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# Corporate Plan

## 2014–17

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## Foreword by the Chair and Chief Regulator

It is a pleasure to present Ofqual's third corporate plan, covering the period to March 2017. The plan sets out our regulatory priorities and how we aim to improve the way we work. Through making sure of the quality of regulated qualifications, we aim to support the most worthwhile outcomes for students, and those who rely on them. Our plans will mean change, for awarding organisations and for us.

This is a period of significant qualification reform. In addition to the ongoing changes to GCSEs, AS and A levels, government is driving change to vocational qualifications, including apprenticeships. Qualifications and assessments are an important part of the skills framework, driving the development of skills and the acquisition of knowledge, essential to long-term economic growth and good-quality employment opportunities.

This is the second year in a three-year programme to reform GCSEs, AS and A levels. We aim to have new qualifications in schools in good time for teaching from September 2017. As always, we aim to make sure that standards are set and maintained to provide confidence in the grades awarded. We also set out in this plan our ambitions for vocational qualifications.

We are extremely grateful to the many people we speak with and work with across the sector and more widely. With their help and advice, we are more likely to achieve what we set out to achieve – to support the most worthwhile educational outcomes.



Glenys Stacey  
Chief Regulator



Amanda Spielman  
Chair

## About Ofqual

### Our duties

Government decides the national curriculum used by primary and secondary schools, the qualifications that can be offered, and the accountability framework by which schools are evaluated. It also determines the vocational qualifications that can be taught in schools and colleges and a framework for qualifications used in apprenticeships.

Our job is to make sure that qualifications are of the right standard and that the qualification system works well so that those who take or rely on qualifications can have confidence in them. The UK Parliament has determined that we shall be independent, and has set us objectives that require us to maintain the currency and worth of regulated qualifications.

Ofqual has five statutory objectives. These are set out in the Apprenticeships, Skills, Children and Learning Act 2009. In brief, they are:

1. To secure qualifications standards
2. To promote assessment standards<sup>1</sup>
3. To promote public confidence in regulated qualifications and assessment arrangements
4. To promote awareness of the range of regulated qualifications and the benefits of regulation
5. To secure that regulated qualifications are provided efficiently.

We regulate awarding organisations that offer qualifications<sup>2</sup> in England and those that provide vocational qualifications in Northern Ireland.<sup>3</sup> We do not regulate degrees. Education and skills policy is devolved and we have regard to qualifications policy in each administration, as we regulate.

### Who we regulate

There are currently 169 recognised awarding organisations operating in the market, down from 183 in 2011 – a consequence of both voluntary withdrawal and regulatory action. Only four are recognised as ‘exam boards’ to provide new GCSE, as well as AS and A level

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<sup>1</sup> National Assessments

<sup>2</sup> A qualification is regulated by us if it is: (a) awarded by an awarding organisation we have recognised to provide the qualification; and (b) if at least some students are being assessed for the qualification in England or (if they are taking vocational qualifications) Northern Ireland.

<sup>3</sup> In Northern Ireland, we regulate Free Standing Maths Qualifications, ESOL, Key Skills, Basic Skills, Higher Level Qualifications, QCF, VRQs, NVQs and Occupational Qualifications.

qualifications. Individual awarding organisations offer significantly different portfolios of qualifications. Some offer only a handful of niche or specialist qualifications, whereas a few offer portfolios including several hundred qualifications, and two (City & Guilds and Pearson) offer thousands of qualifications. Currently, nearly 40 per cent of all regulated qualifications are offered by six awarding organisations.

The qualification landscape is dynamic. In 2012/13, there were nearly 24,000 regulated qualifications available, a 15 per cent increase from 2011/12. The biggest change saw the number of Qualification and Credit Framework (QCF) qualifications on offer increase by 31 per cent to around 17,000 and an increase in certifications from 5.2 million to 6.2 million.

## **Our strategic priorities**

We anticipate a number of challenges to achieving our statutory objectives over the next three years. We have established strategic priorities that will guide our decision-making and delivery plans:

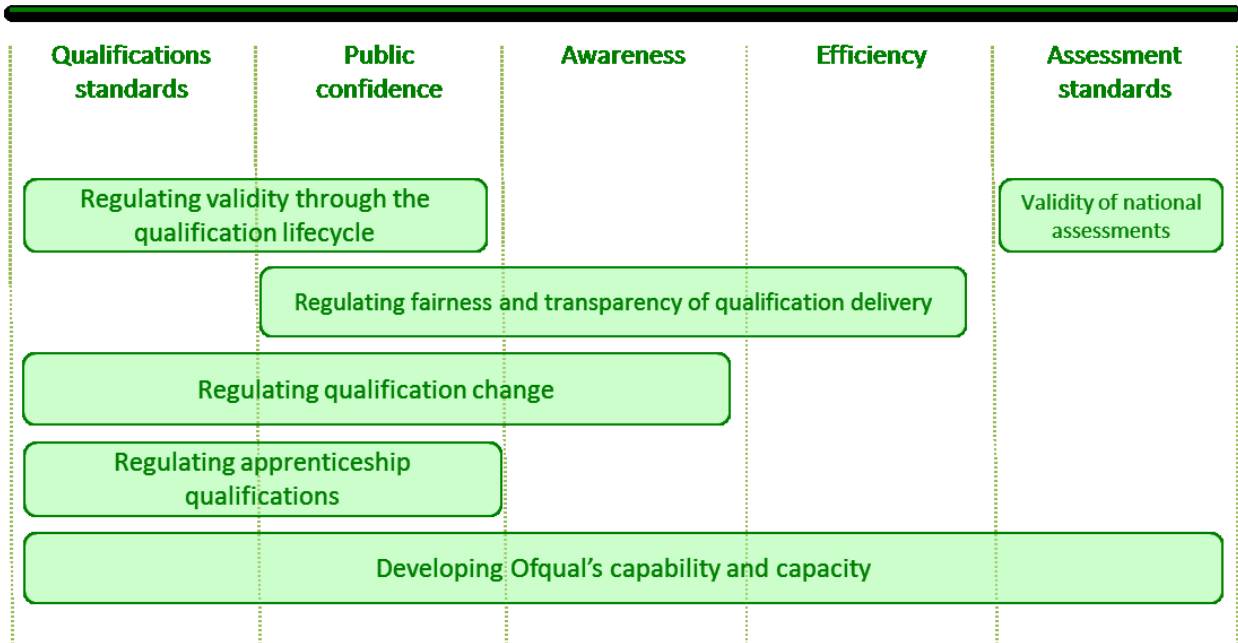
- A. Developing our regulatory approach to focus on:
  - a) Validity of qualifications through their life cycle
  - b) Fairness and transparency of qualification delivery
- B. Regulating changes to key groups of qualifications:
  - a) GCSEs, AS and A levels
  - b) Other reformed qualifications taken by students in schools and colleges in England<sup>4</sup>
  - c) ESOL and functional skills
- C. Regulating in a way to promote employer ownership and engagement with vocational qualifications and apprenticeships.

In addition, we will continue to develop our capability and capacity.

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<sup>4</sup> This includes Level 3 'Core Maths' qualifications and Level 1/2 and 3 vocational qualifications that are included in school performance measures in England.

## Statutory Objectives



We hold awarding organisations to account for the quality of their qualifications. To be fit for purpose, qualifications must measure the right skills and knowledge sufficiently well, enabling people to trust qualification results, knowing that they are meaningful, useful and appropriate. This is known as validity: qualifications and assessments are sufficiently valid if the results mean what they say, and can be relied upon.

We aim to gain public confidence in our ability as an authoritative, strategic regulator. We will continue to have regard to the principles of better regulation.<sup>5</sup>

<sup>5</sup> To ensure that regulations are necessary, fair, effective, affordable and enjoy a broad degree of public confidence, in 1997 the Better Regulation Task Force set out five principles that any policy intervention and its enforcement should meet: proportionality, accountability, consistency, transparency and targeting.

## Developing our regulatory approach

Qualifications should support the most worthwhile outcomes for students, and those who rely on them. Vocational qualifications should reflect the development of skills and knowledge needed by employers and should be responsive to technical and other developments in the range of occupations and areas they cover.

General qualifications such as GCSEs and A levels should make similar demands on students and be consistent and comparable over time. They should provide a fair benchmark for competition between students as they seek employment or academic progress.

We are focusing our regulatory approach on the validity of qualifications, together with the fairness and transparency of their delivery, so that all regulated qualifications are of the right quality, measure results reliably and are trusted.

Over the life of this plan, we aim to remove regulatory requirements that can sometimes get in the way of good qualifications, and to set new requirements on awarding organisations to drive validity, fairness and transparency. We set out here our aims, some of which require us to consult on the details of our proposals.

Our aims would likely result in some qualifications being withdrawn from offer in some sectors, particularly where they do not meet employers' needs. We also expect the quality of those remaining to improve where necessary and those developed in the future to be better. Over time, qualifications should be demonstrably more valid and we will report periodically on the validity of commonly used qualifications.

Starting in 2014/15, we will inform and discuss with awarding organisations the changes we propose to make, recognising that they will need time to meet new requirements.

To promote understanding of how awarding organisations can meet our requirements on validity, we will provide guidance with exemplar materials sometimes developed in collaboration with the sector. We will evaluate the effectiveness of our guidance over the life of this plan.

### Regulating validity of qualifications

#### The importance of validity

Validity is the primary measure of the quality of a qualification. It is a judgement about whether the results achieved by learners can be used by those that rely on them, including employers, in a meaningful and appropriate way. Qualification validity is grounded in engagement with stakeholders to define the intended purpose and scope of the qualifications, which in turn drives the strategy for design, development and delivery.

Qualifications are shown to be valid over time rather than at any fixed point. This means that awarding organisations must work with the users of qualifications (for example,

employers) to define the intended purpose of any qualification, the skills and knowledge it should assess including the breadth, depth and challenge. They must design and develop qualifications with content and assessment approaches that are consistent with the purpose, measuring the right skills and knowledge in the right way. Where a qualification is graded, the results must make sense to users, and the assessment and grading structure should differentiate performance appropriately for the intended purpose. The proposed approach must be deliverable, and planning for the relevant capability and capacity should be an integral part.

### **Responsive development**

Awarding organisations should develop their regulated qualifications in response to the changing needs of users who rely on them so that they remain sufficiently valid. We will expect awarding organisations to gather and act on feedback from end users, including employers.

### **Validity strategies**

We aim to require awarding organisations to explain how they embed validity in the design, development, delivery and evaluation of their regulated qualifications in a validity strategy for each qualification. Exam boards must already do this now for new GCSEs, AS and A levels.<sup>6</sup>

In a staged programme of implementation beginning in 2014/15, our aim is that all awarding organisations will review all of their existing regulated qualifications and to then set out a validity strategy for each qualification that is to remain on offer. Qualifications that are not sufficiently valid will need to be withdrawn with minimum disruption to users. We recognise that awarding organisations will need time to respond to the new requirements and that the challenge is different for each organisation, and we will consult both on the requirements and on the implementation approach and timetable.

### **Modifying other regulatory requirements**

In 2014/15, we propose to change the regulatory requirements for the QCF and accreditation. Proposed changes to qualification specific requirements are set out in the 'Regulating changes to qualifications' section of this plan.

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<sup>6</sup> These are termed assessment strategies.



## **The Qualifications and Credit Framework**

The majority of regulated qualifications are designed to meet requirements set out in the QCF, which was launched in 2008 to standardise vocational qualifications to allow credit accumulation and transfer.<sup>7</sup>

The design rules that were put in place do not always ensure the quality of qualifications in the way that good regulatory requirements should and they have in some cases constrained the development of valid qualifications. Nearly 40 awarding organisations provide *only* QCF qualifications in their regulated qualifications portfolio.

During 2014/15, we will consult with awarding organisations and others on the withdrawal of QCF rules, to include detailed plans to ensure smooth withdrawal.

### **Accreditation requirement**

Our current regulatory focus for many qualifications is accreditation of specifications before qualifications are first made available to schools, colleges and training providers. Where an accreditation requirement is in place for a qualification, it must be accredited by us before it can be awarded. We aim to change this and instead focus on how well awarding organisations are assuring the quality of the qualifications they offer over the life cycle of their qualifications – as they are designed, developed, delivered and evaluated.

We will consult on proposals to retain the accreditation requirement where there is good reason to do so, but in a targeted and specific way. We intend to retain the requirement for GCSEs, AS and A levels. We may impose an accreditation requirement on awarding organisations including where we have specific concerns, or where the awarding organisation is newly recognised.

### **Developing our audit approach**

During 2014/15, we will develop and enhance through audit the ways in which we assess the compliance of awarding organisations. Building on the strengths of our current approaches, we will introduce new risk-based audits with validity of qualifications, fairness and transparency at their heart. We will use the same risk-based approach for all regulated qualifications. We will complement this approach with our existing comparability and thematic reviews where appropriate.

### **Focus on validity through the qualification life cycle**

Through our audits, we will evaluate the robustness of the processes, systems and resources in place to support engagement with stakeholders, centres and third parties at relevant points through the life cycle of the qualification. We will also examine the evidence

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<sup>7</sup> Credit accumulation provides students with the opportunity to gain credit for their learning achievements, which then counts progressively towards an award. Credit transfer is an arrangement by which credits granted by one body are recognised by another.

that an awarding organisation has used in developing the content and assessment approach in a way that is consistent with the qualification’s purpose. In providing focus to these audits, we will also take account of where the qualification is in its product life cycle, as risk will increase as new qualifications become familiar to schools and colleges after the first delivery cycles, and again towards the end of the qualification’s life where managed withdrawal is important.

### **Centred on risk**

Our audit schedule will be risk-based and will also include a proportion of awarding organisations and qualifications randomly selected. We will develop our risk framework to reflect system, entity and qualification cycle risks and it will drive our priorities. The use of qualifications in accountability measures and for immigration purposes will increase risk and the impact of failure is heightened when qualifications are taken in high volumes, such as those taken by large numbers of students in full-time education in schools and colleges, or those commonly used in apprenticeships. We will consider with government and other key stakeholders and regularly review our priorities over the life of this plan.

In parallel, we will review whether our regulatory requirements adequately cover these risks. We will engage with awarding organisations to identify and prioritise where further guidance would improve regulation and we will engage experts to support its development.

Where qualifications are withdrawn, we expect the withdrawal process to be managed with minimum impact on students and learners.

We will continue to evaluate awarding organisations’ general robustness, financial resilience and business health. We will continue to assess new entrants to the market against our Recognition Criteria<sup>8</sup> and we will develop and refine our risk-based approach to expansion of recognition (where awarding organisations wish to award types of qualifications for which they are not currently recognised).

We aim to focus our audits where they have the biggest impact, and where we find shortcomings we will take regulatory action.

### **Acting on what we find**

We set out in ‘Taking Regulatory Action’<sup>9</sup> our range of powers and as we implement our new regulatory approach, we will review how we use our powers to drive awarding organisation accountability throughout the life cycle of their qualifications. We will continue to sharpen our regulatory response and our ability to act swiftly.

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<sup>8</sup> [www.ofqual.gov.uk/documents/criteria-for-recognition](http://www.ofqual.gov.uk/documents/criteria-for-recognition)

<sup>9</sup> [www.ofqual.gov.uk/documents/taking-regulatory-action](http://www.ofqual.gov.uk/documents/taking-regulatory-action)

Whenever we can, we will publish information about our enforcement decisions including where we impose directions and changes to directions to awarding organisations, issue fines and withdraw recognition.

## **Regulating for fairness and transparency**

Students and users of regulated qualifications need to have access to relevant information to allow them to make good choices and have assurance that qualifications are designed and delivered well.

### **Information about qualifications**

Over the course of the plan, we will improve the information we publish about the qualifications and organisations we regulate so that it is clear, informative, easy to access, and meets the needs of students and users, supporting them in the choices they make.

We are working with others including in government<sup>10</sup> to ensure that information, for example, on progression, is provided for employers, higher education, students and others in a coherent and valued way. Where we do not hold the information, we will clearly signpost to the right place.

### **Size of qualifications**

Reformed GCSEs, AS and A levels will be of comparable size to current versions, subject by subject, save for GCSE maths, which will be bigger, reflecting the new maths curriculum.

Guided learning hours are one measure of the size of a qualification. In 2014/15, we are consulting on proposals to clarify guided learning hours and the other components that make up learning time. This will help users of qualifications better understand the commitment involved in completing a qualification. We also intend to require these measures to be evidenced and kept under review.

### **Competition**

Qualifications are provided in a market. Changes in the qualifications system impact the market and can create risks to qualification standards, delivery and efficiency. Qualification reform, funding and demographic and technological changes all impact on awarding organisations' underlying business models. Over the life of this plan, we aim to identify and monitor the risks that these changes present and regulate as necessary to minimise the impact on students and users of qualifications.

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<sup>10</sup> [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/342871/bis-14-543-consultation-outcome-based-success-measures-for-adult-further-education-v15.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/342871/bis-14-543-consultation-outcome-based-success-measures-for-adult-further-education-v15.pdf)

Over the course of the plan, we will also explore the scope to develop efficiency benchmarks to aid the evaluation of the value for money provided by individual awarding organisations, and the acceptable price of qualifications.

Exam boards will compete for market share of new GCSEs and A levels. We will monitor how they market these qualifications to make sure that it does not undermine standards or damage public confidence in these qualifications. We will also monitor ancillary products and services to make sure they do not create risks to standards of the qualifications and that they are not being packaged in an unfair way.

Qualifications should provide value for money and competition on qualification standards is not acceptable. For GCSEs, AS and A levels and other qualifications, awarding organisations can choose to compete in areas other than the specification itself, for example, the products and services available to schools, which includes training, resources and student performance tracking systems. To increase transparency and aid comparisons, we propose to develop and publish key metrics for exam boards across a range of matters – for example, question paper errors, security breaches and marking quality. We will continue to develop these metrics over the life of this plan, and we will publish regular reports of exam board performance, beginning in 2014/15.

From 2014, we will monitor the impact of recent measures we have put in place to control exam boards' endorsements of materials provided by others, to ensure that endorsements, when given, are transparent and it is clear how they are supporting good teaching and student outcomes.

## **Equality**

We must have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share relevant 'protected characteristics' and persons who do not.<sup>11</sup> We must have regard to the reasonable requirements of relevant students, including those with special educational needs and disabilities.

We will meet this duty through influencing the design, delivery, assessment and awarding of qualifications. We will continue to research and prepare equality analyses to accompany our consultations on qualification reform and changes to regulatory policy.

In support of this, we also require awarding organisations to take full account of equality principles through our General Conditions of Recognition<sup>12</sup> so that qualifications and assessments are fair and accessible. In 2014/15, we will undertake a review of how well the awarding organisations are meeting our requirements and produce additional guidance if

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<sup>11</sup> As defined by the Equality Act 2010: age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation.

<sup>12</sup> [www.ofqual.gov.uk/documents/general-conditions-of-recognition](http://www.ofqual.gov.uk/documents/general-conditions-of-recognition)

necessary. We will also evaluate the impact of specific requirements that are in place to ensure that reasonable adjustments made to certain assessments at the point of delivery do not compromise the integrity of the qualification.

We have two specific external advisory groups that will continue to challenge, advise and inform our work on qualification reform, access arrangements and policy development – Equalities Advisory Group and Access Consultation Forum.

### **Malpractice and maladministration**

Student outcomes (and fairness) can be undermined when proper rules on how assessments should be delivered are not followed, either by the school or the student. We expect awarding organisations to provide guidance to schools and colleges on this and to deal with known cases of malpractice and maladministration robustly and transparently.

Awarding organisations are increasingly reporting known cases of malpractice and we plan to use this evidence to inform our audit priorities as we review awarding organisations' practices and the strength of their controls.

### **Technology in assessment innovation**

Technological and other innovation may present opportunities for the sector and benefits for students. We will regulate in a way that does not inhibit the use of e-assessment or other innovative assessment technologies where it leads to good-quality valid assessments.

For vocational qualifications, technology may offer particular opportunities for innovation and fresh thinking about ways to validly test skills and understanding. Through our work with the Department for Business, Innovation and Skills in England and the Department for Employment and Learning in Northern Ireland and our increasing focus on the validity of qualifications, we will keep these developments under review and highlight where they may offer genuine benefits to students and others who use qualifications. Through our audit work, we will check that awarding organisations are managing any risks that arise.

### **Evaluating our regulatory approach**

To evaluate our regulatory strategy, we will use a range of qualitative and quantitative measures of success.

At first, we expect a period where validity issues are increasingly surfaced as flaws in procedures and approaches are identified. This should be followed by a period where the problems underpinning these issues are systematically addressed by awarding organisations, or qualifications are withdrawn, leading to better regulated qualifications over time. We will track this to evaluate our progress.

We will also evaluate the effect of this work on end users' confidence in qualifications and we will gather feedback from the awarding organisations and others. We will be looking to see if awarding organisations recognise the change in approach and if they are producing qualifications of the right quality.

## Regulating changes to qualifications

A major programme of GCSE, AS and A level reform is under way. During the life of this plan, some changes important to vocational qualifications will be undertaken as a result of reform<sup>13</sup> and our regulatory approach.

### GCSE, AS and A level reform

Reform is well under way, with the first specifications in a range of subjects<sup>14</sup> expected in schools in autumn this year.<sup>15</sup> Further subjects will be available in autumn 2015 for first teaching in September 2016, and the aim is for a third and final tranche of subjects to be available in 2016 for first teaching in autumn 2017.

### Range of subjects available

When compared with many other countries, England has an exceptional range of GCSE, AS and A level subjects. In practice, some subjects overlap significantly, the content in a few subjects is insufficiently weighty when compared to that of reformed qualifications, and some subjects are taken by very few students.

We are setting new regulatory requirements as qualifications are reformed, so that different subjects are sufficiently similar in the level of demand on the student and their assessment structure. We anticipate a small drop in the number of subjects available in future as subjects that attract few students are unlikely to be cost-effective for exam boards to reform.

During 2014/15, we will consult on principles to decide the GCSE, AS and A level subjects for the future. We will publish our decisions later in the year and will apply the principles to subsequent reforms.

### Design and development of new GCSEs, AS and A levels

#### Reviewing and updating subject content

As each subject is reformed, the subject content is reviewed and updated by experts, consulted on widely and then published by government.<sup>16</sup> It is important that subject content remains fit for purpose and up to date. We will develop and consult during 2014/15

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<sup>13</sup> [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/286749/bis-14-577-vocational-qualification-reform-plan.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/286749/bis-14-577-vocational-qualification-reform-plan.pdf)

<sup>14</sup> [www.ofqual.gov.uk/documents/update-on-the-reforms-being-made-to-gcses](http://www.ofqual.gov.uk/documents/update-on-the-reforms-being-made-to-gcses)  
[www.ofqual.gov.uk/documents/update-on-the-reforms-being-made-to-as-qualifications-a-levels](http://www.ofqual.gov.uk/documents/update-on-the-reforms-being-made-to-as-qualifications-a-levels)

<sup>15</sup> For first teaching in September 2015, assuming a two-year course of study.

<sup>16</sup> Government in England.

on proposals for the arrangements for remaining subjects where government does not play a role in defining the content. We aim to ensure that subject reviews are thorough and that the views of key stakeholders are taken into account.

We will continue to regulate to ensure the content is consistent with the intended purpose and provides the right level of demand, which can be validly assessed.

### **Assessment objectives**

Each GCSE, AS and A level has assessment objectives defined as part of the subject conditions. They shape the demand and balance of the assessment. Well-drafted assessment objectives provide the clarity needed to protect standards while not constraining innovation. As qualifications are reformed, we will continue to work with subject experts and others to review the assessment objectives for each subject, to improve the quality of assessments, and we will regulate to ensure that future assessments meet the assessment objectives.

### **Assessment arrangements**

As GCSE, AS and A level subjects are reformed, we will determine the best regulatory approach for assessment arrangements. Students will generally be assessed at the end of their studies. We will aim for an appropriate balance of exam and non-exam assessment, suited to the subject content, and one that is most likely to produce valid and reliable results and meet the curriculum aspirations for the subject.

We will continue to develop alternative approaches to regulation for the assessment of those skills that cannot be assessed by written exam. We will consult on detailed proposals for regulatory requirements for assessment subject by subject, as new subject content becomes available.

### **Embedding quality and standards**

As GCSEs, AS and A levels have been reformed, we have agreed with exam boards a set of subject-specific design standards for common features of the specifications. The features include minimum assessment time, minimum and maximum numbers of assessments, the proportion of calculator assessment in maths and the types of calculator allowed. This will help embed quality aspirations and prevent competition that could have an adverse impact on standards. We will continue with this approach in 2014/15.

### **Assessment strategies**

Exam boards must now provide assessment strategies<sup>17</sup> for each new GCSE, AS and A level, to include the approach to sampling the subject domain, determining the mix of question types, setting good mark schemes and avoiding predictability over time. The

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<sup>17</sup> Validity strategies for GCSEs, AS and A levels.

sample assessment materials provided for accreditation must show the application of the assessment strategies. We will be reviewing and commenting on these strategies as they are developed and evaluated.

### **Helping schools to prepare**

Teachers are anticipating reformed GCSEs, AS and A levels, knowing that they will be different in many respects to the qualifications they currently teach. We will work with school representative groups and others to provide information to aid the transition. In 2014/15, we will canvass parents and increase our engagement through discussion forums. We will develop better ways to engage with interest groups, people involved in education, employment and training, over the life of this plan.

### **Teacher support provided by exam boards**

We welcome good-quality support materials for schools, and will monitor and review the support materials that exam boards provide.

Following the exposure of unacceptable practice in 2011, exam board seminars for teachers are now allowed only under controlled circumstances. We expect exam boards to manage the effectiveness of their controls and we will monitor and review them over the course of the plan.

### **Manageability**

There are significant changes to assessment in some subjects – for example, science A levels. As individual subjects are reformed, we will consider the arrangements most likely to produce sufficiently valid and reliable assessments and good educational outcomes. Where the arrangements are changing, we will be as clear as possible about why and how they are changing, and we will work with exam boards to make sure that the delivery arrangements and controls for non-exam assessment are the best they can reasonably be.

In 2014/15, we will consult on proposals for non-exam assessment arrangements for practical work in A level and GCSE sciences and for speaking skills in modern foreign language GCSEs. As other subjects are reformed, we will continue to consider and consult on the best arrangements for non-exam assessment, taking into account the implications for schools.

Non-exam assessment must be manageable in schools. Should our proposals for assessment of science practical work go ahead, we will work with exam boards to pilot collaborative arrangements for the moderation of science practical work.



## Marking

In our recently published review of the quality of marking,<sup>18</sup> we found marking quality acceptable overall, but nevertheless it can be improved. Quality in marking depends upon a number of factors including the quality of mark schemes.

In 2014/15, we will undertake research on the best ways in which to design mark schemes, as better schemes could make the biggest difference to the overall quality of marking. We will discuss the outcomes of our research with exam boards, and agree next steps to improve mark schemes where needed. We will expect to see improvements in coming years. More immediately, we will consider carefully the quality of mark schemes for new GCSEs, AS and A levels submitted to us as sample materials for accreditation.

Various measures are used to gauge the quality of marking. Requiring exam boards to use a single measure for comparison's sake could have unintended consequences. By summer 2015, we will develop and agree with exam boards a suite of measures to be reported to us. We will begin in 2014/15 with the requirement for exam boards to report using a 'reliability co-efficient' measure, which is recognised as the most universal measure of overall assessment reliability.

Over the life of this plan, we will consider with exam boards which information about the quality of their marking will be made available to the public. We will begin in 2014/15 by expecting exam boards to publish information on systemic issues, such as a problem with a specific question on a paper. When this happens, it is important to give the public confidence through transparency of information and confirmation of the steps being taken to reduce the impact as far as possible and to make sure it does not happen again.

When marking incidents occur, we will continue to investigate and take regulatory action.

## Appeals against student marks

We recognise common frustrations with the processes for appeals against student marks. In 2014/15, we will determine with exam boards the requirements for a more effective, fair and transparent approach for appeals. We aim to implement this and anticipate improvements from summer 2015.

## Setting standards for new GCSEs, AS and A levels

### Existing GCSE, AS and A level standards

New GCSEs, AS and A levels will not be awarded until summer 2017. We foresee two particular factors meaning that results may look a little different ahead of then for existing qualifications. Although we will ensure that standards compare year on year nationally, results may differ school by school.

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<sup>18</sup> [www.ofqual.gov.uk/documents/quality-of-marking-final-report](http://www.ofqual.gov.uk/documents/quality-of-marking-final-report)

First, we are making some necessary changes to existing GCSEs, AS and A levels ahead of the reforms. Exams are now taken at the end of the period of study and there have been changes in some subjects – for example, English and geography.

Second, in recent years we have experienced noticeable changes in student entry patterns – for example, students from different year groups being entered for GCSE examinations and individual students entered for several different qualifications in any one subject. We expect this trend to continue, pending the introduction of reformed qualifications. Such trends depend in part on government decisions on the detail of Key Stage 4 accountability measures. Looking beyond summer 2014, we anticipate less variability in the age and year group of students entered for GCSEs, as government has determined that only a student's first GCSE level entry will count in school performance tables. Moves from one qualification to another may well continue.

We will continue to track changes in patterns in entry and to assess their impact on results. Moreover, as reformed qualifications will soon be taught in schools, from now on we will make changes to existing GCSEs, AS and A levels only if absolutely necessary to maintain standards.

Our priority over the period of the plan will be to hold standards steady so that in general, students in any one year are not advantaged or disadvantaged because of changes to qualifications. We have published more detail on how we maintain standards on our website.<sup>19</sup> Wherever possible, we aim to keep schools and colleges informed each year of the factors that are likely to influence the national pattern and spread of results.

### **Reformed GCSE, AS and A level standards**

The standards for new AS and A levels are to remain comparable to those of the current qualifications.

The position is different for new GCSEs as they are expected to be more challenging, with standards that compare well internationally. Following consultation, we will decide in autumn 2014 how standards will be set, giving schools information in good time, well ahead of the first teaching of new GCSEs.

We will regulate exam boards' preparations for awarding the first new GCSE, AS and A level qualifications in summer 2017, so as to ensure that comparable and appropriate standards will be set.

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<sup>19</sup> [www.ofqual.gov.uk/standards/summer-2014-exams/#our-approach-to-summer-2014-awarding](http://www.ofqual.gov.uk/standards/summer-2014-exams/#our-approach-to-summer-2014-awarding)

## **Evaluation of new GCSEs, AS and A levels**

### **Improving awarding and standard setting**

Over the life of this plan, we will continue to discuss and evaluate with experts ways in which standard setting and awarding of GCSEs, AS and A levels could be improved and confidence enhanced. To help build confidence, we will set out clearly how awarding and standard setting are done, how our methods compare with other methods, and how things are done in comparable countries.

To ensure transparency and accountability, once results are known each year we will publish information on the steps we have taken to maintain standards before and during awarding. Where particular concerns are expressed in relation to specific awards or qualifications, we will assess and, where called for, investigate and publish our outcomes.

To strengthen the awarding process over time, we are developing a national reference test in English and maths. The test will be taken by a small but representative sample of Year 11 students shortly before they sit their GCSEs. If overall student performance in the reference test in any year changes compared with the previous year, this will provide useful evidence to inform awarding. We will commission the test in 2014/15, pilot it in summer 2016 and run it annually from 2017. The 2017 findings will not be used in awarding, but will provide a baseline from which to work from 2018 onwards.

### **Comparing qualifications**

There are long-standing concerns about the comparability of different subjects, with suggestions that some subjects are easier than others to study, and that in some subjects it is harder to achieve the top grades.

In 2014/15, we will evaluate the wealth of published research on the comparability of subjects and review the mechanisms for evaluating inter-subject comparability. We will also undertake analysis of the impact on performance standards of aligning subjects, so that debate can be informed by an understanding of the consequences of any action. Should we determine to take further action, we will consult on our intentions and take views.

We have reviewed concerns expressed to us that it is more difficult to achieve top grades in modern foreign language A levels. We have conducted research and will consider the options to redress the issues we have identified, with the changes we propose to come into effect in summer 2015.

### **International comparisons with GCSEs and A levels**

Having compared A levels in selected subjects with their counterparts in a number of other countries,<sup>20</sup> we are now comparing aspects of GCSEs with similar qualifications elsewhere.

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<sup>20</sup> [www.ofqual.gov.uk/documents/international-comparisons-in-senior-secondary-assessment-summary-report](http://www.ofqual.gov.uk/documents/international-comparisons-in-senior-secondary-assessment-summary-report)

In 2014/15, we will compare the demands of assessment in maths here and in selected other countries to see how they compare with each other and with those now being designed here.

GCSEs, AS and A levels in England, Wales and Northern Ireland rely on different curricula and are being reformed in different ways. As the qualifications diverge over the life of this plan, we will set out the differences for students, schools and others using the qualifications.

We will undertake other international comparative studies over the life of this plan, with our priorities set to meet our wider objectives. Our immediate focus is on the *performance* standards in other countries that perform well in the established international tests to inform setting performance standards for new GCSEs.

### **Evaluating outcomes of GCSE, AS and A level reform**

We will begin a longitudinal research evaluation of the impact of reformed qualifications on teaching and learning to assess whether they lead to good educational outcomes. This will involve both quantitative and qualitative studies that will help us to understand the operation of the new qualifications in schools and to evaluate whether the design decisions taken were the right ones; whether they are having unintended effects; and how future reforms might be managed. This work will also allow us to take a wider perspective on the validity of the qualifications and assessments. This will inform the approach we take to regulating validity – for example, through assessment strategies.

We will also begin to conduct research into specific aspects of the reformed qualifications – for example, an evaluation of the implementation of A level science practical assessments in schools. This will involve fieldwork within schools interviewing pupils and teachers, and a technical evaluation of the functioning of the assessments.

Over the course of the introduction of the reformed qualifications, we will continue to conduct research into stakeholder confidence in GCSEs, AS and A levels. Further, we will carry out more in-depth work with teachers, parents, pupils and others to understand the basis for confidence or a lack of confidence, and reactions to the changes to qualifications.

We will also use our regulatory audits to monitor the implementation of reformed GCSEs, AS and A levels and we will consider findings in parallel to inform the research analysis.

### **Vocational qualifications in Key Stage 4 and 5 performance tables**

In 2014/15, some new Key Stage 4 and 5 vocational qualifications<sup>21</sup> for inclusion in school and college performance tables will be developed and submitted for approval to the Department for Education (DfE) by awarding organisations. These qualifications are being

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<sup>21</sup> At Key Stage 4: Level 2 Technical Awards. At Key Stage 5: Substantial Vocational Qualifications at Level 2, Tech Levels and Applied General qualifications.

designed in line with the DfE's Technical Guidance and will inherently carry greater risks because of their use in performance measures.

We will target these qualifications in implementing our new approach to audit, initially focusing on the validity of the design and development of these qualifications. If we identify risks to the future validity of the qualification, we will, in addition to taking regulatory action, advise government of our concerns. We will evaluate how well each qualification, including its assessment approach, has been designed, and assess the robustness of the awarding organisation's delivery capability.

## **Functional skills**

During 2014/15, we will assess functional skills qualifications and the expertise of the awarding organisations in offering them. These qualifications, in maths, English and IT, are taken by large numbers of apprentices, adults and some school-aged students. We will initially focus on Level 2 maths and English, which have the highest number of candidates. We will seek the views of users, teachers and students on these qualifications; determine how awarding organisations ensure validity; undertake a check on delivery arrangements; and ask subject experts to review how performance standards are set and maintained. We aim to publish a report in autumn 2014 and will take regulatory action as necessary.

## **Other academic qualifications**

Government<sup>22</sup> has announced that other academic qualifications including Level 1/2 Certificates (sometimes known as IGCSEs) in each subject will not be included in performance tables in the year that reformed GCSEs in that subject are introduced, starting in 2017 with maths and English. In later years, any alternative qualifications (potentially including reformed IGCSEs) may be included in performance tables if they meet conditions set by DfE. The DfE has said that to be included, a qualification must be at least as demanding as the new GCSEs and share key characteristics. We will regulate these qualifications to secure their validity, including audits of awarding organisations at critical points across the qualification life cycle. At the design stage of a qualification, we will consider whether the proposed content and assessment approaches are consistent with its stated purpose. We will review comparability periodically and we will advise DfE on our views of the standards of these qualifications. As with other regulated qualifications, as we implement our new regulatory approach, awarding organisations will be required to put validity strategies in place for these qualifications.

## **Core maths**

Awarding organisations are developing new core maths qualifications that will offer an alternative alongside Level 3 maths qualifications, which will count towards the new 'Level 3 maths measure' in the Key Stage 5 performance tables. Some schools and colleges are

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<sup>22</sup> Government in England.

preparing to teach the new courses from autumn 2014. The qualifications will be available more widely from September 2015 and taught over two years.

We will regulate these new qualifications using our new regulatory approach and, in due course, will expect awarding organisations to have validity strategies in place.

## **ESOL**

The achievement of some ESOL qualifications, and indeed other qualifications, contribute to decisions about who can enter and stay in the UK. The significance of the value of the qualification increases the risk to the delivery these qualifications. We intend to undertake a risk-based programme of audits of the controls that awarding organisations have in place to manage the assessment delivery for these qualifications, including logistics and centre supervision and inspection arrangements.

## Apprenticeships

There were around 870,000<sup>23</sup> funded apprentices in 2012/13 in England across all sectors of the economy. Apprenticeships are under review and change in England and also in Northern Ireland. In England, the government has identified trailblazers (groups of employers) to develop new apprenticeship assessment arrangements. These employers are to play a key role in determining the content of the qualifications and in some cases may award the qualifications too. In addition to individual qualifications, the proposals include a synoptic end of apprenticeship assessment. Consideration is being given to the need to, and how best to, assure the quality of these assessments.

Apprentices currently take many regulated vocational qualifications. The changes to apprenticeship assessment structure will have a significant impact on the range and take-up of current qualifications.

If we are to have a role in regulating apprenticeship assessments, we will work with the trailblazers and other employers to determine and implement the most effective approach to regulate for validity, fairness and transparency.

In Northern Ireland, where reform to apprenticeships is still evolving, we will offer advice to government and work with stakeholders to provide an effective regulatory response to any changes.

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<sup>23</sup> Department for Business, Innovation and Skills statistical release.

## **Regulating National Assessments**

We have a statutory duty to review and report on whether outcomes in National Assessments are valid, reliable and comparable over time. We also have a statutory duty to keep all aspects of the arrangements under review and to inform the Secretary of State and others if there is, or is likely to be, a failure in those arrangements.

Responsibilities for National Assessments lie with the Standards and Testing Agency, which is now established and has a track record of success. During 2014/15, we will consult on proposals to change the focus of our review of National Assessment standards. We aim to move away from monitoring delivery and in future provide independent expert advice to support strategic overview of the validity and reliability of assessment outcomes.



## Developing our capability and capacity

### Our resources

Our administration and programme resources settlement determined by the 2012–15 Comprehensive Spending Review for 2014/15 was £15.7 million. Our resources for 2015/16 were confirmed by the spending review undertaken in 2013 when ministers agreed that our core budget would remain at £15.8 million, with a decrease in depreciation funding to reflect our changed asset base value.

The resource plans set out in the 2012–15 Comprehensive Spending Review were determined before Ofqual was established and assumed that we would continue to regulate as in the past, for existing qualifications, while delivering efficiency savings in line with wider government policy.

The introduction of GCSE, AS and A level reform programmes and the development of a national reference test now require us to do significantly more than envisaged in our settlements. To fund this work, our resources have been increased by up to £4 million in 2014/15 and further resources will also be available in 2015/16.

We are continuing to discuss with Government our resources for further years in light of the work necessary to ensure that within an acceptable period of time, regulated qualifications are fit for purpose.

### Our operating model

We want to become a better, more agile and effective regulator. We are taking the opportunity presented by qualification reforms and changes to our regulatory approach to review how we are organised. We will improve our processes and systems to enable us to secure the quality of regulated qualifications aiming to support the most worthwhile outcomes for students, and those who rely on them.

We are changing how we are organised so we can capitalise upon and build our expertise, and improve our agility as we implement our new regulatory approach.

We will revise our processes so that we can continue to raise the quality of regulation and our effectiveness. In 2014/15, we will replace our IT platform, including the software for processing information on qualifications from awarding organisations. Our new IT platform will be more flexible and better able to support our business.

### Our people

During 2014/15, we will develop our people strategy. Our objectives are to: (a) perform well; (b) have the skills we need to succeed; (c) have a work environment

that encourages us to thrive; (d) demonstrate the leadership we need to achieve our objectives; and (e) feel positive about working at Ofqual.

In particular, we will focus on strengthening our research and analysis capability to better identify issues in the qualifications landscape, understand their causes, and develop authoritative and credible solutions.

To strengthen our in-house expertise, we are appointing a standards chair and a research chair. We will strengthen our expertise still further by developing existing staff and by recruiting or calling on additional expertise where needed. We will also work collaboratively with universities to share knowledge and expertise, ensuring that the best methodologies and analyses are brought to bear.

### **External expertise**

Last year we set up a Vocational Advisory Group to mirror our established and well-respected Standards Advisory Group. Over the life of this plan, we anticipate that both groups will provide us with invaluable expert advice, as we reform qualifications of all types and seek to ensure the quality of apprenticeship assessments.

We have reviewed and strengthened our arrangements for supporting in-subject expertise, with some 650 subject experts now available to us. We will review and evaluate the quality of the contributions that our experts make, with the aim of always ensuring the best possible contributions.

### **Working with others**

We will continue to work alongside the regulatory bodies for qualifications in Wales, Northern Ireland and Scotland. Government policy differences may lead to variations between qualifications but where the *same* qualifications are taken in more than one of these countries we will seek to maintain similar, if not identical, regulatory arrangements. To support this, we are reviewing interdependencies and the arrangements we have for shared systems.

### **Measuring our success**

In addition to measuring the effectiveness of our new regulatory approach, we will adjust the balance of our Public Confidence Survey, which currently has emphasis on public perceptions in relation to GCSEs and A levels. We will cover in more depth perception about the quality and trust of vocational qualifications that are a priority for government, and areas where we identify increased levels of risk to validity, fairness or transparency.

We wish to make our publications widely accessible. Please contact us if you have any specific accessibility requirements.

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