

# **Analysis of responses to our consultation on setting GCSE (9 to 1) grade boundaries**



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## Executive summary

Our consultation on *Setting GCSE (9 to 1) grade boundaries* took place between 30 November 2016 and 6 January 2017. The consultation questions were available to complete online or download. A copy of the consultation is available at <https://www.gov.uk/government/consultations/requirements-on-setting-gcse-9-to-1-grade-boundaries>.

This technical consultation received nine responses; five of these were from teachers responding in a personal capacity and four were from exam boards.

Respondents to the consultation supported the majority of our proposals. Respondents agreed with our proposed Condition; the only comment we received was a request for clarification about the meaning of 'prior qualification' in the Condition. Similarly, the only comment we received about the draft guidance was a request for clarification about what is meant by a 'similar subject'.

Of the comments we did receive, most were about specific parts of the drafting of our standard setting requirements, not the overall approach. The specific aspects respondents commented on were:

- tiering - some respondents commented that where the 3/U grade boundary in higher tier papers is adjusted based on statistical and technical evidence, there should be a minimum mark gap between the 3/U and 4/3 grade boundaries;
- key grade boundaries - some respondents queried whether the grade 5/4 boundary should be a key grade boundary;
- allowed grades in higher tier - some respondents queried whether a 3-3 grade should be allowed in higher tier double-award GCSE papers.

Some respondents also raised issues that were outside of the scope of this consultation relating to making information about the number of marks needed for particular grade boundaries available to schools before the assessments are taken.

# Introduction

This consultation was for our proposed technical requirements for setting GCSE (9 to 1) grade boundaries and it followed on from our earlier consultations: *Setting the grade standards of new GCSEs in England – part 2*<sup>1</sup> in April 2016; and *Setting the Grade Standards of New GCSEs in England*<sup>2</sup> in April 2014. In the consultation, we set out the wording of the Conditions, Requirements and Statutory Guidance we proposed to implement the decisions we had previously made in relation to setting GCSE grade boundaries.

We also set out our proposal to remove a requirement from the *GCSE Subject Level Conditions and Requirements for Mathematics*<sup>3</sup> and *GCSE Subject Level Conditions and Requirements for Modern Foreign Languages*<sup>4</sup>. This is because these subject level requirements duplicate a requirement that we proposed to put in place at qualification level.

Some of the requirements we plan to introduce for setting grade boundaries for GCSE (9 to 1) qualifications will not be set through qualification level Conditions or guidance. We will include them in the requirements relating to grade standards that we publish each year<sup>5</sup> for all GCSE, AS and A level qualifications, in line with existing practice. These requirements will include the process exam boards must use for setting the grade 8/9 boundary and, when a new GCSE is first awarded, for referencing between current (alphabetical) and new (numerical) grades to set standards in the new qualification.

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<sup>1</sup> <https://www.gov.uk/government/consultations/setting-the-grade-standards-of-new-gcses-in-england-2017-2018>

<sup>2</sup> <http://comment.ofqual.gov.uk/setting-the-grade-standards-of-new-gcses-april-2014/>

<sup>3</sup> <https://www.gov.uk/government/publications/gcse-9-to-1-subject-level-conditions-and-requirements-for-mathematics>

<sup>4</sup> <https://www.gov.uk/government/publications/gcse-9-to-1-subject-level-conditions-and-requirements-for-modern-foreign-languages>

<sup>5</sup> See, for example: <https://www.gov.uk/government/publications/data-exchange-procedures-for-a-level-gcse-level-1-and-2-certificates>

## Who responded?

We received nine responses to our consultation. Five of these were personal responses and four were from organisations.

**Table 1: Breakdown of consultation responses**

<b>Personal/organisation response</b>	<b>Respondent type</b>	<b>Number</b>
Personal response	Teacher	5
Organisation response	Awarding organisation	4

**Table 2: Location of respondents**

<b>Location</b>	<b>Number</b>
England	6
England/Wales/Northern Ireland	1
England/Wales	1
Non-EU	1

## **Approach to analysis**

Respondents could choose to respond using an online form, by email, or by post. The consultation was published on our website and included three questions.

This was a consultation on the views of those who wished to participate. We tried to ensure that as many respondents as possible had the opportunity to reply, but it cannot be considered as a representative sample of the general public or any specific group.

### **Data presentation**

We present the responses to the consultation questions in the order in which they were asked. Respondents could choose to answer all or just some of the questions.

We asked respondents to comment on each of our proposed Conditions, requirements and guidance.

During the analysis phase we reviewed every response to each question.

## Views expressed – consultation response outcomes

In this section we report the views of those who responded to the consultation document in broad terms. We have structured this around the questions covered in the consultation document, and provide analysis of the data broken down by stakeholder type.

We do not detail each individual comment which was made, although we have read and considered all views which were provided.

The consultation responses only reflect the views of those who chose to respond. Typically, these will be those with strong views and/or particular experience or interest in a topic. What follows is a reflection of the views expressed by respondents to the consultation.

A list of the organisations that responded to the consultation is included in Appendix A.

**Question 1: Do you have any comments on our proposal to remove the requirement (detailed in paragraph 5.2 of this consultation) in the *GCSE Subject Level Conditions and Requirements for Mathematics* and *GCSE Subject Level Conditions and Requirements for Modern Foreign Languages*?**

Five respondents provided comments for this question.

One organisation commented that they agreed that the subject level requirements were suitably covered by the proposed qualification level conditions, so were no longer required.

One individual commented on the requirement we proposed to put in place at qualification level relating to setting the 3/U grade boundary in higher tier papers. The proposed requirement would allow for the grade boundary to be moved from the arithmetic mark on the basis of statistical and technical evidence. In putting this proposal in place, we proposed to remove a subject level requirement in maths and modern foreign languages which the proposed requirement would duplicate.

The respondent proposed that additional requirements should be put in place which set out a minimum mark interval between the 4/3 and 3/U grade boundaries on the higher tier. They commented that this would provide assurances that the 3/U grade boundary would not be set too close to the 4/3 boundary. They felt that if the boundaries were close together, that might influence schools' choices of tier entry, and mean more students being entered for the foundation tier. This respondent also commented that where statistical or technical evidence leads to this boundary being set at a different mark, the reasons for this should be published.

Another individual also commented on this requirement. They did not believe that our proposal would remove duplication. They also commented that the ability to move the grade boundary could potentially disadvantage students.

Another organisation, whilst agreeing with the proposal to remove the requirement, commented that the proposed qualification level requirement would give exam boards discretion to move the arithmetically-determined 3/U boundary on the higher tier on the basis of statistical and technical evidence. They said that as this boundary is likely to be important in driving centres' choices in entering for each tier, any inconsistency in approach to setting the 3/U boundary may encourage inappropriate centre entries, if it is perceived that the risks associated with entering the higher tier differ between exam boards or specifications. This organisation suggested that further thought should be given to ensuring decisions to retain or move the higher tier 3/U boundary for a given award are consistent between exam boards and that this could be done through Ofqual's annual requirements for all GCSEs, AS and A levels (previously referred to as data exchange).

**Question 2: Do you have any comments on our proposed Conditions and requirements for GCSE (9 to 1) qualifications?**

Seven respondents provided comments in response to this question.

One organisation commented that they were largely content with our proposals, which reflect what is in place for reformed GCE qualifications.

One individual's comments repeated those made in response to question one, that there should be a minimum mark interval between the 4/3 and 3/U grade boundaries in the higher tier to prevent students being moved to the lower tier to manipulate the profile for the tiers of entry.

Two other individuals also made related comments relating to the 3/U grade boundary on higher tier papers.

- One commented that where the lowest boundary on a higher tier paper is set at a relatively low mark, this might encourage schools to enter more of their students for the higher tier paper, which can be risky for students working at the lower end of the foundation tier grade range.
- One commented that the assigning of grade boundaries between the key grade boundaries is reasonable and clear, other than for the 3/U grade boundary on higher tier papers. They also commented that it was not clear what percentage of students would be expected to achieve certain grades when compared with previous years.

- One organisation suggested that the 5/4 boundary should be a key grade boundary from 2018 onwards to ensure consistency across exam boards, because it was not clear how grade 5 will be considered by users of qualifications, such as employers and higher education. They commented that it would be harder to align this grade across exam boards if it was not a key grade boundary, so there was a risk of a lack of comparability across exam boards at this grade.

Three organisations made comments relating to specific parts of the draft requirements.

- Two organisations commented that in the first year, the process for setting grade 9 will be different to that which is set out in our requirements. This is because in the first year we will set the standard for grade 9 and in subsequent years we will carry forward that standard.
- One organisation commented that the draft requirements suggest that each key grade boundary should be set, in the second and subsequent years, to align with the standard set for the same grade in the first year. The organisation queried what would happen if the evidence suggested that the standard needed to be adjusted in future years.
- Two organisations queried why the lowest allowed grade for double-award higher tier papers is 4-3 and queried whether a 3-3 grade should also be available on double-award higher tier papers.
- One organisation also queried whether the proposed approach for setting the 4-3/U grade boundary in higher tier papers was sufficiently clear.
- One organisation commented that a consistent approach to setting the foundation tier grade 5/4 boundary is necessary across subjects and exam boards to prevent inappropriate centre entry strategies.

<p><b>Question 3: Do you have any comments on our proposed guidance for GCSE (9 to 1) qualifications?</b></p>
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Three respondents (two organisations, one individual) made comments in response to this question.

One organisation commented that it would be helpful to have clarification about what is meant by a 'similar subject', where the guidance says that exam boards should:

*...have regard, as appropriate, to the level of attainment demonstrated by Learners who have taken a pre-reform GCSE qualification in –*

*(a) the same subject, or*

*(b) where there was no pre-reform GCSE qualification in the same subject, a similar subject.*

One organisation commented that the guidance is appropriate for setting the 7/6, 4/3 and 1/U boundaries, but that it was not clear about how scripts should be used when setting the grade 9/8 boundary after the first year.

## **Appendix A: List of organisational consultation respondents**

We asked respondents to indicate whether they were responding as an individual or on behalf of an organisation. Below we list those organisations that submitted a response to the consultation. We have not included a list of those responding as an individual; however, all responses have been reflected in the analysis.

AQA

Pearson

OCR

WJEC

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