathematics) in accountability **systems**.
- Accountability pressures encourage schools to focus on tactical decision-making about their choices from among the proliferating routes through GCSE English/English Language as well as on teaching and exam preparation.
- The ability to defer some of these decisions (ie choice of GCSE (English or English Language) as well as timing of unit entries and resits) until late in the course has intensified tactical concerns, as schools gather intelligence about the apparent attractiveness of available pathways. This intelligence includes news from other schools about their successes and disappointments in individual units, as well as previous unit grade boundaries published by exam boards and also affects school expectations of **outcomes**.
- The increase in the teacher-marked controlled assessment (previously coursework) component of the qualification from 40% to 60% of the qualification may have contributed to very high school expectations of outcomes on the new English/English Language GCSEs. Many schools are disappointed, not because their results are down, but because they were not up more.
- There is some confusion in schools between marking and grading, especially in the context of controlled assessment. Some schools appear to have believed that controlled assessments were graded to pre-set pass marks.

Comment [MJC19]: But not peculiar to English.

Comment [MJC20]: If you wanted to go on the offensive here (maybe not too wise?) you could talk about schools which focus instrumentally upon getting lots of Cs, rather than getting every candidate the best grade they are capable of. Or maybe this is better as an oral remark – it would be likely to register with the Select Committee as it is one of their concerns.

In the light of the difficulties that the introduction of modularisation has presented, we have already agreed with exam boards that an early unit retake will provide an opportunity for many young people to improve their grade.

We also know that the system must work properly for this year's candidates, who may already have taken units and who will have more to take in January or June. We are planning now to minimise the risks to these young people's grade **outcomes**.

Comment [MJC21]: Be ready to say how.

Finally, we welcome the opportunity to answer Select Committee questions this coming **Tuesday**.

Comment [MJC22]: That's as well because it seems to be your fate !!

The disparity between the modular and linear routes' candidates in the differences between outcomes and predictions which is shown in the data you sent me is a serious problem. The awarding has averaged these out – a practice which I have followed in the past, so I am not being critical of the ABs or Ofqual. (Indeed, there is no credible alternative, given that the present furore is nothing compared with what would happen if you used different boundaries for modular and linear candidates taking precisely the same assessments at the same time! And, of course, the linear vs modular comparison is only one of the many you could make: eg modular and lots of re-sitting vs modular without much re-sitting. The problem is endemic in any assessment in which some candidates are allowed more goes than others – it's a downside of modular exams generally.)

However, to the extent that re-sitting gives candidates an opportunity to improve their results, this averaging out is unfair to linear candidates. If you believe that re-sitting modules gives some candidates improperly inflated results, then you are certainly penalising the linear candidates unfairly by making the composite outcomes look right. An alternative option would be to bite this bullet, set boundaries which don't penalise the linear candidates, and let the modular candidates get the "unfair" advantage their choice of route gives them. I can imagine you would want to think very long and hard before doing this, which would be a very brave major climb-down but maybe truly is the result of "further analysis"? Of course, this unfairness is endemic in the awarding of all modular specs, so once this door is opened it would logically (though perhaps not in practice) lead to demands for other subjects to be re-graded. You would also, of course, get significant grade inflation in English this year.

Do we know whether the main complaints this summer are from centres making "Linear" entries?

I am not recommending changing the current position, just warning that as you share data more widely there is a risk that this issue will become visible and you probably need to know your response.

From: Cath Jadhav
Sent: 10 September 2012 14:57
To: Tim Leslie; Glenys Stacey; - CRC; *Okaval x 2* nanda Spielman;
Amanda Spielman; Julie Swan; *Okaval x 2*
Subject: RE: Select committee
Attachments: Questions on Saturday with CJ amends.docx

Follow Up Flag: Follow up
Flag Status: Completed

I've finally managed to answer the questions in the attached, in red.

Cath

Cath Jadhav
Head of Standards, Ofqual

- Direct: _____ • Office: 0300 303 3344 • Mobile: _____
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Tim Leslie
Sent: 08 September 2012 17:43
To: Glenys Stacey; - CRC; *Okaval x 2* Amanda Spielman; Amanda Spielman; Julie Swan;
Okaval x 2
Subject: RE: Select committee

Partly answered. Please see attached. There is more information required. Would be very grateful to Cath (and Fiona and Chris) if highlighted gaps could be addressed.

Thanks

Tim

Tim Leslie
Director of Risk and Markets, Ofqual

- Direct: _____ • Office: 0300 303 3344 • Mobile: _____
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Glenys Stacey

Sent: 08 September 2012 09:31

To: - CRC; *Ofqual x2*

ida Spielman; Amanda Spielman; Julie Swan; *Ofqual*

Subject: Select committee

Importance: High

Thank you very much everybody for all the hard work of the last fortnight, and for getting us to the point we are at. I appreciate we have more work to do over the coming days and weeks in relation to GCSE English, but I am thinking today about the Select Committee next week, on Tuesday.

Thank you Adrian for leading on our SC prep and especially thank you to Emyr, June and others for the work done on our Select Committee pack. We are off to a head start - thanks.

Reading the notes of our meetings this week with representative groups, I can see the concerns that they have. **It would be useful to have those concerns listed succinctly, and also showing which representative group(s) raise them - so that we can see them on one page, and gauge them better.** Can that be done this morning?

Stepping back, we at Ofqual need I think to be able to answer the following questions on Tuesday:

- What sort of 'between centre' variations have we seen in English and English Literature, in fact?
- Are they normal - to be expected? So, what sort of swings do we usually see when new qualifications come in?
- Why are there no representations about English Literature?
- Did Edexcel, OCR and WJEC get GCSE English right?
- Why are the representations centred on AQA?
- Did we play our role properly?
- Should we have recognised particular risks with the GCSE English suite, and did we, and what did we do about that?
- How far have we got with our current review of controlled assessment, and what are we finding?
- Is the awarding process, and our oversight of it, fit for purpose?
- When did these new English quals come in - on our watch?
- When did modularisation come in for GCSEs - on our watch? And how/who decided it?
- When did controlled assessment come in - on our watch? Who decide it - and why 60% for English?

I am pinching some of Tim's time to talk through these questions shortly, to see what needs tube done - comments welcome.

Glenys

Glenys Stacey
Chief Regulator, Ofqual

- Office: 0300 303 3344 • Mobile:
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

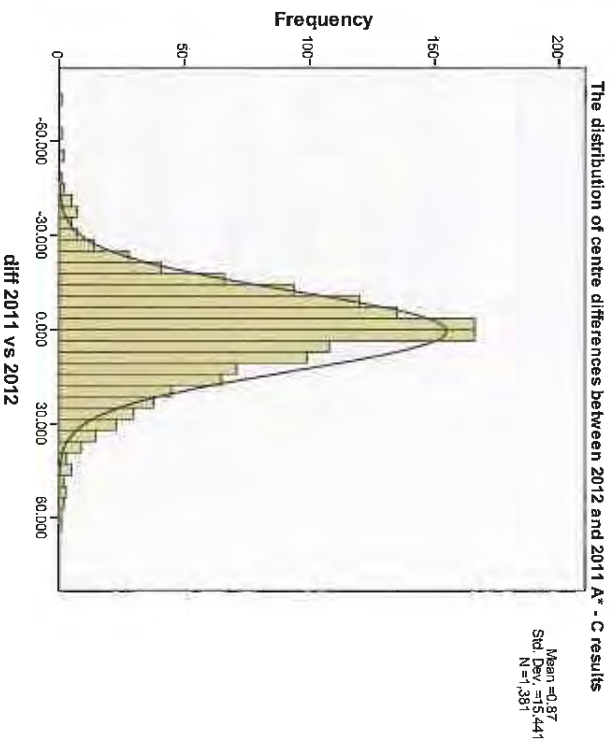
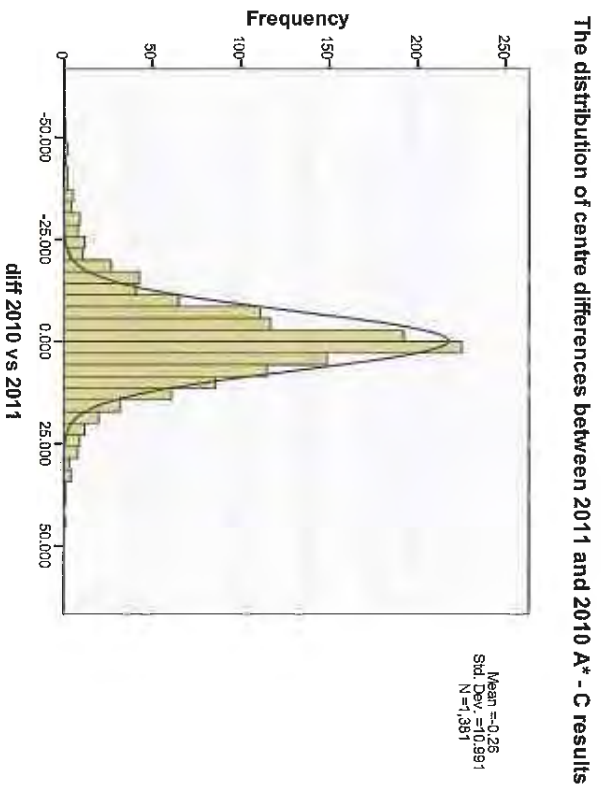
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<p>1. What sort of 'between centre' variations have we seen in English and English Language, in fact?</p>	<ul style="list-style-type: none"> - New specifications this year so not able to compare differences between English and English Language across 2011 and 2012 at centre level, only aggregate for English and English Language combined - Centre-level analysis for AQA 2010/2011 and 2011/2012 is available, comparing change in percentage of candidates gaining at least a C. This confirms there are broadly similar number of centres with increasing and decreasing percentages each year but centres have experienced increased size of change this year (both up and down) (Details below) - AQA has been unable to provide an analysis of actual results versus KS2 predictions, split between foundation tier and higher tier. It has provided comparisons between English and English Language but AQA are at pains to stress that predictions for subsets of the matched candidates are not reliable. Their analysis suggests that, at grade C: <ul style="list-style-type: none"> o English Language: 1179 (0.59%) more of matched candidates achieved the grade against predicted o English: 1025 (1.78%) more of matched candidates achieved the grade against predicted - However, when broken down between linear and modular entries, the position we see fewer candidates than predicted getting a C if they have taken the linear route, but more than predicted amongst those taking a modular route. (Details below)
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The variability in results between 2010/2011 and 2011/2012

The following charts show the differences in percentage A*-C grades for centres over a two year period (2011 vs. 2010 and 2012 vs. 2011) for centres with more than 100 candidates:



Statistics

	diff2010vs2011 1 diff 2011 vs 2011	diff2011vs2012 2 diff 2011 vs 2012
N	Valid 1381	1381
	Missing 0	0
Mean	-.25683	.87437
Median	.00000	-.14225
Std. Deviation	10.991213	15.440597
Skewness	-.536	.204
Std. Error of Skewness	.066	.066
Range	97.408	134.186
Percentiles	-13.69971	-16.68871
	-7.34496	-10.61490
	-3.98211	-6.73703
	-1.32984	-3.12547
	.00000	-.14225
	2.04501	2.43424
	4.65128	7.02537
	7.27770	12.45089
	12.06677	20.72023

From the tables above we can see that the distribution of all samples results is very similar to that of the centres with more than 100 candidates in 2012. If we look at the median results we see that there was no difference overall in centre results between 2011 and 2010. However between 2012 and 2011 there was a slight decline.

In examining the percentiles, we can see large difference in results between 2012 and 2011 compared to 2011 and 2010. In the lower percentiles the difference in results are greater between 2012 and 2011. However in the higher percentiles we see the opposite with higher results for A* - C in 2012 compared to 2011.

Comparison of 2011 and 2012 results based on the number of centres and the A*-C percentage grade

The following tables look at the 30%, 40% and 50% grade boundaries and compare results for centres in 2012 with 2011 for centres with more than 100 candidates.

atoc2011_grp * atoc2012_grp Crosstabulation

atoc2011_grp		atoc2012_grp				Total
		1.00 <30%	2.00 31-40%	3.00 41-50%	4.00 51%+	
1.00 <30%	Count	7	7	13	31	58
	% within atoc2011_grp	12.1%	12.1%	22.4%	53.4%	100.0%
2.00 31-40%	Count	17	10	14	49	90
	% within atoc2011_grp	13.7%	11.3%	9.8%	2.7%	4.2%
3.00 41-50%	Count	14	21	35	112	182
	% within atoc2011_grp	7.7%	11.5%	19.2%	61.5%	100.0%
4.00 51%+	Count	13	24	71	943	1051
	% within atoc2011_grp	1.2%	2.3%	6.8%	89.7%	100.0%
Total	Count	51	62	133	1135	1381
	% within atoc2012_grp	3.7%	4.5%	9.6%	82.2%	100.0%

From the tables above we can see that for the centres who were below the 40% threshold in 2011 (n=185), 64% (n=118) gained results greater than the 40% boundary.

If we look at those centres who in 2011 had results greater than 40% in 2011 (n=1421) we can see that 5% in 2012 had results less than 40% (n=72).

AQA analysis (Michelle Meadows, 7 Sept 2012): Differences between prediction and outcome by route of entry

The 'entry' includes all ages and all centre types; the 'matched entry' includes 16 year olds only and excludes selective and independent centres.

Title	Entry	Matched	Match Rate	Change in number of matched candidates getting a C
ENGLISH LANGUAGE (LINEAR) (F + H)	122043	68824	56.39	3145 fewer (-4.57%)
ENGLISH LANGUAGE (MODULAR) (F + H)	171897	131034	76.23	4324 more (3.30%)
ENGLISH LANGUAGE (LIN+MOD) (F+H)	293940	199858	67.99	1179 more (0.59%)

Title	Entry	Matched	Match Rate	Change in number of matched candidates getting a C
ENGLISH (LINEAR) (F + H)	44754	18867	42.16	1274 fewer (-6.75%)
ENGLISH (MODULAR) (F + H)	52630	38738	73.60	2301 more (5.94%)
ENGLISH (LIN+MOD) (F+H)	97384	57605	59.15	1025 more (1.78%)

<p>2. Are they normal - to be expected? So, what sort of swings do we usually see when new qualifications come in?</p>	<p>Analysis of AQA results (2010/2011 cf. 2011/2012) – see above – does confirm a higher level of volatility this year.</p> <p>Comparison with other GCSEs that were new last year (geography, history, RS) suggest that the variation this year in English is unusual... BUT we also know that the changes in English were more significant than in geography/history, etc, there was less availability (and use) of early modules and the pressure from accountability measures was far less.</p> <p>We don't have any analysis that can explain to what extent the increased volatility may be caused by the new specification being introduced rather than by the other factors present in the GCSE English awarding this year (e.g. linear vs. modular; foundation vs. higher tier; higher percentage of controlled assessment)</p>										
<p>3. Why are there no representations about English Literature?</p>	<ol style="list-style-type: none"> 1. Less change in literature compared to previous specs. 2. May be less difficult to mark (more factual content than in English Language) 3. Less controlled assessment 25% compared with 60% for English / English Language 4. Feedback from schools is that they are satisfied with the Literature awarding, being in line with their predictions. For the same students, their predictions for Language were significantly higher than the awards – used as further evidence the Language awards are harsh. 5. English literature doesn't count in the accountability measures in the same way, so not the same pressures on schools to achieve a C 										
<p>4. Did Edexcel, OCR and WJEC get GCSE English right?</p>	<p>There have been complaints about all of them but AQA dominates. In part, this reflects market share in 2012 (2011 in brackets):</p> <table border="0"> <tr> <td>- AQA</td> <td>57.7 (64.2)</td> </tr> <tr> <td>- WJEC</td> <td>23.1 (22.7)</td> </tr> <tr> <td>- Edexcel</td> <td>10.1 (4.7)</td> </tr> <tr> <td>- OCR</td> <td>6.9 (5.3)</td> </tr> <tr> <td>- CCEA</td> <td>2.2 (3.0) – all candidates were in NI</td> </tr> </table> <p>Also, exam boards offered different entry options for the four series – Jan and June 2011, Jan and June</p>	- AQA	57.7 (64.2)	- WJEC	23.1 (22.7)	- Edexcel	10.1 (4.7)	- OCR	6.9 (5.3)	- CCEA	2.2 (3.0) – all candidates were in NI
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- OCR	6.9 (5.3)										
- CCEA	2.2 (3.0) – all candidates were in NI										

	<p>2012:</p> <ul style="list-style-type: none"> - AQA: all units available in all four series except Speaking and Listening not available in Jan 2011 - WJEC: written papers available from June 2011 but CA units only available in June 2012 - Edexcel: one CA unit available from Jan 2011, other units introduced from June 2011 - OCR: all units available in all series <p>The C Grade boundaries for WJEC's Foundation Tier written papers were LOWERED in June 2012. (Higher tier Grade C boundaries were increased.) This, together with CA units not be available before June 2012, may explain why WJEC appears to be less of a target for criticism.</p>
<p>5. Why are the representations centred on AQA?</p>	<p>See above</p>
<p>6. Did we play our role properly?</p>	<p>No evidence to suggest we didn't.</p> <p>We've been at many of the AO meetings – standardisation and awarding since Jan 2011. Headline issues/findings:</p> <ul style="list-style-type: none"> • we haven't seen anything in any meetings that meant we needed to take further action • there was much discussion in awards about the difficulty of setting standards on early units • several mentions of schools over-marking or simply misunderstanding the requirements. <p>(summary circulated 10/9)</p>
<p>7. Should we have we recognised particular risks with the GCSE English suite, and did we, and what did we do about that?</p>	<ul style="list-style-type: none"> - English Language is known to be one of the more difficult subjects to mark and award – requires significantly more judgement to be applied by examiners than in other subjects. But it's worked in the past; exam boards are experienced in marking and awarding the subject, so this should not have been any different for the new specs - We knew it was more difficult to control awarding in modular structures (e.g. Isabel Nisbet's lecture at Cambridge in 2009) - When did we become aware that applying comparable outcomes across the two English and English Language specifications would be a problem (because there weren't equivalent matched candidate groups)? Not until July when AOs alerted us to problems with the single prediction (see separate

	<p>timeline of what we knew and what action we agreed)</p> <ul style="list-style-type: none"> - Controlled Assessment: was used in the other new-spec GCSEs awarded last year and did not appear to cause a problem. CA in English Language appears to have been more problematic – and it's 60% of total marks (cf Eng Lit is only 25%) - The specification allows schools to consider various routes through – did we consider the risks: <ul style="list-style-type: none"> o Single English vs. Language and Literature o Foundation tier vs. higher tier o Modular vs. linear o Use of re-sits (one re-sit per unit allowed) o Complex rules such as 40% terminal requirement o We started the scrutiny of English and maths as high stakes new qualifications (so we did have some understanding of the possible risks). With hindsight, I don't think we considered the interaction of the bullets above and the pressure on schools from the accountability measures
<p>8. How far have we got with our current review of controlled assessment, and what are we finding?</p>	<p>Not a clear picture at this stage.</p> <p>Summary report says:</p> <p>Problems with CA may be temporary and transitional and may not call for radical change at this stage. The current CA regulations and requirements might need a more consistent and common approach and application across the awarding bodies but they are a legitimate attempt to provide reliable, valid and fit-for-purpose assessment across the breadth and depth of GCSE English.</p> <p>General consensus that speaking and listening should be assessed by CA. On other skills, there are different views about whether CA offers valid assessment of the skills. Some tension between consistency of approach (by centres and AOs) and valid assessment ie too many rules can be constraining and can reduce the validity of the assessment.</p>
<p>9. Is the awarding process, and our oversight of it, fit for purpose?</p>	<p>AOs are responsible for the awarding process. We set out some detailed requirements in the Code of Practice but the responsibility is theirs. We have scaled back our oversight of the process (tick box monitoring against the Code) and increased our oversight of the outcomes of the awards (the data exchange process) – we believe that's a better use of our resources.</p>

	<p>At the end of each series, we review how it's worked, and we have made improvements over the last few years. But I'm sure there's still room for improvement. If pressed, we could commission an independent review of the data exchange process.</p>
<p>10. When did these new English quals come in - on our watch?</p>	<p>Work on qualification criteria will have been completed in 2008, well before Ofqual. These new qualifications were accredited in 2009 for 2010 teaching. Interim Ofqual carried out the accreditation but the development work/feedback to AOs was carried out by QC(D)A. Fiona noted last week that we had no mechanism to refuse to accredit these specifications at the time. Our current accreditation process is far more robust.</p>
<p>11. When did modularisation come in for GCSEs - on our watch? And how/who decided it?</p>	<p>Prior to 2009, GCSE mathematics and sciences qualifications had been modular in format and assessment for some time. This was written into the Subject Criteria – because the Qualification Criteria at the time didn't permit modular assessment.</p> <p>Criteria for qualifications taught from September 2009 (produced by QCA) enabled modular qualifications to be developed in the majority of subjects with limits to the maximum number of modules (4), the size of modules (at least 20%), limits to the number of resits (1) and the terminal assessment rule (40% assessment at the end of the course). These criteria were extended to English, English language, English literature, mathematics and ICT qualifications for teaching from September 2010.</p> <p>[NOTE: The same limits on modules, resits and terminal assessment requirements were introduced for GCSE sciences qualifications when we required them to be revised for first teaching in September 2011.]</p>
<p>12. When did controlled assessment come in - on our watch? Who decide it - and why 60% for English?</p>	<p>Before the other new GCSEs, decision taken in QCA that CA should be 0%, 25% or 60%, to avoid undue variation between subjects. Subjects panels lead by QCA subject experts came to agreement on a subject by subject basis which was then agreed within QCA. Subjects with 60% CA are generally the practical subjects (English revision was a year behind others – was the 0/25/60 decision considered in the context of English?)</p> <p>English had previously had 40% cwk and included 20% speaking and listening. Therefore the view of subject experts likely to be that 25% CA would not be enough.</p> <p>CA was first used in schools for the English suite for the cohort that has just finished – i.e. from September</p>

2010. Used in the other 'new-spec' GCSE's from Sept 2009.

The report of the Ipsos MORI survey we commissioned (published in October 2011) concluded that there were manageability issues around CA, particularly managing the logistics of multiple subjects across a centre. We also found that far more English teachers were positive about CA (63%) than overall (37%).

Extract from the executive summary to that report.

English teachers were particularly positive about the fact that CA ensures that students carry out their own assessment work: 63% of English and English language teachers spontaneously mentioned this benefit, as compared with 37% of teachers on average. English and English Language teachers were more likely than the average across all teachers surveyed to cite absent pupils as an issue in the implementation of assessments. English teachers were more positive about the AO guidance than teachers of other disciplines, which is perhaps linked to their more positive impressions of CA.

There were some differences between the English specifications: English Literature teachers were more likely than other English teachers to feel that levels of control are too high for giving candidate feedback. English and English Language teachers were more likely than other teachers (including English Literature teachers) to say that levels of control are too low around the notes and resources that candidates can take into assessments.

Additional questions:

<p>a) How was the comparable outcomes approach applied in the earlier series (Jan and June 2011, Jan 2012)? What are the differences in the awarding process in modular specs between the early series and the final award?</p>	<p>Cath to complete</p>
<p>b) What is the significance of AQA's grade boundary changes between January and June 2012?</p>	<p>Grade boundaries for each of AQA's units for January and June 2012 are shown in the table below.</p> <p>Unit 1 – foundation tier: the January C boundary of 43 was significantly closer to the D boundary in June (41) than to the C boundary (43). The increase in the C boundary is equivalent to approximately 0.8 of the D grade range. Whether or not this is justified, it is a large movement. Cath – any examples in other written papers where the grade boundary has moved to this extent? How extreme is it?</p> <p>Unit 1 – higher tier: similar picture – the January C boundary of 41 was closer to June's D boundary of 39 than to June's C boundary of 44. The increase in the C boundary is equivalent to approximately 0.75 of the D grade range.</p> <p>Unit 2 (speaking and listening) – the C grade boundary increased by about ½ a grade from January to June.</p> <p>Unit 3 (written controlled assessment) – the increase in the grade boundaries (there are separate units for English and English Language) was less marked than on the other units, less than ½ a grade.</p> <p>The other aspect of the AQA grade boundary changes relates to the marking bands that teachers apply to arrive at their mark. For example, in unit 2, each band has a range of 3 marks (e.g. band 3 – 'clear, consistent' is marked between 7 and 9. Unit 2 has three tasks, each with a maximum of 15 marks. Teachers have been working to the expectation that a mark for about 8 or 9 out of 15 was equivalent to a Grade C. But three marks of 9 out of 15 would only give the candidate 27 marks and the C grade boundary for this</p>

unit in June was set at 28. Hence, teachers' consternation. The AQA Moderator from a school in Leeds also stated that AQA had advised moderators that marks in the region of 8 or 9 out of 15 would result in a C grade for the unit.

There is a similar issue with unit 3 but less pronounced.

AQA grade boundaries – January and June 2012

		Maximum mark	A*	A	B	C	D	E	F	G
Unit 1 FT (written)	Jan 2012	80				43	33	23	13	3
	June 2012	80				53	41	30	19	8
Unit 1 HT (written)	Jan 2012	80	61	54	47	41	33			
	June 2012	80	61	55	49	44	39			
Unit 2 (CA – S&L)	Jan 2012	45	41	37	31	25	20	15	11	7
	June 2012	45	41	38	33	28	23	18	13	8
Unit 3 (CA Eng)	Jan 2012	90	72	65	58	51	39	27	15	3
	June 2012	90	75	68	61	54	42	30	18	6
Unit 3 (CA – Lang)	Jan 2012	80	72	64	53	43	34	25	16	7
	June 2012	80	72	64	55	46	36	27	18	9

<p>c) Examples of AQA's controlled assessment tasks</p>	<p>Cath to complete (Sorry- they are on a secure part of AQA's web site)</p>
<p>d) What changed between the old, legacy specs and the new English suite that was taught from Sept 2010?</p>	<p>Cath to complete</p> <ul style="list-style-type: none"> - Old specs were for English (A and B), English Literature (A and B); new specs for English, and for English Language and Literature – two GCSE's but candidates must enter for both - Old spec were not modular, and used coursework rather than controlled assessment - Content? - Demand is comparable between the old and new specs Cath – what does Ofqual plan to do to review this year's papers and confirm comparability?
<p>e) How does moderation work in practice?</p>	<p>Moderation requirements are set out in the Code of Practice. However, this does not provide the detailed requirements for:</p> <ul style="list-style-type: none"> - Sample sizes - Tolerances - What is the minimum part of the sampled work that the moderator should review before deciding that the marking is within tolerance? <p>Are these left to each exam board to decide? Has Ofqual reviewed their moderation practices and confirmed them to be acceptable? Cath / Chris to advise, please</p> <p>The issue is that current moderation practice may not be adequate to control generous marking by some centres.</p>

Checked

From: Glenys Stacey
Sent: 09 January 2014 17:03
To: *Checked*
Subject: FW: *Checked* has acknowledged GCSE English Language
Attachments: 120910 - Letter to Glenys Stacey re GCSE English Lang.doc; 120910 GCSE English Language Report.doc

Checked

• Direct: _____ • Office: 0300 303 3344 • 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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-----Original Message-----

From: Glenys Stacey
Sent: 10 September 2012 13:30
To: Fiona Pethick
Subject: FW: *Checked* has acknowledged GCSE English Language

Hello you.

were we expecting this?

Glenys Stacey
Chief Regulator, Ofqual

• Direct: • Office: 0300 303 3344 • Mobile: 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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-----Original Message-----

Welsh Front
QLD)
Sent: 10 September 2012 11:37
To: Glenys Stacey
Cc: *COFA*
Subject: *Checked* has acknowledged GCSE English Language

Please find attached a letter and report from *Welsh Front*

Welsh Front

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Yr Adran Addysg a Sgiliau
Department for Education and Skills



Llywodraeth Cymru
Welsh Government

Glenys Stacey
Chief Executive Officer
Ofqual
Spring Place
Coventry

10 September 2012

Dear Glenys

GCSE English Language

Please find attached a copy of the Welsh Government's report on its investigation into GCSE English Language and the outcomes for candidates in Wales in 2012. It is our intention to publish this report later this afternoon.

The Minister for Education and Skills has had sight of the report and has indicated his intention to accept all the recommendations therein. You will therefore need to be aware that a central finding and key recommendation of the report is that:

"Having considered all the available evidence, it is the conclusion of this investigation that the published provisional outcomes for candidates in Wales for GCSE English Language at Grade C and above, which show a fall of 3.9 percentage points from the equivalent outcomes in 2011, are not secure or supported by any reasonable justification. It is therefore recommended that the Minister for Education and Skills, representing the Welsh Ministers in fulfilling their responsibilities in relation to relevant qualifications as set out in Section 30 of the Education Act 1997, should:

request that WJEC undertake a regrading of GCSE English Language in order to achieve outcomes that are as similar as possible to the outcomes achieved by candidates in 2011, on the basis that there is no reason to believe that the 2012 Wales cohort was significantly different to the 2011 Wales cohort. It would be strongly preferable for this regrading to be applied to all of WJEC's candidates in both Wales and in England but, in the event of the regulator in England (Ofqual) refusing to endorse this regrading, it should be applied only to candidates in Wales."

We note the correspondence and discussions that have taken place between Welsh Government officials and Ofqual officials over the last two weeks and we understand that Ofqual's current position is to *not* request a regrade in relation to the GCSE English Language or GCSE English awards. We would like to take this opportunity to re-iterate our preference for a regrade of



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Ty'r Afon
Heol Bedwas/Bedwas Road
Bedwas
CAERFFILI/CAERPHILLY
CF83 8WT

Ffôn/Tel: 01443 663978
kate.crabtree@wales.gsi.gov.uk
Gwefan • website: www.wales.gov.uk

candidates across both England and Wales. However, if you wish to proceed with an option not to regrade in relation to English candidates, we will request that WJEC undertakes a regrading for candidates in Wales alone.

I would be grateful if you would let us know how you wish to proceed, preferably before 3:00pm today though discussions can of course continue beyond this.

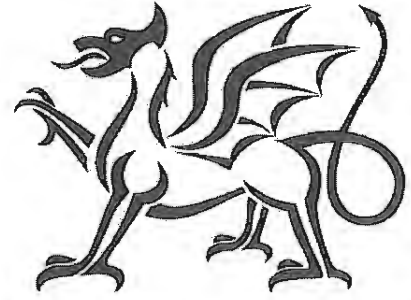
I am sure that, like me, you will acknowledge the exceptional and difficult nature of this issue. Our preference is that we should take similar action in both England and Wales. However, we must act in a way that is in the best interests of fairness to candidates in Wales.

I am copying this letter to Roger McCune in CCEA.

Yours sincerely

A handwritten signature in black ink that reads "K. Crabtree". The signature is written in a cursive style with a long horizontal flourish underneath.

Kate Crabtree
Acting Deputy Director
Qualifications and Learning Division
Welsh Government



**Llywodraeth Cymru
Welsh Government**

**GCSE English Language 2012
An investigation into the outcomes
for candidates in Wales**

**Qualifications and Learning Division
10 September 2012**

GCSE English Language 2012

An investigation into the outcomes for candidates in Wales by the Qualifications and Learning Division of the Welsh Government

Introduction

1. On 23 August 2012, following the publication of provisional GCSE results, the Minister for Education and Skills, Leighton Andrews, asked officials to conduct an investigation into the performance in GCSE English Language of candidates in Wales. The investigation was commissioned in the light of concerns about:
 - i) the significant fall in outcomes at grades A* to C for candidates in Wales, compared with the outcomes in 2011;
 - ii) significant variations in performance between schools and colleges in Wales, with a few centres experiencing significant improvements and many experiencing significant falls in outcomes when compared with 2011; and
 - iii) significant changes to grade boundaries for some units between January and June, by some awarding organisations.
2. This report has been prepared by the Qualifications and Learning Division of the Department for Education and Skills, which, on behalf of the Welsh Ministers, undertakes the functions relating to qualifications in Wales as set out in Section 30 of the Education Act 1997.
3. In conducting this investigation, officials have drawn upon:
 - extensive data provided by awarding organisations
 - data provided by other Divisions within the Welsh Government
 - discussions with awarding organisations
 - discussions and records of meetings with the regulators of qualifications regulators in England (Ofqual) and Northern Ireland (CCEA)
 - the report of the regulators of qualifications in England (Ofqual): GCSE Awards 2012 – a Regulatory Report (published on 31 August)
 - discussions with and evidence submitted by schools and colleges in Wales.

Summary of Findings

4. Having considered the available evidence, officials have reached the conclusion that, in relation to the concerns listed in paragraph 1 above:
 - i) The methodology for determining the grade boundaries for candidates in Wales did not deliver comparable outcomes for the 2012 cohort when compared with the 2011 cohort and that some candidates, particularly those close to the C/D boundary, are likely

to have been disadvantaged when compared with their peers in 2011. Recommended action to reduce this disadvantage is set out in paragraph 81 below.

- ii) The range of variability in centres' year-on-year outcomes at grades A* to C in 2012 was greater than in 2011. It is also clearly the case that the lower overall outcomes than expected will have contributed to this issue. However, it is also likely to have some connection with the very high proportion of controlled assessment in the new English Language specifications and possibly to different approaches to controlled assessment across centres. This particular issue will need further investigation over the coming weeks and action to carry out this work is recommended in paragraph 82 below.
- iii) Grade boundaries for some GCSE English Language units taken by candidates in Wales in June 2012 were *more different* to those taken by candidates in January 2012 than has been the case in previous years. This was most significant for some of the 5% of candidates in Wales who took their awards with AQA. AQA candidates who submitted controlled assessment tasks in June may have received a lower unit grade outcome than if they had submitted the same task in January and, in addition, AQA's Foundation Tier examination paper required ten more marks for a C grade in June than in January. WJEC did not offer controlled assessment units in January so that particular aspect of inconsistency was not an issue for their candidates – who represent 95% of candidates in Wales. There were, however, some slightly larger differences than usual between the marks required for a C grade in some of WJEC's examination papers in June and in January. These issues are explored further in paragraphs 53 to 56 below.

5. Other significant issues raised in this report include:

- i) the extent to which the awarding of qualifications in Wales is currently bound to, and determined by, policies and methodologies designed to be fit for purpose in England – and the challenges this presents to a devolved education system;
- ii) the fitness for purpose of the current suite of GCSE English Language qualifications; and
- iii) the need to give further consideration, in the development of future qualifications policies for Wales, to the relative merits and methods of norm-referencing style approaches to grading compared with more criteria-referenced approaches to grading.

GCSE English Language – overall outcomes in Wales

- 6. In Wales, 35331 candidates were entered for GCSE English Language in June 2012. Of these, 95% were entered with WJEC

and 5% were entered with AQA. No candidates in Wales were entered for GCSE English Language with Edexcel/Pearson, OCR or CCEA, the other awarding organisations which are able to offer this qualification to centres in Wales. In investigating the issues relating to outcomes, officials have therefore focused on data provided by WJEC and, to a slightly lesser extent, AQA.

7. GCSE English Language is a high entry, high stakes qualification. The vast majority of 16 year olds in Wales are entered for this qualification and a pass at Grade C and above is set down by most providers as a pre-requisite for progression onto many post-16 qualifications (such as A levels), apprenticeships and other employment opportunities. It is also an entry requirement for many degree and professional programmes. Furthermore, outcomes for GCSE English Language at grade C and above contribute to performance measures and as an indicator for banding for schools in Wales. It is essential, therefore, to learners and to providers that the outcomes for GCSE English Language are accurate, appropriate and comparable over time.
8. The percentage of candidates in Wales achieving GCSE English Language at grade C and above in 2012 was 57.4%. This was down 3.9 percentage points from 61.3% in 2011 and, when seen in the light of outcomes over a five year period, represents a significant and unexpected fall (see Figure 1 below).

Figure 1: Overall outcomes at Grade C and above for GCSE English Language¹ in Wales 2008 – 2012 : Source JCQ

Examination Series	% of candidates in Wales with Grades C to A*
June 2008	62.4%
June 2009	60.4%
June 2010	61.6%
June 2011	61.3%
June 2012	57.4%

9. It is relevant, also, to consider whether there have been any significant changes in the cohort in Wales between 2011 and 2012. We therefore asked WJEC, who had 95% of the candidature in Wales, to provide us with information on the numbers of entries and the grade distributions for learners who were aged 16 on 31st August in 2011 and 2012. This data (see Figure 2 below) showed us that there were very similar numbers of 16 year olds entered for

¹ Prior to the 2012 awards, the qualification which was replaced by GCSE English Language was called GCSE English. From the 2012 awards onwards, GCSE English is a different qualification and co-exists in England with GCSE English Language. This is explained later in the report.

GCSE English Language in both years, indicating a stable cohort at this age. It also showed that 16 year old candidates had a similar, though slightly greater, fall in outcomes at grade C and above when compared to the all-age Wales cohort, with 16-year olds seeing a fall of 4.1 percentage points between 2011 and 2012.

Figure 2: GCSE English Language candidates in Wales aged 16 as at 31st August in each relevant year. Source: WJEC

Year	Entry – 16 yr olds	% at Grade C and above
2011	30830	63.1
2012	30933	59

10. We also looked at whether there had been a shift in the type of centre which candidates for GCSE English Language in Wales attended. Looking again at data provided by WJEC, we found that there had been a slight shift in the proportion of candidates from each type of centre. This showed that, in Wales, for WJEC’s specification, there had been a small reduction in the percentage of entries from maintained schools (down from 92.4% to 91.9%), small increases in the proportion of entries from FE and sixth form colleges (up from 4.2% to 4.8%) and from independent schools (up from 2.1% to 2.5%).² There does not appear to be any indication from this data that the balance of centre types should have any significant direct consequence upon outcomes at C and above.

Introduction of new GCSE English Language qualifications

11. Across Wales, England and Northern Ireland a new suite of GCSEs in subjects relating to English were introduced for teaching from September 2010. These replaced the former GCSEs in “English” and “English Literature”. While direct replacements for GCSE English and GCSE English Literature were developed, it was also proposed that a combined GCSE, simply titled GCSE English and combining elements of English Language and English Literature, should be offered to enable candidates who had less of an interest and or aptitude in English Literature to meet the requirements of their national curriculum programme of study while only completing one GCSE in the subject area instead of two.
12. In Wales, this proposal was not accepted as it was judged that GCSE English alone would not enable learners to cover the full national curriculum programme of study for English Language or for English Literature in Wales. GCSE English is, therefore, not approved for use in schools in Wales and learners in maintained

² These sets of figures do not add up to 100% as a small proportion of entries are categorised as ‘other’.

schools in Wales are required to cover the fuller programme of study in English Language that GCSE English Language promotes. The programme of study also requires that learners in Wales should study elements of literature and the majority of learners in Wales, therefore, also take GCSE English Literature.

13. In England the proposal to offer a reduced, combined assessment model was accepted and learners in England are able to study either for GCSE English (alone) *or* GCSE English Language and GCSE English Literature. It is likely that this policy difference in England has had some impact on the determination of outcomes for GCSE English Language in Wales as suggested in paragraphs 34 to 36 below.
14. The new GCSE English Language specifications which were introduced for teaching from September 2010, and which were awarded for the first time this summer, had two particularly significant features which differentiated them from the previous GCSE English specifications. These were unitisation and controlled assessment.

Unitised specifications

15. With unitised specifications, candidates are able to enter for units prior to the end of the course and are awarded a grade for those units which can subsequently contribute to the overall qualification grade. This enables candidates to 'bank' units prior to the end of the course so that their GCSE outcome need not be entirely dependent upon assessment at the end of two years of study. If candidates are unhappy with their unit grade, they are permitted to retake any unit, once only, to try to improve their grade. In addition, candidates must always take a minimum of 40% of the qualification at the end of their course.
16. In England, the Westminster Government and subsequently Ofqual, announced in 2011 that candidates in England would no longer be able to take unitised GCSEs. Therefore, for courses beginning in September 2012 onwards, all units must be submitted and awarded at the end of the course and no retaking of units will be permitted. The Welsh Government has not implemented this policy and the issue is being considered by the Review of Qualifications 14-19 in Wales. In the meantime, until at least September 2014, centres in Wales may choose to enter learners for unitised specifications. For the qualifications awarded this summer, candidates in both Wales and England were able to take some of their units early and to retake one or more of these units (once only) to try to improve their grade.
17. Data received from WJEC about their candidates shows that candidates who took one or more units before the June 2012

examination series (ie in a unitised way) were substantially more likely to have gained an overall A* to C than those candidates who took all of their units for the first time in June (ie in a linear way).

Figure 3: Impact of taking one or more units before June 2012 on final outcomes for candidates in Wales for WJEC's GCSE English Language.
Source: WJEC

	Candidates in Wales who took one or more units before June 2012.	Candidates in Wales who took all of their units in June 2012
% achieving grade C or above	64%	52.8%
% achieving grade A or above	13.4%	11.1%

18. The same data indicates that there are significant differences in the proportion of candidates taking units early in Wales and in England. Well over two thirds of WJEC's candidates for GCSE English or English Language in England (69.2%) took one or more units before June 2012 whereas well under half (42%) of candidates in Wales took one or more units early.

Figure 4: Percentage of WJEC GCSE English/English Language candidates in Wales and England who took one or more units before June 2012.
Source: WJEC

	GCSE English/English Language candidates in England who have taken one or more units early, expressed as a percentage of all candidates in England	GCSE English Language candidates in Wales who have taken one or more units early expressed as a percentage of all candidates in Wales.
Foundation tier	25.3%	17.4%
Higher tier	35.4%	21.1%
Mixed tier ³	8.5%	3.5%

19. It therefore appears likely that some centres in Wales, due to not having entered as many candidates for units earlier than June as did centres in England, have unknowingly rendered their candidates more likely to receive lower grades than those who took one or more units early. There are likely to be two main reasons for these differences in attainment levels between the two entry patterns. The first is that the January 2012 grade boundaries were set lower

³ Mixed tier candidates will have had grades taken into account for one Foundation tier unit and one Higher tier unit. This might, for example, have occurred where candidates took a unit early and achieved a grade C at Foundation tier, then retook the unit at Higher tier in the hope of gaining a B or above but instead gained a grade D: in this case the C from the Foundation tier paper would count in their final grade.

than the June 2012 boundaries (as discussed later in this report); the second is that unitised specifications delivered the benefits for which they were initially designed – by enabling candidates to be assessed in stages rather than leaving all the assessment to the end of the course. In either case, this significant difference between centres' approaches to entry patterns in Wales and England may be a significant factor in the failure to maintain comparable outcomes in Wales using the methodology for reviewing potential GCSE outcomes against cohort predictions based on Key Stage 2 outcomes in England. WJEC were required to follow this methodology due to the majority of their candidates for GCSE English and English Language being candidates in England. The methodology is discussed in paragraphs 24 to 33 below.

Controlled Assessment

20. Controlled Assessment was introduced into revised GCSEs which have been taught from September 2009 for non-core subjects; from September 2010 for English Language, English Literature, Welsh Language, Welsh Literature and ICT; and from September 2011 for the Sciences. Controlled assessments replaced coursework and aimed to encourage a more integrated approach to teaching, learning and assessment, and to enable teachers to confirm that students had carried out the work involved.
21. In 2011, in the light of significant concerns emanating from the teaching profession, the regulators in England, Wales and Northern Ireland commissioned an investigation into the introduction of the first round of controlled assessment in those GCSEs that had been introduced for teaching from September 2009. It was clear from this report ⁴that there was considerable variety between centres in the effectiveness with which controlled assessment had been introduced. While many teachers could see some of the benefits of controlled assessment in reducing some of the security concerns relating to coursework, many others raised concerns about, for example, the limitations of guidance from awarding organisations, potential inconsistencies across centres in the application of the control of tasks, and the impact on teaching and learning time.
22. While the moderation by awarding organisations of internally assessed controlled assessments is designed to ensure that candidates' work is fairly and consistently assessed and marked, it is difficult to be confident that the introduction of this new form of assessment has been implemented equally effectively across all centres. For example, candidates are able to take a limited amount of notes into their assessment and there is the potential for a different amount and quality of support to be provided to learners in

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<http://wales.gov.uk/topics/educationandskills/qualificationsinwales/qualificationregulation/regpublication/reports/assessment/?lang=en>

different centres in the preparation of these notes. Indeed, the advice of one of the independent scrutineers, with whom officials contracted to conduct the initial part of our scrutiny review of WJEC English Language⁵, while commending the awarding organisation's attempts to manage the challenges of moderating the assessment of candidates' work, expressed in clear terms the risks presented by the inclusion of controlled assessment in this qualification – particularly when it accounts for 60% of the final mark.

“[An] area of concern is the actual mechanics of Controlled Assessment. Not only is this an organisational problem for many schools but there is clearly no way that the awarding organisation can police whether Controlled Assessment is being carried out according to the regulations”

Source: Independent subject specialist reporting to the Welsh Government

Related concerns were raised by officers and moderators at AQA as referred to in paragraphs 67-68 below.

23. Given the potential for variation in the quality of preparedness of candidates across centres, the introduction of controlled assessment contributing 60% of the marks of such a high entry, high stakes qualification as GCSE English Language, where consistency and comparability across Wales is of crucial importance, was perhaps questionable. The Review of Qualifications (14-19) in Wales is giving consideration to the future of controlled assessment in qualifications, especially GCSEs and to the future assessment of literacy and numeracy.

Maintaining Standards when Qualifications Change

24. One of the central factors in considering the reason for the fall in outcomes for GCSE English Language in Wales is the introduction in recent years of a methodology that is designed to ensure that 'standards' in qualifications are maintained from one year to the next and across awarding organisations. This particular programme of work was established in the autumn of 2008 at the time that schools and colleges commenced teaching the current suite of A level qualifications. There had been significant changes to the structure of these A levels which had moved, for the most part, from six modules to four. Regulators and awarding organisations were mindful of the fact that when the *previous* generation of A levels had first been introduced, there had been significant increases in outcomes in the first year of awarding and that this had generated much concern both in the media and in the education sector.
25. At the same time, it was noted that candidates and teachers undertaking a new specification are faced with a different order of

⁵ See paragraphs 72 to 74 below for an explanation of the scrutiny programme.

challenge from those taking a well-established specification with the benefit of past papers, examiners' reports and teacher experience – and that this should not have a negative impact on the chances of learners in this first cohort achieving the grades they deserve.

26. For A levels, the methodology used to determine whether a set of outcomes is in line with the outcomes of the previous cohort, is based on the relationship between the previous cohort's GCSE results and their A level outcomes. This relationship is tabulated to generate the most common outcome at A level for any given 'score' in GCSEs. This relationship is then applied to the actual GCSE 'scores' of those candidates entered for the current year's A levels for whom GCSE results are known, in order to generate a predicted percentage of these 'matched' candidates at each grade for each specific A level. It is important to note that the methodology is applied at a cohort level, rather than at the level of the individual learner. This methodology is complicated – but it has been demonstrated to have value by the findings of an independent research project commissioned by the regulators in England, Wales and Northern Ireland.⁶
27. Although initiated by the regulator in England (Ofqual), Welsh Government officials were engaged with, and contributed to the refinement of, this methodology for determining expected outcomes for A levels. In general, and with some reservations, this methodology is applicable and relevant for A levels across England and Wales, while GCSE outcomes remain reliable and consistent across the two nations.
28. Whereas Wales and England have a common qualification (GCSE) which is generally taken by learners prior to A levels, there is no such common qualification taken by learners in both nations prior to GCSE. In England, learners who are currently aged 16 took externally set and marked tests at the end of Key Stage 2, the data from which is accessible to awarding organisations. These tests were not taken by learners in Wales, who, instead, at the end of Foundation Phase, Key Stages 2 and 3, were assessed by statutory teacher assessments which were locally moderated and reported to the Welsh Government. The awarding organisations do not have access to this data.
29. With the introduction of significantly changed GCSEs, and in the light of the relative success of the predictor methodology in determining and considering comparable outcomes for A levels, the qualifications regulators were keen to identify whether any similar methodology could be employed to review GCSE outcomes in order

⁶ The NfER report is available at <http://wales.gov.uk/topics/educationandskills/qualificationsinwales/qualificationregulation/regpublication/reports/gcses/?lang=en>

to maintain outcomes for these qualifications. When one of the awarding organisations suggested in 2009 that Key Stage 2 outcomes might be used to predict GCSE outcomes there was considerable cynicism. Welsh Government officials were clear, from the outset, that such a methodology could not, and should not, be used in relation to candidates in Wales. Following some initial modelling and extensive discussions, Ofqual and the awarding organisations in England agreed that the Key Stage 2 model was the best methodology available for indicating any given cohort's expected performance at GCSE. Welsh Government officials continued to reject the use of this methodology for awarding decisions where substantial numbers of candidates from Welsh centres were involved.

30. As a consequence of these discussions, it was agreed that, for the awarding of the June 2011 examination series, which saw the first awards of the new GCSEs in non-core subjects, the awarding organisations based in England would use Key Stage 2 data in determining expected outcomes while WJEC (who had the majority of candidates in Wales) and CCEA (who had the majority of candidates in Northern Ireland) would not use Key Stage 2 data but would seek to maintain comparable outcomes using, in the main, a methodology which looked at predicted outcomes for 'common centres' – a methodology that draws on data from centres with entries in the same subject (with any awarding organisation) in the current and previous years. The common centres methodology is based on the assumptions that over time GCSE outcomes are stable and that, while there may be changes at centre level, these are evened out for the whole cohort.
31. In the awarding of these new non-core GCSEs in 2011, no significant issues arose in the outcomes for Wales. The 'common centre' predictors were of some use in maintaining comparable outcomes, but in some cases they produced unconvincing results and it was agreed between the regulators in Wales and England, that a 'common sense' approach to considering both the common centre predictions and the year-on-year overall outcomes should be adopted.
32. Early in 2012, Ofqual officials alerted Welsh Government officials that they were minded, in the light of WJEC having substantial numbers of entries from candidates in England for some of their core subject GCSEs, to require WJEC to employ the use of Key Stage 2 predictors to determine the expected outcomes for WJEC's specifications. Welsh Government officials expressed serious concerns that it was not appropriate for results for Welsh candidates to be determined on the basis of prior achievement by candidates in England. Nevertheless, when it became clear that a significant majority of WJEC's candidature for GCSE English Language was from England, and that this represented the second

largest awarding organisation entry for candidates from England, it was hard to justify continued resistance to the use of the methodology. Simultaneously, WJEC also suggested that they would be prepared, with some reservations, to use the Key Stage 2 methodology for the awarding of GCSE English and English Language. It was therefore agreed that, for these subjects only, WJEC would report their projected outcomes against the Key Stage 2-based predictions.

33. It should be stressed that at no point in these early discussions was it apparent that this would have any significant impact on the outcomes for candidates in Wales.

WJEC GCSE English Language Provisional Results, Summer 2012

34. Towards the end of July 2012, when marks and awards were being prepared by awarding organisations, it became clear that the split of the candidature in England between GCSE English and GCSE English Language appeared to be causing difficulties with the predictor model. As many centres in England appeared to have entered their lower ability candidates for the new GCSE English specification, the entry profile of candidates for GCSE English Language was significantly different in England to that for its direct predecessor, the former GCSE English. As a consequence, there was a need to adjust the predictions for these two qualifications to take account of the different candidate profiles in England.
35. A 'fix' was proposed and accepted by awarding organisations which was based on the assumption that, in the main, the 'typical' candidates for GCSE English would have been those who previously would have only taken GCSE English Language and not English Literature, whereas the 'typical' candidate for GCSE English Language, in England, would have previously taken both. Two sets of prediction matrices were accordingly compiled and awarding organisations were instructed to achieve outcomes that were within 3% of the predictions for each of the separate predictions and within 1% of the overall predictions for the combined cohort for both GCSE English and English Language.
36. Given that all candidates in Wales previously took GCSE English and this year took GCSE English Language (and given that the number of 16 year olds taking the qualification remained stable in Wales) it is clear that the position in Wales is much more stable and therefore comparable, year on year, than the position in England where the cohort has been split between GCSE English and GCSE English Language. It is unfortunate, therefore, that sufficient consideration was not given, in the determination of WJEC's outcomes, to maintaining comparable outcomes for the Wales element of WJEC's cohort.

37. The first indication that awarding processes adopted could have an impact on candidate outcomes for Wales began to emerge late on Friday 27th July following the meeting of the awarding committee at WJEC. Officials in DfES were alerted that results in GCSE English Language for Wales may be below those in 2011 and on Monday 30th July, the Chief Executive Officer of WJEC gave further notice to the Welsh Government that the outcomes for Wales were likely to be significantly down from the previous year.
38. In the following two weeks, officials from the Welsh Government engaged with WJEC and with Ofqual to attempt to reach an agreement on the final agreed outcomes for GCSE English Language. While taking account of the guidelines for using the predictors, WJEC had been unable to confirm outcomes which fell within tolerance of the predictors that had been based on Key Stage 2 performance in England. Although the outcomes from the awarding meeting already represented a significant fall in outcomes for the Wales cohort (a likely overall fall of 3.4 percentage points), Ofqual officials were not prepared to accept these outcomes as they regarded these as too 'generous' in comparison with the Key Stage 2 predictions.
39. Following extensive correspondence and discussions, at a time when there was considerable pressure to agree final outcomes in order for candidates to receive their results on time, one of three options provided by WJEC of outcomes which came closer to the Key Stage 2 predictions for England was accepted by Ofqual. Regulatory officials in Wales continued to express strong reservations about the methodology, but at this late stage, recognising the need to reach agreement, as this option produced the least damaging impact on outcomes for Wales, Welsh Government officials reluctantly agreed to accept this amendment to the outcomes which resulted in an overall 3.9 percentage point fall in outcomes for Wales. We address this issue further in paragraphs 79 and 80.
40. Following the announcement by the Minister for Education and Skills that there would be an investigation into the outcomes for GCSE English Language in Wales, officials have given further detailed consideration to the data relating to WJEC's potential and actual outcomes and to a range of supporting evidence.

Further Consideration of WJEC's outcomes

41. WJEC's original proposed outcomes were determined in the meeting of examiners that was held on 27th July. This meeting was observed by another independent subject specialist, contracted by the Welsh Government as part of its scrutiny programme. The observer reported that "*appropriate statistical evidence was combined with examiners' judgements*" in determining the award

and that *“the entire Awarding process was underpinned by the expectation that work considered at a certain boundary would on balance demonstrate the knowledge, understanding and skills set out in the grade descriptions.”* We deduce from these, and from other comments in our observer’s report, that the awarding meeting was fairly and appropriately conducted.

42. As stated in paragraph 38 above, the outcomes recommended by WJEC’s awarding committee resulted in outcomes which would have led to a 3.4 percentage point fall in outcomes for Wales at grade C and above (compared with the final 3.9 percentage point fall that was implemented at the request of Ofqual). However, WJEC has provided us with data that shows the significant effect that would be brought about by adjusting downward, by one mark, the grade boundary recommended for *one* of the controlled assessment units. Such a slight amendment would result in an increase of 2.4 percentage points in the GCSE English Language outcomes for Wales at grade C and above. The overall outcomes at grades C to A* would then be increased to 59.8% which is only 1.5 percentage points below the 2011 outcomes for Wales (compared with 57.4% with the currently published provisional outcomes). This outcome would be closer to the current year-on-year fall in overall outcomes in England, though it would, in itself, if adopted for candidates from England as well as from Wales, reduce further the fall in England.
43. Welsh Government officials recommended this option for adjustment to Ofqual officials on Thursday 30th August but Ofqual rejected the recommendation on the grounds that it would place WJEC’s outcomes for England too far out of tolerance of the Key Stage 2 predictions.
44. While respecting the view of the regulator in England (Ofqual) that the Key Stage 2 predictor model may be useful in comparing the outcomes of candidates in England, Welsh Government officials have concerns about the level of confidence that can be placed in the degree of precision that this model can provide in determining awarding outcomes. Furthermore, officials have very serious concerns, as outlined above) about using the model where a cohort has significant entries from Wales and especially where those entries comprise a high proportion of the Wales national cohort (in this case 95%).
45. While externally assessed Key Stage 2 data is not available for candidates in Wales, the Welsh Government does hold teacher assessment results for English for the 2012 cohort and its predecessors at the former Key Stage 1, at Key Stage 2 and at Key Stage 3. This data (Figure 5 below) shows that, when compared with its predecessor cohort, the 2012 GCSE cohort was performing slightly below the 2011 GCSE cohort at Key Stage 1, on a par with

the 2011 GCSE cohort at Key Stage 2, and slightly above the 2011 cohort at Key Stage 3. This indicates that, had a similar prediction model been devised for Wales candidates to that used in England, they may have been expected to achieve a similar outcome for GCSE English as their immediate predecessors. Indeed, if a prediction model had been based on the Key Stage 3 outcomes, the GCSE English Language outcomes in 2012 would have been expected to surpass the outcomes in 2011. We are not suggesting that these data should have been used as an alternative methodology, however we believe that the data is relevant in cross-checking the reliability of the methodology used for candidates in England.

Figure 5: Percentage of the Wales cohort achieving the expected level of attainment in teacher assessments at Key Stages 1 to 3 (and in GCSE at Key Stage 4) over three years. Source: Welsh Government

Subject	Year GCSE taken	KS1	KS2	KS3	KS4⁷
English	2012 cohort	82.3	78.6	72.5	57.4
	2011 cohort	83.0	78.6	70.6	61.3
	2010 cohort	83.4	79.3	69.5	61.6

46. In addition to these indicators of prior attainment, we asked WJEC to calculate the predicted outcomes for the Wales cohort only, based on the “common centre” benchmark model that is used for the remainder of WJEC’s GCSE specifications (as referred to in paragraph 30 above). This model (Figure 6 below) includes the vast majority of WJEC’s candidates in Wales and illustrates a significant variation between the “common centre” prediction for candidates in Wales and their actual outcomes. If this predictive model had been used for Wales candidates alone, it would have resulted in a significant increase in outcomes at Grade C and above for candidates in Wales.

⁷ percentage of candidates achieving A*-C in GCSE English (2010 and 2011) and GCSE English language (2012)

Figure 6: Comparison of predicted outcomes based on ‘common centre’ methodology with actual outcomes for WJEC’s GCSE English Language candidates in Wales in 2012. Source: WJEC

GCSE English Language:

Wales Common Centre predictions compared with outcomes in 2012

	Cumulative Prediction	Cumulative Results	Difference
A*	3.6	3.0	-0.6
A	14.3	12.8	-1.6
B	35.0	31.1	-3.9
C	64.6	59.7	-4.9
D	84.8	82.6	-2.1
E	94.9	93.5	-1.4
F	98.7	98.3	-0.5
G	99.9	99.7	-0.1
No. of Cands	30,247	30,247	

47. As has been identified in paragraphs 15 to 19 above, the introduction of opportunities to take units early may have significantly increased candidates’ likelihood of achieving a grade C or above. Candidates in England who have taken one or more units early have achieved over 10.3 percentage points higher outcomes than candidates who took all units at the end of the course. Candidates in England have taken up the opportunity to take units early significantly more frequently than candidates in Wales. Given that there were no opportunities to take units early in the previous specifications for GCSE English Language, it would appear that over two thirds of the candidature in England may have increased their potential outcomes at grade C and above by some ten percentage points due to the ability to take units early when compared with the candidates in 2011 (and 2010 which is the comparator year for the England predictor model) who were not able to take any units early. Whether it was due entirely to different grade boundaries, or also to the benefits of staggered assessment, it seems likely that the significant difference between entry patterns in 2010 and 2012 could have had an impact on the reliability of the Key Stage 2 predictor matrix, for candidates in England as a whole. In attempting to maintain a stable relationship between Key Stage 2 outcomes and GCSE outcomes, the methodology attempts to smooth out any other factors which may change this relationship. Where these factors have impacted differently upon candidates in England and in Wales, then the ‘smoothing’ carries increased risks of distortion.

48. This issue highlights a fundamental tension between the aims of maintaining comparable outcomes while maintaining comparable 'standards'. If the ability to take units early is helpful to learners in promoting improvements in their performance, resulting in improved chances of success, consideration needs to be given as to whether these improved chances should be reflected in improved national outcomes – or whether similar outcomes to previous cohorts without the ability to take units early should be the desired aim. In potentially suppressing the improvements in the outcomes for the English cohort brought about by the ability to take units early, through the KS2 predictor model, there is a strong chance that the Wales cohort has been relatively disadvantaged. This tension will need further consideration in the coming months and in the development of any future policies on the grading of new qualifications.
49. In trying to juggle to fit the outcomes for candidates in England to a prediction model based on a different entry profile and different entry patterns, it seems possible that a serious distortion to the outcomes of the candidates in Wales has been caused. Certainly the provisional outcomes for Wales, published on 23 August, contradict one of the early principles that was stated by Ofqual in the minutes of one of the first Maintaining Standards meetings which was that:

“on a national level, overall there is no reason to believe that outcomes in terms of grade distribution in the first year should be very different from those before the changes” Source: minutes of Maintaining Standards meeting published by Ofqual in October 2008.

50. A consideration of the technical and qualitative data available strongly suggests that, in the context of maintaining 'comparable outcomes', the 2012 GCSE English Language outcomes for candidates in Wales, at grades C and above, would have been expected to be at least as high as, or even higher than, the equivalent outcomes in 2011. In summary:
- a. the cohort in Wales in 2012 is very similar in size and centre type to the cohort in 2011;
 - b. the 2012 cohort in Wales performed as well as the 2011 cohort in Key Stage 2 English teacher assessments and 1.9 percentage points better than the 2011 cohort in Key Stage 3 English teacher assessments;
 - c. the “common centres” predictor model, which is the preferred predictor model for Wales, indicated an expected outcome for candidates which was 4.9 percentage points higher than the actual published outcomes;
 - d. the effect and likelihood of candidates in England taking units early does not appear to be taken into account in the England predictor model using Key Stage 2 outcomes in England; and

- e. very minor amendments to the grade boundaries determined at awarding – a process which, in itself, was influenced by the requirements to keep within or very close to predictions - would result in significantly improved outcomes in Wales which would be much closer in line with the implications of this evidence.
51. In reviewing the outcomes for candidates in Wales, it is the considered view of regulatory officials that the 3.9 percentage point fall in outcomes for GCSE English Language at grades C and above in 2012, when compared with 2011, as announced in the provisional results for GCSE English Language, is unjustifiable and almost certainly unfair to candidates.
52. Given that 95% of the candidates for GCSE English Language in Wales entered with WJEC, it is recommended that the Minister should require WJEC to re-award this qualification, adjusting grade boundaries to bring the outcomes for candidates in Wales as close as possible to the outcomes for GCSE English of the candidates in Wales in 2011 (see paragraph 81 below).

Variability of centre outcomes across Wales

53. In addition to the concerns outlined above about the overall outcomes for candidates in Wales, concerns have been raised about the wide variability of outcomes on a centre by centre basis, when compared with previous years. WJEC and AQA have provided us with data that shows that, in 2012, a total of 85 centres in Wales had centre outcomes at grade C and above for GCSE English Language which differed by more than 15 percentage points from their outcomes for GCSE English in 2011.
54. For 21 of these centres, their outcomes at grade C and above had improved by 15 percentage points or more, but 64 centres had seen a fall in outcomes of 15 percentage points or more. We asked WJEC to provide comparative data from 2011 and this did confirm that more centres in 2012 had variations of >15 percentage points than in 2011 (Figure 7 below). The increase in variability appears, from this data, to have been due to worsening outcomes for more centres, but it is interesting to note that despite the significant fall in national outcomes at grades C and above, some centres still managed to achieve significant improvements.

Figure 7: Number of WJEC centres with >15 percentage points change in outcomes at grade C and above for GCSE English Language and direction of change in 2011 and 2012. Source: WJEC

Year	No. of centres with >15 percentage points change	No. of these with improved outcomes	No. of these with lower outcomes
2011	51	21	30
2012	84	20	64

55. As has been explained in paragraphs 20 to 23 above, the introduction of controlled assessment into GCSE English Language, and the difficulties inherent in ensuring that centres conduct these assessments consistently, are unlikely to reduce variability between centres unless efforts are made to improve both the quality and consistency of assessment and the preparedness of candidates.
56. In the context of its ongoing work to improve literacy and numeracy outcomes in Wales and in response to both the fall in outcomes in 2012 at Key Stage 4, the Schools Standards Unit in the Department for Education and Skills has already planned a programme of data analysis and visits to schools to review the features of more successful and of less successful schools and to investigate, in particular, the delivery of controlled assessment. WJEC has also offered to conduct some further analysis of its data and of outcomes and it is recommended that the Schools Standards Unit liaises with WJEC in this area of work.

Changes to unit grade boundaries between January and June

57. The aspect of the awarding of GCSE English Language (and of GCSE English) which has raised most concern across the UK, was the fact that grade boundaries for some units, with some awarding organisations, changed between January and June 2012. As has been explained above candidates in Wales were only entered with two awarding organisations: WJEC (who had 95% of the Wales candidates) and AQA (who had 5% of the Wales candidates). While some other awarding organisations made changes to grade boundaries, these are not relevant to Wales and have therefore not been reviewed as part of this investigation.
58. With traditionally examined units, it is normal for the marks required to reach any grade boundary to vary between examination series. Despite the best efforts of examiners, exam papers can turn out to prove relatively easier or harder for candidates from one series to the next. Typically, and depending on a number of technical factors, including the overall number of marks available, the marks required for a unit to be awarded a C can vary by up to 3 marks in either direction.

59. On the other hand, marks for coursework (the predecessor for controlled assessment) have, historically, generally remained the same from one series to the next, as learners are completing similar tasks. Controlled assessments are different in some respects to coursework, but in January 2012 and June 2012, for AQA, candidates completed the same tasks. WJEC did not award any controlled assessment grades in January 2012.
60. In reviewing the C/D boundary marks for WJEC's examined papers for GCSE English Language, we can see that, between January and June, the boundary marks changed by 4 marks for two papers which is a slightly larger change than might be accepted without question.
61. We asked WJEC to provide an explanation for each of these four mark changes. For one WJEC Foundation tier paper, the boundary mark fell by four marks from the January paper, meaning that candidates needed to achieve fewer marks in June to gain a grade C than they needed to gain a grade C in January. WJEC explained to us that examiners felt, in January, that some of the questions had proved to be insufficiently demanding, especially the first question on the paper. Therefore, candidates needed to gain more marks than expected in order to demonstrate the requirements of a grade C. In June 2012, the examination paper met expectations more closely, and in fact the mark required to achieve a grade C in June 2012 was the same as had been required in June 2011 (when the paper was taken 'early' by some year 10 candidates). We believe this to be a satisfactory explanation.
62. WJEC's other 4 mark change in a C/D boundary mark between January and June was for one of the two Higher tier papers (Higher tier papers are taken by candidates wishing to access grades B and above). In this case, candidates in June 2012 had to achieve 4 more marks to achieve a unit outcome of grade C than candidates in January had needed to achieve. The June 2012 mark was, in this case, also 2 marks higher than the June 2011 mark. WJEC has explained that examiners in January 2012 had found that they needed to make allowances for one question that candidates had found more challenging than expected – and that this brought the grade boundary down, in January, to a point which would normally have been unacceptable. The issue for this unit appears to be more that the standard achieved by candidates in January was lower than might be expected, rather than that the candidates in June were disadvantaged. However, if a regrading of the award is required to take place, it may be appropriate for WJEC to give further consideration as to whether they are fully satisfied that the C/D boundary was set appropriately for this unit.
63. Turning to the grade boundary changes implemented by AQA, it can be seen in Figure 8 below that AQA implemented four changes

to the C/D boundary marks for GCSE English Language between January and June.

Figure 8: AQA Grade boundary marks in June and January 2012. Source: AQA

June 2012					
English Language (4705)					
	A	C	F		Max
ENG1F		53	19		80
ENG1H	55	44			80
ENG02	38	28	13		45
ENL03	64	46	18		60
January 2012					
English Language (4705)					
	A	C	D	F	Max
ENG1F		43		13	80
ENG1H	54	41	33		80
ENG02	37	25		11	45
ENL03	64	43		16	80

64. AQA's paper ENG1F is the foundation tier externally assessed examination paper, "Understanding and producing non-fiction texts", and the boundary mark set for grade C in June was 10 marks higher than the grade boundary set in January. Evidence provided to Welsh Government officials and reported by the regulator in England (Ofqual) demonstrates that AQA places a strong emphasis on statistical indicators in determining grade boundaries and that, in both January and June, examiners based their judgements around statistically recommended boundaries while giving due cognisance to the quality of candidates' work.
65. The Chair of examiner's report for ENG1F in June 2012 states that *"the Tier F agreed 'C' boundary, initially 52, was moved up to 53 on revisiting the tick charts in the light of further statistical information. Although this mark was significantly higher than the mark for the reference year it was felt that this higher mark was a truer reflection of the quality of candidates' work in relation to the 'C' grade criteria"* and the principal examiner's report for this unit claims that *"the overall demands of the paper were very similar to previous series"*. The implication of these comments, and the conclusion of Ofqual as the regulator in England, is that the boundary mark in January 2012 was set too low and that the boundary mark in June 2012 was the necessary boundary mark in order to meet the predicted outcomes (using the Key Stage 2 prediction methodology for candidates in England). Of the 1084 candidates from Wales who sat this paper in 2012, 488 took the January paper and the remainder took the June paper.
66. AQA's paper ENG1H in June 2012 required 3 more marks to achieve the C grade boundary than did the equivalent paper in

January 2012. This difference falls within the category of a 'normal' change in boundary marks between one series and the next.

67. Units ENG02 and ENL03 comprise the two controlled assessment units for AQA's GCSE English Language specification. For both these units, the boundary marks were 3 marks higher than they were in January 2012, even though candidates had completed the same task. According to Ofqual, AQA officers noted concerns, in January, that marks appeared to be high and that there was some evidence of over-marking by teachers. However, the grade boundaries that had been used previously in June 2011 were maintained in January 2012 as the January entry represented only a small subset of the wider cohort and it was not clear at that point in time as to whether higher grade boundaries would have a detrimental effect on AQA's ability to meet the predicted outcomes for the whole qualification in June 2012.
68. For ENG02, which is AQA's controlled assessment unit for Writing, there are indications of concern about the difficulties of arriving at an appropriate grade boundary in June 2012. Prior to the awarding meeting the principal moderator for this unit suggested that marks from the previous series should "*probably*" be carried forward and described this as the "*ideal scenario*". The principal moderator went on to comment that "*I have no overall sense of how vast numbers of teachers have been rewarding their students. Anecdotally I fear the raw statistical award would need to be high, but I have been working very hard with the AQA research team....to prepare for this award and its aftermath. I suspect there will need to be a judicious decision made on a host of factors, which will move the award upwards, but maybe not as high as it 'should' be.*" It is clear that the changes to the boundary mark, which rose by three marks between January and June 2012, were made in the interest of meeting the statistical predictions for candidates in England. This appears to have created a distinct inequality between candidates who received a unit award in January and those who were awarded for this unit in June and it is relevant to note that **none** of the candidates from Wales who took GCSE English Language with AQA were entered for unit ENG02 in January and all were therefore graded against the higher grade boundaries.
69. ENL03 is the Speaking and Listening controlled assessment unit and again here the mark required at the C/D boundary in June 2012 was three marks higher than in January 2012. The principal moderator's initial report for this unit in June 2012 simply recommended that the mark from January 2012 be carried forward. However, a subsequent report by the same principal moderator explicitly welcomed the fact that moderators are able to amend the grade boundaries for controlled assessment. The principal moderator goes on to comment that "most of the work seen at the

borderlines in controlled assessment by the Principal Moderator has been over-rewarded". There are other suggestions throughout the documentation received from AQA that there are significant reliability (and presumably variability issues) with teachers' marking of controlled assessment. Nevertheless, it remains the fact that for this unit too, there is an inequality in the awarding between candidates who took this controlled assessment unit in January and those who took it in June. Of the 1890 candidates from Wales who took this unit in 2012, only 200 received their unit awards in January, with the majority being awarded against the higher grade boundaries in June.

70. In conclusion, with regard to the determination of grades by AQA between January and June, it is clear that AQA set their grade boundaries in line with the requirements set down by the regulators that Key Stage 2 predictions for England should be used to inform a statistically based decision.
71. While the arguments against the use of the Key Stage 2 predictor methodology for candidates in Wales, as rehearsed earlier in this report, could be deemed to apply equally to those candidates whose centres chose to enter them for AQA qualifications, the fall in outcomes for AQA's 16 year old candidates from Wales (from 59.7% to 57.8% is less than the equivalent fall in outcomes for WJEC's candidates from Wales. In addition, candidates in Wales form a tiny minority of AQA's overall candidature (less than 1%). On balance it is not possible to determine definitively, from the evidence available, whether outcomes for AQA's Welsh candidates for June 2012 are any less reliable than the equivalent outcomes for June 2011. Should further evidence be received, or further action subsequently taken, in respect of AQA grading elsewhere, we would be prepared to look at this issue again.

Scrutiny of WJEC's GCSE English Language specification

72. Each year, as part of its ongoing programme of monitoring, the Qualifications and Learning Division of the Welsh Government conduct a number of 'scrutinies' of WJEC's general qualifications. A scrutiny is an in depth review of the quality of identified qualifications in terms of the design, delivery and standards of those qualifications and in terms of the awarding organisation's compliance with the Code of Practice for General Qualifications. In 2012 the nominated specifications for scrutiny are GCSE English Language, GCSE Mathematics, GCSE History and GCSE Science.
73. For each of these scrutinies the Welsh Government contracts with a team of subject specialists, who, under the leadership of an experienced Welsh Government official, conduct a series of activities designed to elicit qualitative and quantitative evidence on the performance of each qualification. These activities include:

observations of various meetings of WJEC's examiners; a review of the question papers, tasks and supporting documentation; a review of candidate scripts; comparison with the question papers, tasks and candidates' work from other awarding organisations and meetings with staff from centres who have delivered the qualification.

74. The scrutiny of GCSE English Language is currently underway and will not be complete until the end of this year. However, in addition to the comments cited earlier in this report in relation to the awarding meeting, the scrutineers have provided this investigation with some preliminary findings which indicate that:

- *"In both Foundation and Higher Tier examinations and also in the internally-assessed components, the level of demand was appropriately challenging for the full range of the candidature and offered scope for students to show what they knew, understood and could do."*
- *"The levels of demand are appropriately differentiated."*

The next stage in this scrutiny will be the review of candidates' work at key grade boundaries. This will be followed by a number of meetings with selected centres across Wales. Any concerns raised about the standard of candidates' work, or about the design or delivery of the qualification will be identified in a report to WJEC. Regulatory officials will, where necessary, agree the nature and timescale of any appropriate action to be taken, with WJEC and will monitor compliance against a formal action plan.

Matters arising from Ofqual's report on GCSE English Awards 2012

75. Welsh Government officials are grateful to officials at Ofqual for the opportunity to observe their meetings with awarding organisations in the week leading up to the publication of Ofqual's report on GCSE English on 31st August 2012 – and for the willingness expressed by Ofqual to share the data which they received from awarding organisations as well as some of their initial findings in the preparation of their report.
76. Ofqual's report makes clear that it is a report about and for England. Similarly, it should be clearly understood that this is a report about, and for, Wales.
77. We fully respect the integrity of the recommendations made by Ofqual in the light of its own initial findings for England from the evidence it has considered. However, our findings for Wales differ in part to Ofqual's findings for England. In particular, we cannot agree that, in relation to candidates in Wales that:

“the standard set for these English [including English Language] GCSEs is comparable with the standard set in previous years”.

In addition, while we share Ofqual's view that *“each exam board set standards for the qualifications in the manner expected”* we have less confidence than Ofqual that, in relation to candidates for GCSE English Language in Wales, *“candidates' work has been properly graded”.*

78. Ofqual express a clear view that the decision to move away from a modular system for GCSEs in England was the right decision for England. The findings of this investigation do not point to a need to move away from a modular system in Wales. Rather they reinforce, in our view, the need to take into account a full, appropriate and relevant range of both qualitative and quantitative data, for the particular cohort in question, when determining grade boundaries. In particular, our findings suggest that, in determining outcomes for candidates in Wales the most relevant data is that which relates to candidates in Wales rather than that which relates to candidates in England.

Reflection on the challenges presented by qualifications that are delivered by Wales and England

79. One of the findings of this investigation is that a key difficulty in maintaining comparable outcomes for candidates in Wales is the need to reach a compromise where the same qualification is offered in both England and Wales. If we were designing a methodology to ensure comparable outcomes over time for a qualification taken by the vast majority of learners in Wales, we would not choose to do so by using a methodology which only made reference to the predicted and actual outcomes of candidates in England. Ofqual has regulatory jurisdiction over the majority of candidates for this qualification and it was judged important to reach a compromise on determining candidates' outcomes, in the days immediately before the publication of the provisional GCSE results. In hindsight, and in the light of the evidence which has subsequently become available, this compromise was, in our judgement, an inappropriate solution to accept on behalf of candidates in Wales.
80. In order to ensure that awarding decisions for candidates in Wales are made entirely on the basis of data relevant to Wales, it would be necessary to ensure that candidates in Wales followed different qualification specifications to candidates in England. To a certain extent this will be happening for many GCSE courses which start this September as candidates in Wales are able to continue to enter candidates for modular (or 'unitised') GCSEs which candidates in England will not be able to take. Although the linear and unitised qualifications are very similar, they exist and have been separately accredited: linear specifications by the regulators in Wales, England

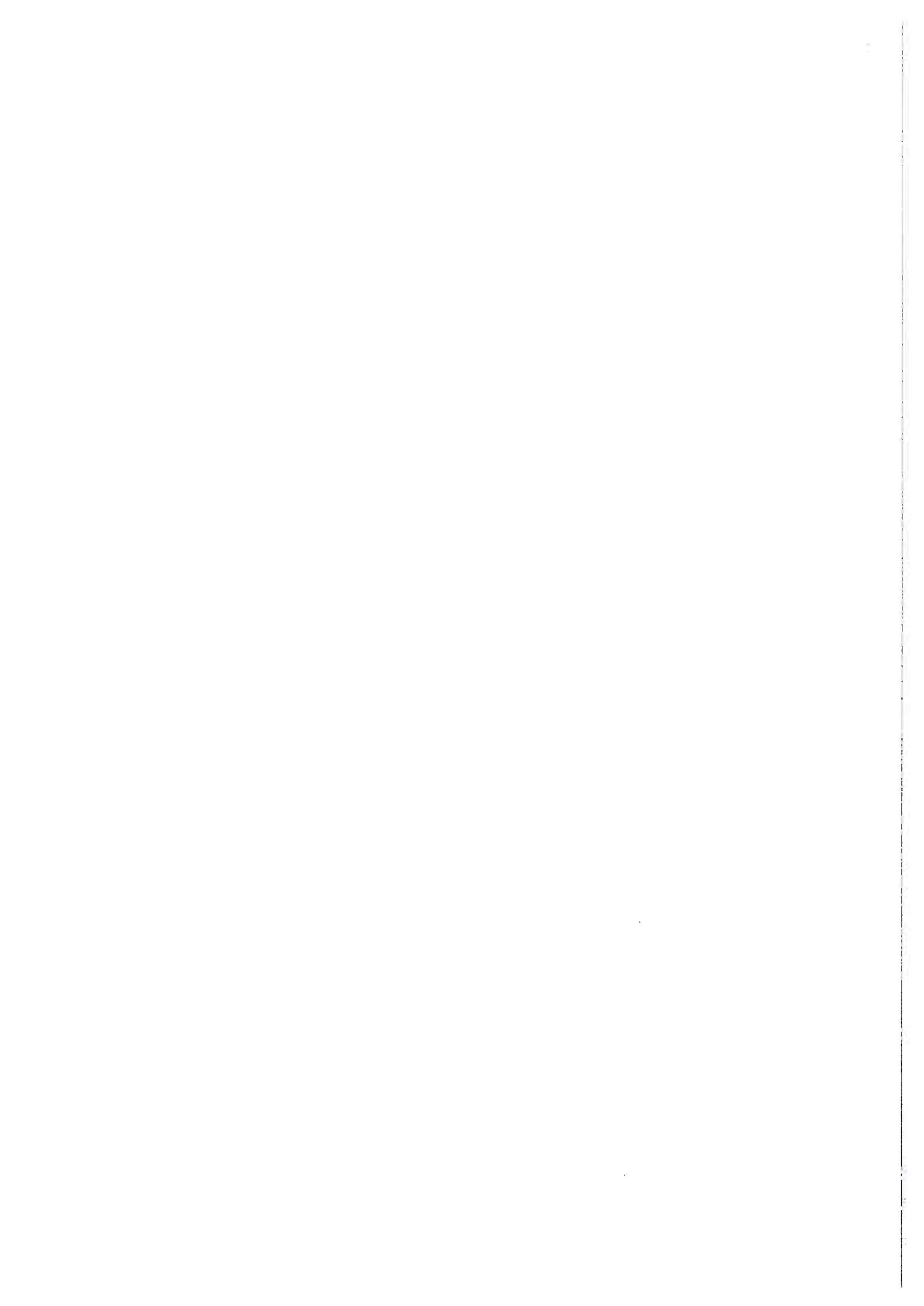
and Northern Ireland, and unitised specifications only by the regulators in Wales and Northern Ireland. It is not inconceivable that any future divergence of policy on qualifications could lead to entirely separate qualifications at this level in Wales, England and Northern Ireland – and indeed this is one of the issues which is currently being debated by the Review of Qualifications 14-19 in Wales.

Recommendations of this investigation

81. Having considered all the available evidence, it is the conclusion of this investigation that the published provisional outcomes for candidates in Wales for GCSE English Language at Grade C and above, which show a fall of 3.9 percentage points from the equivalent outcomes in 2011, are not secure or supported by any reasonable justification. It is therefore recommended that the Minister for Education and Skills, representing the Welsh Ministers in fulfilling their responsibilities in relation to relevant qualifications as set out in Section 30 of the Education Act 1997, should:
- a. **request that WJEC undertake a regrading of GCSE English Language in order to achieve outcomes that are as similar as possible to the outcomes achieved by candidates in 2011, on the basis that there is no reason to believe that the 2012 Wales cohort was significantly different to the 2011 Wales cohort. It would be strongly preferable for this regrading to be applied to all of WJEC's candidates in both Wales and in England but, in the event of the regulator in England (Ofqual) refusing to endorse this regrading, it should be applied only to candidates in Wales;**
 - b. **take no action in respect of the published provisional outcomes for AQA on the basis that, on balance, there is no clear evidence that candidates in Wales who were entered for GCSE English Language with AQA received inappropriate grades, though this could be reviewed in the light of any further action taken by the regulators in England or Northern Ireland.**
82. With regard to the variability in outcomes between centres, it is recommended that the School Standards Unit should:
- c. **in consultation with WJEC and with schools across Wales, continue to undertake the programme of activities that it has already commenced in order to learn the lessons of successful centres in Wales and improve the potential outcomes for less successful centres, with particular regard to the implementation of controlled assessment.**

83. With regard to the difficulty of maintaining comparable outcomes for Wales when qualifications are subject to regulation by a regulator in England which is tasked with implementing policies and methodologies that are designed for England, it is recommended that the Review of Qualifications 14-19 in Wales should:
- d. take due cognisance of the issues raised in this report in forming its views on the extent of future divergence from qualifications in England.**
84. With regard to the difficulties presented by the large proportion of controlled assessment in GCSE English Language, it is recommended that the Review of Qualifications 14-19 in Wales should:
- e. give consideration as to whether controlled assessment is an appropriate assessment methodology for GCSE English Language.**
85. With regard to the difficulties of achieving a good balance between approaches to grading which are akin to norm-referencing and criteria based approaches grading, it is recommended that the Review of Qualifications 14-19 in Wales should:
- f. give consideration as to the most appropriate method of grading the next generation of general qualifications in Wales.**

Qualifications and Learning Division
Department for Education and Skills
Welsh Government
September 2012



Oliver

From: Glenys Stacey
Sent: 09 January 2014 17:05
To: Alison Townsend
Subject: FW: Call to Gareth Pierce

Oliver

• Direct: () ce: 0300 303 3344 • 1410 Spring Place, Herald Avenue, Coventry Business Park •
Coventry • West Midlands • CV5 6UB

www.ofqual.gov.uk • twitter.com/ofqual

-----Original Message-----

From: Glenys Stacey
Sent: 10 September 2012 14:53
To: Fiona Pethick
Subject: RE: Call to Gareth Pierce

cheers

Glenys Stacey
Chief Regulator, Ofqual

• Direct: • Office: 0300 303 3344 • Mobile: () 0 Spring Place, Herald Avenue, Coventry Business
Park • Coventry • West Midlands • CV5 6UB

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-----Original Message-----

From: Fiona Pethick
Sent: 10 September 2012 14:53
To: Glenys Stacey; Julie Swan; Cath Jadhav; Adrian Long
Subject: Call to Gareth Pierce

I spoke to Gareth. He recognises the difficult position he is in. He is considering his response. He believes the report has been issued to the press so withdrawing it may be difficult.

I told him we had asked for a few hours extension. Gareth said he would ask for the same.

Gareth also promised to let us have his line to take asap.

Fiona
Fiona Pethick
Director of Regulation
Ofqual

Okaval

From: Glenys Stacey
Sent: 09 January 2014 17:05
To: Alison Townsend
Subject: FW: Okaval has acknowledged GCSE English Language

Okaval

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-----Original Message-----

From: Glenys Stacey
Sent: 10 September 2012 14:56
To: Crabtree, Kate - (DfES - QLD)
Cc: CCEA
Subject: RE: Okaval has acknowledged GCSE English Language

Welsh Hunt

We have spoken, in a teleconference at 2.15 today. As I explained, I had only just seen your report - the teleconference was arranged as soon as I had seen your E mail below.

In the teleconference I asked, formally, for more time for Ofqual to consider the report and accompanying letter. The matters raised are extremely significant - as we know.

I hope to hear from you shortly.

Best wishes

Glenys

Glenys Stacey
Chief Regulator, Ofqual

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-----Original Message-----

From: Welsh Hunt
Sent: 10 September 2012 11:37
To: Glenys Stacey
Cc: CCEA
Subject: Okaval has acknowledged GCSE English Language

Please find attached a letter and report from t

Gerold Gammert

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Ofqual

From: *Ofqual*
Sent: 09 January 2014 17:05
To: *Ofqual*
Subject: FW: Wales Government report

Ofqual

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From: Fiona Pethick
Sent: 10 September 2012 14:56
To: Adrian Long; Glenys Stacey; Julie Swan; Cath Jadhav
Subject: Fw: Wales Government report

Fiona Pethick
Director of Regulation
Ofqual

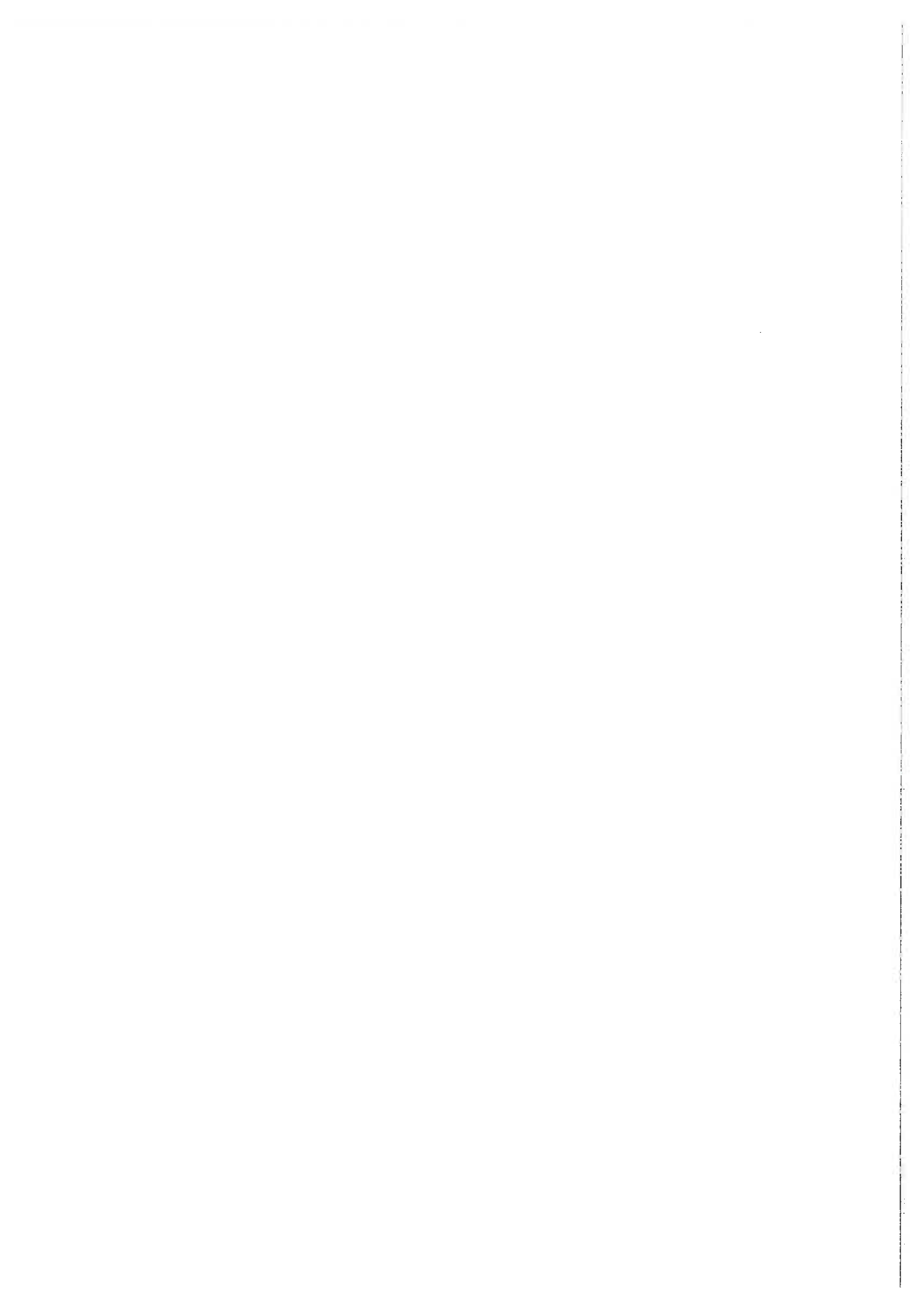
From: Pierce, Gareth
Sent: Monday, September 10, 2012 02:54 PM
To: Fiona Pethick
Subject: Wales Government report

Fiona

We asked about a delay beyond 4:00 release of the report, and had what seems to be the same response given to you.

Gareth

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Checked

From: Glenys Stacey
Sent: 09 January 2014 17:06
To: Alison Townsend
Subject: FW: Welsh report

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From: Julie Swan
Sent: 10 September 2012 15:08
To: Fiona Pethick; Cath Jadhav; Jeremy Benson; Adrian Long; Glenys Stacey
Subject: Welsh report

In summary:

- The cohorts in E and W were different because of the Welsh policy decision not to allow their pupils to take GCSE English
- More candidates took the modular/early entry option in England than they did in Wales. English candidates therefore benefited from both re-sit opportunities and the lower grade boundaries, and disproportionately compared with Welsh candidates
- Using predictions based on KS2 were inappropriate for Wales

In addition:

- Controlled assessment is difficult in English and the 60% weighting might have been inappropriate
- If the common centre approach had been used the overall results in Wales would have been closer to 2011 - many more candidates in Wales would have received a C
- The number of AQA candidates is so small in Wales and the difference between actual and expected outcomes for them is less than for WJEC - hence no recommendation to re-grade.

Tone:

- It reads well and is quite persuasive
- It reads as if WG argued its case with Ofqual but we were committed to the comparable outcomes approach
- It also reads that the drop in English results for Wales was not acceptable for Wales
- It's clear to readers that if we don't move Welsh candidates will be awarded a higher grade than English candidates for the same marks

The future:

- The report concludes that the current approach of common qualifications and joint regulation results in uncomfortable compromises

I'll work up some lines on the consequences.

NI still working on its report.

Julie

Julie Swan
Head of Regulatory Development, Ofqual

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Okayed

From: Glenys Stacey
Sent: 09 January 2014 17:06
To: Okayed
Subject: FW: GCSE English Language - Response to Glenys Stacey
Attachments: 120910 ER to GS Ofqual.doc
Importance: High

Ofqual

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From: Welsh Govt
Sent: 10 September 2012 15:33
To: Glenys Stacey
Cc: Welsh Govt & S
Subject: GCSE English Language - Response to Glenys Stacey
Importance: High

Please find attached a letter from Dr Emyr Roberts

Welsh Govt

Director - Skills, Higher Education and Lifelong Learning
Cyfarwyddwr - Sgiliau, Addysg Uwch a Dysgu Gydol Oes
Department for Education and Skills
Adran Addysg a Sgiliau
Welsh Government / Llywodraeth Cymru
Tel / Ffon:
e-mail / e-bost: j

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Wrth adael Mewnwyd Ddiogel y Llywodraeth nid oedd unrhyw feirws yn gysylltiedig â'r neges hon.

Mae'n ddigon posibl y bydd unrhyw ohebiaeth drwy'r GSi yn cael ei logio, ei monitro a/neu ei chofnodi yn

awtomatig am resymau cyfreithiol.

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Emyr Roberts
Cyfarwyddwr Cyffredinol • Director General

Yr Adran Addysg a Sgiliau
Department for Education and Skills



Llywodraeth Cymru
Welsh Government

Glenys Stacey
Chief Executive Officer
Ofqual
Spring Place
Coventry CV5 6UB

10 September 2012

Dear Glenys

GCSE English Language

Further to our telephone conversation earlier this afternoon, I acknowledge your formal request that the Welsh Government should delay the publication of the report on our investigation into GCSE English Language outcomes in Wales in 2012.

I have put your request to the Minister for Education and Skills in his capacity as the representative of the Welsh Ministers in fulfilling their responsibilities in relation to relevant qualifications under Section 30 of the Education Act 1997. He has considered your request but sees no reason to withhold this report. The report makes clear that, should Ofqual change its position in respect of the re-grading by WJEC for candidates in England, that would be our preferred position. We note your intention to publish your final report in 4-6 weeks time. The Minister has accepted the recommendations of the report and has no wish to cause further delay to the issuing of appropriate grades to candidates. The report will be published at 4pm today.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Emyr Roberts'.

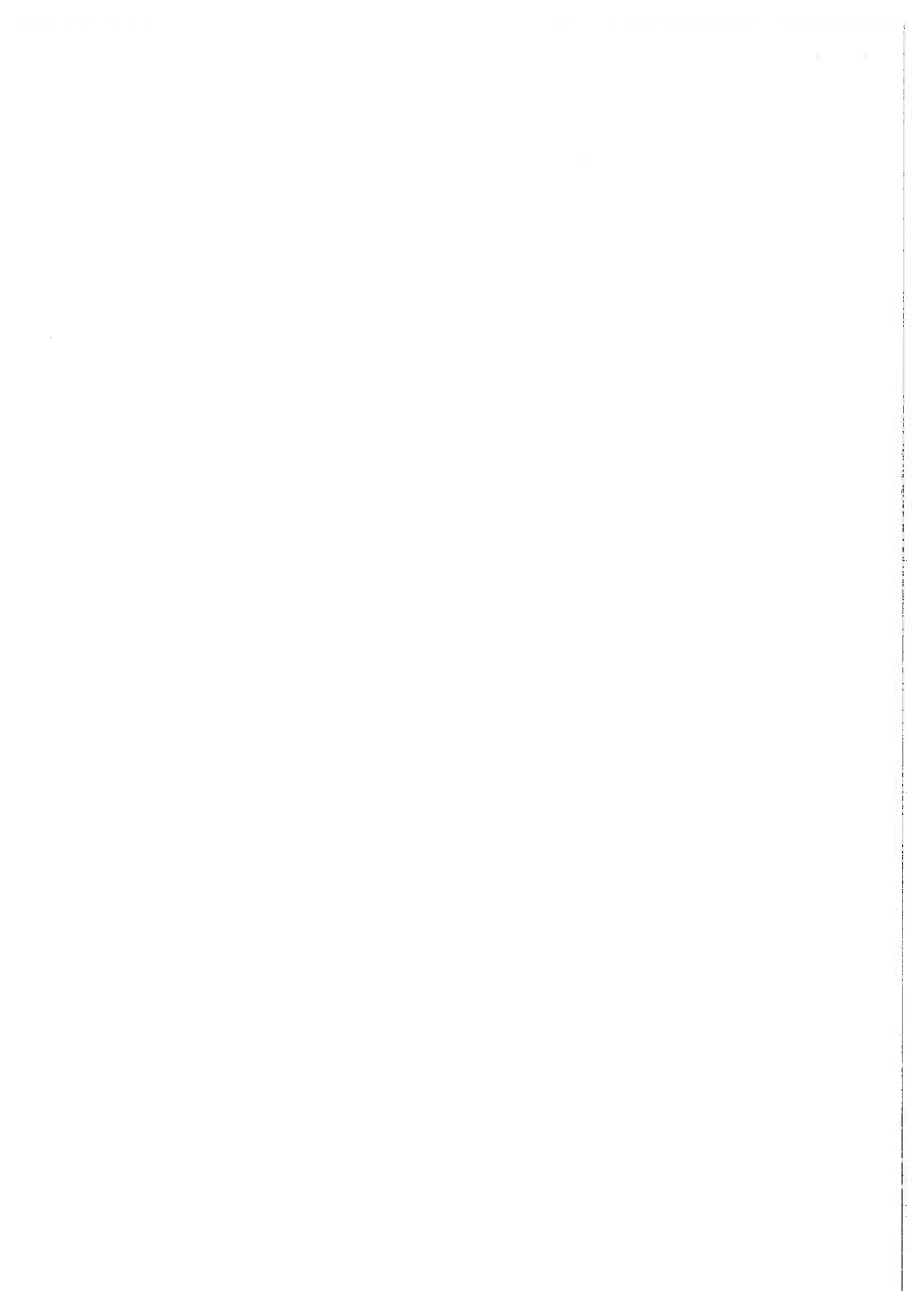
Emyr Roberts



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MEWN POBL | IN PEOPLE



Parc Cathays • Cathays Park
Caerdydd • Cardiff
CF10 3NQ

Ffôn • Tel 02920 826310
emyr.roberts@wales.gsi.gov.uk
Gwefan • website: www.wales.gov.uk



Jeremy

Jeremy Benson
Deputy Director - Policy, Ofqual

- **Direct:**  • **Office:** 0300 303 3344 • **Mobile:** 
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From: Julie Swan
Sent: 11 September 2012 14:34
To: Fiona Pethick; Clare Gilligan; Jeremy Benson; Cath Jadhav
Subject: WJEC

First thoughts on the WJEC issue and options

Regulatory position:

- WG can only direct WJEC to re-grade if it can show WJEC has or might breach a condition
- But WJEC followed WG and Ofqual requirements when setting its final grade boundaries
- If WJEC re-grades it may breach its conditions of recognition - eg H4 - certainly ours and perhaps the WG's too
- So WG may try to achieve its desired outcome without directing WJEC
- WJEC has said an undertaking from it to the WG would not be appropriate
- WJEC has confirmed it will not decide on any response to the WG position ahead of a discussion with us
- WJEC cannot simultaneously satisfy both of its regulators - our duties apply to the qualification, wherever it is taken (although WG has disputed this and maintains the regulation of qualifications taken in Wales is the sole responsibility of the Welsh Minister)
- If WG does decide to re-grade for candidates who took their exams in Wales we would need to consider one or more of the following:
 - Directing it not to re-grade
 - Fining it for breaching its conditions if it goes ahead
 - Withdrawing its recognition
 - Inviting WJEC to surrender its recognition in view of the position in which it finds itself
 - Prohibiting WG from offering the same qualifications in both Wales and England - because we cannot be confident there won't be a re-occurrence. In this case we'd have to consider placing the same prohibition on all AOs. We could do this by way of a special condition
 - Prohibiting WJEC from using the Ofqual logo on the re-graded qualification certificates

We need to consider:

- Consequences for 3 country arrangements, eg use of qualification criteria, ownership of qualification trademarks, use of RITS, reliance on our Register and expertise
- Managing expectations of England based WJEC candidates

Propose:

- Setting out our position in writing to the WG, including the regulatory implications for WJEC and for the other AOs who operate in Wales. Need to decide whether to challenge their analysis or just their recommendation to re-grade

Okaved

From: Fiona Pethick
Sent: 06 January 2014 22:02
To: *Okaved*
Subject: FW: WJEC

FOI

Fiona Pethick
Director of Regulation, Ofqual

• **Direct:** ~~_____~~ • **Office:** 0300 303 3344 • **Mobile:** ~~_____~~
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Fiona Pethick
Sent: 11 September 2012 15:42
To: Jeremy Benson; Julie Swan; Clare Gilligan; Cath Jadhav
Cc: Carol Evans; *Okaved*; Adrian Long
Subject: Re: WJEC

Julie

Looks as if you have covered all the grounds. I think we could find ourselves saying WG have effectively created a new qualification of a new standard.

I suggest an early meeting with WG but it will need to be at a senior level at their end. Chris Tweedale or Emyr Roberts?

Fiona
Fiona Pethick
Director of Regulation
Ofqual

From: Jeremy Benson
Sent: Tuesday, September 11, 2012 02:45 PM
To: Julie Swan; Fiona Pethick; Clare Gilligan; Cath Jadhav
Cc: Carol Evans; *Okaved*; Adrian Long
Subject: RE: WJEC

Julie – thanks – I agree with all this.


However we do it, I think we need to get a stronger public position out very quickly – ideally before the SoS hearing tomorrow (he won't want to have to say 'Ofqual hasn't yet decided on its position' esp given that Leighton Andrews is on the offensive). As long as we don't say 'we will not allow regrading in England', we leave open the possibility that we will, which undermines our position.

- A meeting with WJEC and WG

Our bottom line:

- It is not acceptable to have different standards set for candidates in Wales and England who took the same qualification
- If the regulators cannot agree to secure consistent standards, there can be no common qualifications. AOs will have to make choices.
- Our logo cannot be used on certificates or any other documentation associated with a re-graded qualification
- If there is re-grading we should require/direct WJEC to add some additional words to the certificates awarded to candidates in England so it is clear their qualifications have been awarded using the originally agreed standards; the WG logo should not appear on those certificates

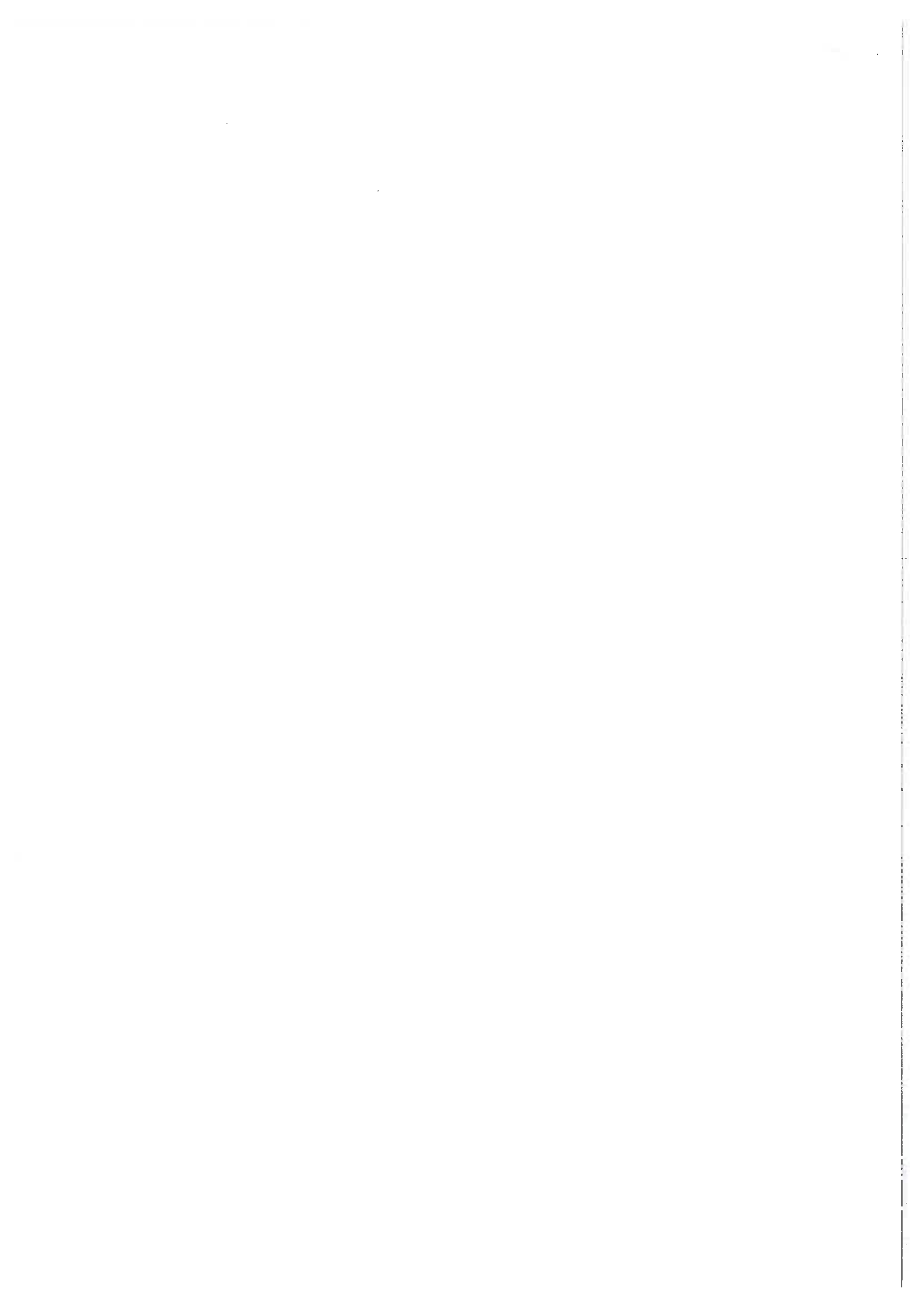
Julie
Julie Swan
Head of Regulatory Development, Ofqual

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Ofqual

From: Julie Swan
Sent: 10 December 2013 15:19
To: Ofqual FOI
Subject: FW: Please Can you tell Roger McCune about Welsh report

Julie Swan
Head of Regulatory Development, Ofqual

• Direct  • Office: 0300 303 3344 • 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB


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-----Original Message-----

From: Julie Swan
Sent: 10 September 2012 15:54
To: Fiona Pethick
Subject: RE: Please Can you tell Roger McCune about Welsh report

Yes he's seen it. He's got a meeting on his report now - have told him we're worried about future of 3 country regulation/qualifications Will be speaking to him later J

Julie Swan
Head of Regulatory Development, Ofqual

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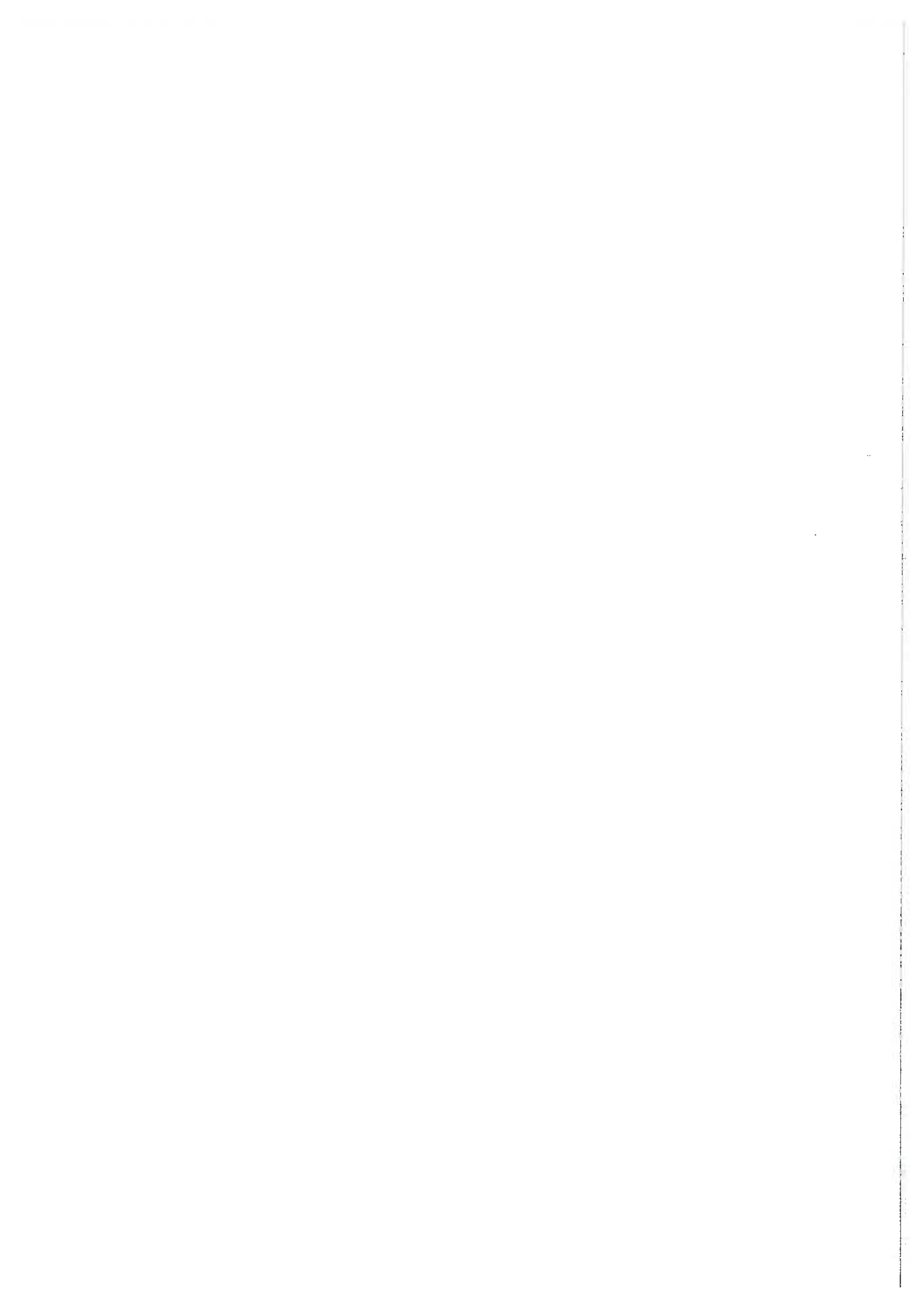
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-----Original Message-----

From: Fiona Pethick
Sent: 10 September 2012 15:53
To: Julie Swan
Subject: Please Can you tell Roger McCune about Welsh report

Fiona Pethick
Director of Regulation
Ofqual





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From: *Andrew*
Sent: 10 September 2012 17:01
To: - CRC; Cath Jadhav
Cc: - Media Relations
Subject: BBC website copy on Welsh regrade call

GCSE English: Regrade demand made in Wales

Several hundred pupils in Wales are expected to receive higher GCSE English grades after the education minister demanded their papers be regraded.

Leighton Andrews said a review had persuaded him they had been the victims of an "injustice".

It follows a row about students being awarded lower grades than expected last month.

His decision marks a break with England where ministers have refused to intervene.

The percentage of pupils from Wales gaining an A* to C in GCSE English language fell from 61.3% in 2011 to 57.4% this year.

The Welsh government says it expects "several hundred" candidates will now get higher grades.

England's exams regulator, Ofqual, has refused to order exam boards to regrade this summer's English GCSEs.

It acknowledged grade boundaries had changed part way through the year, but stood by the new June grading system.

UK Education Secretary Michael Gove has refused to intervene despite admitting pupils have been treated unfairly, saying it was up to Ofqual to oversee marking.

But Wales' education minister has taken a different course of action by asking the WJEC exam board to regrade papers. If it refuses his request he can order the board to act.

An investigation was commissioned by Mr Andrew after the results were published.

Announcing its findings, the Welsh government said it identifies significant problems with the methodology used to award grades.

Mr Andrews said: "After careful consideration, the report leads me to believe that the apparent injustice which has been served to hundreds of Welsh learners needs to be addressed as a matter of urgency.

"Therefore, whilst recognising that the WJEC made its initial awards in compliance with regulatory requirements, I have today asked the WJEC to re-award its GCSE English language in line with the report's recommendations."

Ofqual still had the option to take similar action for pupils sitting WJEC papers in England, he said.

He added: "My responsibility is to ensure fairness to the GCSE candidates in Wales."

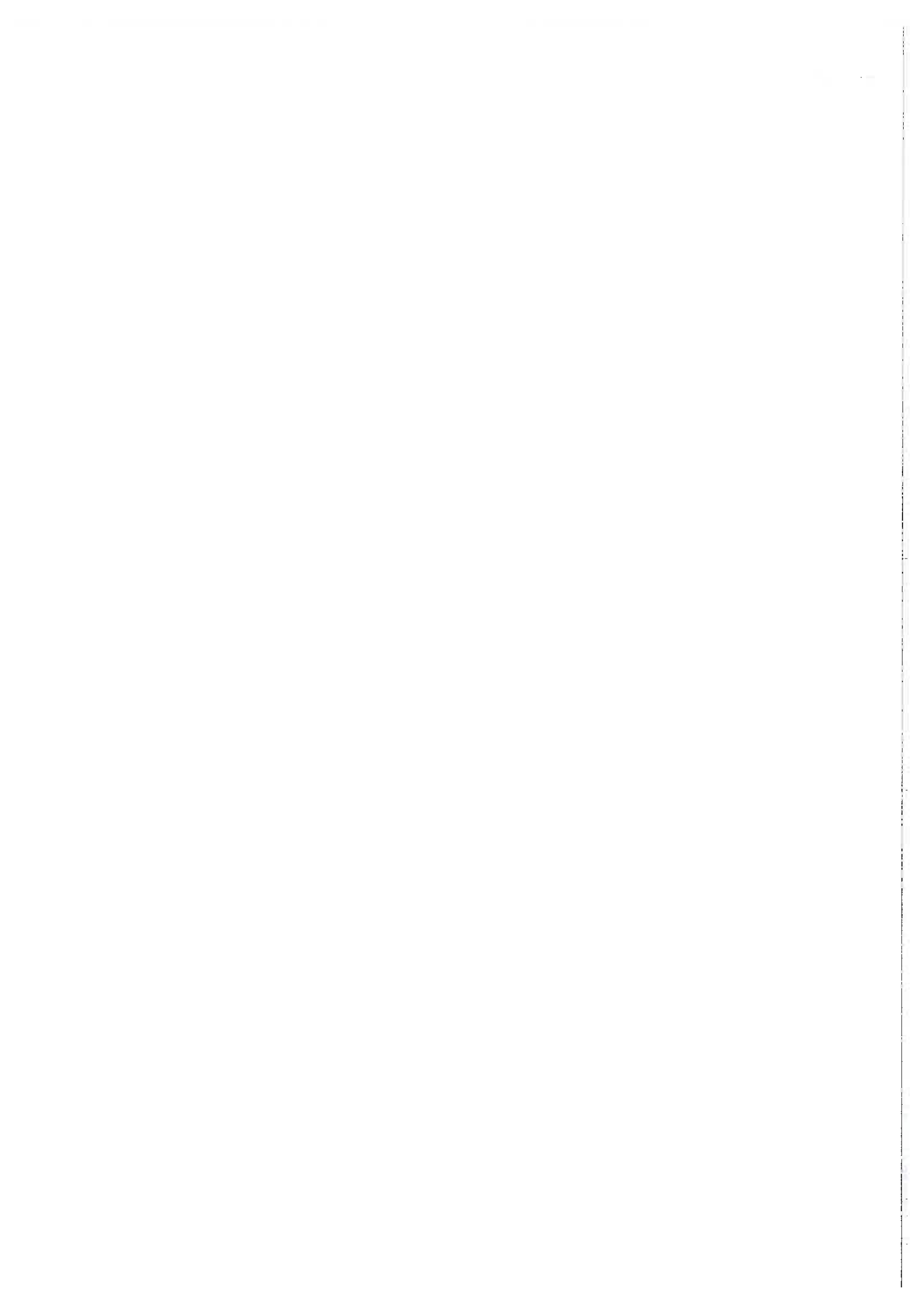
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Okwel

From: Julie Swan
Sent: 10 December 2013 15:25
To: Ofqual FOI
Subject: FW: Welsh lines

Julie Swan
Head of Regulatory Development, Ofqual

- **Direct:**  • **Office:** 0300 303 3344
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Julie Swan
Sent: 10 September 2012 17:51
To: Jeremy Benson; Adrian Long
Subject: RE: Welsh lines

Thanks, happy with that
Julie

Julie Swan
Head of Regulatory Development, Ofqual

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From: Jeremy Benson
Sent: 10 September 2012 17:51
To: Julie Swan; Adrian Long
Subject: RE: Welsh lines

I don't think there's more to say than our press line says. Let's wait until we've considered further.

Jeremy

Jeremy Benson
Deputy Director - Policy, Ofqual

• Direct: [redacted] Office: 0300 303 3344 • Mobile: [redacted]
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Julie Swan
Sent: 10 September 2012 17:31
To: Adrian Long; Jeremy Benson
Subject: FW: Welsh lines

Both I haven't been in touch with the unions, ASCL etc.

What's your advice?

Thanks

Julie

Julie Swan
Head of Regulatory Development, Ofqual

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From: Fiona Pethick
Sent: 10 September 2012 16:35
To: Julie Swan
Cc: Adrian Long; Jeremy Benson; Tim Leslie
Subject: Re: Welsh lines

Thanks

Then what about all the other stakeholders we have seen in recent weeks? It is not our report but we would be better to give the teachers our line before we get calls from NAHT to follow the Welsh regulator and ask for re grading.

Fiona
Fiona Pethick

Director of Regulation
Ofqual

From: Julie Swan
Sent: Monday, September 10, 2012 04:12 PM
To: Fiona Pethick
Subject: RE: Welsh lines

I will brief *David* next – as soon as it hits the news we will get another flurry of calls

Julie Swan
Head of Regulatory Development, Ofqual

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From: Fiona Pethick
Sent: 10 September 2012 16:08
To: Julie Swan
Subject: Re: Welsh lines

No we know Andrew knows but I don't know about the rest.

Fiona
Fiona Pethick
Director of Regulation
Ofqual

From: Julie Swan
Sent: Monday, September 10, 2012 04:04 PM
To: Fiona Pethick
Subject: RE: Welsh lines

Fiona do we know whether all AO CEOs have seen the Welsh report?
Julie

Julie Swan
Head of Regulatory Development, Ofqual

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From: Fiona Pethick
Sent: 10 September 2012 16:02
To: *Clare* Julie Swan; Adrian Long; Glenys Stacey; Jeremy Benson
Cc: - Media Relations
Subject: Re: Welsh lines

Please can *Clare* share these with press office colleagues in WJEC and other exam boards.

Please can Julie send this to Gareth, and to *Clare* / and separately to the other CEOs and Roger McCune.

Thanks

Fiona
Fiona Pethick
Director of Regulation
Ofqual

From: *Clare*
Sent: Monday, September 10, 2012 03:56 PM
To: Julie Swan; Fiona Pethick; Adrian Long; Glenys Stacey; Jeremy Benson
Cc: - Media Relations
Subject: RE: Welsh lines

Following discussion with Glenys and others, the line we will be using for the media is now:

"We need time over the next couple of days to consider this report in detail. There are significant consequences to the recommendations that we do need to look into closely. It is our job to make sure that standards are right in England, and we will not compromise on that."

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From: Julie Swan
Sent: 10 September 2012 15:41
To: Fiona Pethick; *Oliver*, Adrian Long; Glenys Stacey; Jeremy Benson
Subject: Welsh lines

Some possible lines - both for today and for the next few days.

We will be considering the contents of this report carefully as we reach our conclusions in our final report. We need to understand the consequences for the standards of GCSE English Language and for public confidence in the qualification. We also need to understand the consequences for students in England who took WJEC GCSE English Language this year and who took the qualification with other exam boards.

Could add:

For the longer term, decisions will need to be taken on the future of qualifications designed to be taken in both England and Wales

Fuller lines, for later days might include:

Agree regulating a common qualification across different countries is challenging. Particularly with the greater divergence of education policy, notably for this example:

- The withdrawal in Wales of externally marked national curriculum tests and
- The requirement on all Welsh candidates to take English Language and English Literature, without the option to take English

PISA results (international tests run by the OECD) have highlighted the different levels of performance of pupils across the UK, with pupils in Wales achieving at lower levels than those elsewhere in the UK. The overall results which showed lower levels of achievement in Wales in comparison to England and Northern Ireland have been reflected in previous years GCSE results too. We know the WG was uncomfortable with the results in Wales as the first indications of the results became available, and showed the gap in performance this year for Wales compared with England and Northern Ireland had widened.

GCSEs are taken across England, Wales and Northern Ireland. Employers, universities, colleges and the professions that require GCSE English assume the qualification indicates the same level of performance wherever it is taken.

If the WG's recommendation is adopted, the qualification will not indicate this, as candidates in Wales will be awarded a grade for lower marks than would be required for English candidates. (NB We will have to insist that the Ofqual logo does not appear on Welsh candidates certificates - to date all 3 regulators logos have been used on GCSE and A level certificates as an indication that standards are the same wherever the candidate took his or her exams.)

We share the WG's concerns about controlled assessment and have come to the same conclusion that candidates who took the qualification in a modular way generally did better than those who did all of their assessment at the end.

We are continuing our investigations and we will publish a final report in about 6 weeks' time. In the meantime we have agreed with the exam boards that candidates who wish to improve their results will have an opportunity to re-sit some or all of their units in November.

Ofqual is an independent regulator. The decision to establish an independent regulator in England was taken in part to secure the regulator's independence from Ministers and to address perceptions that Ministers' interest in demonstrating the success of their education policy might have an impact on regulatory decisions. In Wales, the Education Minister is also the regulator.

We will urgently be considering the consequences of the Welsh Government's decision and its impact on qualification standards and for public confidence. More candidates took WJEC's GCSE English qualifications in England than they did in Wales. We will be considering how the qualifications will now be viewed and understood across the UK and elsewhere.

Julie Swan
Head of Regulatory Development, Ofqual

- Direct: ~~01203 333333~~ Office: 0300 303 3344
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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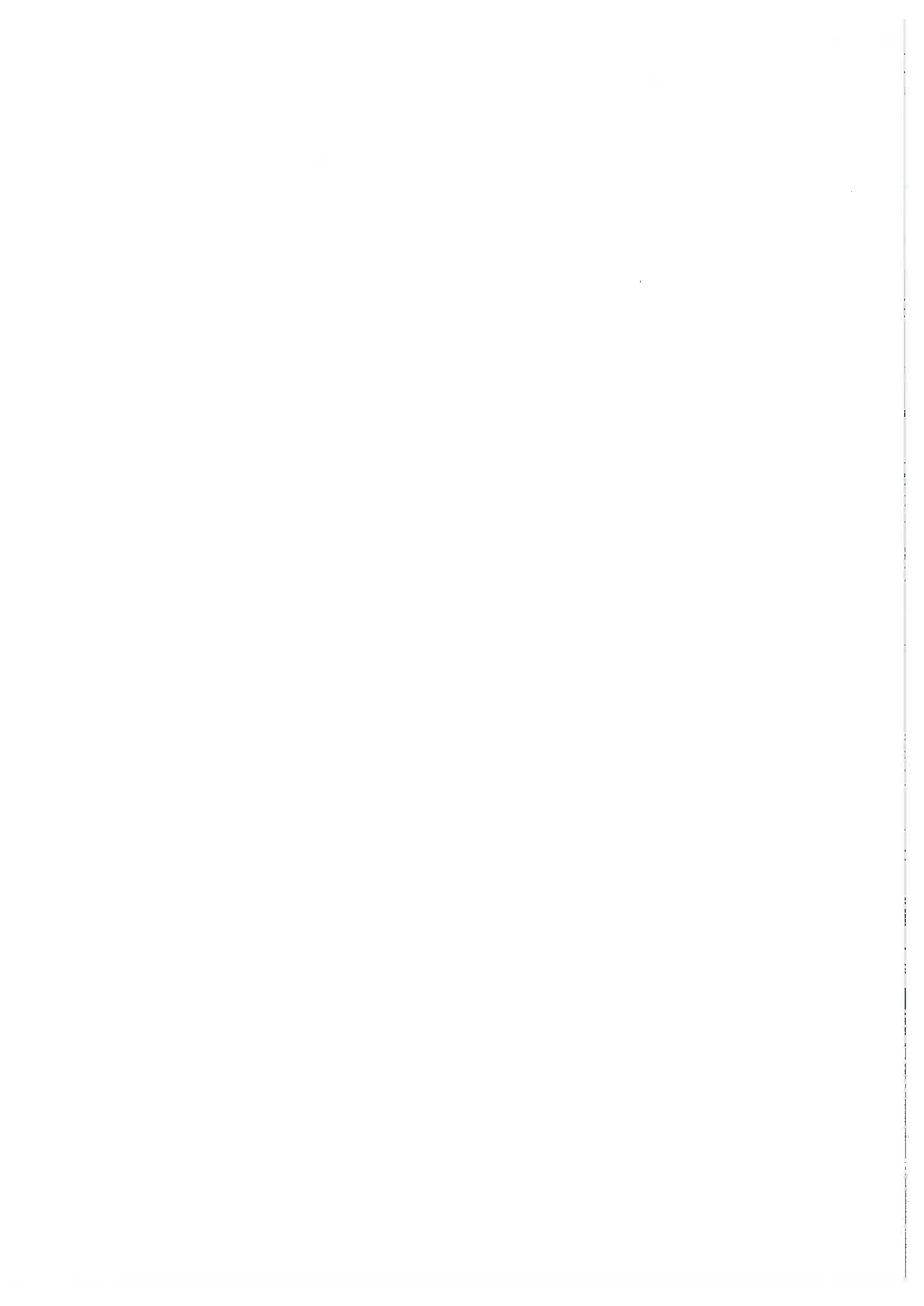
WJEC's contention, therefore, is that there should be no use of those units that represent standards "S-4172" and "S-4174" in future cash-in series, in order to avoid giving some candidates a relative advantage over others, and in order to avoid denying three-regulator certification to some candidates.

Recommendation

WJEC recommends that the grade boundaries and related UMS values for the regrading exercise carried out under direction from the Welsh Government should be regarded as being specific to achieving a particular "cash-in" outcome which was defined in the Direction. Therefore, UMS scores from units that represent standards "S-4172" and "S-4174" would not be used in future cash-in series: instead, for candidates included in the regrading exercise, the UMS scores from the summer award of units 4172/02 and 4174/01 would be used, so that all units included in future cash-ins would be based solely on units which can associated with the standard represented as "S".

Notes

- 1) *A related issue arises from the perspective of grade boundaries in the context of the November re-sit opportunity for GCSE English Language, for which there is an understanding that all awarding organisations shall use, for the controlled assessment units, the same grade boundaries as for the summer award (This fact is not being publicised to centres as it could unduly influence their use of the mark range). In this context, WJEC is proposing to use the summer award grade boundaries for the controlled assessment units for all re-sitting candidates whether from England or from Wales centres, so that we are able to treat the candidature as a whole (i.e. we shall not be using the grade boundary which relates to the re-grading exercise). This is of course the equivalent to using the summer award basis for UMS scores.*
- 2) *An issue also arises in relation to unit UMS scores at the A* grade, in that the regrading exercise will have given a lower unit UMS score for some candidates than what was given at the summer series, through the arithmetic calculation on which the A* boundary is based.*



Yr Adran Addysg a Sgiliau
Department for Education and Skills



Llywodraeth Cymru
Welsh Government

Glenys Stacey
Chief Executive Officer
Ofqual
Spring Place
Coventry

10 September 2012

Dear Glenys

GCSE English Language

Please find attached a copy of the Welsh Government's report on its investigation into GCSE English Language and the outcomes for candidates in Wales in 2012. It is our intention to publish this report later this afternoon.

The Minister for Education and Skills has had sight of the report and has indicated his intention to accept all the recommendations therein. You will therefore need to be aware that a central finding and key recommendation of the report is that:

"Having considered all the available evidence, it is the conclusion of this investigation that the published provisional outcomes for candidates in Wales for GCSE English Language at Grade C and above, which show a fall of 3.9 percentage points from the equivalent outcomes in 2011, are not secure or supported by any reasonable justification. It is therefore recommended that the Minister for Education and Skills, representing the Welsh Ministers in fulfilling their responsibilities in relation to relevant qualifications as set out in Section 30 of the Education Act 1997, should:

request that WJEC undertake a regrading of GCSE English Language in order to achieve outcomes that are as similar as possible to the outcomes achieved by candidates in 2011, on the basis that there is no reason to believe that the 2012 Wales cohort was significantly different to the 2011 Wales cohort. It would be strongly preferable for this regrading to be applied to all of WJEC's candidates in both Wales and in England but, in the event of the regulator in England (Ofqual) refusing to endorse this regrading, it should be applied only to candidates in Wales."

We note the correspondence and discussions that have taken place between Welsh Government officials and Ofqual officials over the last two weeks and we understand that Ofqual's current position is to *not* request a regrade in relation to the GCSE English Language or GCSE English awards. We would like to take this opportunity to re-iterate our preference for a regrade of

candidates across both England and Wales. However, if you wish to proceed with an option not to regrade in relation to English candidates, we will request that WJEC undertakes a regrading for candidates in Wales alone.

I would be grateful if you would let us know how you wish to proceed, preferably before 3:00pm today though discussions can of course continue beyond this.

I am sure that, like me, you will acknowledge the exceptional and difficult nature of this issue. Our preference is that we should take similar action in both England and Wales. However, we must act in a way that is in the best interests of fairness to candidates in Wales.

I am copying this letter to Roger McCune in CCEA.

Yours sincerely

A handwritten signature in black ink that reads "K. Crabtree". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Kate Crabtree
Acting Deputy Director
Qualifications and Learning Division
Welsh Government

Emyr Roberts
Cyfarwyddwr Cyffredinol • Director General

Yr Adran Addysg a Sgiliau
Department for Education and Skills



Llywodraeth Cymru
Welsh Government

Glenys Stacey
Chief Executive Officer
Ofqual
Spring Place
Coventry CV5 6UB

10 September 2012

Dear Glenys

GCSE English Language

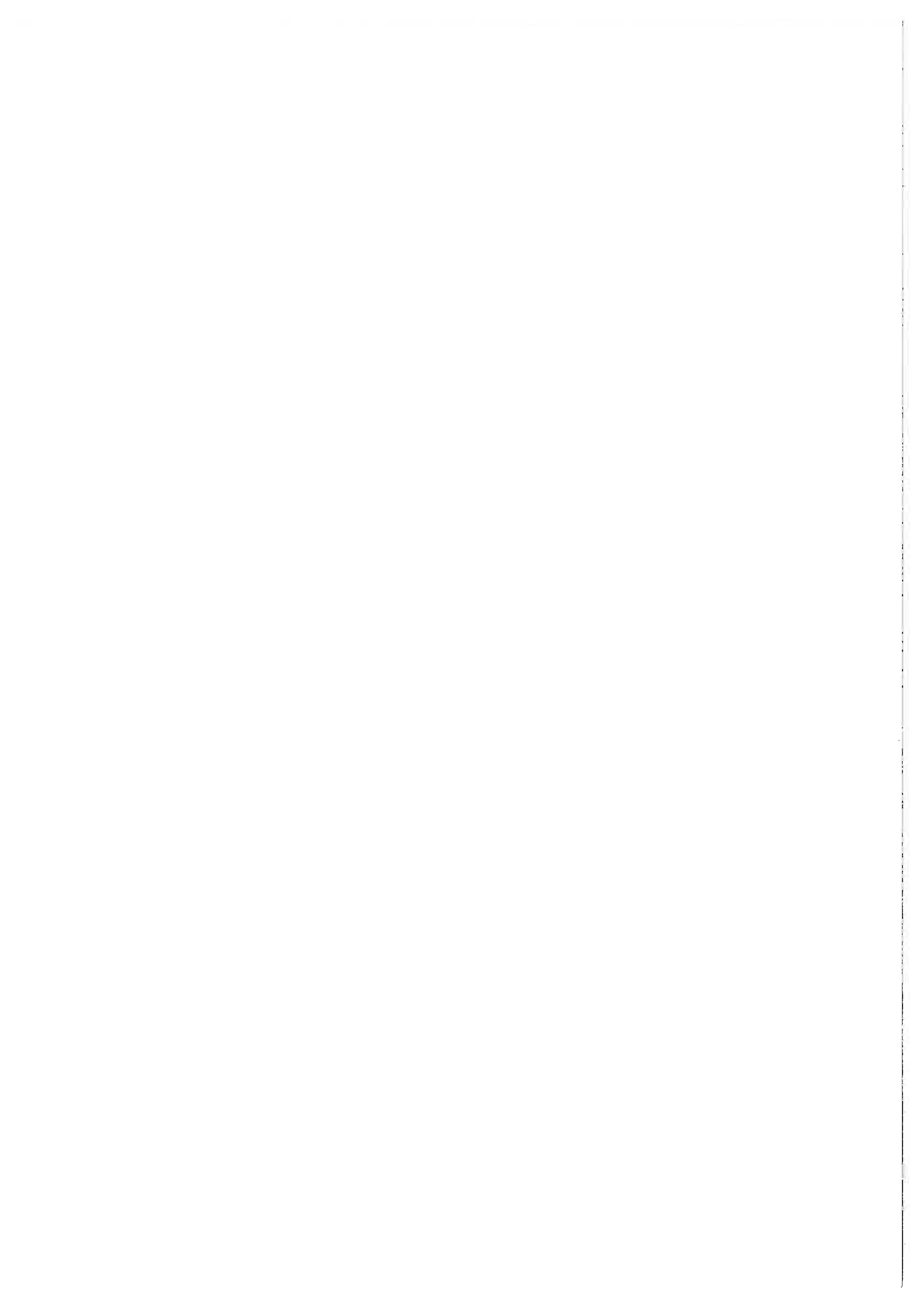
Further to our telephone conversation earlier this afternoon, I acknowledge your formal request that the Welsh Government should delay the publication of the report on our investigation into GCSE English Language outcomes in Wales in 2012.

I have put your request to the Minister for Education and Skills in his capacity as the representative of the Welsh Ministers in fulfilling their responsibilities in relation to relevant qualifications under Section 30 of the Education Act 1997. He has considered your request but sees no reason to withhold this report. The report makes clear that, should Ofqual change its position in respect of the re-grading by WJEC for candidates in England, that would be our preferred position. We note your intention to publish your final report in 4-6 weeks time. The Minister has accepted the recommendations of the report and has no wish to cause further delay to the issuing of appropriate grades to candidates. The report will be published at 4pm today.

Yours sincerely

A handwritten signature in black ink that reads "Emyr Roberts".

Emyr Roberts





11 September 2012

Kate Crabtree
Acting Deputy Director
Qualifications and Learning Division
Welsh Government
Ty'r Afon
Bedwas Road
Bedwas
Caerphilly CF83 8WT

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

Telephone 0300 303 3344
Textphone 0300 303 3345
info@ofqual.gov.uk
www.ofqual.gov.uk

Dear Kate

GCSE English Language

Thank you for your letter of yesterday to Glenys, sharing with us the report of your investigation into GCSE English Language qualifications to be awarded this year to candidates in Wales. We note that your Minister has now also issued a direction to WJEC.

Ofqual's priority is to secure the standards of the qualifications we regulate. The majority of candidates who took WJEC's GCSE English Language this year are based in England, and those candidates are our main concern. But the standard should be one and the same for all students, regardless of where they live. And we do not agree that the qualification should be re-graded, because the evidence we have seen does not justify this.

As we have said publicly, we will need to consider your report in detail, because of the significance of the recommendations. We have been considering in particular whether WJEC can simultaneously meet the requirements of both your direction and our Conditions of Recognition. There are serious consequences if it cannot.

We would therefore like an urgent, senior level meeting so that we can consider your report, the direction to WJEC and the implications for the standard of the qualifications and for public confidence in them. There are also wider issues we will need to discuss about future regulatory approaches and the implications for all awarding organisations that offer qualifications in both Wales and England. I hope we will be able to arrange a meeting this week.



I am copying this letter to Roger McCune at CCEA and to Gareth Pierce at WJEC.

Yours sincerely

A handwritten signature in black ink that reads "Jeremy Benson". The signature is written in a cursive style with a prominent flourish at the end of the name.

Jeremy Benson
Deputy Director, Policy

Yr Adran Addysg a Sgiliau
Department for Education and Skills



Llywodraeth Cymru
Welsh Government

Glenys Stacey
Chief Executive Officer
Ofqual
Spring Place
Coventry Business Park
Herald Avenue
Coventry
CV5 6UB

12 September 2012

Dear Glenys

GCSE ENGLISH LANGUAGE

Thank you for the letter that Jeremy Benson sent to Kate Crabtree yesterday.

I note that Ofqual has taken the decision not to require a re-grade of WJEC's English Language qualification. While that is a decision for Ofqual, I find your conclusion surprising in the light of the questions raised in our published report about the level of confidence that can be placed in the precision of the key stage 2 predictor methodology when considering these particular outcomes. We stand by the evidence and findings of our report which indicate that some candidates in Wales received outcomes that were unjustifiable and unfair.

In implementing the regulatory responsibilities of the Welsh Ministers in relation to relevant qualifications in Wales, our main priority is candidates in Wales. We would prefer to see a common approach across England, Wales and Northern Ireland, but, to date, that does not seem to have been possible on this issue. The recommendation in our report for WJEC to re-grade GCSE English Language is framed in such a way that the door is open for other regulators to join us. We hope that, even now, Ofqual may consider the opportunity to enable candidates in England to receive grades that are directly equivalent to those that will be received by candidates in Wales.

As you are aware, I was in attendance at the meeting of the Select Committee yesterday. I wish to take this opportunity to formally raise our concerns about the comments made by your Chair, which were widely reported, in which she implied that the decision taken in Wales was politically motivated. We believe these comments to be inappropriate, ill-judged and prejudicial, and we would ask that they be withdrawn. We have also noted some comments which you made at the Select Committee and which we do not believe are either fair, accurate or give the complete picture.

With regard to the General Conditions of Recognition, you will be aware that the Welsh Government has similar, parallel Conditions of Recognition. While we acknowledge that the re-grading for candidates in Wales only is an unusual position to find ourselves in, we believe that it should be possible to reach a sensible agreement about the relationship between the action to be taken by WJEC and your Conditions of Recognition.

I am more than willing to meet with you and your officials and would ask that you suggest a convenient time. I must reiterate that the Direction has already been issued to WJEC and we expect the re-grading to occur within the timescale stipulated.

I acknowledge that these issues raise fundamental questions about the future of three country regulation in the light of significantly differing policy directions in each of the countries; in this context, we note the decision of CCEA to cease offering its qualifications in England because of these emerging differences. We need to discuss these issues further.

I am copying this letter to Roger McCune at CCEA.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Tweedale', written in a cursive style.

CHRIS TWEEDALE
DIRECTOR, SCHOOLS AND YOUNG PEOPLE GROUP

Glenys Stacey
Chief Regulator



14 September 2012

Mr Chris Tweedale
Director, Schools and Young People Group
Welsh Government
Cathays Park
Cardiff, CF10 3NQ

Via Email: chris.tweedale@wales.gsi.gov.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
info@ofqual.gov.uk
www.ofqual.gov.uk

Dear Chris

Thank you for your letter of 12 September 2012.

I should say first of all that Ofqual recognises and respects fully the right of Welsh Ministers, in the context of the devolution settlement, to take their own decisions on both regulatory and policy issues relating to qualifications.

Equally, we have always believed – as we said in our recent response to the Education Select Committee report on exams administration – that the well-established arrangements for three-country working are of benefit to students, employers and others, provided that they do not compromise standards.

With the good and trusting working relationships that we have enjoyed in the past, it has been possible to maintain common regulatory arrangements. These arrangements will be tested, increasingly, in the face of divergent qualifications policies, but we believe it is worth the effort of trying to maintain common arrangements so far as possible, provided that standards are not compromised.

We know that at times and out of necessity we have had to act quickly and make regulatory decisions which we would have preferred to have spent more time discussing with you, and we will reflect on that. However, the Welsh Government's actions this week represent something different – a unilateral change to the standard of a key qualification, which represents an unprecedented challenge to joint regulatory working.

All the evidence we at Ofqual have seen is that the approaches adopted by the three regulators in GCSE English/English language and all other GCSE awarding have generally stood up well, and standards across the various examination boards in different parts of the UK are now broadly consistent – indeed, as the NFER report we published a year ago suggests, more consistent than they may have been in the past.

Continued/

The Welsh Government decision to change the standard of GCSE English language qualifications in Wales will lead to confusion amongst employers and universities about the meaning of the GCSE title and the value they can place on it. It risks, in particular, candidates from Wales having certificates which are seen to be of less value than those from elsewhere, even though they will have worked hard for them, and we regret to see that.

We are meeting with you and colleagues later today. We have some immediate issues to deal with, but I hope that we will also begin to discuss the longer term implications of this week's actions. We need to know whether there is still a commitment, in Wales, to joint regulation and we need to discuss what assurances we need to have in place, so that we can continue to regulate jointly.

Finally you mention our Select Committee appearances on Tuesday. I haven't seen the transcript of evidence from Tuesday's Select Committee session yet, and I am not aware as yet that anything I said was inaccurate, but I will of course review the transcript carefully, to check that.

I am copying this letter to Roger McCune at CCEA, and will be publishing it on our website.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Glenys Stacey', written in a cursive style.

Glenys Stacey
Chief Regulator, Ofqual

cc: Roger McCune, CCEA



Glenys Stacey
Chief Regulator

21 September 2012

Mr Chris Tweedale
Director, Schools and Young People Group
Welsh Government
Cathays Park
Cardiff, CF10 3NQ

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

Telephone 0300 303 3344
Textphone 0300 303 3345
info@ofqual.gov.uk
www.ofqual.gov.uk

Dear Chris

GCSE English Language

Thank you for your letter of 16 September.

Let me say straightaway that Amanda very much regrets any offence caused, in what she said at the Select Committee last week. Amanda appreciates that there is a lot for policy makers to discuss, so that they can understand what lies behind the differences in results between students in England and Wales, and we do not wish to pre-judge.

You and I have met together since then to discuss future arrangements for regulation. We at Ofqual welcomed the continued commitment you gave at the meeting to what we call three country regulation – that is, a joint approach in Wales, Northern Ireland and England to regulating qualifications. It has worked well in the past, and we are committed to it working for the future.

Qualifications policy is different in each of the three countries - Wales, Northern Ireland and England - and may differ even more in the future. The regulators in each country know that we will need to keep this under review, and take stock periodically. But we agree that if it is possible, a joint approach is best for all students because the qualifications we regulate are relied on by students, employers and higher education, across borders.

We have agreed to consider together whether we can make any improvements to the way in which we regulators and exam boards predict qualification results in each of the three countries. We think this is a positive and worthwhile development. We don't know as yet whether and how exactly it can be improved but we do think that looking at it afresh is the right thing to do. And that might shed some light on the perplexing differences in performance that we see, so as to assist those responsible for making qualifications policy.

More immediately, we had good discussions this week about how to best manage the risks to standards in 2012-13. The three regulators have a common view, and we will be talking now with exam boards about that.

Lastly, you are quite right - I confused our challenge to WJECs A levels with GCSEs in answer to the Select Committee Chair's question 112 when I gave evidence to the Select Committee last week. We did recognise that at the time - my colleague said as much. But to be absolutely clear, I have asked the Select Committee clerk to correct the record.

Yours sincerely

A handwritten signature in black ink, appearing to be 'G Stacey', written in a cursive style.

Glenys Stacey
Chief Regulator, Ofqual

Okaved

From: Fiona Pethick
Sent: 28 January 2014 21:46
To: *Okaved*
Cc: *Okaved*
Subject: FW: Welsh Government and GCSEs

Fiona Pethick
Director of Regulation, Ofqual

• **Direct:** _____) • **Office:** 0300 303 3344 • **Mobile:** _____
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Glenys Stacey
Sent: 24 August 2012 18:14
To: Fiona Pethick; - CRC; Julie Swan
Cc: *Okaved*
Subject: Re: Welsh Government and GCSEs

Very well done.

From: Fiona Pethick
Sent: Friday, August 24, 2012 06:09 PM
To: - CRC; Julie Swan
Cc: *Okaved*
Subject: Welsh Government and GCSEs

After a couple of email exchanges with Chris Tweedale this morning he rang to tell me the outcome of their deliberations at their end.

First they are not expecting Leighton Andrews to say anything more publicly and LA is about to go on holiday until 10 September.

Officials are proposing an internal enquiry in Wales into GCSE English results - to be led by Owen Evans (Chris Tweedale's equivalent with responsibility for HE and FE).

He recognises that we jointly regulate GCSEs.

The enquiry will look at

1. The process that got us to where we are today. He will want to find all the correspondence there is between us and Welsh Government on these matters, and any correspondence we have had with the SoS (this will not be an FOI request - not appropriate)
2. The implications of the results for "banding" of schools - the equivalent of league tables
3. The role of WJEC - I checked and Gareth Pierce is aware of this enquiry
4. Lessons for future work as a joint regulator.

From: Fiona Pethick
Sent: 09 January 2014 16:26
To:
Subject: FW: GCSE results etc

Fiona Pethick
Director of Regulation, Ofqual

• **Direct:** Office: 0300 303 3344 • **Mobile:**
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Tweedale, Chris (Director - SYPG) [K]
Sent: 24 August 2012 11:28
To: Fiona Pethick
Cc: Jeremy Benson; *Okaval, 2x welsh govt*
Subject: RE: GCSE results etc

Fiona,

I hope you are well. Sorry I was away when you tried to get in touch.

We have been given a remit by the Minister and have an internal meeting booked for this afternoon to scope out and plan the review. I know that we will be asking to see all the correspondence between Ofqual and the AOs, and (if any exist) any communications between Ofqual and the Secretary of State or officials regarding standards and / grade boundaries on the decision process for grade boundaries etc on English [I say this because the Minister has already asked me to contact Glenys to say that a request will be coming from us for this information]. Obviously *WGA* is already involved in the usual scrutiny work with you already. Perhaps we could get back in touch with you after our meeting this afternoon and have a conversation about the proposed scope of the review we intend to undertake?

Best wishes,

Chris

Chris Tweedale
Director / Cyfarwyddwr
Schools and Young People Group
Grŵp Ysgolion a Phobl Ifanc
Welsh Government/ Llywodraeth Cymru

Tel / Ffôn:
Fax / Ffacs:
Mob / Ffon symudol 0
email/e-bost:

From: Fiona Pethick [mailto:Fiona.Pethick@Ofqual.Gov.Uk]
Sent: 24 August 2012 09:53
To: Tweedale, Chris (Director - SYPG)
Cc: Jeremy Benson; Breda Cunningham
Subject: GCSE results etc

Chris

I hope you have had a good holiday - you were away a couple of weeks ago when we tried to get in touch before.

I am aware from the media coverage of yesterday that Leighton Andrews wants to look into the GCSE results and the English in particular. I am not sure, you may not be either, what the scope of this work is. Will it include looking into the comparable outcomes approach which was agreed by exam boards and the regulators at the end of 2011? How can we help you and the team? Would it be sensible to have a conversation?

Best wishes

Fiona

Fiona Pethick
Director of Regulation, Ofqual

• Direct: 02476 716710 • Office: 0300 303 3344 • Mobile: 07595 087434
• 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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Chris

From: Fiona Pethick
Sent: 09 January 2014 16:21
To: Alison Townsend
Subject: FW: On behalf of Chris Tweedale re GCSE English Language
Importance: High

Fiona Pethick
Director of Regulation, Ofqual

- Direct: [redacted] • Mobile: [redacted]
- 1410 Spring Place, Herald Avenue, Coventry Business Park • Coventry • West Midlands • CV5 6UB

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From: Welsh Government
Sent: 31 August 2012 13:21
To: Fiona Pethick
Cc: Jeremy Benson; Tweedale, Chris (Director - SYPG); [redacted] *Ex Welsh Govt*
Subject: On behalf of Chris Tweedale re GCSE English Language
Importance: High

I am sending this on behalf of Chris Tweedale:

Dear Fiona

We look forward to receiving your report on GCSE English and English Language which we will read with interest. We would like to place on record, however, our deep concern that you appear likely to have come to a conclusion that the 2012 results for GCSE English Language are secure when there has been a clear, substantial, unexpected and detrimental effect on an entire cohort of learners in Wales. As we have repeatedly stated, a 3.9% drop, in one year, when a new specification has been introduced for such a high stakes, high entry qualification is unacceptable and indefensible.

Your endeavours to establish a series of November resit opportunities for candidates indicate to us that it is also clear to you that this cohort has been uniquely disadvantaged. It is our view that November examinations, when many candidates will be in different learning settings and when results will not be available until January, are an inadequate response and too late to mitigate the harm that has been caused to the life chances of many young people.

I note that when first discussing the principles of maintaining standards over changed specifications, Ofqual put on record an agreement that:

"on a national level, overall there is no reason to believe that outcomes in terms of grade distribution in the first year should be very different from those before the changes" Ofqual, Maintaining Standards Meeting, 28 Oct 2008.

As you are aware, we are continuing our own investigations and will be reporting in due course.

Regards

Chris

Welsh Government / Llywodraeth Cymru
Qualifications and Learning Division / Is-adran Cymwysterau a Dysgu
Department for Education and Skills (DfES)/ Yr Adran Addysg a Sgiliau (AdAS)
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