



House of Commons  
Education Committee

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**From GCSEs to EBCs: the  
Government's proposals for  
reform: Government Response  
to the Committee's Eighth  
Report of Session 2012–13**

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**Seventh Special Report of Session 2012–13**

*Ordered by the House of Commons  
to be printed 24 April 2013*

## The Education Committee

The Education Committee is appointed by the House of Commons to examine the expenditure, administration and policy of the Department for Education and its associated public bodies.

### Membership at time Report agreed:

Mr Graham Stuart MP (*Conservative, Beverley & Holderness*) (Chair)  
Neil Carmichael MP (*Conservative, Stroud*)  
Alex Cunningham MP (*Labour, Stockton North*)  
Bill Esterson MP (*Labour, Sefton Central*)  
Pat Glass MP (*Labour, North West Durham*)  
Charlotte Leslie MP (*Conservative, Bristol North West*)  
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Ian Mearns MP (*Labour, Gateshead*)  
Chris Skidmore MP (*Conservative, Kingswood*)  
Mr David Ward MP (*Liberal Democrat, Bradford East*)  
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### Powers

The Committee is one of the departmental select committees, the powers of which are set out in House of Commons Standing Orders, principally in SO No 152. These are available on the Internet via [www.parliament.uk](http://www.parliament.uk)

### Publications

The Reports and evidence of the Committee are published by The Stationery Office by Order of the House. All publications of the Committee (including press notices) are on the Internet at [www.parliament.uk/education-committee](http://www.parliament.uk/education-committee)

### Committee staff

The current staff of the Committee are Dr Lynn Gardner (Clerk), Geraldine Alexander (Second Clerk), Penny Crouzet (Committee Specialist), Emma Gordon (Committee Specialist), Jake Anders (Committee Specialist), Ameet Chudasama (Senior Committee Assistant), Caroline McElwee (Committee Assistant), and Paul Hampson (Committee Support Assistant)

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# Seventh Special Report

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On 31 January 2013 we published our Eighth Report of this Session, *From GCSEs to EBCs: the Government's proposals for reform*.<sup>1</sup> The response from the Government was received on 22 April 2013 and is published as an Appendix to this Report.

## Appendix

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### Government response

#### Introduction

On 7 February the Secretary of State announced, in a statement to the House of Commons, the next phase of reform for secondary education in England. He set out the Government's plans for reform of the National Curriculum, Key Stage 4 qualifications and the secondary school accountability system.

Our announcement on GCSE reform followed a high profile public consultation, which received over 5,500 responses. Our decisions were made on the basis of the evidence gathered and address many of the concerns raised in the Committee's report.

At the same time as announcing reform of GCSEs, the Government published for consultation programmes of study and attainment targets for all subjects at Key Stages 1 to 3. The Government also launched a consultation on secondary accountability, proposing new measures to be used for floor standards, replacing the current 5 A\*-C including English and mathematics measure.

These changes build on reforms which are already in place: greater freedom for schools; improvements to the quality and intake of teacher training; support for pupils who have not reached national expectations by the end of primary school; and support for disadvantaged pupils through the Pupil Premium. We believe that, through providing schools with world class qualifications, sharper accountability and a more ambitious National Curriculum, we can achieve our goal of an education system which competes with the best in the world and gives every young person the high quality education they deserve.

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<sup>1</sup> Education Committee, Eighth Report of Session 2012–13, *From GCSEs to EBCs: the Government's proposals for reform*, HC 808–I

## The case for reform

*This section addresses the Committee's recommendations 5, 7, 11, 12, 23, and 24, as listed below:*

**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)**

**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)**

**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)**

**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)**

Our Memorandum to the Committee, of November 2012, set out evidence that the demand of GCSEs has lessened over time. We welcome the Committee's agreement on the need for further improvements to our qualifications and its endorsement of changes which have already been put in place to increase their rigour.

Responses to the reforming Key Stage 4 qualifications consultation showed broad agreement that GCSEs as currently constituted are not giving our pupils the best chance to succeed, and that change is required. Respondents argued that GCSEs themselves could, with comprehensive reform, once again be highly respected qualifications in which pupils, employers and further and higher education institutions can have faith. Having taken account of these views the Government decided to reform GCSEs rather than replace them with wholly new qualifications.

We note the Committee's concerns about the scale and pace of our proposed reforms. We believe the case for urgent reform is compelling; young people should have access to qualifications that give the right recognition for their achievement. However we acknowledge the points that the regulator has made about the potential risks of reforming the market at the same time as fundamentally changing Key Stage 4 qualifications. In order to focus on the urgent need to reform qualifications, we have deferred proposals for selecting a single Awarding Organisation to offer specifications in individual subject suites. We recognise the significant steps Ofqual has taken to tighten up the regulation of GCSEs and to ensure that standards are right. We hold open the option of considering market reform at a later date.

Taking account of the scale of change this represents for schools, and the responses to our consultation, we have asked Ofqual to phase implementation. Reformed GCSEs in English language, English literature, mathematics, biology, chemistry, physics, combined science (double award), history and geography GCSEs will be introduced for first teaching in 2015. We expect other subjects to follow as soon as possible after that, with the aim that they should be available for first teaching in 2016, and have asked Ofqual the extent to which it considers that will be possible.

### GCSE characteristics

*This section addresses the Committee's recommendations 1, 3, 8, 9, 10, 17, 18, and 19, as listed below:*

**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)**

**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)**

**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)

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)

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)

The Government has published revised programmes of study for all the National Curriculum subjects other than for Key Stage 4 English, mathematics and science, which have been published separately for information. We will also be publishing for consultation, in May this year, requirements for subject content in new GCSEs which will be taught from 2015. Work on developing that content will build on the revised programmes of study, drawing on exemplar from the best international curricula, to ensure that pupils are studying a syllabus which combines knowledge, understanding and skills and compares with the best in the world.

The Secretary of State has also written to Ofqual setting out his policy steer for reform of GCSEs. They will remain universal qualifications that are accessible, with good teaching, to the same proportion of pupils as currently sit GCSE exams at the end of Key Stage 4. There will be an increase in the demand at the level of what is widely considered to be a pass (currently indicated by a grade C). At the top end they will provide proper preparation for A Level. This will be achieved through a balance of more challenging subject content and more rigorous assessment structures.

The reforms will be applied across all GCSE subjects; Ofqual will consider the appropriate subject coverage for the reformed qualifications. Specifications for new GCSEs in English language, English literature, mathematics, biology, chemistry, physics, combined science (double award), geography and history will be available from September 2014, giving schools a year to prepare for first teaching in 2015. Our aim is that GCSEs in other subjects should be introduced for teaching from September 2016.

The Secretary of State's letter set out that the purpose of the qualifications should primarily be to evidence pupils' achievement against demanding and fulfilling content. They also need to provide a strong foundation for further academic and vocational study; and a basis upon which schools will be held accountable for the performance of all of their pupils.

We note the Committee's comments regarding the removal of higher and lower tier papers. We remain concerned that the current system of tiered papers, whereby pupils are forced to choose between higher and lower tier papers, places a cap on ambition. We have asked Ofqual to ensure that reformed GCSEs avoid that, while enabling high quality assessment at all levels. The Government agrees that the appropriate approach to assessment will vary between subjects and a range of solutions may come forward, for example, extension papers offering access to higher grades alongside a common core. We believe that there should be no disincentive for schools to give an open choice of papers to their pupils. Ofqual will consult in May on the regulatory conditions for the new GCSEs, as part of which it will seek views on these issues.

In line with changes to current GCSEs the new qualifications will be linear, freeing up more time for schools and pupils to focus on learning. The Committee is right to note that Ofqual's research on linearity did not profile pupils by background. Our review of evidence on the impact of linearity<sup>2</sup>, suggests that the picture across different pupil groupings is not straightforward. Pupil outcomes in modular and linear routes vary between subject and ability grouping, with research in this area presenting variable conclusions. For example, Rodeiro and Nadas (2010) found that more pupils achieved higher grades in mathematics via a modular route, but in English more achieved higher grades via a linear route. Ofqual (2012), however, found higher average grades in mathematics via a linear route but in English via a modular route.

Ofqual's equality analysis<sup>3</sup> of the impact of implementing linear assessment in GCSEs concluded that while this change could affect how learners with disabilities accessed GCSE qualifications, the timing of assessment (whether terminal or modular) was of less concern than the form of the assessment. Ofqual went on to argue that moving from modular to linear assessment can be seen to be advancing equality of opportunity. Removing choice of terminal or modular routes and the advantages and disadvantages associated with each may result in the 'levelling' of an approach to assessment.

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2 DfE GCSE reform equality analysis (March 2013)

3 <http://www.ofqual.gov.uk/downloads/category/149-equality-analyses>



## Standards and grading

*This section addresses the Committee's recommendations 15 and 16, as listed below:*

**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)**

We agree with the Committee that qualifications must reflect genuine improvements in performance. Standard setting and consideration of grading arrangements are matters for the regulator. In Ofqual, we have a strong and independent regulator that will alert Government, and Parliament, to any concerns regarding standards. We are confident that the regulator will take action on standards where needed and has the powers to do so. We have indicated our preference that new GCSEs have a new common grading scale to signal the step change in the demand of the qualifications. Ofqual's consultation in May will seek views on this issue.

Our consultation on secondary school accountability proposes introducing a sample test at Key Stage 4, which would provide independent monitoring of national performance in the core subjects. Ofqual will provide assurance that any increases in the proportion of pupils achieving top grades in new GCSEs reflect real improvements in performance and the sample test will help to act as a check on that.

## Lower attaining pupils

*This section addresses the Committee's recommendations 14 and 22 of its report, as listed below:*

**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)**

**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)**

The Committee raises concerns about the effect of raising standards on lower attaining pupils. The reformed GCSEs will be accessible to all pupils, with the same numbers taking them as currently take existing GCSEs. Our review of research<sup>4</sup> indicates that a culture of high expectations is a key and consistent factor essential to high pupil attainment and good progress.

All pupils will be studying a curriculum which draws on those of the best international systems and ensures that they are equipped with essential skills and knowledge. Schools will be held account for their pupils' performance across all subjects and will be incentivised to raise achievement for all their pupils. The Government is providing support to disadvantaged pupils through the Pupil Premium, and targeted catch up support is being provided for those who do not meet English and mathematics expectations at the end of Key Stage 2.

During the consultation, the Government looked at ways of ensuring that pupils who do not achieve a grade in qualifications at the end of Key Stage 4 (either because they are not entered or because they fail), together with those who achieve a low grade, are supported to achieve by 19. There was general consensus that the 'Statement of Achievement', proposed as one way to recognise achievement for this group, would in fact result in stigmatising them. The Government recognises that effective transition to post-16 education and training for this group is crucial to pupils' progression, and is therefore taking steps to enable better transfer of information for all pupils changing school or college at 16. We are looking at ways to enable and encourage schools and colleges to transfer data reflecting progress and attainment in English and mathematics between one another. This will benefit all pupils. We have asked Ofqual to look at ways in which Awarding Organisations can improve the detail of feedback to pupils, beyond grades, about examination performance. This will enable pupils and their future teachers to better know their strengths and weaknesses, to support progression post-16.

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4 Ofsted (2009) Twelve outstanding secondary schools: Excelling against the odds; OECD (2010), PISA 2009 Results: What Makes a School Successful? – Resources, Policies and Practices (Volume IV) <http://dx.doi.org/10.1787/9789264091559-en>.

## Secondary school accountability

*This section addresses the Committee's recommendations 2, 4 and 6, as listed below:*

**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)**

**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)**

**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)**

We agree with the Committee that school performance measures, competition between exam boards and modularity of qualifications have all played a part in lessening the demand of GCSEs over time. We have already taken action to address the problems of modularity by introducing linear GCSEs for teaching from September 2012 and reformed GCSEs to be taught from September 2015 will also be linear.

The Government has now launched a consultation on secondary accountability. This takes account of the impact of accountability pressures on qualifications, and proposes a balance of measures to be used for floor standards. A threshold measure in English and mathematics (recognising the crucial importance of achieving these qualifications for pupils' future life chances) would be complemented by a progress measure based on pupils' point scores across a suite of eight qualifications. This balance of measures will reward achievement at all levels, while reducing the emphasis on 'borderline' pupils.

This approach provides a strong incentive for schools to offer a broad and balanced curriculum, including the academic core of the EBacc as appropriate, and to ensure high standards of teaching in a wide range of subjects. This balance of measures should improve the current system by rewarding schools more clearly for their work with all their pupils.

### **Delivery of reforms**

*This section addresses the Committee's recommendations 13, 20 and 21, as listed below:*

**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)**

**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)**

We do not underestimate the implications of these reforms for schools. It is right to expect higher standards given the improvements in teaching in recent years and our wider reforms to drive up the quality of teaching and learning. To improve teaching standards we are focusing on building the capacity of schools to create more opportunities for collaborative learning and the sharing of good practice across the teaching profession. Giving schools the freedom to plan teacher development according to local requirements will enable them to respond flexibly when implementing the new curriculum and qualifications.

We have already designated over 200 outstanding schools as Teaching Schools to support school improvement. These schools will play a leading role in supporting teachers through the curriculum and qualification changes, developing and sharing good practice. In addition we have recently announced a third round of the National Scholarship Fund for Teachers, which will open in April 2013. The Fund offers teachers the opportunity to deepen their subject knowledge in English, mathematics or science.

We also note the Committee's recommendations with regards to preparing post-16 providers for the reforms. The Government has already taken steps to improve the capacity of post-16 institutions to teach English and mathematics. In the current academic year, we are offering £1,500 fee grants for those undertaking ITT to teach English and mathematics in higher education institution led provision. In line with the recommendations made by Lord Lingfield in his two reports into Professionalism in FE, we are also introducing new further education initial teaching training qualifications from September 2013. These include subject specific qualifications to teach English and mathematics<sup>5</sup>.

The Ministerial Working Group on implementation of reforms to post-16 education and funding is reviewing the effectiveness of measures to increase the supply of English and mathematics teachers in school sixth forms, Sixth Form Colleges and FE Colleges. We will take account of the Group's advice in determining whether any further action is needed.

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5 The final report of the independent review panel can be viewed at:  
<https://www.gov.uk/government/publications/professionalism-in-further-education-final-report-of-the-independent-review-panel>