



Department of
Education
www.deni.gov.uk

DEPARTMENT OF EDUCATION
EQUALITY AND HUMAN RIGHTS POLICY SCREENING
GCSE GRADING

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1. POLICY SCOPING

1.1

Title of policy: GCSE Grading

1.2 Type of Policy Development

This is a revised policy.

1.3 Description of policy

On 11 March 2014, the Education Minister announced that he had accepted all of the recommendations from the CCEA fundamental review of GCSEs and A Levels.

The Minister asked his departmental officials to provide advice on a number of qualification issues that arise as a result of GCSE reform decisions in England including GCSE grading.

This policy relates to a new numerical GCSE grading system being introduced with grades from 9 to 1 rather than A* to G.

A more detailed background to the policy is attached at Annex A.

1.4 What factors could contribute to, or detract from the intended aim/outcome of the policy?

None	
Legislative	
Financial	✓
Others (please specify) See below	✓

Issues/Risks for DE

GCSE Grading

The main concern of not changing to a numerical grading structure is the implications of having a permanent situation where there are two grading systems in place for GCSE qualifications. This may have implications for learners, parents, employers and so on.

We recognise that for at least two years (for GCSE results released in Aug 2017 and Aug 2018), there will be GCSEs awarded here with different grading systems since CCEA's revised GCSEs will not be available for first teaching until Sep 2017).

England, Wales and the north of Ireland operate a 3-country qualifications system. In the main, we have the same qualifications and the regulators work together to ensure there are common standards and demands across all 3 jurisdictions. This means pupils taking exams here can have their qualifications easily recognised and accepted by universities and employers if they wish to go to study or work in England, Wales or the south of Ireland and vice-versa. The intention is that the comparability of the qualification would be maintained if the grading system was the same.

In considering this issue, DE had to consider if the north of Ireland should also move to numerical grading system. As part of our considerations, we have taken into account advice from CCEA in its capacity as qualifications regulator, and the views of key stakeholders, especially teachers and pupils. Our over-riding concern is the interests of young people and ensuring they are enabled to achieve to their full potential.

1.5 Main stakeholders affected (Please tick ✓ relevant boxes)

Pupils (Actual or Potential)	✓
Parents	✓
Teaching Staff	✓
Trade Unions or Professional Organisations	
Other Public Sector Organisations (CCEA)	✓
Departmental Staff	
Others (please specify) – Higher Education Establishments	✓

1.6 Who is responsible for:

(a) Devising the policy

The Department of Education

(b) Implementing it

DE, CCEA.

(c) Explain the relationship?

The Department for Education in England can make changes to its policy and there is an expectation that it will inform and liaise with the devolved administrations throughout its decision making process. We can develop the same or different policy as we see fit for our circumstances..

The Council for the Curriculum, Examinations and Assessment (CCEA) was established on 1 April 1994 and is a non-departmental public body reporting to the Department of Education in this jurisdiction. CCEA provides advice to the Department of Education here on a range of issues including the changes proposed by DfE.

1.7 Other policies or objectives with a bearing on this policy

Achievement levels at GCE/GCSE – as set out in the department’s business plan and PfG (2011-15).

2. EVIDENCE

2.1 What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? *(Relevant details should be given for each of the categories.)*

Section 75 Category	Details of Evidence/Information						
Religious Belief	Overall attainment at GCSEs by religion is recorded. Figures for 2012/13 GCSE school leavers are set out below.						
	There is no indication that the policy proposal will disproportionately impact on the basis of religion. However, this will be monitored by the Department.						
			Protestant		Catholic		
			Number	%	Number	%	
	5+ GCSEs A*-C(inc. equivalents)		7066	77.4	9232	80.4	
	5+ GCSEs A*-C(inc. equivalents) inc. GCSE English and maths		5562	61.0	7326	63.8	
	5+ GCSEs A*-G(inc. equivalents)		8690	95.2	10876	94.8	
No GCSEs		135	1.5	194	1.7		
Total Leavers		9124		11476			
Political Opinion	There is no indication that the policy proposal will disproportionately impact on the basis of religion						
Racial Group	Race of school leavers is recorded as Other White and Minority Ethnic. There is no indication the policy proposal will disproportionately impact on the basis of race. However, this will be monitored by the Department.						
		Other		White		Minority Ethnic Groups	
		Number	%	Number	%	Number	%
5+ GCSEs A*-C(inc. equivalents)		1766	73.6	17770	78.8	294	65.3
5+ GCSEs A*-C(inc. equivalents) inc. GCSE English and maths		1415	58.9	14071	62.4	232	51.6
5+ GCSEs A*-G(inc. equivalents)		2248	93.6	21433	95.0	381	84.7
No GCSEs		43	1.8	332	1.5	40	8.9
Total Leavers		2401		22551		450	
Age	GCSE's are taken within school at broadly the same age.						
Marital Status	Not applicable.						

Section 75 Category	Details of Evidence/Information																																					
Sexual Orientation	<p>This information is not currently collected. However the shout Report stated that, “analysis of the 2001 Census indicates that between 2% and 10% of the population may be lesbian, gay or bisexual.”</p> <p>There is no evidence to suggest that the changes proposed to GCSE grading will differentially impact people dependent on their sexual orientation.</p>																																					
Men And Women Generally	<table border="1" data-bbox="363 533 1406 875"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Girls</th> <th colspan="2">Boys</th> </tr> <tr> <th>Number</th> <th>%</th> <th>Number</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>5+ GCSEs A*-C(inc. equivalents)</td> <td>9314</td> <td>82.8</td> <td>8750</td> <td>74.5</td> </tr> <tr> <td>5+ GCSEs A*-C(inc. equivalents) inc. GCSE English and maths</td> <td>7544</td> <td>67.0</td> <td>6759</td> <td>57.5</td> </tr> <tr> <td>5+ GCSEs A*-G(inc. equivalents)</td> <td>10806</td> <td>96.0</td> <td>11008</td> <td>93.7</td> </tr> <tr> <td>No GCSEs</td> <td>132</td> <td>1.2</td> <td>240</td> <td>2.0</td> </tr> <tr> <td>Total Leavers</td> <td>11255</td> <td></td> <td>11746</td> <td></td> </tr> </tbody> </table> <p>Females generally perform better than their male counterparts in GCSE exams, in 2012/13. 82.8% of female school leavers in year 12 achieved 5 or more GCSEs (including equivalents) at grades A*-C compared to 74.5% of male school leavers</p> <p>The performance gap is not as large when GCSE grades (including equivalents) at grades A*-G are considered, with 96% of females achieving compared with 93.7% of male school leavers.</p> <p>Source: School Leavers Survey 2012/13</p> <p>There is a no evidence to suggest that the changes to grading and performance points will have an impact on males greater than females. This will be monitored by the Department.</p> <p>In respect of transgender men and women, a UK wide study for the Gender Identity Research and Education Society (GIRES) http://www.gires.org.uk/assets/Medpro-Assets/GenderVarianceUKreport.pdf suggests that the prevalence rate for Northern Ireland is 8/100,000 (16 and over) population or approximately .0008% of the population (16 and over, 1,432,501 people in 2011), i.e. approximately 115 people.</p>					Girls		Boys		Number	%	Number	%	5+ GCSEs A*-C(inc. equivalents)	9314	82.8	8750	74.5	5+ GCSEs A*-C(inc. equivalents) inc. GCSE English and maths	7544	67.0	6759	57.5	5+ GCSEs A*-G(inc. equivalents)	10806	96.0	11008	93.7	No GCSEs	132	1.2	240	2.0	Total Leavers	11255		11746	
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Disability	<p>Arrangements are already in place to make appropriate adjustments for persons with a disability. The proposed changes to GCSE grading will not impact on these arrangements. However, this will be monitored by the Department.</p> <p>There is a no evidence to suggest that the changes to grading will have an impact on persons with a disability.</p> <table border="1" data-bbox="363 1917 1406 1953"> <tr> <td></td> <td>Not disabled</td> <td>Disabled*</td> </tr> </table>					Not disabled	Disabled*																															
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Section 75 Category	Details of Evidence/Information					
		Number	%	Number	%	
	5+ GCSEs A*-C(inc. equivalents)	17935	78.6	129	69.0	
	5+ GCSEs A*-C(inc. equivalents) inc. GCSE English and maths	14222	62.3	81	43.3	
	5+ GCSEs A*-G(inc. equivalents)	21648	94.9	166	88.8	
	No GCSEs	363	1.6	9	4.8	
	Total Leavers	22814		187		
	<p>*The definition for disability is that a child 'has a disability if he or she has a physical or mental impairment which has a substantial and long-term (has or is likely to last 12 months or more) adverse effect on his ability to carry out normal day-to-day activities' This must have been assessed by a medical professional. The disability variable is not validated by the department.</p>					
Dependants	<p>The Young Life and Times Survey reports that 1 in 10 young people are carers.</p> <p>There is no evidence to suggest that the changes proposed to GCSEs would differentially impact upon people with dependants.</p>					

2.2 Taking into account the evidence gathered at 2.1 what are the needs, experiences and priorities of each of the categories in relation to this particular policy?

Section 75 category	Needs/Experiences/Uptake/Priorities
Religious Belief	No issues.
Political Opinion	Using religious belief as a proxy for political opinion, there are no issues.
Racial Group	No issues.
Age	No issues.
Marital Status	Not applicable.
Sexual Orientation	No issues.
Men And Women Generally	<p>Females generally perform better in GCSEs than their male counterparts, although The performance gap is not as large when GCSE grades (including equivalents) at grades A*-G are considered, (Source: School Leavers Survey 2012/13)</p> <p>However, there is a no evidence to suggest that the technical changes proposed to grading will have a greater impact on males than females. This will be monitored by the Department.</p>
Disability	Special arrangements are already in place to make appropriate arrangements for persons with a disability. The proposed technical changes to GCSE grading will not impact on these

	arrangements and there is a no evidence to suggest that these changes to grading will have a differential impact on persons with disabilities.
Dependants	No issues

3. SCREENING QUESTIONS

3.1 What is the likely impact of this policy on equality of opportunity for each of the Section 75 equality categories?

Section 75 category	None*	Minor*	Major*	Details of policy impact Level of impact?
Religious belief	✓			
Political opinion	✓			
Racial group	✓			
Age	✓			
Marital status	✓			
Sexual Orientation	✓			
Men and women generally	✓			
Disability	✓			
Dependants	✓			

3.2 Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?

Section 75 category	NO*	Yes*	Provide Details
Religious belief	✓		
Political opinion	✓		
Racial group	✓		
Age	✓		
Marital status	✓		
Sexual Orientation	✓		
Men and women generally	✓		
Disability	✓		
Dependants	✓		

3.3 To what extent is the policy likely to impact on good relations between: people of different religious belief, political opinion or racial group?

Good relations category	No impact*	Minor impact*	Major impact*	Details of policy impact
Religious belief	✓			
Political opinion	✓			
Racial group	✓			

3.4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good relations category	NO*	YES*	Provide Details
Religious belief	✓		
Political opinion	✓		
Racial group	✓		

3.5 Additional considerations - Multiple identities

Please provide details of data on the impact of the policy on people with multiple identities and specify relevant Section 75 categories concerned.

The revised policy is not considered to have an adverse differential impact or effect on an individual or group with multiple identities.

4. SCREENING DECISION

Not to conduct an equality impact assessment because no equality issues have been identified.

Please provide details which support the decision

Overall the desire to address issues of comparability and reduce confusion in the grading systems is in the best interest of schools and learners.

There is no evidence to suggest that a numerical grading system or alpha system would have a differential impact on any categories.

5. TIMETABLING AND PRIORITISING

5.1 If the policy has been ‘screened in’ for equality impact assessment, then please answer the following questions to determine its priority.

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Criterion	Priority Rating
Effect on equality of opportunity and good relations	
Social need	
Effect on people’s daily lives	
Relevance to a public authority’s functions	
Total	

Details of the Department’s Equality Impact Assessment Timetable will be included in a Quarterly Screening Report.

5.2 If the policy is affected by timetables established by other relevant Public Authorities please provide details

6. MITIGATION

If you conclude that the likely impact is ‘**minor**’ and an equality impact assessment is not to be conducted, you should consider: mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Why and how will the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations?

7. MONITORING

Effective monitoring will help identify any future adverse impact arising from the policy, as well as help with future planning and policy development.

Please detail what data you will collect in the future in order to monitor the effect of the policy on any of Section 75 equality categories.

The Department will monitor the impact of its proposed changes on an ongoing basis to ensure that the outcomes from these policy changes are as intended and that there is no adverse differential impact on any of the nine Section 75 categories.

We will monitor for example:

- GCSE results;and.
- The number of requests for Access Arrangements, Reasonable Adjustments and Special Consideration and the number and percentage granted.

8. DISABILITY DISCRIMINATION

8.1 Please state if the policy/decision in any way discourages persons with disabilities from participating in public life or fails to promote positive attitudes towards persons with disabilities.

N/A

8.2 Please state if there is an opportunity to better promote positive attitudes towards persons with disabilities or encourage participation in public life by making changes to the policy/decision or introducing additional measures.

N/A

8.3 Please detail what data you will collect in the future in order to monitor the effect of the policy with reference to the disability duties.

The number of requests for: Access Arrangements, Reasonable Adjustments and Special Consideration and percentage granted.

9 CONSIDERATION OF HUMAN RIGHTS ISSUES

9.1 How does the policy/decision affect anyone’s Human Rights?

I.E.

[The Human Rights Act \(1998\)](#)

[The United Nations Convention on the Rights of the Child \(UNCRC\)](#)

[The United Nations Convention on the Rights of Persons with Disabilities \(UNCRPD\)](#)

[The United Nations Convention on the Elimination of All Forms of Discrimination Against Women \(CEDAW\)](#)

(* Please tick ✓ as appropriate)

Insert Right Considered	*
Positive Impact	
Negative Impact (human right interfered with or restricted)	
Neutral Impact	✓

If the effect you have identified is positive or neutral proceed to Question 9.3.

9.2 If you have identified a negative impact who is affected and how?

N/A

At this stage you should determine whether to seek legal advice and to refer to the issue to the Equality Team to consider:

- *whether there is a law which allows you to interfere with or restrict rights*
- *whether this interference or restriction is necessary and proportionate*

- *what action would be required to reduce the level of interference or restriction).*

9.3 Outline any actions which could be taken to promote or raise awareness of human rights or to ensure compliance with the legislation in relation to the policy/decision.

N/A

10 CONSIDERATION OF RURAL IMPACTS

10.1 Is there potentially a direct, or indirect, impact on rural areas?

(* Please tick ✓ as appropriate)

YES*	
NO*	✓

Guidance on Rural Impact Assessment can be found in [Thinking Rural: The Essential Guide to Rural Proofing](#)

10.2 If YES please attach a DARD Rural Issues Statement Pro-forma
(A Pro-forma can be found in TRIM Document DE1/14/117152)

11. APPROVAL AND AUTHORISATION

Screened By:	Position	Date
Geraldine Catney	SO, Assessment and Qualifications Team	13/08/14
Approved BY:	Position	Date
Dale Heaney	G7, Head of Assessment and Qualifications Team	12/09/14

Note: A copy of the Screening Form must be approved and 'signed off' by a senior manager responsible for the policy.

The **TRIM** version of the completed Screening Form must be sent to the Equality Team (equality@deni.gov.uk) for quality assurance.

FOR COMPLETION BY EQUALITY TEAM

Quality Assured by: RICHARD MAGOWAN

Date: 12/09/14

Screening Decision: Agreed
Comments: N/A

Date Directorate/Team Informed: 12/09/14

If your decision was to "Screen Out":

1 As soon as possible following quality assurance you must publish a copy of the screening form on the Department's website, with a link on the "Policy Screening" page

Placed on Internet by: _____ Date: _____

2 You must tell the Equality Team once your screening is published so it can fulfil the Department's statutory obligation to inform the Department Consultees when and where the screening was published

Consultees Informed by _____ Date: _____

3 You must store this completed screening form on TRIM and finalise it. Use the record naming convention "Completed Screening form of....."

Annex A – Background to GCSE Grading Policy

I. GCSE GRADING

The position in England is that Ofqual, in conjunction with the Department for Education (DfE) in England has already decided to change the grading from A*- G to 9- 1 (9 being the highest grade) with effect from September 2015 (first teaching). In England, new GCSEs in English language, English literature and maths will be introduced from September 2015 (first teaching)), with further GCSE titles to follow from September 2016. The first new GCSE qualifications will be awarded in summer 2017 (2018 for those subjects taught from 2016). CCEA's new GCSE specifications will be available from September 2017, so irrespective of whether CCEA changes its grading from alphabetic to numeric, there will be a mixture of the two grading systems in place when GCSEs are awarded (for the first time) in September 2017 and subsequently in September 2018. So even if there was a decision taken here to harmonise grading arrangements by moving to grades 9 to 1, there will be a period of transition that we need to manage.

In the new grading arrangements being introduced in England, Ofqual envisages that grade 4 will equate broadly to the current grade C. However over time, it envisages that the C equivalent will increase to grade 5 – with a view to stretching pupils and increasing performance as a whole. In its support for the new grading arrangements, Ofqual argues that there is currently too much bunching at the top of the marks scale and its new grading system will mean that there will be more grades available to accommodate this. There will be six (from 4 to 9) grades compared with four as at present (C to A*). The counter-argument to this increase is that there will be fewer grades at the bottom of the marks scale – there will be three (3 to 1) compared with four (D to G) as at present.

Ofqual intends to proceed with this change and, as a result, Awarding Organisations including OCR, AQA, Pearson (and WJEC qualifications offered in England) will be grading from 9 to 1.

The Department of Education (DE) here has considered the implications of this decision in England and has sought the views of post primary principals across the north of Ireland. A summary is attached at **Annex B**. ETI and the CCEA Regulator has also been asked to provide advice.

Timescales and next steps

Taking into account the analysis process and the need to update the Minister and Education Committee, we estimate that final decisions are likely to follow in Summer 2015. A young people's version of the consultation document will be available and we are seeking the views of parents using Parenting NI.

If the decision is taken to change GCSE grading from alphabetic to numeric, the effective date of change would be September 2017 for GCSEs produced by CCEA.

ANNEX B – SUMMARY OF FEEDBACK FROM WORKSHOPS WITH POST-PRIMARY PRINCIPALS – GCSE GRADING

- General support to keep the GCSE brand, NI GCSEs have an international credibility, if we want to hold onto this we need to hold onto the brand. Everyone suffers if we do not have a credible system.
- GCSE grading is difficult for parents and employers/HE to understand. Harmonisation of grades across all GCSE should make understanding easier.
- General agreement that moving to numerical grading would reduce confusion and make qualifications comparable.
- Proposed new grading is loaded in favour of the higher grades. Lower grades are also important. GCSEs were designed to be inclusive.
- Consideration could be given to aligning other level 1 and level 2 qualifications to the proposed new GCSE grading structure.
- Other developments in relation to levels of assessment/levels of progression could be taken into account if a new GCSE grading structure is put in place.
- Consideration could be given to using the new grades to track progress through all key stages.
- A* pupils could be disadvantaged if we don't move to the proposed new grading structure, as they will not have access to the top numerical grade. It may be perceived that it is harder to get a 9 than A*.
- Universities will be more likely to look at GCSEs rather than AS as not everyone will be offering AS levels – makes the comparability of GCSEs of greater importance.
- Important that any changes to the existing grade structure are based on sound educational arguments.
- Concern that any changes to the existing grading system could impact on the Entitlement Framework.
- In the proposed new grading structure, the increased focus on granularity for the higher grades could send out a message that the lower grades are not important. Grave concern with the reduction in the number of grades at the lower end – bigger impact on the secondary schools. New grading 9-1 seems to stretch the top and ignore the bottom.
- Method for measuring schools' performance will need reviewed (i.e. is it 5 A*-C or 9-5).
- View expressed that we would be doing a disservice to students to have a “dolly mixture” set of grades at GCSE.

- Current grade C is considered as the threshold. If the standard required to achieve this grade was to be increased, then it might be better to move to the new grading structure.
- Ethical imperative to maintain comparability – retrospective failure if one year you get a 'C' and then in another year this would be considered a failure.
- Some not convinced of the educational reasons for changing the grades.
- More thought and consultation needed on this issue, Effective communication will be crucial.
- Suggestion that it may be prudent to hold off any decision on the grading until after the general election.