



House of Commons
Education Committee

From GCSEs to EBCs: the Government's proposals for reform

Eighth Report of Session 2012–13



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The Education Committee

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Summary

Decisions about reforming GCSEs and the way they are administered will be some of the most important that Ministers in the Department for Education will take, with profound and far-reaching consequences that will affect the lives of many children for years to come. There is much that we can welcome in the Government's current proposals for reform. We agree that significant improvements are required to GCSEs and to the system in which they operate, in order to restore public confidence in our exams. We are concerned, however, that the Government is trying to do too much, too fast.

The proposed changes need to be considered in the context of other changes to the education system. It is unfortunate that the Government has announced the proposed changes to GCSEs before publishing the revised secondary National Curriculum and before it has set out its proposed changes to the accountability system, which drives the way that qualifications are used in schools. This makes it almost impossible to make a full and proper assessment of the likely impact of the proposed changes.

We agree that significant improvements are required to qualifications at Key Stage 4 and we welcome the changes to GCSEs already instigated by the Government. However, the Government needs to show that GCSEs are so discredited that a new qualification is required. We have concerns about the potential impact of the English Baccalaureate Certificates (EBCs) on subjects outside the English Baccalaureate, which will be left with "discredited" GCSEs for some time to come. We question the extent to which it is possible to "upgrade" some subjects, without implicitly "downgrading" others. The Government should be prepared to revise its policies if evidence emerges that our school system is failing to help sufficient numbers of young people acquire the technical and creative skills needed for further learning and work in key areas.

We welcome the Government's intention to ensure that young people acquire the knowledge, skills and understanding valued by universities and employers. While it is right to raise young people's aspirations, we fail to see how raising the bar will automatically result in more young people achieving higher standards. In particular, we have concerns about how well the proposed changes will serve the 40 per cent of young people who currently fail to achieve 5 A*-C GCSEs including English and mathematics. We call upon the Government to explain what it means by a "greater and more honest level of challenge" in exams for 16 year olds and on what basis it will decide what level of challenge is appropriate.

We have not seen any evidence to suggest that the proposed changes will be more successful than GCSEs in addressing under-achievement or in narrowing the attainment gap between the most disadvantaged students and their peers. We recommend that the Government re-considers its proposals for a "Statement of Achievement" specifically for lower attaining pupils, as it could become less useful to these young people than a low grade GCSE or alternative qualification. It must not be allowed to become a badge of failure.

We agree with the Government that changes are needed to the way exams are administered. We are concerned, however, about the long-term impact and serious downsides of franchising subject areas to single exam boards. The Government needs to show that it has paid sufficient attention to the likely unintended consequences of a franchised system or to the complexities of the tendering process.

We have serious concerns about the proposed timetable for reform. The Government is proposing to make change to qualifications and to the way they are administered, as well as to introduce a step-change in standards, all at the same time and to a very tight timetable. This may not only jeopardise the quality of the qualifications developed and of the franchising process, but could threaten the stability of the wider exam system, including A levels. The Government must act in the best interests of young people by ensuring the safe delivery of the qualifications upon which many of their life chances depend. We call upon the Government to pay the most serious attention to the concerns expressed by experts in the field and to slow down the pace of reform.

1 Introduction

The Government's proposals for GCSE reform

1. The assessment system, as a former Secretary of State for Education recently observed, sends a powerful message of what is valued and what defines success in a country, giving us “a glimpse of the sort of citizens the government hopes our children will become”.¹ Qualifications taken at 16 exert a huge influence on what young people learn at this stage of their schooling. Decisions made about reforming GCSEs and the way they are administered will be some of the most important decisions that Ministers in the Department for Education (DfE) will take, with profound and far-reaching consequences which will affect the lives of many children for years to come.

2. The current Secretary of State, the Rt Hon Michael Gove MP, announced his plans for reform of Key Stage 4 qualifications in England on 17 September 2012. The Government is proposing to replace GCSEs with “English Baccalaureate Certificates” (EBCs) in English, mathematics and sciences for first teaching in September 2015, with first examinations in summer 2017. EBCs in history, geography and languages, as well as post-16 English and mathematics, will follow. EBCs in each subject area will be run by a single exam board, chosen by the Secretary of State. EBCs are intended to be more challenging than current GCSEs, signalling a “step change” in standards.²

3. The Government ran a consultation on the proposed reforms which closed on 10 December 2012. Following consideration of the consultation responses, the Department for Education is due to set out its “final policy requirements” to Ofqual. These policy requirements will include the Government's expectations of subject content. Ofqual will then develop and consult on new regulations for assessing and regulating exam boards and their qualifications.³

4. Once Ofqual has set the new regulations, exam boards will submit newly developed EBCs to Ofqual for approval. The Secretary of State will then decide which qualification is selected in each subject to be the new EBC (and therefore which exam board will offer that subject). Exam boards will administer a subject for five years; then the competition will be re-run.

Our inquiry

5. As a Committee, we decided to undertake a very short inquiry in order to scrutinise the proposals for reform and to gauge reaction to the plans. We have taken a keen interest in qualifications and their administration: in 2012, we conducted an in-depth inquiry into the administration of examinations for 15–19 year olds in England, considering issues such as

1 School assessment reforms confirm the government's obsession with exams, Estelle Morris writing in *The Guardian*, 26 November 2012

2 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 1.1

3 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 5.19

standards and grade inflation, the impact of competing exam boards and the interaction between the exams and accountability systems. Many of these issues lie behind the proposals for GCSE reform put forward by the Government.

6. We held an informal seminar on 20 November 2012 with curriculum and assessment experts to explore the benefits and drawbacks of the proposed reforms. A note of this discussion, held under the Chatham House rule, can be found in the Annex to this Report.

7. We asked the Department for Education (DfE) to submit a Memorandum to the Committee, detailing the evidence base for its proposed reforms. Following this, we took oral evidence from the Secretary of State for Education on 5 December 2012. The DfE memorandum and a transcript of the oral evidence are appended to our Report.⁴

8. We also received correspondence and have seen consultation responses and other papers from a range of interested parties, including teachers and teaching unions, voluntary sector organisations and learned societies.

9. In this Report, we do not include a detailed analysis of responses to the Government's consultation on the proposed reforms. Instead, we set out some concerns we have at this stage about the Government's proposals, as well as commenting on features we welcome, based on what we have heard from curriculum and assessment experts and from the Secretary of State himself.

⁴ The oral evidence is contained in Volume II.

2 Coherence and purpose of reforms

Overall coherence

10. In the 2010 White Paper, the Importance of Teaching, the Government signalled that it would be making changes to GCSEs. These included a return to end-of-course assessment, reduced opportunities for re-sits and improved assessment of spelling, punctuation and grammar in some subjects.⁵ In April 2012, the Government indicated that further changes to GCSEs were planned following the outcome of the National Curriculum review.⁶

11. The current proposed changes are rather more significant and have been drawn up before the revised secondary National Curriculum has been published. The Government's consultation document stated that "there will be a separate consultation on reforms to the school accountability system later this year [2012]".⁷ At the time of writing, proposed changes to the school accountability system have yet to be announced.

12. Concerns have been raised about the overall coherence of the Government's reforms, with critics pointing out that the Secretary of State has put forward specific and fundamental changes to qualifications, before the conclusion of the National Curriculum review or the reform of the accountability system.

13. At the moment there is little clarity regarding the curriculum and educational outcomes that will be required of the new qualifications. The Government is keen to have "truly world class syllabuses" that "match the curriculum content taught in the highest performing jurisdictions around the world".⁸ We note that Ofqual has urged the Secretary of State to "state as clearly as possible the curriculum and educational outcomes required," in order to ensure qualifications are designed to meet the Government's requirements.⁹

14. One participant in our seminar subsequently wrote to us that "successful reforms in other countries have taken significant time to consider their education system as a whole, reflecting on curriculum as well as assessment, and ensuring that changes at one stage or age are combined with the necessary changes elsewhere to ensure progression."¹⁰ The Confederation of British Industry (CBI) has called for a "whole system" approach to educational improvement, arguing that "unless all reforms are aligned to a clear set of outcomes across academic performance and the behaviours young people need to move on

5 *The Importance of Teaching—The Schools White Paper 2010*, paragraphs 4.47-4.50

6 Changes to GCSEs from 2012, General Article, on DfE website, updated 26 April 2012. This stated that the DfE expected "to announce in the near future the timescale for introducing new GCSEs in National Curriculum subjects, alongside decisions on the introduction of the new programmes of study." Accessed 9 May 2012

7 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 1.5

8 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 5.18

9 Ofqual response to consultation, 10 December 2012

10 See appendix 2

in life [...] there is a risk that a tougher exam system will simply lead to higher failure rates".¹¹

15. When we questioned the Secretary of State about the overall coherence of his proposed reforms, he told us that "coherence comes at the end of the process".¹² We are not reassured by this assertion and are concerned that there is a lack of overall coherence in the Government's approach to reform of the curriculum, qualifications and school accountability system. It is unfortunate that the Government has chosen to publish its proposals for qualifications reform, before the revised secondary National Curriculum has been published. No sensible reform of assessment can take place without clarity as to what is to be taught. Coherence is not achieved by accident but by design. **We recommend that the Government publishes programmes of study for the revised secondary National Curriculum as soon as possible, so that it can be seen how these relate to the proposed qualification reforms. We also recommend that the Government sets out the curriculum and educational outcomes required of the new EBCs.**

16. The Government has identified the school accountability system as part of the "root cause" of the problems with our exam system, and the consultation document indicates that the Government will "refocus Department's floor standard measures [...] to take account of performance in our new English, mathematics and science qualifications from 2017".¹³ We emphasised in our report last year the consequences arising from the interaction between the schools accountability system and the exam system and we welcome the Government's intention to make changes to the school accountability measures.¹⁴ We believe, however, that if the school accountability is part of the "root cause" of the problem, then proposals for changing the accountability system should properly be considered alongside qualifications reform.¹⁵ It is difficult to see how the Government's current proposals for qualifications reform will end "the perverse incentives created by interaction of our qualifications and accountability system" without being able to consider the revised accountability measures and how they might affect schools' behaviour with regard to the new qualifications.¹⁶ **As we concluded in our exams inquiry last year, any option for reform of exams administration, whether it be a single board or a franchised system, can only have limited impact while the school accountability system continues to drive schools' behaviour in the way that it does at present. We recommend that the Government publishes its proposals for reforms to the accountability system as soon as possible, so that they can be considered alongside the proposed GCSE reforms. Changes to assessment and school accountability should only be implemented as part of a coherent review of Key Stage 4 education.**

11 First Steps—A new approach for our schools, CBI, November 2012

12 Oral evidence 5 December 2012, Q 4

13 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraphs 3.7 and 4.4

14 Education Committee, First Report of Session 2012–13, *The administration of examinations for 15–19 year olds in England*, HC 141–1, chapter 10

15 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 3.7

16 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 1.2

Purposes of examinations at 16

17. The Government has been criticised for failing to take a step back and consider the purposes of assessment at 16 which underpin the proposed reforms. Speaking in the House of Commons, Minister of State for Schools David Laws stated that the Government's qualifications reforms have two objectives: "first we want to restore confidence in standards, and secondly, we want to ensure that the quality of our qualifications matches the best in the world."¹⁷ The DfE consultation document on the proposed reforms identifies what it sees as the main failures of the exam system and provides its analysis of the root cause of these problems. The consultation does not, however, set out what it believes to be the most important purpose of assessment at 16. This is also absent from the DfE memorandum submitted to us regarding the evidence base for the proposed reforms.

18. The Association of School and College Leaders (ASCL) has commented that "a review of GCSE examinations needed first to ask questions about the purpose of GCSE, especially in the changing landscape of raising the participation age (RPA)." The ASCL reports that its members "in the main find it difficult to imagine a complete removal of qualifications at age 16 [...] given the nature of our structures and the numbers of students who transfer to another institution at that age and move on from level 2 to level 3 study." The union suggests that "it would have been helpful to hold that discussion and to address issues around the purpose before moving to such a major change."¹⁸ Others, such as former Education Secretary, Lord Baker of Dorking, and the Confederation of British Industry (CBI), have gone further and have argued that the Government should not be concentrating on exams at 16. A recent CBI report stated that "it is at 18 not 16 that we should be thinking in terms of externally-marked, high-value qualifications." The report warns of the risk that "the mistakes of the past—both teaching to the test by schools and micro-management of the school system through the means of exams and league tables—may be repeated in the EBC".¹⁹

19. As we noted in our report on the administration of exams last year, GCSEs are currently used for a variety of purposes and these multiple purposes place additional pressures on the exam system.²⁰ We agree with the Advisory Committee on Mathematics Education (ACME) that the purpose of a qualification should frame its characteristics and design.²¹ **We recommend that the Government states clearly what it sees as the essential purposes of qualifications and assessment at age 16, which underpin the proposed reforms.**

20. We also note Ofqual's warning that the Government may be expecting too much of its new qualifications, by asking the new single tier assessments to support the best teaching

17 HC Deb, 16 January 2013 col 887

18 ASCL consultation response paragraph 4

19 First Steps—A new approach for our schools, CBI, November 2012 chapter six

20 Education Committee, *The administration of examinations for 15-19 year olds in England*, para 11. Purposes include accountability, certification, progression and differentiation between candidates. See also SCORE consultation response paragraph 3

21 ACME consultation response paragraph 4

and learning, to provide reliable data for accountability purposes, be immune to pressures from the accountability system, to reflect genuine improvements in pupils' achievements and to be capable of being passed by the vast majority of students. In a letter to the Secretary of State, Chief Regulator, Glenys Stacey expressed concern that "the aims for EBCs may exceed what is realistically achievable through a single assessment".²² She concluded that "our advice is that there are no precedents that show that a single assessment could successfully fulfil all of these purposes".²³ **The Government may risk transferring the strain currently placed on GCSEs to the new EBCs, if it continues to use the new qualification, and particular grades obtained in it, as the sole basis of its accountability measurements. We recommend that the Government takes very careful account of Ofqual's advice when drawing up proposals for a revised accountability system.**

22 Letter from Glenys Stacey to Michael Gove, 19 November 2012

23 Letter from Glenys Stacey to Michael Gove, 19 November 2012

3 The GCSE brand

21. The Government announced in the 2010 White Paper, the Importance of Teaching, that it would be making several changes to GCSEs. In April 2012, the DfE indicated that new GCSEs would be introduced in National Curriculum subjects, following the National Curriculum review.²⁴ The proposed reforms go further, suggesting that “a clear break from the past” is needed and a new qualification, the English Baccalaureate Certificate, should replace GCSEs, initially in English, maths and the sciences.²⁵

22. The DfE consultation document identifies two main failures of the current exam system, namely a lessening of demand in GCSEs and the failure of lower GCSE grades to provide a foundation for progression. The DfE’s analysis of the root cause of these problems is “the interaction of the current school accountability system with England’s competitive examinations market”.²⁶ The Government believes that Ofqual’s recent action to tighten controls over GCSEs has “addressed the symptoms of the problem and not the root cause” and that more fundamental reform is necessary to “address the ‘race to the bottom’ at its source”.²⁷ This includes the development of new qualifications, English Baccalaureate Certificates (EBCs), with a “step change” in standards, alongside a move to a single exam board in key subjects.²⁸ The Secretary of State told us on 5 December 2012 that “it is my strong view that attempting to breathe life into the GCSE brand would be in no-one’s interest”.²⁹

23. Many have questioned whether the GCSE brand is so discredited that a new qualification is required. Curriculum and assessment experts at our seminar suggested that GCSEs have been effective at improving attainment in the middle of the ability range, but have served the most and least able less well. They acknowledged that there are issues with GCSEs that need to be addressed; such as modularisation, the re-sit culture, early and multiple entries, controlled assessment, predictability of assessment and too much question scaffolding. It was, however, pointed out that none of these problems is irremediable. Ultimately, as one participant suggested, it is a political decision whether or not to “nurture the brand” or to bring in something new.

24. We agree with the Government that significant improvements are required to qualifications at Key Stage 4 and to the system in which they operate. We broadly welcome the changes to GCSEs already instigated by the Coalition Government, such as a move to end-of-course assessment in some subjects and restricting re-sit

24 Changes to GCSEs from 2012, General Article, DfE website, updated 26 April 2012. This stated that the DfE expected “to announce in the near future the timescale for introducing new GCSEs in National Curriculum subjects, alongside decisions on the introduction of the new programmes of study.” Accessed 9 May 2012.

25 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 4.9

26 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 3.7

27 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 3.7. Changes include a move from modular to linear exams, tightening of requirements for spelling, punctuation and grammar and syllabus content in some subjects.

28 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 1.1

29 Oral evidence 5 December 2012, Q 43

opportunities, as well as changes to the way qualifications count in performance tables. We consider that these changes will help to achieve some of the improvements that the Government is seeking.

25. We believe that many of the problems identified with GCSEs are linked to perverse incentives generated by the system in which the qualification operates, such as school performance measures and competition between exam boards. We concluded in our inquiry last year that competition between the exam boards for market share, combined with the influence of the accountability system, leads to significant downward pressure on standards. These pressures may be compounded by features of the qualifications themselves, such as the high degree of flexibility afforded by a modular structure and repeated opportunities for re-sits. It is essential that the Government in its approach to reform is clear whether the problems that it is seeking to remedy are linked primarily to the qualification itself or to the system in which it operates.

26. We have not received evidence that GCSEs are so discredited that a new qualification is required. Legitimate criticisms can be made of GCSEs, and should be addressed, but the Government must publish in full the results of its consultation and its analysis to justify its case that the brand is so damaged that it is beyond remedy. It must show that the Government could not achieve the objectives outlined by David Laws, namely restoring confidence in standards and ensuring our qualifications match the best in the world, by making changes to GCSEs rather than by bringing in a new qualification. Furthermore, we have particular concerns about several aspects of the proposed reforms, as set out in chapters four to eight.

4 A dual system

27. The Government is clear that it wishes to encourage more young people to study qualifications in core academic subjects. It is proposing that new English Baccalaureate Certificates in English, mathematics and the sciences will be introduced for first teaching from September 2015, with young people taking exams in summer 2017. English Baccalaureate Certificates in history, geography and modern languages, as well as post-16 English and mathematics, will follow, with the timetable to be determined following responses to the Government's consultation. Beyond the English Baccalaureate subjects, the Government has said that it will "ask Ofqual to consider how these new higher standards can be used as a template for judging and accrediting a new suite of qualifications, beyond these subjects, at age 16, to replace current GCSEs".³⁰ It appears, therefore, that EBCs will run alongside GCSEs in other subjects for some time.

28. There has been vigorous opposition to the Government's proposals from prominent figures in the arts community. Concerns have also been expressed about the implications for religious studies, sports and technical subjects, such as design and technology; and about the impact of the reforms on vocational education, and how the proposals may exacerbate the gap between academic and vocational subjects.

29. In a recent open letter to David Cameron, 22 Professors of Education warned that the EBCs will "grievously affect the contribution that our education system makes to both the cultural life of the country and to the creative and innovatory development of our economy".³¹ Higher education representatives have expressed concern to us about the impact of the proposed reforms on widening participation, saying that "universities are offering a vast range of relevant courses, but these proposals sideline the arts, social sciences and some humanities".³²

30. Critics of the Government's proposals also argue that subjects outside the English Baccalaureate will be marginalised and under-resourced, as schools respond to the incentives generated by the English Baccalaureate performance measure, thus creating a two-tier system among curriculum subjects. The Secretary of State emphatically rejected this in oral evidence to us, telling us that "we are putting in place support for music, art and design, physical education and sport, which would lead me to believe that these subjects will flourish more than ever before".³³

31. We support the Government's desire for all pupils to be offered a broad and balanced curriculum which will equip them with the knowledge, skills and understanding they need to progress to further learning and work. We welcome the recent increases in the numbers of young people studying for GCSEs in history,

30 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 4.7

31 "The perfect storm brewing over education", open letter from 22 Professors of Education to David Cameron, 22 November 2012

32 See Appendix 4

33 Oral evidence 5 December 2012, Q 107 and Q 108

geography and modern languages, assuming that this is matched by the achievement of good grades in these subjects. We are, however, very concerned about the potential impact of the English Baccalaureate Certificates on subjects outside the English Baccalaureate, which will be left with “discredited” GCSE qualifications for some time. We question the extent to which it is possible to “upgrade” some subjects without implicitly “downgrading” others. The proposed reforms may undermine parity of esteem between different subjects, and between academic and vocational education, rather than do anything to reinforce it.

32. As GCSEs will continue to be offered in many subjects for the foreseeable future, it is important that public confidence in these qualifications is restored. We recommend that the Government continues with the improvements to GCSEs and that a concerted effort is made to restore confidence in GCSEs in subjects outside the English Baccalaureate.

33. We recommend that the Government tracks very carefully the impact on take-up in subjects outside the English Baccalaureate and the way they are resourced in schools over the next few years if EBCs are introduced. The Government should be open and explicit in acknowledging and explaining the consequences for these subjects. It should also be prepared to revise its policies, should evidence emerge from universities and employers that the school system is failing to help sufficient numbers of young people acquire the technical and creative skills needed for further learning and work in key areas.

5 Administration of examinations

34. The Government believes that moving to a franchised system, whereby a single exam board runs EBCs for a particular subject area, will “address the ‘race to the bottom’ [between exam boards] at its source”.³⁴ We explored in detail the benefits and drawbacks of the various options for administering the exam system, including a single exam board, franchising and multiple exam boards, in our inquiry into the administration of examinations last year. As we acknowledged in that report, there are advantages and disadvantages associated with each option. Key issues raised with us by assessment experts and the regulator in relation to franchising include:

- substantial Government and regulatory input required to draw up and award contracts to providers;
- resource implications for exam boards (to develop qualifications and then put together bids);
- impact on unsuccessful bidders and their future economic viability;
- risk that pricing could “become a dark art” and would be likely to increase;³⁵
- how to encourage innovation and associated financial investment;
- impact on other subjects/qualifications which are currently cross-subsidised by large entry GCSEs;
- concentration of subject expertise in one exam board means that franchising effectively could become a “one-way street”.³⁶

35. A further consideration is how changes to qualifications would be handled within a franchised system. The new EBCs will not be piloted and it is unclear how much flexibility exam boards and Ofqual would have to make improvements, if these were found to be necessary during the five-year lifetime of each EBC.

36. Participants at our seminar were generally pessimistic about the impact of a franchised system on pricing, cross-subsidisation of smaller subjects/qualifications, innovation and subject expertise. One contributor predicted that cross-subsidisation would cease to work and that either the prices for these qualifications/subjects would increase or the qualifications would disappear. It was suggested that subject expertise would either migrate to the successful provider or be lost, meaning that options for renewal of contracts after five years would be much more limited. Ofqual has warned in a letter to the Secretary of

34 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 3.7

35 Education Committee, *The administration of examinations for 15-19 year olds in England*, para 77

36 Education Committee, *The administration of examinations for 15-19 year olds in England*, para 79

State that the system could lose a large amount of subject expertise which “would not only damage the quality of EBCs but would also jeopardise the A level reforms”.³⁷

37. In response to questioning by us, the Secretary of State indicated that he did not share our concerns about pricing and the implications for subject expertise.³⁸ He did, however, indicate that he would be prepared to grant additional powers to Ofqual to enable it to regulate monopoly provision and pricing, should these be required.³⁹

38. Participants at our seminar emphasised that more information was needed on the criteria which the Secretary of State would use to choose the winning exam board in each subject. The Secretary of State confirmed to us that the criteria for selection would be published and that he wants “the whole process of why a particular qualification was chosen to be rendered as transparent as possible.”⁴⁰ He also stated that the selection process would be a genuine competition, based on his assessment of the bids against the published criteria.

39. The Secretary of State also told us that the Government will have a “relationship” rather than a “contract” with the successful exam board. When questioned, he referred to “frustrations” experienced by the Government as a result of European procurement law.⁴¹ He acknowledged that any decision to award a “relationship” to an exam board could be subject to legal challenge by disappointed bidders, as such decisions could threaten the future financial viability of exam boards.⁴²

40. Ofqual has advised the Secretary of State to delay market reform in order to concentrate on qualification reform, on the grounds that “there are significant risks to the safe and continued delivery of all qualifications in the model proposed” and that market reform “will distract Ofqual and exam boards from the central, most important matters of first class qualification and assessment design, standards and delivery”.⁴³

41. In our report last year, we recognised the need for change and expressed concern about the possible long-term impact and the “serious downsides” of a franchised system.⁴⁴ The Government must demonstrate that it has taken sufficient account of the likely unintended consequences of franchising, such as an increase in pricing, and of the complexities of the tendering process, in view of the explicit warnings from the regulator and assessment experts about the risks associated with market reform. As we noted in our exams report, the success of the system will depend to a large extent on how well the Government and regulator specify their requirements and on the quality of the tendering process. The Secretary of State should clarify as a matter of urgency the

37 Letter from Glenys Stacey to Michael Gove, 19 November 2012

38 Oral evidence 5 December 2012, Qq 66, 79-80

39 Oral evidence 5 December 2012, Q 78

40 Oral evidence 5 December 2012, Q 58

41 Oral evidence 5 December 2012, Q 73

42 Oral evidence 5 December 2012, Q 85

43 Ofqual response to DfE consultation, 10 December 2012

44 Education Committee, *The administration of examinations for 15-19 year olds in England*, paras 75 to 82

distinction between a “relationship” and a “contract” and whether these definitions are sustainable.

42. We believe that the speed with which the Government intends to instigate simultaneous market and qualification reform increases the likelihood of problems and may jeopardise the quality of the tendering process and of the qualifications developed. We recommend that Ministers give very serious consideration to Ofqual’s advice and decouple qualification and market reform. We return to the proposed timetable for reform in chapter eight.

6 The impact of a step change in standards

43. The stated intention of EBCs is to “restore rigour and confidence” to the exam system, to “raise the level of challenge” and to create “a step change in standards”.⁴⁵ Candidates will be expected to perform “beyond the minimum levels which are currently required to achieve a C grade at GCSE” and the majority of students will be expected to achieve this.⁴⁶ When we asked the Secretary of State how it would be possible to design an exam that is simultaneously more difficult and has more children succeeding, he responded “because they are taught better”.⁴⁷

44. Participants at our seminar told us that balancing accessibility and a step change in standards would be challenging, with significant implications for teaching and learning in schools. “Change the brand if you like,” commented one contributor, “but standards is the key issue.” It was felt that there was a risk that this improvement in standards would not be delivered by the school system by 2017. Concern was expressed that this could lead to a continued “fudge” over standards, which ironically would perpetuate the threat to the credibility of the system.

45. The Secretary of State has repeatedly emphasised that significant amounts of teaching and learning time will be gained by having qualifications with almost all assessment at the end of the course. He has also cited improved quality in teacher recruitment, sharper performance management of teachers and improved opportunities for professional development, as well as Ofsted’s “increasing preoccupation” with disseminating strategies fostering a high level of student achievement, as factors which will contribute to improved teaching.⁴⁸

46. We welcome the Government’s intention to ensure that young people acquire the knowledge, skills and understanding valued by universities and employers, particularly in literacy and numeracy. We also welcome the clarity from the Secretary of State that the new exams will be graded using a criterion-referencing approach, linked to the standard of work achieved by candidates.⁴⁹

47. We believe that the Government should not underestimate the implications of a step change in standards for teaching and learning in schools. The Government quite rightly sees qualifications as a significant driver to improve performance in schools. It is critical that the Government gets the alignment of assessment and accountability

45 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 1.1

46 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 5.4

47 Oral evidence 5 December 2012, Q 90

48 Oral evidence 5 December 2012, Qq 90-92

49 Oral evidence 5 December 2012, Qq 97-98. There had been speculation that the new examinations would be norm-referenced, that is a fixed percentage of candidates would achieve each grade in any given year, regardless of the standard achieved.

right. The Government should also make greater use of other levers at its disposal, such as the curriculum and supporting teachers' professional development. The proposed timetable for reform must allow teachers sufficient time to prepare for the new qualifications. In addition, teachers must be provided with appropriate training and resources to support their teaching.

48. According to the DfE, 58.6 per cent of young people achieved 5 or more GCSEs at grade A* to C or equivalent including English and mathematics GCSEs or iGCSEs, in 2011/12, meaning that 41.4 per cent of young people do not reach this standard at age 16.⁵⁰ This is rightly a matter of concern to the Government. **Policies need to be focused on improving the attainment of the significant minority of young people, who do not achieve 5 or more A*-C grade GCSEs including English and mathematics. While it is right to raise young people's expectations and aspirations, we fail to see how raising the bar will automatically result in more young people achieving higher standards. Furthermore, we have serious concerns about how well the proposed reforms will serve the 40 per cent plus of pupils who do not achieve the Government's current floor standard.** We return to this in chapter seven.

Standards and grade inflation

49. The DfE consultation document states that “there is clear evidence that the standards of our examinations have fallen over time”.⁵¹ Both the consultation document and the DfE memorandum to us contrast rises in the proportion of students achieving higher GCSE grades with static or “stagnating” performance on international tests such as PISA. The Government cites research by Durham University, the Royal Society of Chemistry, Ofqual and Ofsted in support of its view that “the increase in GCSE attainment seen over time has not been matched by the same level of improvements in learning”.⁵²

50. The concept of exam standards is complex, involving the content of syllabuses, the demand of question papers and tasks, as well as marking and grading. As part of our exams inquiry last year, we explored with assessment experts the factors contributing to increasing numbers of students achieving higher GCSE grades. These fell into four broad categories: genuine improvements (e.g. better quality teachers and teaching), changes in the structure and design of qualifications (e.g. modularisation, re-sits), factors linked to underlying drivers such as the accountability system (e.g. focus on C/D borderline, teaching to the test), and finally factors linked to exam board procedures (e.g. increased transparency, tolerance of small, year-on-year increases). A further factor is the extent to which competition between exam boards may exert downward pressure on standards. Tim Oates, Group Director of Assessment Research and Development at Cambridge Assessment and head of the National Curriculum review expert panel, has made the point that there is a lack of evidence identifying which factors lead to actual improvements in

50 GCSE and Equivalent Results (Provisional) and National Curriculum Teacher Assessments at Key Stage 3 in England, 2011/12, DfE Statistical First Release, 18 October 2012

51 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 3.3

52 Appendix 1, written memorandum submitted by DfE, paragraph 3.13

underlying attainment (as well as improved grades).⁵³ Grade inflation is therefore very difficult to disentangle.

51. The Government's proposed reforms involve some, but not all, of the factors cited above: competition between exam boards within a subject area will be removed, the new EBCs will be linear and they will involve a step-change in the standards expected. The Government has also suggested that it may discourage teaching to the test (and also reduce transparency) by limiting access to materials such as past papers and mark schemes.⁵⁴ A key factor missing from the current proposals is the accountability system and how changes to performance measures may interact with the new qualifications.

52. We agree with the Government that it is important to try to address grade inflation and to foster genuine improvements in standards, in order to improve public confidence in our exam system. Beyond the Secretary of State's statement to us that he is opposed to norm-referencing and that EBCs will be graded using criterion-referencing, there is little further detail about how he expects the new qualification to be graded. We would stress that the issues around grading are complex, multi-faceted and technical. Removing competition between exam boards within a subject area may not solve all problems associated with grading (indeed assessment experts have told us that many issues would persist with different organisational models).⁵⁵ **The Government needs to give further consideration to how the new qualifications will reflect genuine improvements in performance and to how it will demonstrate that this is the case. The Government should take expert technical advice when considering how the new qualifications will be graded, to ensure that it has considered the potential implications of any proposals. This advice should be published, in the interests of transparency.**

53. Students who take GCSEs in summer 2016 will find themselves competing for places in further/higher education and work against the summer 2017 cohort who will have a mix of GCSEs and harder EBCs. In our report last year, we suggested that "occasional explicit recalibration of grading standards may be required".⁵⁶ The "step change" in standards marks a departure from the emphasis in recent years on maintaining standards in examinations from one year to the next. **The Government must pay very careful attention to how the "step change" in standards will be managed and to the potential implications of the move to EBCs. This includes holding discussions with representatives from further and higher education and employers to consider how GCSEs and EBCs will be used in selecting students, so that all young people, whether they take GCSEs or EBCs, are treated fairly as they progress in education and work.**

54. The Government wants the new qualifications to "provide a greater and more honest level of challenge".⁵⁷ It has not, however, explained what assessment it has made of the

53 Exam standards: the big debate, Cambridge Assessment, 29 April 2010

54 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 5.24

55 Education Committee, *The administration of examinations for 15-19 year olds in England*, para 49

56 Education Committee, *The administration of examinations for 15-19 year olds in England*, para 92

57 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 4.1

appropriate level of difficulty for exams taken by 16 year olds, why that is desirable or how it should be benchmarked. The Government is expecting that EBCs will “match the curriculum content taught in the highest performing jurisdictions around the world”.⁵⁸ It is not clear how or why O level Mathematics in Singapore, for example, might be appropriate for pupils in England. **The Government must explain what it means by a “greater and more honest level of challenge” in exams for 16 year olds and why this is appropriate. It should also recognise that, whatever the level of challenge, there will be winners and losers as a result. We recommend that the Government sets out explicitly who these will be.**

7 Addressing under-achievement

55. One of the Government's stated leading priorities is to narrow the attainment gaps between disadvantaged pupils and their peers.⁵⁹ The DfE memorandum to us states that "socio-economic disadvantage has a strong impact on pupils' performance in England."⁶⁰ Evidence shows that the gap in attainment begins before children start school and continues to widen throughout children's time at school.⁶¹ In 2010–11, 58.2 per cent of pupils overall achieved 5 or more A*-C grades at GCSE or equivalent, including English and mathematics, while just 33.8 per cent of disadvantaged pupils (pupils eligible for free school meals or looked after children) achieved the same benchmark.⁶²

56. Speaking in the House of Commons, Minister for Schools David Laws stated that "our reforms combine rigour with a commitment to fairness and social mobility. They will raise the bar, but they will not shut the door on any young people".⁶³ When asked how well the proposed reforms would serve lower attaining pupils, who are also often the most disadvantaged, the Secretary of State told us that "the changes we are bringing about will ensure more time for teaching and learning, and that there is a style of assessment that helps students who come from more challenging backgrounds".⁶⁴ He also cited the proposed removal of tiering from examinations.

100% external assessment

57. The Government's preferred approach is to remove internal assessment from all six English Baccalaureate subjects.⁶⁵ EBCs will be linear qualifications, assessed at the end of the course. The Secretary of State told us that "there is some evidence from Ofqual that linear rather than modular assessment helps those students either from poorer socio-economic backgrounds or who have been poorer performers beforehand. There has been an assumption amongst some, and the argument has been put forward, that modular assessment helps students from more challenging backgrounds. Ofqual's research contests that".⁶⁶

59 DfE website <http://www.education.gov.uk/b00214299/attainment-gap-at-ages-11-16-and-19>, accessed 17 January 2013

60 Appendix 1, paragraph 5.3

61 Early Years Foundation Stage Profile Results in England, 2011/2012, DfE Statistical First Release, October 2012; Low income and early cognitive development in the UK, A report for the Sutton Trust by Jane Waldfogel and Elizabeth Washbrook, February 2010 and Research findings for the Social Mobility Summit, Carnegie Corporation of New York and the Sutton Trust, May 2012; National Curriculum Assessments at Key Stage 2 in England, 2011/2012 (Revised), DfE Statistical First Release, December 2012. In 2011/12 66 per cent of pupils known to be eligible for FSM achieved the expected level in both English and mathematics compared with 82 per cent of all other pupils, a gap of 17 percentage points.

62 GCSE and Equivalent Attainment by Pupil Characteristics in England, 2010/11, DfE Statistical First Release, February 2012

63 HC Deb, 16 January 2013, col 888

64 Oral evidence 5 December 2012, Q 10

65 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 5.9–5.10

66 Oral evidence 5 December 2012, Q 9

58. Ofqual published its study “Effects of Unitisation in 2009 GCSE Assessments Comparison of Candidate Achievement in Modular and Linear Assessments” in March 2012. The report concluded that “there is no uniform pattern as to whether modular or linear routes lead to better outcomes.” The study found that lower ability candidates gained higher grades in linear assessments in mathematics. It did not, however, identify the same pattern specifically for lower ability candidates in English, English Literature, geography, ICT or RE. More importantly, it did not investigate any link between candidates’ performance in modular or linear assessments and their socio-economic background.⁶⁷ **The Ofqual research therefore provides insufficient evidence to back the Secretary of State’s assertion that linear assessment helps students from disadvantaged backgrounds.**

Removal of tiering

59. The DfE consultation states that “the current structure of GCSEs fails lower attaining students”, as the lower grades at GCSE provide a weak foundation for progression.⁶⁸ Furthermore, the current GCSE system with two tiers of exams “caps students’ aspirations” by limiting foundation tier candidates to achieving a grade C.⁶⁹ The Government believes that “having a grade-cap in foundation tier examinations is likely to be de-motivating and limit the aspirations of students”.^{70 71}

60. The Government is proposing that wherever possible EBCs should not be tiered, in order to remove the grade-cap and to “benefit all students and increase motivation and attainment possibilities”.⁷² Assessment experts at our seminar questioned how a single untiered assessment would simultaneously stretch the most able while remaining accessible to lower ability candidates. Professor Robert Coe of Durham University, and Professor Dylan Wiliam, a member of the Government’s national curriculum review expert panel, have warned publicly that untiered assessment may be technically less reliable.⁷³ We also note the consultation response from The Association of Schools and College Leaders (ASCL) which states that “able students often perform poorly on the simplest questions as they are searching for non-existent complications and may not be stretched appropriately, and lower ability candidates will find large part of the qualification inaccessible”.⁷⁴

67 Effects of Unitisation in 2009 GCSE Assessments Comparison of Candidate Achievement in Modular and Linear Assessments, Ofqual, March 2012

68 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 3.5

69 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 5.7

70 Appendix 1, paragraph 5.9

71 In current GCSE examinations, question papers are targeted either at grades A*-G (a single tier), or are targeted at one of two tiers, foundation and higher. Students entered for higher tier can achieve grades A*-D, while foundation tier candidates can achieve grades C-G. Examples of subjects with two tiers are English, English literature, mathematics, geography, modern and classical languages and the sciences. Subjects with a single tier include history, economics, music, business, religious studies, drama, and art and design.

72 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 5.8 and appendix 1, paragraph 5.10

73 Is retreat the only option? *The Times Educational Supplement*, 18 January 2013

74 ASCL consultation response paragraph 19

61. While we acknowledge the potentially demotivating effect of a grade-cap, our understanding is that tiering was not designed to cap aspiration (although this may have been an unintended consequence). Rather, it was designed to provide appropriately differentiated assessments for young people across the ability range. Whether or not GCSE question papers have managed to do this effectively in all subjects is a matter for debate. However, rather than imposing a central requirement for untiered assessment in EBCs, we recommend that the Government takes advice from assessment and subject specialists on a subject-by-subject basis, as untiered assessment may be more effective and appropriate in some subjects than others.

Proposals for English and mathematics post-16

62. The Government is proposing that young people who are “not secure” in English and maths at 16 should continue to study these subjects post-16.⁷⁵ We welcome this proposal, as achieving good qualifications in these subjects is vital for young people’s progression to further learning and work. There is, however, a clear need for additional resources and training to support these changes, as there are concerns about both the quality and quantity of expertise in English and mathematics teaching at GCSE level in the further education sector. The DfE estimates that there is a shortage of specialist English and mathematics teachers in the sector able to teach to GCSE level of 10 per cent and 25 per cent respectively.⁷⁶ Ofsted has also expressed concern about the “sufficiency of expertise in English and maths teaching” in the further education sector, as well as identifying problems with the quality of current teaching.⁷⁷ The Secretary of State acknowledged to us that “there is more that we need to do” to support post-16 education providers, in particular FE colleges, in teaching English and maths.⁷⁸

63. The Government must take steps to improve the staff subject expertise in English and mathematics in further education colleges, both through professional development opportunities for the current workforce and through measures to recruit more English and mathematics specialists to work in post-16 providers. We recommend that the DfE sets out a detailed strategic plan of how it will achieve this, including initial teacher training and professional development for existing teachers, and showing how sufficient resource will be put in place to support the measures.

Statement of Achievement

64. The Government proposes that students who are not entered for EBCs (and possibly also those achieving a low grade, or even all students) should be provided with a “Statement of Achievement” by their school, setting out their strengths and weaknesses in each subject.⁷⁹ This has been described by teacher Ben Morse as “the educational wooden

75 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 6.4

76 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraph 7.5

77 Ofsted annual report 2011/12, Learning and Skills, paragraph 12 and paragraphs 52-60

78 Oral evidence 5 December 2012, Q 101

79 Reforming Key Stage 4 Qualifications, DfE consultation, 17 September 2012, paragraphs 6.1 and 6.2

spoon” which will “be worthless to employers, and identify these young people as the bottom of the pile”.⁸⁰

65. The DfE memorandum to us set out a range to evidence showing that the future prospects for young people who achieve GCSE grades D and below are limited, which we accept entirely.⁸¹ However, it is unclear to us how the proposed Statement of Achievement would serve young people any better than low GCSE grades or alternative qualifications, particularly if it was only provided to lower attaining students. As learned society SCORE has suggested, such a statement “risks appearing as a ‘statement of failure’”.⁸²

66. Overall, we have serious concerns about how well the Government’s proposed reforms will serve lower attaining pupils, particularly with a new qualification that will be more difficult to achieve, and we have not seen any evidence that leads us to believe that the proposed changes will be more successful than GCSEs in addressing under-achievement or in helping to narrow the attainment gap between the most disadvantaged students and their peers. In particular, we recommend that the Government re-considers its proposals for a “Statement of Achievement” specifically for lower attaining pupils, as it could become less useful to these young people than a low grade GCSE or alternative qualification. It must not be allowed to become a badge of failure.

80 New exam proposal is full of holes, *The Guardian*, 17 October 2012

81 Appendix 1, paragraph 5.12

82 SCORE consultation response paragraph 29

8 Timetable and risks of proposed reforms

68. Our understanding of the timetable for the proposed reforms, which we confirmed with the Secretary of State, is that Ofqual will have developed and consulted on criteria for assessing and regulating EBCs by Easter, with exam boards submitting newly developed EBCs to Ofqual for approval by June 2013.⁸³ The Secretary of State will then select the winning exam board in each subject area, using criteria to be published later this year.

69. Participants at our seminar questioned whether the proposed timetable was achievable. There have also been suggestions that the rushed timetable might jeopardise the quality of the reforms. The Secretary of State acknowledged to us that “there are a number of people who are concerned about the pace”, but told us that his “very, very strong view is that we should stick to the timetable we have set, but of course, if a red light flashes, we will take account of it”.⁸⁴ He indicated that he would be prepared to overrule concerns from the regulator over the timetable.⁸⁵

70. On 22 January 2013, the Secretary of State wrote to Ofqual, setting out the next steps for A level reform. Revised A levels in the facilitating subjects will be introduced for first teaching from September 2015, with students sitting exams in summer 2017, the same timetable as for the proposed changes at Key Stage 4.⁸⁶ This will place a significant burden on many schools, with teachers having to adapt to major changes at GCSE and A level at the same time.

71. We have serious concerns about the Government’s proposed timetable for change and about the risks of making fundamental changes to qualifications and the way they are administered at the same time. The problems with results in GCSE English in 2012, which ultimately led to a legal challenge, illustrate the turbulence and disruption that can ensue when significant changes are made to a high stakes qualification. The proposed reforms involve changes to qualifications, and the way they are administered, as well as a step-change in standards. They constitute change on a far greater scale, with correspondingly higher risks to the stability of the exam system.

72. We believe that the current proposed timetable is not merely challenging but so tight that it may risk endangering the quality of the franchising process and/or of the qualifications developed, as well as risk the continued safe delivery of current GCSEs and other qualifications, including A levels. We take the Secretary of State’s point that “simply because there is risk, it does not mean that one should not move forward” and we accept that there is a case for significant changes to GCSEs and the way they are

83 Oral evidence 5 December 2012, Qq 59-63

84 Oral evidence 5 December 2012, Q 44

85 Oral evidence 5 December 2012, Q 46

86 Letter from Michael Gove to Glenys Stacey, 22 January 2013. Facilitating subjects at A level are English literature, mathematics, chemistry, biology, physics, history, geography and classical and modern languages.

administered, as well as to the accountability system.⁸⁷ We believe, however, that the repeated calls to slow down the pace of change from a range of education and assessment professionals, including the Chief Regulator, constitute a “red light” which warrants serious attention by Ministers. The Government must act in the best interests of young people by ensuring the safe delivery of the qualifications upon which many of their life chances depend. We recommend that the Government takes time for careful consideration and slows down the pace of change.

9 Conclusion

73. Having considered the Government's proposals for reforming Key Stage 4 qualifications, there is much that we can welcome. We agree that significant improvements are required to GCSEs and to the system in which they operate, in order to restore public confidence in our exams. We are concerned, however, that the Government is trying to do too much, too quickly. The Government needs to show that the GCSE brand is so discredited that a new qualification is required and that the many improvements it is rightly seeking could not be achieved by making changes to GCSEs. In particular, we have serious concerns about how well the proposed reforms will serve lower attaining pupils, who are often the most disadvantaged, and we question how raising the bar will help these students.

74. The Government must show that it has paid sufficient attention to the likely unintended consequences of franchising and to the complexities of the tendering process. We are concerned that attempting to reform qualifications, increase their difficulty, and change the way exams are administered all at the same time and to a very tight timetable may jeopardise the quality of the reforms, as well as threaten the stability of the wider exam system.

75. The proposed reforms need to be considered in the context of other changes to the education system. It is vital that these proposed changes are reviewed alongside changes to the curriculum and, crucially, changes to the accountability system which drives the way that qualifications are used in schools. Without this information, it is impossible to make a full and proper assessment of the potential impact of the Government's proposed changes.

76. There has been a lot of opposition to the proposals and many questions remain unanswered. Changes of this magnitude are best achieved with as wide support as possible across the education system, the wider economy, young people and their parents and, not least, the political spectrum. We call upon the Government to slow down the pace of reform.

Conclusions and recommendations

Coherence and purpose of reforms

1. We recommend that the Government publishes programmes of study for the revised secondary National Curriculum as soon as possible, so that it can be seen how these relate to the proposed qualification reforms. We also recommend that the Government sets out the curriculum and educational outcomes required of the new EBCs. (Paragraph 15)
2. As we concluded in our exams inquiry last year, any option for reform of exams administration, whether it be a single board or a franchised system, can only have limited impact while the school accountability system continues to drive schools' behaviour in the way that it does at present. We recommend that the Government publishes its proposals for reforms to the accountability system as soon as possible, so that they can be considered alongside the proposed GCSE reforms. Changes to assessment and school accountability should only be implemented as part of a coherent review of Key Stage 4 education. (Paragraph 16)
3. We recommend that the Government states clearly what it sees as the essential purposes of qualifications and assessment at age 16, which underpin the proposed reforms. (Paragraph 19)
4. The Government may risk transferring the strain currently placed on GCSEs to the new EBCs, if it continues to use the new qualification, and particular grades obtained in it, as the sole basis of its accountability measurements. We recommend that the Government takes very careful account of Ofqual's advice when drawing up proposals for a revised accountability system. (Paragraph 20)

The GCSE brand

5. We agree with the Government that significant improvements are required to qualifications at Key Stage 4 and to the system in which they operate. We broadly welcome the changes to GCSEs already instigated by the Coalition Government, such as a move to end-of-course assessment in some subjects and restricting re-sit opportunities, as well as changes to the way qualifications count in performance tables. We consider that these changes will help to achieve some of the improvements that the Government is seeking. (Paragraph 24)
6. We believe that many of the problems identified with GCSEs are linked to perverse incentives generated by the system in which the qualification operates, such as school performance measures and competition between exam boards. We concluded in our inquiry last year that competition between the exam boards for market share, combined with the influence of the accountability system, leads to significant downward pressure on standards. These pressures may be compounded by features of the qualifications themselves, such as the high degree of flexibility afforded by a modular structure and repeated opportunities for re-sits. It is essential that the Government in its approach to reform is clear whether the problems that it is seeking

to remedy are linked primarily to the qualification itself or to the system in which it operates. (Paragraph 25)

7. We have not received evidence that GCSEs are so discredited that a new qualification is required. Legitimate criticisms can be made of GCSEs, and should be addressed, but the Government must publish in full the results of its consultation and its analysis to justify its case that the brand is so damaged that it is beyond remedy. It must show that the Government could not achieve the objectives outlined by David Laws, namely restoring confidence in standards and ensuring our qualifications match the best in the world, by making changes to GCSEs rather than by bringing in a new qualification. (Paragraph 26)

A dual system

8. We support the Government's desire for all pupils to be offered a broad and balanced curriculum which will equip them with the knowledge, skills and understanding they need to progress to further learning and work. We welcome the recent increases in the numbers of young people studying for GCSEs in history, geography and modern languages, assuming that this is matched by the achievement of good grades in these subjects. We are, however, very concerned about the potential impact of the English Baccalaureate Certificates on subjects outside the English Baccalaureate, which will be left with "discredited" GCSE qualifications for some time. We question the extent to which it is possible to "upgrade" some subjects without implicitly "downgrading" others. The proposed reforms may undermine parity of esteem between different subjects, and between academic and vocational education, rather than do anything to reinforce it. (Paragraph 31)
9. As GCSEs will continue to be offered in many subjects for the foreseeable future, it is important that public confidence in these qualifications is restored. We recommend that the Government continues with the improvements to GCSEs and that a concerted effort is made to restore confidence in GCSEs in subjects outside the English Baccalaureate. (Paragraph 32)
10. We recommend that the Government tracks very carefully the impact on take-up in subjects outside the English Baccalaureate and the way they are resourced in schools over the next few years if EBCs are introduced. The Government should be open and explicit in acknowledging and explaining the consequences for these subjects. It should also be prepared to revise its policies, should evidence emerge from universities and employers that the school system is failing to help sufficient numbers of young people acquire the technical and creative skills needed for further learning and work in key areas. (Paragraph 33)

Administration of examinations

11. In our report last year, we recognised the need for change and expressed concern about the possible long-term impact and the "serious downsides" of a franchised system for the administration of exams. The Government must demonstrate that it has taken sufficient account of the likely unintended consequences of franchising, such as an increase in pricing, and of the complexities of the tendering process, in

view of the explicit warnings from the regulator and assessment experts about the risks associated with market reform. As we noted in our exams report, the success of the system will depend to a large extent on how well the Government and regulator specify their requirements and on the quality of the tendering process. The Secretary of State should clarify as a matter of urgency the distinction between a “relationship” and a “contract” and whether these definitions are sustainable. (Paragraph 41)

12. We believe that the speed with which the Government intends to instigate simultaneous market and qualification reform increases the likelihood of problems and may jeopardise the quality of the tendering process and of the qualifications developed. We recommend that Ministers give very serious consideration to Ofqual's advice and decouple qualification and market reform. (Paragraph 42)

The impact of a step change in standards

13. We believe that the Government should not underestimate the implications of a step change in standards for teaching and learning in schools. The Government quite rightly sees qualifications as a significant driver to improve performance in schools. It is critical that the Government gets the alignment of assessment and accountability right. The Government should also make greater use of other levers at its disposal, such as the curriculum and supporting teachers' professional development. The proposed timetable for reform must allow teachers sufficient time to prepare for the new qualifications. In addition, teachers must be provided with appropriate training and resources to support their teaching. (Paragraph 47)
14. Policies need to be focused on improving the attainment of the significant minority of young people, who do not achieve 5 or more A*-C grade GCSEs including English and mathematics. While it is right to raise young people's expectations and aspirations, we fail to see how raising the bar will automatically result in more young people achieving higher standards. Furthermore, we have serious concerns about how well the proposed reforms will serve the 40 per cent plus of pupils who do not achieve the Government's current floor standard (Paragraph 48)

Standards and grade inflation

15. The Government needs to give further consideration to how the new qualifications will reflect genuine improvements in performance and to how it will demonstrate that this is the case. The Government should take expert technical advice when considering how the new qualifications will be graded, to ensure that it has considered the potential implications of any proposals. This advice should be published, in the interests of transparency. (Paragraph 52)
16. The Government must pay very careful attention to how the “step change” in standards will be managed and to the potential implications of the move to EBCs. This includes holding discussions with representatives from further and higher education and employers to consider how GCSEs and EBCs will be used in selecting students, so that all young people, whether they take GCSEs or EBCs, are treated fairly as they progress in education and work. (Paragraph 53)

17. The Government must explain what it means by a “greater and more honest level of challenge” in exams for 16 year olds and why this is appropriate. It should also recognise that, whatever the level of challenge, there will be winners and losers as a result. We recommend that the Government sets out explicitly who these will be. (Paragraph 54)

Addressing under-achievement

100% external assessment

18. The Ofqual research provides insufficient evidence to back the Secretary of State's assertion that linear assessment helps students from disadvantaged backgrounds. (Paragraph 58)
19. While we acknowledge the potentially demotivating effect of a grade-cap, our understanding is that tiering was not designed to cap aspiration (although this may have been an unintended consequence). Rather, it was designed to provide appropriately differentiated assessments for young people across the ability range. Whether or not GCSE question papers have managed to do this effectively in all subjects is a matter for debate. However, rather than imposing a central requirement for untiered assessment in EBCs, we recommend that the Government takes advice from assessment and subject specialists on a subject-by-subject basis, as untiered assessment may be more effective and appropriate in some subjects than others. (Paragraph 61)

Proposals for English and mathematics post-16

20. The Government is proposing that young people who are “not secure” in English and maths at 16 should continue to study these subjects post-16. We welcome this proposal, as achieving good qualifications in these subjects is vital for young people's progression to further learning and work. (Paragraph 62)
21. The Government must take steps to improve the staff subject expertise in English and mathematics in further education colleges, both through professional development opportunities for the current workforce and through measures to recruit more English and mathematics specialists to work in post-16 providers. We recommend that the DfE sets out a detailed strategic plan of how it will achieve this, including initial teacher training and professional development for existing teachers, and showing how sufficient resource will be put in place to support the measures. (Paragraph 63)

Statement of Achievement

22. Overall, we have serious concerns about how well the Government's proposed reforms will serve lower attaining pupils, particularly with a new qualification that will be more difficult to achieve, and we have not seen any evidence that leads us to believe that the proposed changes will be more successful than GCSEs in addressing under-achievement or in helping to narrow the attainment gap between the most disadvantaged students and their peers. In particular, we recommend that the Government re-considers its proposals for a “Statement of Achievement” specifically

for lower attaining pupils, as it could become less useful to these young people than a low grade GCSE or alternative qualification. It must not be allowed to become a badge of failure. (Paragraph 66)

Timetable and risks of proposed reforms

23. We have serious concerns about the Government's proposed timetable for change and about the risks of making fundamental changes to qualifications and the way they are administered at the same time. The problems with results in GCSE English in 2012, which ultimately led to a legal challenge, illustrate the turbulence and disruption that can ensue when significant changes are made to a high stakes qualification. The proposed reforms involve changes to qualifications, and the way they are administered, as well as a step-change in standards. They constitute change on a far greater scale, with correspondingly higher risks to the stability of the exam system. (Paragraph 71)

24. We believe that the current proposed timetable is not merely challenging but so tight that it may risk endangering the quality of the franchising process and/or of the qualifications developed, as well as risk the continued safe delivery of current GCSEs and other qualifications, including A levels. We take the Secretary of State's point that "simply because there is risk, it does not mean that one should not move forward" and we accept that there is a case for significant changes to GCSEs and the way they are administered, as well as to the accountability system. We believe, however, that the repeated calls to slow down the pace of change from a range of education and assessment professionals, including the Chief Regulator, constitute a "red light" which warrants serious attention by Ministers. The Government must act in the best interests of young people by ensuring the safe delivery of the qualifications upon which many of their life chances depend. We recommend that the Government takes time for careful consideration and slows down the pace of change. (Paragraph 72)

Annex: Note of informal seminar held on 20 November 2012

The seminar was conducted under the Chatham House rule to encourage an open and frank discussion. Comments are therefore unattributed.

There was discussion about whether the GCSE was so discredited that a new qualification was needed. Some participants felt that a new brand was needed to help restore public confidence. Others observed that some aspects of GCSE were good, others not so good. One participant stated that GCSEs had been very effective at improving attainment in the middle of the ability range, but had served the most and least able less well. Negative factors cited were modularisation, the re-sit culture, early and multiple entries, predictability of assessment and too much question scaffolding. However, it was suggested that none of these issues was fatal, all could be remedied. It was a political decision whether to “nurture the brand” or to bring in something new. It was also pointed out that GCSEs will continue in many subjects for some time yet and that there will be an on-going need for a range of level 2 and 3 qualifications for 16-18 year olds.

Contributors pointed out that the way the competition between exam boards is to be set up makes it difficult for learned societies to engage with exam boards, as they still need to work with all boards in order to have an input in syllabus development. Participants also expressed concern the changes may stifle innovation in qualifications. Contributors commented that the proposed reforms and competition arrangements has already significantly reduced communication between exam boards and their assessment experts.

Participants agreed that the step change in standards signalled by the Government was a key issue. Balancing accessibility and a step change in the standards would be challenging, with implications for teaching and learning in schools. It was felt that there was a significant risk that this improvement in standards would not be delivered by the school system by 2017. “Change the brand if you like,” commented one contributor, “but standards is the key issue.”

There was general agreement that it is vital to look more broadly at the curriculum and teacher preparation and development as well as qualifications when attempting to effect changes in the level of achievement in classrooms. Contributors were concerned that the Government is relying very heavily on qualifications in England to make significant changes to teaching and learning. It was pointed out that other high performing jurisdictions do not see this as the only lever in the system to make such changes.

Concern was expressed that the risk of the school system not delivering the required improvements in achievement could lead to a continued “fudge” over standards, which ironically would perpetuate the threat to the credibility of the system. It was suggested that the volatility of results would also be likely to increase, particularly if the new qualifications were technically less reliable. A crucial question would be whether the accountability system would continue to focus disproportionately on key grades in key subjects. It was

agreed that there was a risk that the multiple purposes of GCSEs, which have put the qualification under considerable strain, would continue and possibly be exacerbated for a new qualification, which was simultaneously being asked to provide increased stretch and challenge and rich curriculum opportunities and to be accessible to all, while having potentially less reliable assessment.

It was suggested that the Government could have taken a lower risk approach to address the problems it has identified, but that such an approach would be harder to communicate effectively. “Tinkering” (smaller scale changes to the system), followed by appropriate evaluation, can be a good idea and help to nudge a system over time in the desired direction. This approach has been used effectively by several high performing jurisdictions, such as Singapore, Finland, Australia and Alberta.

Several participants questioned the connection between the issues raised by the Government about the exam system and the solutions proposed. For example, contributors questioned how a single untiered exam will help to stretch the most able. They also questioned how restricting exam aids would enable students to “demonstrate their true abilities and competence.” Contributors pointed out that removing exam aids does not of itself make an exam more challenging and that providing aids, such as a periodic table, enables examiners to set more challenging questions that test understanding rather than rote learning.

Asked how the proposed reforms relate to the National Curriculum review, participants suggested that the Government is using qualifications as the main instrument for structuring the curriculum in secondary schools and that qualifications will be the key driver of content (while in primary schools the main instrument will be the National Curriculum). However, contributors felt that further clarification is needed on how the content of the new qualifications would be determined and also the expected curriculum for years 7 to 9.

It was agreed that greater clarity was needed on the proposed changes to accountability measures. Participants agreed that accountability measures of some sort were needed to address under-performance in schools and that some measure of core learning was helpful. However, contributors suggested that the Government needed to have processes for spotting “bad behaviour” (such as the disproportionate focus on particular groups of students or subjects at the expense of others) and be prepared to change measures more frequently in order to counteract gaming of the system.

There was general agreement that more information was needed on the criteria which the Secretary of State would use to award contracts to exam boards. Serious concerns were also raised about the proposed timescales and how exam boards could be expected to design high quality syllabuses within two or three months. When asked about how cross-subsidisation of smaller entry subjects and qualifications would work under a franchised system, one participant predicted that either the prices for these qualifications/subjects would increase or they would disappear, as cross-subsidisation would cease to work.

Participants were generally pessimistic about the impact of a franchised system on pricing, as well as subject expertise. Subject expertise would either migrate to the successful provider or be lost, meaning that options for renewal after five years would be much more limited. If one exam board won more than one contract, there would need to be significant financial investment in scanning equipment to assist delivery. One contributor commented that GCSEs were relatively good value for money and “I can only envisage prices going up.” Questions were raised about whether the exams regulator has the statutory framework needed to regulate monopoly provision and pricing.

Appendix 1: Memorandum submitted by the Department for Education

Written evidence submitted by the Department for Education

The Evidence Base for Proposed Reform of the Examination System at Key Stage 4

1. Summary

1.1. The Committee has requested the evidence base used in drawing up proposals for reform of the examination system at Key Stage 4. To inform their decisions on these proposals, Ministers have drawn on evidence in the following areas:

- **The importance of a core academic curriculum;**
- **Problems in the existing system;**
- **Stagnating standards over time;**
- **The failure of the current system to support lower attaining pupils.**

1.2. High performing jurisdictions often set a compulsory academic core whilst allowing schools the local freedom to implement it in the way they see fit. In particular, the subjects that make up the English Baccalaureate measure in the Key Stage 4 performance tables in England—English, mathematics, the sciences, history, geography, and languages—are compulsory in many high performing jurisdictions until age 16. As outlined in section 2, the introduction of this measure in the performance tables has had a positive effect on take up of core academic subjects in England. We now need to ensure that qualifications in these subjects are providing students with the level of knowledge and skills expected in our highest performing international competitors.

1.3. The structure of the existing qualifications market in England allows several Awarding Organisations (AOs), once recognised by Ofqual, to compete for market share. This oligopoly has created incentives for Awarding Organisations to drive down standards in order to win business from schools. The risks this poses to the education system were made clear in April 2012 when Ofqual reported on Awarding Organisation led seminars. Ofqual concluded that seminars concentrating on specific qualifications gave rise to a real risk that inappropriate information about the future content of secure exams is disclosed and that this could lead to a narrowing of the curriculum taught.

1.4. Further problems in the system have been highlighted this summer, with a report from Ofqual concluding that English GCSEs are exceptionally complex and difficult to award, and that there has been significant over-marking of controlled assessment units.

1.5. The interaction of the current school accountability and examination system— where schools are incentivised to boost their performance by seeking examinations in which they believe their students will achieve higher grades, and Awarding Organisations have a corresponding incentive to compete for market share by providing less demanding examinations, has contributed to the stagnation of standards in England.

1.6. Increases in performance at GCSE have not been matched by the same level of improvements in learning; between 2006 and 2009, the proportion of students achieving a C grade or higher in English and mathematics GCSE increased by 8%. But comparison of international tests—where there is no incentive for achievement to be inflated— shows that this significantly overstates the actual improvement in attainment which has taken place. Evidence that the standards of our examinations have flat-lined and

that the expectations they set for our students are now below those of our international competitors is set out in section 4.

1.7. Finally, the system is failing to support lower attaining pupils. Future prospects for pupils who fail to get a GCSE grade D or better are poor and tiered papers, where students are able to take either foundation (allows students to achieve grades C–G) or higher tier examinations (allows students to achieve grades A*–D) caps aspiration. This is discussed in section 5.

1.8. That is why the Government is proposing to move away from the competition between Awarding Organisations in the core academic subjects that make up the English Baccalaureate. The Department for Education will hold a competition to identify the single, best qualification, offered by a single Awarding Organisation, which could be adopted in each of these subjects, for a period of five years. The successful qualifications will have to demonstrate a stringent set of characteristics including minimal controlled or other internal assessment. The evidence to support these proposals is detailed in section 3.

2. The importance of a core academic curriculum

A feature of high performing jurisdictions is a requirement on all students to study a broad range of subjects to the age of 16.⁸⁸ In particular, many high performing jurisdictions have a compulsory substantive core up to age 16 that includes the mother tongue, mathematics, the sciences, modern foreign languages, history, and geography. Chart 1 shows these subjects in the compulsory phase curriculum for England and a number of high performing jurisdictions.

2.1. Chart 1 demonstrates that England narrows its curriculum for the majority of pupils earlier than more successful nations. Furthermore, perverse incentives in the current system have encouraged pupils to move away from a core academic curriculum and we have seen a decline in opportunity to take core academic subjects at Key Stage 4, a trend that disproportionately affects pupils from the poorest backgrounds or attending schools in disadvantaged areas.

88 Department for Education, (2011). *The Framework for the National Curriculum. A report by the Expert Panel for the National Curriculum review.* (London: Department for Education).

Chart 1: Subjects in the Compulsory Phase Curriculum in High Performing Jurisdictions and Emerging Economies^{89, 90, 91}:



Chart 1 Notes:

England: At age 14-16, science may be taught as combined science or as individual subjects: physics, chemistry and biology.

Australia, Victoria: The curriculum is expressed in three inter related strands: physical, personal and social learning, discipline (subject) based learning, and interdisciplinary learning. The information in this table reflects the content of all three strands. History, geography and economics are combined as 'humanities' for students aged 8-10.

89 DfE (2011) *The Framework for the National Curriculum. A report by the Expert Panel for the National Curriculum review*, and www.inca.org.uk *International Review of Curriculum and Assessment Frameworks Internet Archive*

90 UNESCO (2011) *World Data on Education*, 7th edition: People's Republic of China

91 UNESCO (2010) *World Data on Education*, 7th edition: Brazil

Brazil: Portuguese and Brazilian literature, social studies (history and geography), sciences (physics, chemistry and biology), mathematics, one foreign language, arts, health programmes, and physical education are the subjects in the core curricula for secondary schools.

Canada, Ontario: Geography and history studied as part of social studies until age 12. Where French is studied as an immersion language, study begins at age 6.

In **China** mainland, students completing senior (general) secondary education sit the final examination (administered by the provincial authorities) in nine subjects: politics, Chinese, mathematics, a foreign language (normally English, but it may be also Japanese, Russian, French or German), physics, chemistry, biology, history and geography. Students also sit practical examinations in physics, chemistry and biology, and are assessed on their moral, ideological and political development. Successful students are awarded the senior middle school graduation certificate.

Finland: In Years 1–4, ages 7–11, geography, biology, physics and chemistry are taught—with health education as a combined subject—‘environment and nature studies’. History is taught as history and civics.

France: Experimental science and technology for 8 to 11-year-olds, life and earth science for 11 to 12-year-olds, life and earth science and physics/chemistry for 12–to 16-year-olds. Geography and history are part of humanities for 8 to 11 year olds, history/geography/civics for 11 to 12 year olds, and history/geography for 12 to 16 year olds.

Japan: Science is taught as life environment studies, ages 6–8. Recent changes mean that, from the 2011–12 academic year, English is being introduced as a first foreign language for elementary school studies in Years 5 and 6, ages 10–12.

The Netherlands: ‘Social and environmental studies’ includes geography, history, science (including biology), citizenship, social and life skills (including road safety). ‘Healthy living/social structure’ includes geography, history, science (including biology), citizenship, social and life skills (including road safety).

Singapore: Mother tongue includes a choice of Chinese, Malay or Tamil. For six to 10 year olds this includes health education and information literacy. At age 14, students choose at least one of: biology or human and social biology; physics; chemistry; science/integrated science. At age 14, students choose at least one of the humanities; literature; geography; history. English is taught as a foreign language from age 6; another language is an option at age 14. Other subjects available at age 14 include a third language (French, Japanese, German or Malay language elective); art and crafts; music; fashion and Fabrics; food and nutrition; commerce; principles of accounts; design and technology; and religious knowledge.

USA, Massachusetts: Science is taught as science and technology. Geography and history are taught as ‘social science/social studies’ which includes US and world history, geography, economics, civics and government.

2.2. It is the Government's ambition for England to match the performance of leading international competitors. The subjects that make up the English Baccalaureate —English, mathematics, sciences, history, geography and languages—give pupils an academic foundation that is a secure basis on which further study, vocational learning or a satisfying apprenticeship can be built. Pupils who succeed in the English Baccalaureate subjects are more likely to progress onto A-levels, take more A-levels and, in both A-levels and other qualifications, get better results⁹².

2.3. The introduction of the English Baccalaureate measure has resulted in the number of pupils studying physics, chemistry, biology, history, geography and foreign languages all rising. A recent nationally representative survey commissioned by the Department for Education⁹³ indicates that:

- 41 per cent of GCSE pupils are set to take history GCSE in summer 2014. That would be the highest proportion since summer 1994 when 39 per cent of pupils took history GCSE.
- 93 per cent of GCSE pupils are set to take double or triple science GCSE in summer 2014. That would be the highest proportion since summer 1994 when 79 per cent of pupils took it.
- 36 per cent of GCSE pupils are set to take geography GCSE in summer 2014. That would be the highest proportion since summer 2001 when 37 per cent of pupils took geography GCSE.
- 54 per cent of GCSE pupils are set to take a language GCSE in summer 2014. That would be the highest proportion since summer 2005 when 60 per cent of pupils took a language GCSE

2.4. The survey also indicates that the introduction of the English Baccalaureate performance measure has had an especially positive impact for poorer pupils. In 2010, 10 per cent of pupils in schools with a high proportion of children eligible for Free School Meals were taking a combination of subjects that could have led to the English Baccalaureate. 41 per cent of pupils in these schools started studying the set of key subjects from September 2012—a 310 per cent increase. The rise over the same period in schools with a low proportion of students eligible for Free School Meals is 54 per cent. A table of actual and estimated take up of English Baccalaureate subjects between 2010 and 2014 is set out below at Annex A.

2.5. We now need to ensure that qualifications in these subjects are providing students with the level of knowledge and skills expected of students in the highest performing jurisdictions.

92 National Pupil Database.

93 Ipsos Mori survey of state-maintained mainstream secondary schools conducted in June/July 2012.

3. Problems in the existing system

Qualifications Market

3.1. The structure of the existing qualifications market in England allows several Awarding Organisations (AOs), once recognised by Ofqual, to compete for market share and offer differing products and prices. In practice, the AOs have converged on similar prices for qualifications, suggesting that any competition is therefore in terms of the design of qualifications and the service that is offered to schools. As the Select Committee has said, this system is unusual, if not unique⁹⁴.

3.2. The oligopoly in England has created incentives for Awarding Organisations to drive down standards in order to win business from schools. Incidents of this occurring were raised in the media in December 2011 when it was reported that Awarding Organisations were revealing the content of their exams at teacher seminars, thereby driving a culture of teaching to the test.⁹⁵

3.3. This expose resulted in an official inquiry into the examination system and in April 2012, Ofqual reported that there were 'specific incidents of malpractice' within the system⁹⁶. Ofqual's report concluded that 'seminars concentrating on a specific qualification present unacceptable risks to the wider education system. There is a real risk that inappropriate information about the future content of secure exams is disclosed. And there is a risk of narrowing the curriculum through sessions on how to teach the specification'. In light of these findings Ofqual made a number of recommendations including that exam board face-to-face teacher training seminars that relate directly to the delivery of a specific, named qualification must not occur after 31st August 2013.

3.4. Furthermore, it is clear that the interaction of the current school accountability and examination system at Key Stage 4 has contributed to stagnating qualification standards—schools are incentivised to boost their performance by seeking examinations in which they believe their students will achieve higher grades, and Awarding Organisations have a corresponding incentive to compete for market share by providing less demanding examinations. The Education Select Committee's recent report on the administration of exams for 15–19 year olds in England concluded that 'the current system incentivises downward competition on content standards and we recommend that the Government act immediately to change these incentives'.

3.5. The Government is proposing to move away from the competition between Awarding Organisations in the core academic subjects that make up the English Baccalaureate. The Department for Education will hold a competition to identify the single, best qualification, offered by a single Awarding Organisation, which could be adopted in each of these subjects, for a period of five years.

3.6. There is broad support, from across the educational spectrum, for a single awarding body model. A range of commentators have expressed concern that the current multi Awarding Body system is lessening the quality of specifications and there is widespread agreement that, if you were designing a system from first principles, a single awarding body model would be the preferred approach.

3.7. The following individuals and organisations provided evidence in support of a single awarding body to the Select Committee (for its report on the administration of examinations for 15–19 year olds in England):

- The Wellcome Trust

94 Education Select Committee: The administration of examinations for 15-19 year olds in England (July 2012).

95 In autumn 2011 the Daily Telegraph sent undercover reporters to 13 seminars organised for teachers by awarding organisations. The Daily Telegraph published their findings in December 2011.

96 Ofqual (April 2012) Exam Board Seminars, Final Report

- SCORE (Science Community Representing Education)
- The Mathematical Association
- The Institute of Mathematics and its Applications
- The Association of Teachers of Mathematics
- NASUWT
- The National Union of Students (NUS)

3.8. Further detail of the comments made by these organisations in support of a single awarding body model is included at Annex B.

Grade Inflation

3.9. Grade inflation occurs when higher grades are awarded for work of comparable quality over a period of time (i.e. that work would have previously been given a lower grade). To assess whether the effect of rising grades is due to improved achievement or grade inflation (or an element of both) is very difficult. However the following figures illustrate at least the clear reduced potency of the signalling effects from the GCSE qualification over time.

3.10. Between 1988 and 2011 there was an almost continuous GCSE grade improvement⁹⁷. Over this period, the proportion of candidates obtaining A*-C in English increased from 36 to 72%, and in mathematics from 31 to 67%. The attainment of 5+A*-C GCSEs including English and mathematics, and the number of pupils scoring top grades has also increased. In 2005 44.7% of pupils achieved 5+A*-C GCSEs including English and mathematics; this increased to 58.9% in 2011. In 2011, 4.2% of pupils achieved ten or more GCSEs at A or A* compared to 2.5% in 2005⁹⁸.

3.11. The reduction in the proportion of A*-C grades awarded in summer 2012 was the first time such a fall has been recorded since the introduction of GCSEs, and does not detract from the overall picture; the concerns that have been raised about grading have demonstrated how the current modular exam system can be unfair to students..

3.12. If more students obtain the highest GCSE grades available year after year, these grades are likely to lose their currency with employers; grade inflation will make it more difficult to correctly distinguish the top performing pupils and hide gaps in the real ability of pupils achieving a 'pass grade'.

97 A levels 2011 and GCSEs 2011, Alan Smithers, Centre for Education and Employment Research, University of Buckingham, 2011.

98 DfE SFR—GCSE and Equivalent Results in England, 2010/11 (Revised).

Table A: GCSE attainment in mathematics and English 1988–2011⁹⁹

Percent of entries											Thousands
GCSE Mathematics	Grades obtained										Total
	A*	A	B	C	D	E	F	G	U,X	A* C	Entries
1988	31	.
1993	-	10	12	24	15	16	12	6	6	46	461.1
1998	3	9	17	20	15	16	10	6	5	48	537.0
2003	3	9	18	21	16	15	9	4	4	51	613.4
2008	5	11	17	26	16	11	7	4	3	59	731.9
2011	7	14	18	29	12	9	7	3	2	67	598.6

Percent of entries											Thousands
GCSE English	Grades obtained										Total
	A*	A	B	C	D	E	F	G	U,X	A* C	Entries
1988	36	.
1993	-	11	19	26	20	13	7	2	1	56	478.0
1998	3	10	18	26	20	13	7	3	1	56	520.0
2003	3	12	21	24	19	11	6	3	1	60	577.4
2008	4	12	21	26	19	10	5	2	2	65	642.8
2011	5	14	23	30	15	7	3	1	1	72	587.5

3.13. The following evidence suggests that this increase in GCSE attainment seen over time has not been matched by the same level of improvements in learning:

- Evidence using baseline comparison tests (YELLIS)¹⁰⁰ suggests that candidates of comparable ability are being awarded higher grades each year.¹⁰¹ A student who scored 45 (just below the average) on the YELLIS test could expect to achieve D grades in French, mathematics and history at GCSE in 1996, but by 2005 would be receiving C grades. Taking an average of 26 subjects, pupils of the same YELLIS standard could generally expect to achieve around half a grade higher in 2005 than they could in 1996.
- The Royal Society of Chemistry (2008) ran an online chemistry examination featuring questions from hundreds of GCSE and O-Level papers in chemistry from the last five decades. The average mark for the 1960s questions was 15%, and for each subsequent decade this rose steadily, reaching 35% for the 2000s.¹⁰² The authors explain that changes to the syllabus and language used in examination papers may partly explain the difference in scores. For example, pupils may be likely to perform better on the syllabus closest to what they have been taught, and the phrasing of questions that they are used to. However, they argue that this is unlikely to provide a complete explanation.

99 Figures are for pupils at the end of key stage 4. Prior to 2005, data relates to pupils aged 15 at the start of Key Stage 4. Figures are not available by grade prior to 1993; exam data in earlier years were produced from the Department's annual School Examinations (Form 7d) and 113FE surveys.

100 The YELLIS test began in 1994 and has been used to analyse the GCSE results of pupils. The test was taken by pupils in Year 10 or 11 and provided a baseline to compare against GCSE grades.

101 Coe, R. (2007) Changes in standards at GCSE and A-Level: Evidence from ALIS and YELLIS—Report for the ONS by Robert Coe—CEM Centre, Durham University, April 2007

102 The Royal Society of Chemistry (2008) The Five-Decade Challenge—A wake-up call for UK science education?

3.14. Ofqual, as the regulatory body for external qualifications in England, publish reports reviewing standards on various subjects at different intervals. The most recent reviews of GCSE mathematics, biology and chemistry indicate that the qualifications are less demanding in 2008 compared with previous years, particularly for mathematics and biology. This has been attributed to changes in the structure of the assessments rather than the content¹⁰³.

3.15. The independent sector is moving away from GCSEs and choosing other qualifications that they see as offering more rigour and therefore better preparing their students for further learning and entry to the best universities. In 2011, nearly 20,000 pupils in independent schools were not enrolled for GCSE mathematics compared to 2,500 pupils in 2006. Over 150 independent schools are now not offering GCSE mathematics to the substantial majority of their pupils¹⁰⁴. Cambridge Assessment reported that the take up of their iGCSEs has increased in UK schools (state and independent) by 119%¹⁰⁵ in the last year.

Standard of GCSE Grade C

3.16. GCSE grade C is often required for entry into further education and employment. The grade descriptors at Annex C are used to guide the award of grade C in English, maths and science GCSEs. The descriptions capture the average performance expected to achieve the mid-point of grade C. It should be noted that GCSEs are assessed in a compensatory way, meaning that the final grade is based on the total marks achieved across all components of the GCSE. The compensatory nature of GCSEs allows students to gain marks in their stronger areas to compensate for weak performance elsewhere. This means that many students achieving a given grade will not demonstrate consistent performance across all areas tested.

3.17. The evidence below suggests that public confidence in the GCSE and in particular the standard required to achieve the 'pass grade' has been damaged and may not be fit for purpose.

- 35% of employers report dissatisfaction with literacy skills of school and college leavers, and 30% report dissatisfaction with numeracy skills¹⁰⁶.
- In the past year, more than two in five employers (42%) report that they have organised remedial training for at least some young people joining them from school or college. A fifth of firms included in the survey have provided training in literacy (20%) and 18% in numeracy (CBI survey, 2012).

3.18. This evidence is supported by statements made by employer associations in June 2012:

- Mike Harris, Head of Education Policy at the Institute of Directors has said: 'Employers are concerned that standards in British exams have slipped, so action to make qualifications more demanding is welcome. We strongly support Government reforms to increase standards in all areas of education.'
- Neil Carberry, the CBI's Head of Education and Skills Policy has said: 'We are concerned that GCSEs in their current form may not be delivering. With the leaving age for compulsory education about to change to 18, the time is right to review the role of a summative exam at 16.'
- Adam Marshall, Director of Policy at the British Chambers of Commerce has said: 'Businesses have

103 Ofqual (2012a) Review of Standards in GCSE Biology 2003 and 2008; Ofqual (2012b). Review of Standards in GCSE Mathematics 2004 and 2008; Ofqual (2012c). Review of Standards in GCSE Chemistry 2003 and 2008.

104 Internal DFE analysis of the amended 2011 GCSE results file

105 Cambridge International Examinations 2012: http://www.cie.org.uk/news/features/detail?feature_id=47912

106 CBI Education and Skills Survey, 2012

steadily lost confidence in the ability of the education system to deliver young people who are ready for the world of work. If this is a route that leads more employers to say more young people are ready for the world of work, then it will have been successful.’

3.19. However, the UK CES Employer Skills Survey found that employers are much more likely to report school leavers lack experience/maturity or have poor attitude/motivation, than a lack of literacy and/or numeracy skills.¹⁰⁷

Controlled Assessment

3.20. Further problems in the system have been caused by the move towards controlled assessment. This replaced coursework in 2009 and was introduced in an attempt to tackle problems with coursework that were undermining confidence in GCSEs, due to concerns about plagiarism and the perception that it conferred an advantage to those pupils whose parents could offer them greater support. However, Ofqual evaluation tells us that schools have had major concerns about the manageability of controlled assessment in GCSEs and its impact on teaching time and methods¹⁰⁸. The report also cites concerns that, rather than promoting in-depth independent learning, CA tests rote learning (particularly in modern foreign languages).

3.21. Controlled assessment has also contributed to the grade variations seen by some schools in GCSE English exams this summer. A recent report by Ofqual concludes that the complexity and poor design of GCSE English exams, along with too much emphasis on school-based controlled assessment, led to some schools in England experiencing grade variations this summer. The incentive created by performance measures to ensure as many students as possible achieve a C grade led to significant over-marking of controlled assessments—where work is marked by teachers in schools.¹⁰⁹

3.22. It is proposed that EBCs should restrict the use of controlled assessment, coursework or other forms of internal assessment, as far as possible, in all six English Baccalaureate subjects. This will free up teaching time and reduce opportunities for the malpractice associated with internal assessment. It will ensure that assessment judgments are of the highest quality and will limit the rote learning of isolated tasks.

3.23. We will be consulting on how these new qualifications will be used to hold schools accountable later this year.

4. Stagnating standards

4.1. There is a growing body of evidence to suggest that England's performance in international studies has stagnated at best, and that the expectations set by our examinations are now below those of our leading international competitors. International benchmark studies offer insight into changes over time in patterns of attainment in England:

International Comparisons

- The gap in attainment begins at primary school. In the PIRLS study,¹¹⁰ among 28 jurisdictions participating in both 2001 and 2006, eight showed significant gains in average reading achievement at age 10. These were Russia, Hong Kong, Singapore, Slovenia, the Slovak Republic, Italy, Germany, and Hungary. England, by contrast, saw a significant decrease. Much of the fall was due to fewer

107 UK CES (2012) *UK Employer Skills Survey 2011*

108 Ofqual, *Evaluation of the Introduction of Controlled Assessment*, October 2011

109 Ofqual, *GCSE English 2012*, November 2012.

110 *Progress in Reading and Literacy Study (PIRLS)*: see national reports for England at www.NFER.ac.uk/PIRLS

children reaching the highest level: 20 per cent in 2001 but 15 per cent in 2006.

- The TIMSS 2007¹¹¹ assessment of 10-year-olds found 16 per cent of children in England reaching the highest level of mathematics performance. This compared to 41 per cent in Singapore and 40 per cent in Hong Kong. It should be noted that in the TIMSS study the scores of England's 14-year-olds rose significantly in mathematics from 1999 to 2007, and for science the previous high performance was maintained in both age groups. However, it is clear that there is still a big gap between England and the leading countries in this survey.

Table B: England's average scores in TIMSS Grade 8 assessments

	TIMSS 1995	TIMSS 1999	TIMSS 2003 ¹¹²	TIMSS 2007
Year 9 Maths	498	496	498	513*
Year 9 Science	533	538	544	542

* - statistically significant increase on the previous round.

- The OECD found that average attainment of 15-year-olds in England in reading, mathematics and science had not changed significantly between their two most recent PISA¹¹³ studies (2006 and 2009). England has, however, fallen in the international rankings in all three subjects. Two new countries / jurisdictions entered PISA for the first time in 2009 (Shanghai-China and Singapore) and significantly outperformed the UK. A number of previously participating countries have also increased their mean performance and pushed the UK down the rankings. These included Germany, France, Norway and Iceland in reading; Norway and the Slovak Republic in mathematics; and Switzerland in science.
- The OECD's has confirmed that "education performance in England measured by PISA scores remains static and uneven"¹¹⁴. It praises the introduction of the pupil premium. It also recommends more autonomy across school types, consistent with our free school and Academies policies. Dr Andreas Schleicher, Head of OECD's Indicators and Analysis Division, commenting on the PISA 2009 findings, said that UK performance had "stagnated at best".

Table C: England's rank among all countries participating in PISA 2000, 2006 and 2009

Subject	Rankings for UK		
	2000 (32 countries)	2006 (57 countries)	2009 (65 countries)
Reading	7 th (England 7 th)	17 th (England 17 th)	25th (England 25th)
Mathematics	8 th (England 8 th)	24 th (England 24 th)	28th (England 27th)
Science	4 th (England 4 th)	14 th (England 14 th)	16th (England 16th)

- **It should be noted that the PISA 2000 and 2003 samples for the United Kingdom did not meet the PISA response rate standards, so data from the United Kingdom are not comparable with other countries.**

111 Trends in International Mathematics and Science Study (TIMSS): see national reports for England at www.NFER.ac.uk/TIMSS

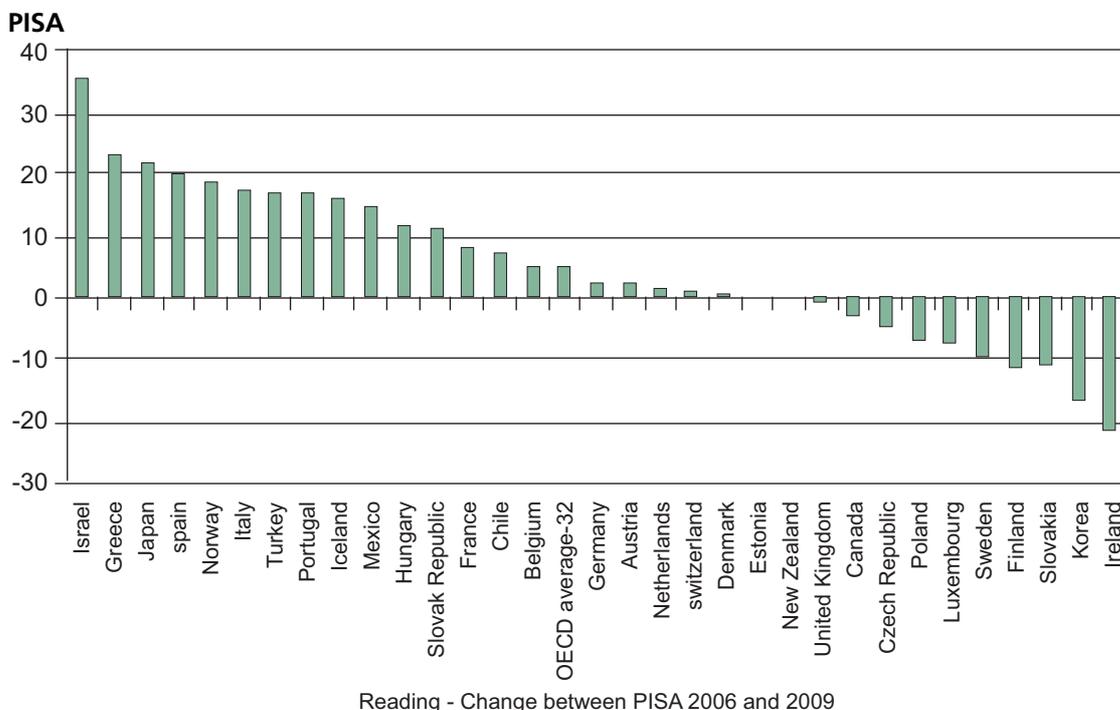
112 In TIMSS 2003, the sample for Grade 4 in England met the international sampling requirements. In Grade 8 the standards were met for pupils' participation, but not for schools' participation. Because the pupil participation rate was met, IEA considered it appropriate to weight the data using schools' performance in national tests and examinations, and, with this caveat, they are used for comparisons in the international report.

113 Programme for International Student Assessment (PISA): see national reports for England at www.NFER.ac.uk/PISA

114 OECD Economic Survey of the UK 2011

- An independent report by the Statistical Sciences Research Institute at the University of Southampton looked at the bias in mean scores that resulted from the failure of the UK PISA sample to meet the response rate standards in 2000 and 2003. The authors estimated that the bias would have shifted England's position in a ranking of countries by about one place¹¹⁵

Chart 2: change in PISA reading scores between 2006 and 2009



- In PISA 2006, TIMSS 2007 and PISA 2009 there is a decline in the proportion of pupils achieving the highest attainment levels. In TIMSS 2007 just 8% of England's 14-year-olds reached the highest benchmark for Mathematics. In Chinese Taipei this figure was 45%.
- Language attainment in England is also among the very worst in Europe. In June 2012, the European Commission published the findings of its first-ever study of language attainment, the European Survey on Language Competences. For reading, listening and writing in French and in German, England was at or near the bottom of the rankings. More generally, England performed poorly for both the first and the second taught language across all sixteen participating countries. Sweden, Malta and the Netherlands performed consistently highly.¹¹⁶

5. The failure of the current system to support for lower attaining pupils

5.1. The current system is failing lower attaining pupils. The structure of tiered papers, where students are able to take either foundation (allows students to achieve grades C–G) or higher tier examinations (allows students to achieve grades A* - D) caps aspiration. Future prospects for pupils who fail to get a GCSE grade D or better are poor.

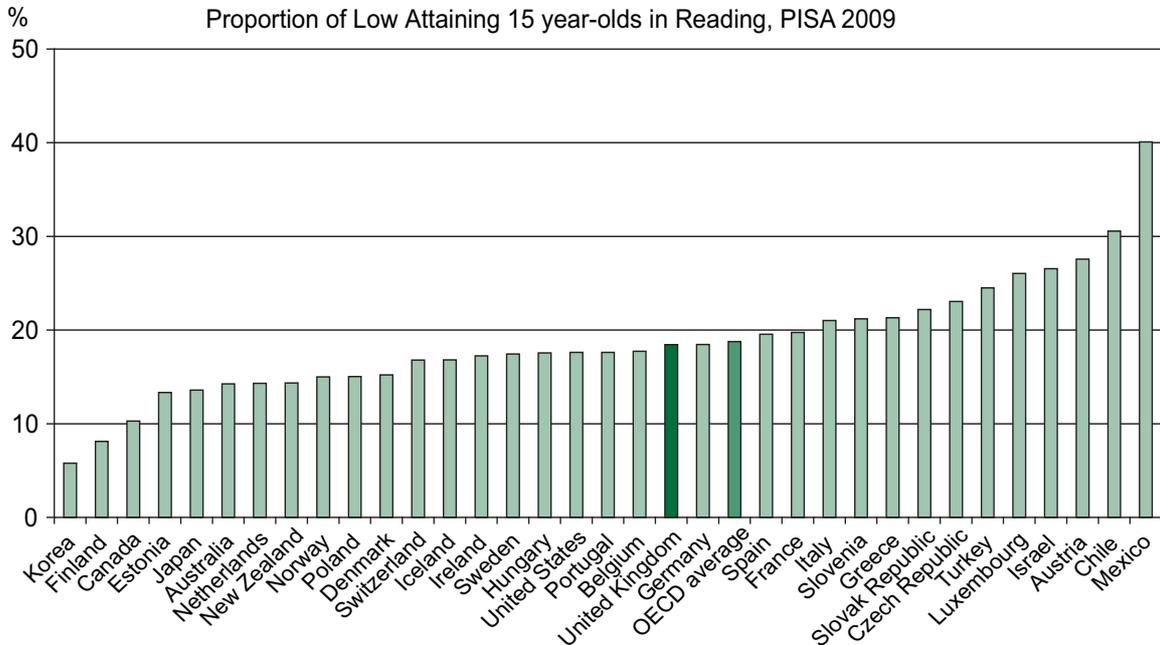
115 John Micklewright & Sylke V. Schnepf (2006) *Response Bias in England In PISA 2000 and 2003* Southampton Statistical Sciences Research Institute <https://www.education.gov.uk/publications/eOrderingDownload/RR771.pdf>

116 National Foundation for Educational Research (2012) *European Survey on Language Competences (ESLC): Initial Findings*—see <http://www.nfer.ac.uk/publications/ELDZ01>

International Comparisons

5.2. In reading in PISA 2009, England's proportion of low attainers (17.4% scored below level 2 in the PISA measurement) is similar to the OECD average of 18.8%. However, the high-scoring countries did considerably better—in Korea only 5.8% performed below level 2, and in Finland it was 8.1%.¹¹⁷

Chart 3:



5.3. Socio-economic disadvantage has a strong impact on student performance in England: Students with a higher socio-economic status in England were shown to achieve the equivalent of a year's progress (44 PISA points) higher, on average, than their peers in the 2009 PISA study. This compares with a difference of just under a year's progress (38 PISA points) on average across OECD countries. Although socio-economic disadvantage also has a strong impact on performance in some high-performing countries (for example New Zealand and Singapore), the impact of socio-economic status on attainment in Hong Kong (17 points), Shanghai (27 points) and Finland (31 points) is significantly lower.

5.4. Among the countries that showed improvements in average reading performance since 2000, most can attribute those gains to large improvements among their lowest performing students. In most of these countries, the gap in reading scores between the highest- and lowest performing students narrowed; and in some countries the impact of socio-economic background on performance weakened between 2000 and 2009.¹¹⁸

5.5. The OECD¹¹⁹ says: "A variety of policy changes (Chile, Portugal), policies targeted at disadvantaged, mainly immigrant, students (Germany) and sweeping education reform (Poland) all helped in their own ways, in their specific contexts, to raise performance levels among low achievers. PISA results suggest that the countries that improved the most, or that are among the top performers, are those that establish clear, ambitious policy goals, monitor student performance, grant greater autonomy to individual schools, offer the same curriculum to all 15-year-olds, invest in teacher preparation and development, and support low-performing schools and students."

¹¹⁷ Organisation for Economic Cooperation and Development (2010) *PISA 2009 Results: What Students Know and Can Do - Student Performance in Reading, Mathematics and Science* (Volume 1) Paris: OECD

¹¹⁸ OECD (2011) *PISA in Focus 2—Improving Performance: Leading from the Bottom*

¹¹⁹ *PISA in Focus 2*, *ibid.*

5.6. A case study providing further detail of how Germany narrowed the gap in scores between their highest- and lowest-performing students can be found at Annex D.

Tiered Qualifications

5.7. In the current GCSE system, students are able to take either foundation or higher tier examinations in a number of GCSEs, including all of the English Baccalaureate subjects except history. The higher tier allows students to achieve grades A*–D and the lower tier allows students to achieve grades C–G.

5.8. This structure fails lower attaining students. The prospects for those students taking a foundation tier paper are poor; progression rates for students achieving C grade are much lower than for those achieving A*–B. Further education institutions frequently require a B grade or higher at GCSE for access to some A Level courses.

5.9. There is some research to suggest that there may be a negative impact of grouping by ability on the motivation and self-esteem of students assigned to low ability groups¹²⁰. Having a grade-cap in foundation tier examinations is also likely to be de-motivating and limit the aspirations of students.

5.10. The Government believes that the new qualifications should not be tiered, removing the grade-cap that currently exists at C grade in GCSE foundation tier papers, to benefit all students and increase motivation and attainment possibilities.

5.11. The disadvantage potentially faced by students entered for lower tier papers, and who cannot, therefore, achieve above a grade C, is demonstrated by the following evidence:

Progression to A Level in a particular subject

- Progression to A Level in a given subject is largely dependent on a pupil gaining a grade A* to B in that subject at GCSE: for example in mathematics, almost no students with a C grade GCSE continued that subject to A Level in 2011 compared to 22% of those with a grade A* to C¹²¹ (Annex E).

Progression to any Level 3 qualifications

- Half of end-KS4 pupils progressed to level 3 qualifications and 36% of them took A-levels in 2011¹²².
- Progress rates for those achieving grade C are much lower than those achieving higher grades. In 2011, 96% of those who achieved an A* in English or mathematics progressed onto Level 3 whereas only 55% of those achieving a C in mathematics and 53% of those achieving a C in English progressed onto Level 3 qualifications (Annex F)¹²³.

University requirements for a B (+) to enter particular courses

120 Ireson, J and Hallam, S (1999): 'Raising Standards: is ability grouping the answer?' in Oxford Review of Education, Vol. 25, No. 3, 1999, and Ireson, J and Hallam, S (2007): Secondary school pupils' satisfaction with their ability grouping placements. in British Educational Research Journal, Volume 33, Issue 1, February 2007

121 Data refers to pupils at the end of Key Stage 4 in 2009 who continued to A Level in a given subject—the source is DfE: National Pupil Database

122 Data refers to pupils at the end of Key Stage 4 in 2009 and tracks progression up to 2010/11—the source is DfE: National Pupil Database

123 Data refers to pupils at the end of Key Stage 4 in 2009 who continued to any L3 qualification—the source is DfE: National Pupil Database

- There is evidence of some Universities requiring GCSE Grades B or above for some undergraduate Courses (Annex G).

College requirements for a B (+) to enter particular courses

- There is substantial evidence of FE colleges requiring a B grade or higher at GCSE for access to some A Level courses. Occasionally, colleges request that the C or B grade has been gained from a higher tier paper (Annex H).

Future prospects for low attainers in England

5.12. Future prospects for pupils who fail to get a GCSE grade D or better are poor, as demonstrated by the following evidence:

Attainment of Level 2 English or mathematics qualifications post 16

- A student who fails to get a D or better in English or mathematics by the end of Key Stage 4 has only a one in ten chance of continuing to study these GCSEs after the age of 16, and only a one in fifty chance of securing a C grade by 19¹²⁴.

Attainment at A Level¹²⁵

For English:

- Only 3% of those gaining D-G in English in year 11 attained 2+ A levels by age 19 compared with 55% for those who had achieved A*-C.
- Almost no pupils gaining an F grade—just 0.2%—attained 2 or more A Levels (and only 1% of those gaining an E grade).

For mathematics:

- Only 6% of those gaining D-G in mathematics in year 11 attained 2+ A levels by age 19 compared with 56% for those who had achieved A*-C.
- Only 1% of pupils gaining an F grade (and 4% of those gaining an E grade) attained 2 or more A Levels.

Progression to Higher Education¹²⁶

- Only 5% of pupils who achieved grades D- G in both English and mathematics progressed to HE—this compares to 62% of pupils who achieved an A*-C in both subjects.
- Only 2% of pupils who achieved grades E- G in both English and mathematics progressed to HE.
- Only 1% of pupils who achieved grades F- G in both subjects progressed to HE.

Wage returns to lower level qualification

124 DfE: Matched Administrative Data

125 Data covers those passing GCSE English/Mathematics when in year 11 in 2007/8 in maintained schools and tracks progression up to 2010/11: DfE: Matched Administrative Data

126 Data produced using Higher Education Statistics Authority (HESA) data for 2010 and the 2006 Key Stage 4 National Pupil Database.

- A study looking at returns to qualifications between 1993 and 2001 shows that there has been virtually no change in the estimated returns to most qualifications over the time period considered. An exception seems to be GCSE qualifications at grades D and below, the returns to which seem to have fallen from 6-11% returns to zero by 2001.¹²⁷

NEETs data¹²⁸

- 18% of young people with 5+ D–G grades at GCSE had spent 12 months or more NEET by the age of 18, compared to 4% of those with 5–7 GCSEs at A*–C (Annex I).

6. Next steps

6.1. The Department's consultation on reforming Key Stage 4 qualifications ends on the 10 December. Following this consultation, the Secretary of State will set out his policy steers for the new qualifications to Ofqual, and will ask Ofqual to consult on new, demanding regulations that will allow them to assess and regulate awarding organisations and their qualifications against these requirements.

6.2. Responses to the consultation will also inform an equalities impact analysis, which will be published alongside the Government response to the consultation. Key findings from our initial equalities impact analysis of the proposals are included at Annex J.

6.3. The Department will also be launching a separate consultation on secondary accountability later this year.

Annex A: Actual and estimated EBacc take-up (2010-2014)

Date cohort starting Year 10	Sept 2008	Sept 2009	Sept 2010	Sept 2011	Sept 2012
Date cohort taking GCSE at end of KS4	June 2010 ¹	June 2011 ¹	June 2012	June 2013 ⁴	June 2014 ⁴
Full EBacc	22%	22%	23% ²	46%	49%
History	30%	31%	32% ²	39%	41%
Geography	25%	25%	26% ²	33%	36%
Language	40%	38%	40% ²	51%	54%
Double Science	46%	41%	40% ³	57%	59%
Triple Science	16%	20%	23% ³	31%	34%

Sources

1 Figures sourced from the National Pupil Database.

2 Figures sourced from data published by DfE: *GCSE and Equivalent Results (Provisional) Statistical First Release October 2012*. The SFR does not provide separate data for double and triple science entries but does confirm that 64% of the cohort entered double or triple science GCSEs; see footnote 3.

3 Figures sourced from provisional data published by JCQ, which include all entrants to qualifications, not just at the end of KS4. The science figures have been estimated: using the KS4 cohort size as the denominator.

4 Figures sourced from two nationally representative surveys of state-maintained mainstream secondary schools conducted in June/July 2011 and June/July 2012.

127 McIntosh, S. (2002) Further analysis of the Returns to Academic and Vocational Qualifications: Centre for Economic Performance, London School of Economics, DfE RR370

128 DfE: Matched Administrative Data

Annex B: Evidence in support of a single awarding body

1. The following individuals and organisations provided evidence in support of a single awarding body to the Select Committee (for their report on the administration of examinations for 15-19 year olds in England):

The Wellcome Trust

2. Found that “there are significant problems arising from the current model of multiple awarding bodies for academic qualifications for 15-19 year olds. If we were establishing the examination system from scratch, a single awarding body would be most favorable”.

The Trust went on to say that:

3. “It seems likely that grades have reduced in part because the awarding bodies are competing for custom and teachers are likely to choose those qualifications that will yield the best performance for their schools and for their students. This process could happen without conscious direction from the awarding bodies. However, this process may be more explicit, as suggested by the fact that at least one awarding body uses grade improvement in its marketing, stating that its science GCSE course is “Proven to help improve grades...” backed up by a teacher’s comments that she had “seen a big 18% increase in C+ grades” . Furthermore, Sir Mark Walport, chair of the Science and Learning Expert Group observed that, when giving evidence, awarding bodies openly admitted that they struggle to avoid competing with each other on grade standards.”

It cited the following more specific problems with the current multi exam board system:

- Variation in awarding processes across the bodies, and lack of transparency about how grades are arrived at;
- Errors in examination papers and the quality of the questioning in exams;
- Endorsement of textbooks by awarding bodies;
- The low level of teacher, HEI and professional body engagement in development of examinations.

SCORE (Science Community Representing Education)

4. SCORE found that “the assessments are not testing the specifications; therefore, even students with high grades are not prepared for the next stage in their career or education—despite the fact that the specifications suggest that they should be; and consequently, consumers of qualifications have lost confidence in the examinations system. This has come about because the five main Awarding Organisations (AOs) which cover England, Wales and Northern Ireland are competing for market share on the basis of enabling more candidates to get higher grades rather than on the basis of high quality assessments or high quality curricula specifications. We ask that the Select Committee recommends significant changes that include drivers for quality in the examinations system and bring an end to the ‘race to the bottom’.

Specific concerns raised by SCORE were that:

5. “The commercial nature of AOs has led to an erosion of standards. Because it is a priority for AOs to maintain market share in qualifications they will never make a unilateral change to an assessment that makes it more difficult to achieve a high grade (or, put another way, reduce the number of high grades)—as most schools are unlikely to choose an AO that offers fewer high grades. This has led to a continual increase in the number of students getting the high grades.
6. The nature of AOs we believe has led to some decisions being made on commercial rather than educational grounds. These decisions have affected both the content of the specifications (chosen to be easily assessable) and the way in which they are assessed (tending to concentrate on the lower

levels of Bloom's taxonomy). The higher levels in the taxonomy (analysis, synthesis and evaluation) are rarely assessed. Attributes like curiosity, enthusiasm, imagination, persistence and teamwork are also relatively un-assessed; and therefore they are less likely to be taught.

7. Multiple AOs producing multiple specifications for the same qualification in the same subject means that the expertise is spread thinly. It calls into question whether there are enough people who have sufficient subject and examining expertise and experience in each subject in each of five main AOs in England, Wales and Northern Ireland. Additionally, having multiple AOs makes it hard for professional bodies and the subject communities to take any role in specification development, as all must be treated equally. This lack of engagement with subject communities results in a lack of confidence from users of the system, including HEIs and employers".
8. In summary, SCORE found that there were "very few advantages of providing the same qualification for a given subject, in competition, by multiple AOs. Although there are a number of risks, we would favor a model in which competition is not for market share within a qualification".

The Mathematical Association

9. The Association noted its concern that "the current competitive model may be creating downward pressure on genuine standards". It found that there are "potential advantages in working towards a single awarding body", whilst saying that there might prove to be "considerable barriers to such a move in the short to medium term" (in terms of implementation).

The Institute of Mathematics and its Applications

10. The Institute found that "the present competition between awarding organisations does not promote excellence in teaching mathematics in schools, and may even drive down standards".

It took the view that "the introduction of appropriately challenging mathematics papers, for both GCSE and GCE, will not happen whilst multiple examinations exist that are intended to assess the same curriculum in the same way. We do not believe that awarding organisations will be willing to set more demanding questions enabling proper assessment of higher level skills for higher attaining students if by so doing they would risk losing market share", and recommended that "one approach would be to have a single awarding organisation and a single specification. This would ensure fairness for candidates. A single award would allow for far greater scrutiny, and would concentrate the talents of the best examiners. It would permit a wide variety of curricula and teaching approaches to flourish, and a range of textbooks to support this variety. It would make the case that teaching to the test is not regarded as providing a good curriculum."

The Association of Teachers of Mathematics

11. The Association was of the view that "the argument for a range of awarding organisations has always been that it offers choice and will help to maintain standards. In reality, market forces encourage competition and a race to the bottom —'what can we get away with' (Science and Learning expert group). Schools may have concerns about the extent to which the exams they enter students for reflect the statutory curriculum, but the drive for results at any cost means they opt for the exams that they perceive to be 'easier'."
12. It went on to recommend that "in high stakes subjects like GCSE mathematics and English a national system of exam development would be preferable. This doesn't necessarily mean a national body for qualifications. Awarding organisations could continue to administer the nationally developed exam and provide support for centers, but by having a single exam issues around parity of esteem, maintenance of standards and quality of assessment design would be addressed."

NASUWT

13. NASUWT found that “the complexity of the current market presents significant challenges in the establishment of an effective accredited qualifications system that meets the legitimate needs of all those with a stake in the coherent and purposeful functioning of the system”. It also stated that “competition between awarding bodies has led to a driving down of the quality of support and good practice.”
14. The Union’s recommendation was that: “the awarding and accreditation of qualifications, particularly key qualifications available in the 14–19 sectors, (should) be undertaken by a single, dedicated and appropriately accountable organisation located within the public sector.”

The National Union of Students (NUS)

15. The union stated that a market in the examination system had introduced “perverse incentives for the end users and does nothing to address inequalities between those from advantaged and disadvantaged backgrounds.”
16. It went on to say that “the practice of examination bodies producing study and revision resources for sale constitutes a potential conflict of interest. In particular, it seems that this creates a number of internal markets (the market for resources aimed at a particular examination from a particular examination body) in which fair competition is extremely hard to achieve”, and recommended that “a single, centralised examinations body would offer a better, more reliable and more efficient examinations system.”

Annex C: Definition of what is needed to achieve a C grade (mid-point) from the grade descriptors

The following grade descriptions are used to guide the award of grade C in English, mathematics and science GCSEs. The descriptions capture the average performance expected to achieve the mid-point of grade C.

Mathematics	
	Grade description
Grade C	Learners use a range of mathematical techniques, terminology, diagrams and symbols consistently, appropriately and accurately. Learners are able to use different representations effectively and they recognise some equivalent representations; for example numerical, graphical and algebraic representations of linear functions; percentages, fractions and decimals. Their numerical skills are sound and they use a calculator accurately. They apply ideas of proportionality to numerical problems and use geometric properties of angles, lines and shapes.
	Learners identify relevant information, select appropriate representations and apply appropriate methods and knowledge. They are able to move from one representation to another, in order to make sense of a situation. Learners use different methods of mathematical communication.
	Learners tackle problems that bring aspects of mathematics together. They identify evidence that supports or refutes conjectures and hypotheses. They understand the limitations of evidence and sampling, and the difference between a mathematical argument and conclusions based on experimental evidence.
	They identify strategies to solve problems involving a limited number of

	variables. They communicate their chosen strategy, making changes as necessary. They construct a mathematical argument and identify inconsistencies in a given argument or exceptions to a generalisation.
English Language	
Grade C	<p>Learners adapt their talk to the demands of different situations and contexts. They recognise when standard English is required and use it confidently. They use different sentence structures and select vocabulary so that information, ideas and feelings are communicated clearly and the listener's interest is engaged. They explain and evaluate how they and others use and adapt spoken language for specific purposes. Through careful listening and by developing their own and others' ideas, they make significant contributions to discussion and participate effectively in creative activities.</p> <p>Learners understand and demonstrate how meaning and information are conveyed in a range of texts. They make personal and critical responses, referring to specific aspects of language, grammar, structure and presentational devices to justify their views. They successfully compare and cross-reference aspects of texts and explain convincingly how they may vary in purpose and how they achieve different effects.</p> <p>Learners' writing shows successful adaptation of form and style to different tasks and for various purposes. They use a range of sentence structures and varied vocabulary to create different effects and engage the reader's interest. Paragraphing is used effectively to make the sequence of events or development of ideas coherent and clear to the reader. Sentence structures are varied; punctuation and spelling are accurate and sometimes bold.</p>
English Literature	
Grade C	Learners understand and demonstrate how writers use ideas, themes and settings in texts to affect the reader. They respond personally to the effects of language, structure and form, referring to textual detail to support their views and reactions. They explain the relevance and impact of connections and comparisons between texts. They show awareness of some of the social, cultural and historical contexts of texts and of how this influences their meanings for contemporary and modern readers. They convey ideas clearly and appropriately.

Science	
Grade C	<p>Learners recall, select and communicate secure knowledge and understanding of science. They demonstrate understanding of the nature of science, its laws, its applications and the influences of society on science and science on society. They understand how scientific advances may have ethical implications, benefits and risks. They use scientific and technical knowledge, terminology and conventions appropriately, showing understanding of scale in terms of time, size and space.</p> <p>They apply appropriate skills, including communication, mathematical and technological skills, knowledge and understanding in a range of practical and other contexts. They recognise, understand and use straightforward links between hypotheses, evidence, theories, and explanations. They use models to explain phenomena, events and processes. Using appropriate methods, sources of information and data, they apply their skills to answer scientific questions, solve problems and test hypotheses.</p> <p>Learners analyse, interpret and evaluate a range of quantitative and qualitative data and information. They understand the limitations of evidence and develop arguments with supporting explanations. They draw conclusions consistent with the available evidence.</p>
Additional Science	
Grade C	<p>Learners recall, select and communicate secure knowledge and understanding of science. They demonstrate understanding of the nature of science, its laws, its applications and the influences of society on science and science on society. They understand how scientific advances may have ethical implications, benefits and risks. They use scientific and technical knowledge, terminology and conventions appropriately, showing understanding of scale in terms of time, size and space.</p> <p>They apply appropriate skills, including communication, mathematical and technological skills, knowledge and understanding in a range of practical and other contexts. They recognise, understand and use straightforward links between hypotheses, evidence, theories and explanations. They use models to explain phenomena, events and processes. Using appropriate methods, sources of information and data, they apply their skills to answer scientific questions, solve problems and test hypotheses.</p> <p>Learners analyse, interpret and evaluate a range of quantitative and qualitative data and information. They understand the limitations of evidence and develop arguments with supporting explanations. They draw conclusions consistent with the available evidence.</p>
Biology	
Grade C	<p>Learners recall, select and communicate secure knowledge and understanding of biology. They demonstrate understanding of the nature of biology and its principles and applications and the relationship between biology and society. They understand that scientific advances may have ethical implications, benefits and risks. They use scientific and technical knowledge, terminology and conventions appropriately, showing understanding of scale in terms of time, size and space.</p> <p>They apply appropriate skills, including communication, mathematical, technical and observational skills, knowledge and understanding in a range of</p>

	<p>practical and other contexts. They show understanding of the relationships between hypotheses, evidence, theories and explanations and use models, including mathematical models, to describe abstract ideas, phenomena, events and processes. They use a range of appropriate methods, sources of information and data, applying their skills to address scientific questions, solve problems and test hypotheses.</p> <p>Learners analyse, interpret and evaluate a range of quantitative and qualitative data and information. They understand the limitations of evidence and use evidence and information to develop arguments with supporting explanations. They draw conclusions based on the available evidence.</p>
Chemistry	
Grade C	<p>Learners recall, select and communicate secure knowledge and understanding of chemistry. They demonstrate understanding of the nature of chemistry, its laws, principles and its applications and the relationship between chemistry and society. They understand that scientific advances may have ethical implications, benefits and risks. They use scientific and technical knowledge, terminology and conventions appropriately, showing understanding of scale in terms of time, size and space.</p> <p>They apply appropriate skills, including communication, mathematical, technical and observational skills, knowledge and understanding in a range of practical and other contexts. They show understanding of the relationships between hypotheses, evidence, theories and explanations and use models, including mathematical models, to describe abstract ideas, phenomena, events and processes. They use a range of appropriate methods, sources of information and data, applying their skills to address scientific questions, solve problems and test hypotheses.</p> <p>Learners analyse, interpret and evaluate a range of quantitative and qualitative data and information. They understand the limitations of evidence and use evidence and information to develop arguments with supporting explanations. They draw conclusions based on the available evidence.</p>
Physics	
Grade C	<p>Learners recall, select and communicate secure knowledge and understanding of physics. They demonstrate understanding of the nature of physics, its laws, principles and applications and the relationship between physics and society. They understand that scientific advances may have ethical implications, benefits and risks. They use scientific and technical knowledge, terminology and conventions appropriately, showing understanding of scale in terms of time, size and space.</p> <p>They apply appropriate skills, including communication, mathematical, technical and observational skills, knowledge and understanding in a range of practical and other contexts. They show understanding of the relationships between hypotheses, evidence, theories and explanations and use models, including mathematical models, to describe abstract ideas, phenomena, events and processes. They use a range of appropriate methods, sources of information and data, applying their skills to address scientific questions, solve problems and test hypotheses.</p>

	Learners analyse, interpret and evaluate a range of quantitative and qualitative data and information. They understand the limitations of evidence and use evidence and information to develop arguments with supporting explanations. They draw conclusions based on the available evidence.
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Annex D: Case study—Germany

Between 2000 and 2009, Germany narrowed the gap in scores between their highest- and lowest-performing students by raising the performance of their lowest-achieving students while maintaining the performance level among their highest-achieving students¹²⁹.

OECD identified: “the main factors behind Germany’s strong recovery as being the changes it has made to the structure of its secondary schools; the high quality of its teachers; the value of its dual system, which helps develop workplace skills in children before they leave school; and its development of common standards and curricula and the assessment and research capacity to monitor them”¹³⁰.

Common standards

Following PISA 2000 Germany introduced national educational standards for the first time. In primary schools they covered German and mathematics; with standards for German, mathematics, a first foreign language (English or French), and science (biology, chemistry and physics) in lower secondary schools. Standards at the end of upper secondary school were later introduced in seven subjects: mathematics, German, French, English, biology, chemistry and physics.

These performance standards describe in some detail subject-specific competencies that students are expected to meet. They are mandatory for all 16 German states and are benchmarked against international standards.

Annex E: Progression to A Level in a particular subject

The figures below refer to pupils, at the end of Key Stage 4 in 2009, who continued to A-level in a given subject (for example, GCSE mathematics to A-level mathematics).

Progress rates for pupils achieving grade C are much lower than for those achieving A* - C grades.

129 OECD (2010) *PISA 2009 Results: Learning Trends – volume V*

130 OECD (2011) *Strong Performers and Successful Reformers in Education: Lessons from PISA for the United States*

Progression to A-level 2011

	Mathematics	Biology	Chemistry	Physics
Proportion of candidates achieving a C grade going on to A Level in that subject	0%	4%	2%	1%
Proportion of candidates achieving A*- C grades going on to A Level in that subject	22%	31%	30%	18%

Annex F: Progression to any Level 3

Progression rates to level 3 qualifications are much higher for those achieving 5 or more A*/A GCSEs compared with those achieving 5 or more A*-C GCSEs.

	Main qualification route, 2011		
	None	Level 3 qualifications	A-levels
Of end-KS4 pupils in 2009	50%	50%	36%
5+ A*/A GCSEs incl English and maths	5%	95%	92%
5+ A*-C GCSEs incl English and maths	22%	78%	64%

Proportion of pupils who progress to any Level 3 qualification by subject and grade:

- Progress rates for those achieving grade C are much lower than those achieving grade B and above.

	Progress to any Level 3 qualification				
	Mathematics	Biology	Chemistry	Physics	English
A*	96%	97%	97%	97%	96%
A	88%	92%	92%	92%	91%
B	74%	81%	81%	82%	78%
C	55%	64%	67%	68%	53%

Annex G: University requirements for a B (+) to enter particular courses

There is evidence of some Universities requiring GCSE Grades B or above for some undergraduate Courses. For example:

UCL:

All programmes require GCSE or equivalent passes in English Language and Mathematics at grade C or higher. Some programmes require grades higher than C or additional GCSE passes in specified subjects. E.g.:

Biology—English Language and Mathematics at grade B.

Classics—English Language at grade B, plus Mathematics at grade C.

English—English Language at grade B,

History of Art—English Language at grade B,

Law—English Language and Mathematics at grade B.

Psychology—English Language, Mathematics and two Sciences (double award acceptable) at grade B.

Bristol:

Typical requirements for:

Biology—English, Sciences and Mathematics A*-B

Dentistry—Minimum of 5 GCSEs at grade A*/A to include English Language, Mathematics and two science subjects

Geography/Geology/Geoscience—Grade B or above in Mathematics

Medicine—Minimum five GCSEs at grade A to include English Language, Mathematics and two science subjects

Psychology—Mathematics, English and Science at grade B, but grade A Preferred

Veterinary Nursing—Grade B or above in Science, Mathematics and English Language, plus two other GCSEs at grade C or above

Veterinary Science—A minimum of 6A*/A grades normally expected, including Mathematics if Mathematics or Physics not offered at A- or AS-level

Annex H: College requirements for a B (+) to enter particular courses

There is substantial evidence of **FE colleges** requiring a B grade or higher at GCSE for access to some A Level courses. Occasionally, colleges request that the C or B grade has been gained from a higher tier paper. For example:

Abbeyfield School Sixth Form: Pupils must have achieved at least a C grade at GCSE in the subject they want to study at A Level. For some subjects a grade B is required (e.g. French, physics, mathematics achieved on the higher tier paper).

Caroline Chisholm School Sixth Form: the most challenging learning pathway (enables pupils to take up to 4 full A Levels) requires a strong array of GCSE grades and a B grade or better in subjects that pupils are continuing to study.

Elizabeth Woodville School Sixth Form: Requires 8 GCSE grades at an average of B, this must include a B Grade for each of the specific courses a pupil wants to access, and English and mathematics at grade C.

Walthamstow Academy: The minimum entry requirement for a Level 3 programme of study is 5A* to C grades at GCSE or equivalent in 4 or more subjects including English and maths. Some Level 3 subjects have specific entry requirements (such as a B grade at the higher tier of entry).

Hanson Sixth Form: Students taking A Levels will need to achieve at least five GCSE passes at grade C or above. Many subjects also state specific grade requirements (e.g. chemistry: A–C at GCSE, at least double B in additional science or a double A in applied science and at least a grade C in mathematics; modern foreign languages: 5 grade A–C at GCSE and a GCSE grade B or better in a language; mathematics: grade B, or better in mathematics—This grade will have been obtained at the higher tier).

Annex I: NEETs Data

Months NEET since compulsory education by characteristics

	<i>Weighted base</i>	0 months NEET (%)	1 to 12 months NEET (%)	Greater than 12 months NEET (%)
All	14,713	69	23	8
Year 11 GCSE qualifications				
8+A*-C	6,847	82	17	1
5-7 A*-C	2,065	72	23	4
1-4 A*-C	2,998	64	28	9
5+D-G	1,541	50	32	18
1-4 D-G	711	31	30	39
None reported	543	27	28	45

The source is the Longitudinal Study of Young People in England

Annex J: Equalities analysis

7. The Government proposes the introduction of higher quality, more rigorous qualifications. Candidates will need to perform beyond the minimum levels which are currently required to achieve a grade C at GCSE if they are to demonstrate that they are literate and numerate, have a sound understanding of the subject studied, and are ready to move on to further study. All pupils will benefit from being provided with an accurate assessment of their performance that has real value for their future progression to further education and/or employment.
8. In assessing the potential impact of more rigorous qualifications our analysis has focused on the characteristics of high and low C grade (the current 'pass' grade) pupils in GCSE English, mathematics, geography, history, and French.
9. Initial equalities impact analysis of the proposals indicates that:¹³¹
 - In all 5 subjects, SEN pupils are currently more likely to achieve a low C grade than a high C grade. If there are no improvements to teaching, SEN pupils are more likely than their peers to their grades be affected by the introduction of exams which require candidates to perform beyond the minimum levels currently required to achieve a grade C at GCSE (to show that they have sound knowledge of the syllabus and are ready to progress to further study).
 - Boys are more likely than girls to achieve low C grades in GCSE mathematics, history and geography.
 - Low C pupils are slightly more likely to be FSM, most noticeably in GCSE French.
10. This analysis should not be taken to set any specific expectation of what level of challenge the new qualifications will present, compared to GCSEs; the scenario is solely designed to investigate the

¹³¹ Sourced from the 2011 Key Stage 4 National Pupil Database for pupils in the maintained sector in England only.

possibilities of differential impact for different groups. It is also important to note that this analysis takes no account of any improvement in the quality of teaching, and therefore of student attainment, during the period before the introduction of the new qualifications. The Government expects wider reforms, through improvements to teacher training, Pupil Premium support for disadvantaged pupils, greater freedoms for head teachers and the growth of academies and free schools, to lead to higher aspirations and greater achievement for all pupils. So, even as qualifications become more rigorous, more students will be equipped to clear a higher bar.

November 2012

Appendix 2: Written evidence submitted by Pearson

Thanks for inviting me to the session.

The session did of course reflect some scepticism about the path we are on. However it is also important to reiterate that Pearson believe that there is a need for change and there is significant opportunity to make a positive difference to education in the UK through the reform of the GCSE. We are in favour of a rethink of what students learn up to (and indeed beyond) age 16 and there is powerful evidence that we could do more for our young people, when we compare what is offered to British schoolchildren as compared to the rest of the world.

Our major concern is in the means rather than the principle, therefore. Successful reforms in other countries have taken significant time to consider their education system as a whole, reflecting on curriculum as well as assessment, and ensuring that changes at one stage or age are combined with the necessary changes elsewhere to ensure progression. At the moment, we're not convinced that the timetables enable this and this could be a significant missed opportunity to do something really worthwhile, or worse, end up being a risk to standards.

We're also concerned about the ability of the system to regenerate and innovate after such a reform, and more thought does need to be put into the model to ensure that upward pressure on standards is sustained. As we know, monopoly can breed inertia—and this would be a bad thing for the system over the long term. The world will not stop changing, and we need to ensure that the capacity and incentives are right so that our education system can adapt when it needs to and establish a long term leadership position in relation to the rest of the world.

I've attached a short piece we did for the Department on a possible alternative model which might deal with the second issue, and still enable us to take the opportunity that reform presents (provided it is set alongside the right timescales to produce high quality offers, of course).

22 November 2012

Annex: The franchise model—an alternative approach

We understand the desire to create simplicity around high stakes qualifications, and the apparent benefits of a franchised system in achieving this.

However the UK would be unusual, given its cohort size, in taking a single awarding organisation approach, and we do have concerns that the franchise approach will create a single point of delivery risk for each subject. Other large countries use a regional model to manage their large volumes, and increasingly use sophisticated standardisation scales to ensure comparability.

Franchising will also reduce capacity—both to solve problems (for example, in delivery) and to drive innovation and investment in new approaches to assessment. We do not expect that a franchise in 5 years time would be perfectly competitive, since we would expect awarding organisations to be forced to rationalise their operations on the basis of the subjects awarded in from 2015.

An alternative approach is to align incentives within the competitive market across all subjects in the direction of increasing standards, to maintain choice and competition to continue to drive investment and innovation. Standards can be checked within this model using the methods now being used by other large systems.

We believe this would achieve the objective of raising and securing standards right now, but also make this effort sustainable and guard against inertia over the long term.

In practice, this would mean allowing the recognition of more than one qualification per subject, with increased rigour in the demands made of that qualification in terms of its requirements at the front end, and the evidence required to support changes in performance against pre-determined standards at the back end.

- There is a loose precedent for the “front end” of this model in the process recently adopted for vocational qualifications, where the DfE has created an additional hurdle for the appropriation of performance measure points. This now incentivises the competitive creation of qualifications which have these characteristics.
- The second half of this proposal is based on the approach taken in Australia where statistical techniques are used to moderate performances across schools, across subjects and across time. In addition, the same techniques are being considered to moderate results across providers. This approach is being adopted now to bring the subject scores from more than 46 examination boards across India onto a single scale to make sure that no students are advantaged or disadvantaged by the examinations set by the various Boards.

The basic process is outlined below:

1. New requirements for all qualifications offered in schools in key subjects

We propose to reset the criteria for accreditation qualifications in core subjects. This would capture objective and transparent criteria set by DfE and Ofqual against the following areas:

- Assessment
- Quality of syllabus
- Grading and stretch
- Accessibility
- Deliverability
- International benchmarking

We would suggest adding to this evidence of quality progression outcomes for students taking the qualification.

This would incentivise awarding bodies to develop qualifications with these characteristics. This approach would therefore address the issue of concern around a perceived “race to the bottom” whilst managing delivery risks and reducing disruption, maintaining choice for teachers and learners, and ensuring pressures on price and level of service remain.

2. Confirming accreditation on the evidence of outcomes

To make the approach even more robust, we would suggest using more rigorous moderation techniques to provide evidence that qualifications recognised in league tables have comparable standards; and, that these standards are maintained over time.

There are a number of ways to moderate the results. All of them require ensuring “something” is common between awarding organisations.

- One way would be to use “raters” (subject experts) to conduct pairwise comparisons of the questions from the various examination papers. The results can then be used to produce a scale on which the various cut-scores can be located. The thing that is in common in this case is the “raters”.

- An alternative model would involve having a small number of questions being embedded in all examinations in comparable subjects to enable the comparisons of performance on the common or “anchor” set of items. This will enable a single scale to be produced and the standards to be compared as with the previous “rater” technique. Once again this model could be used (with the agreement of international benchmarking partners) to compare performance with other countries.

- A number of systems around the world use “scaling tests” (“aptitude tests”; “equating tests”; “core skills tests”; “general achievement tests”) with random samples of students to place the results from various providers of similar subject examinations on the same scale for ensuring comparability with pre-determined standards.

Qualifications which were found to be lenient or dropping down the common scale would have their recognition removed.

Adding an additional accountability measure for schools on the destinations of their pupils would further drive the delivery of the highest value qualifications on the ground. Work on tracking destination data from individual schools is already well underway.

November 2012

Appendix 3: Written evidence submitted by SCORE

Comments submitted following informal seminar held on 20 November 2012

- SCORE is very concerned about the prospect of the proposal that to achieve an EBacc, students will be required to achieve two qualifications in science, while there is also a proposal that no combined science option would be available. This could lead to students giving up one of the three sciences, which would have a detrimental effect on uptake:

It would exacerbate the inequalities currently seen in the numbers of boys and girls taking biology and physics respectively.

It would undermine the efforts being made to ensure more schools have specialist teachers in each of the sciences.

A triple science route is not appropriate for all students, and SCORE would want to see a combined science option available, that still allowed for progression to A-level.

- SCORE is not convinced that a single tiered assessment system can accurately and fairly measure achievement across abilities.

It is unlikely that a single tier can both differentiate effectively at the top end, while also allowing those at the bottom end to demonstrate their abilities.

- SCORE does not believe that awarding a franchise on the basis of a competition between specifications is the best way to ensure quality.

SCORE would support a single awarding organisation and models where this is currently working should be explored (e.g. Scotland and Northern Ireland)

Failing that, we would prefer a franchising system that awarded the franchise to an awarding organisation rather than a specification, which would allow awarding organisations to engage with appropriate stakeholders to improve the quality of their qualifications after the award has been made.

- SCORE would like to see the quality of assessment placed at the centre of any reform.

It is the content and quality of assessment that drives teaching in schools, rather than the specifications, which makes it imperative that assessment is well designed to ensure curriculum coverage and development of skills.

It is for this reason that practical work in the sciences must continue to be assessed, since this will ensure that schools place appropriate emphasis on it.

- SCORE is concerned that different processes are being put in place for the reform of A-levels and Key Stage 4 qualifications. This will make it difficult for organisations such as those in SCORE to engage effectively with awarding organisations, and will also make it harder to ensure coherence and progression between different educational stages.
- There must be suitable progression from KS3 to KS4. We are concerned that these new qualifications are being developed with little regard with the National Curriculum Review which is taking place alongside these reforms.
- SCORE is also concerned about implications for vocational education and non-EBacc subjects. The list of subjects required for an E-bacc appears arbitrary, has no educational rationale, and will only provide for

progression to A-levels. It is likely to be de-motivating for the large proportion of students who would be better suited to other routes post-16.

- SCORE would like to see changes to the accountability structure considered at the same time as those to Key Stage 4. We know that using assessment both for individual qualification and school accountability distorts its effects, encouraging perverse decisions and behaviours. Accountability is being built into the qualification system, since the Ebacc has no rationale other than as an accountability measure, but this will not ensure that the resulting qualifications are of a high quality.
- SCORE agrees that GCSEs do not have public confidence and there is a correctly identified need for more stretch at the top end. However, we think that much improvement could be made without such a drastic overhaul of the system.
- We would like to stress our view that publishing needs to be separated from the AOs.
- At the seminar last week there was a general feeling that we would need to raise the quality of the workforce to teach more stretch. SCORE disagrees with this notion, we would prefer the policy was lead by the assumption (although some CPD may be required) that teachers can easily cope with a bit of stretch at KS4.

November 2012

Appendix 4: Written evidence submitted by Dr Terry Lamb, University of Sheffield

1. In terms of University involvement in qualifications development, I think it is fair to say that Universities UK welcomes the opportunity, and has indeed always been involved closely in various ways. One example is that universities had considerable involvement in the 14-19 Diploma development: I had HE representatives on my steering group when I developed the Diploma in Languages and International Communication, and I also used a number of HE groups for regular consultation, e.g. Universities Council for Modern Languages, Committee for Linguistics in Education. I know that this was also the case in the other 16 diplomas. However HE involvement has permeated all qualifications development, not just the 14-19 Diploma.

2. Having said this, I believe that UUK is concerned about placing too much of the responsibility on universities. It is felt that considerable technical expertise is needed in qualifications development, and that there is a danger in shifting the balance too far towards HE. There is particular concern with the speed of change and the loss of expertise which used to reside in QCDA.

3. There is concern about privileging a narrow range of academic subjects, and the impact on engagement of learners, whose individual differences, such as motivations, contexts and learning styles, means they have different needs. This is not to deny that they should develop basic skills of literacy and numeracy, but achievement is supported by success and engagement not by forcing children into doing even more of those aspects of learning that they struggle with.

4. To add to this, there is a great need to address the gap in status between academic and vocational subjects in the 21st century, as is the case in other successful countries. The government proposals will only exacerbate this gap.

5. This is linked to concerns about widening participation. Universities are offering a vast range of relevant courses, but these proposals sideline the arts, social sciences and some humanities, for example. This will lead to an impoverished curriculum offer for children, and a significant loss of expertise nationally. (China, for example, is investing in the development of more courses on Design, and cultural industries play a significant role in most economies.) We discussed the needs of the country in the 21st century, and also the 21st century learner. These proposals do not meet these demands at all.

6. The possible introduction of different grading systems for different subjects could lead to inconsistency across subjects, and difficulty in comparing them.

7. One positive aspect is the move to greater differentiation between candidates at the top end, though it would be useful to consider how this is achieved in other countries where, for example, there is much greater reliance on teacher assessment.

8. From my perspective as a linguist committed for decades to valuing all languages, I am concerned that many of the gains made since the 1980s, and particularly since the National Languages Strategy in 2002, will be lost. The EBacc may well include a language, but we have seen that motivation for language learning is not high in this country, and that a more engaging curriculum and qualifications which reflect this can draw more children into language learning. We have also made many gains in recognising the many languages used to various degrees by children in their homes. The impact of the EBacc is to threaten Asset qualifications in 20 out of the 25 languages in which they are offered, leaving many languages with

no possibility of accreditation. Schools are not using these qualifications now that they no longer 'count' in league tables. More information on this can be found at the following e-petition address:<http://www.change.org/en-GB/petitions/keep-our-languages-exams-every-language-is-an-asset>

Many thanks once again for the opportunity to have some voice in this.

November 2012

Formal Minutes

Tuesday 29 January 2013

Members present:

Mr Graham Stuart, in the Chair

Neil Carmichael
Alex Cunningham
Bill Esterson
Pat Glass
Charlotte Leslie

Siobhain McDonagh
Ian Mearns
Chris Skidmore
David Ward

Draft Report (*From GCSEs to EBCs: the Government's proposals for reform*), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 76 read and agreed to.

Annex agreed to.

Summary agreed to.

Papers were appended to the Report as Appendices 1 to 4.

Resolved, That the Report be the Eighth Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[Adjourned till Wednesday 30 January at 9.15 am

Witnesses

Wednesday 5 December 2012

Page

Rt Hon Michael Gove MP, Secretary of State, Department for Education

Ev 1

List of Reports from the Committee during the current Parliament

The reference number of the Government's response to each Report is printed in brackets after the HC printing number.

Session 2010-12

First Special Report	Young people not in education, employment or training: Government Response to the Children, Schools and Families Committee's Eighth Report of Session 2009-10	HC 416
Second Special Report	The Early Years Single Funding Formula: Government Response to the Seventh Report from the Children, Schools and Families Committee, Session 2009-10	HC 524
Third Special Report	Transforming Education Outside the Classroom: Responses from the Government and Ofsted to the Sixth Report of the Children, Schools and Families Committee, Session 2009-10	HC 525
Fourth Special Report	Sure Start Children's Centres: Government Response to the Fifth Report from the Children, Schools and Families Committee, Session 2009-10	HC 768
First Report	Behaviour and Discipline in Schools	HC 516-I and -II (HC 1316)
Second Report	The role and performance of Ofsted	HC 570-I and II (HC 1317)
Fifth Special Report	Looked-after Children: Further Government Response to the Third Report from the Children, Schools and Families Committee, Session 2008-09	HC 924
Third Report	Services for young people	HC 744-I and -II (HC 1501)
Fourth Report	Participation by 16-19 year olds in education and training	HC 850-I and -II (HC 1572)
Fifth Report	The English Baccalaureate	HC 851 (HC 1577)
Sixth Report	Services for young people: Government Response to the Committee's Third Report of Session 2010-12	HC 1501 (HC 1736)
Seventh Report	Appointment of HM Chief Inspector, Ofsted	HC 1607-I
Eighth Report	Chief Regulator of Qualifications and Examinations	HC 1764-I and -II
Ninth Report	Great teachers: attracting, training and retaining the best	HC 1515-I

Session 2012–13

First Report	The administration of examinations for 15–19 year olds in England	HC 141-I (HC 679)
Second Report	Appointment of Chair, Social Mobility and Child Poverty Commission	HC 461-I
Third Report	Governance and leadership of the Department for Education	HC 700 (HC 919)
Fourth Report	Children first: the child protection system in England	HC 137-I
Fifth Report	Support for Home Education	HC 559-I
Sixth Report	Pre-legislative scrutiny: Special Educational Needs	HC 631-I
Seventh Report	Careers guidance for young people: The impact of the new duty on schools	HC 632-I
