

Setting Grade Standards Consultation

Analysis of consultation responses

By

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YouGov

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Ofqual
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Executive Summary

In spring 2014 Ofqual undertook a consultation on 'Setting the Grade Standards of new GCSEs'. This consultation focussed on the approach to setting grade standards within the first year for new GCSEs, specifically in English literature, English language and mathematics. The consultation ran from 3 April to 30th June and a total of 226 individuals and organisations responded.

Simultaneously between the 3rd and 18th June 2014, Ofqual held stakeholder events to capture feedback. An Ofqual team visited cities in six regions: Manchester, London, Exeter, Newcastle, Birmingham and Cambridge. A total of 134 delegates attended these events which were designed to stimulate debate and support two live consultations on: 'Setting the Grade Standards of the new GCSEs in England' and 'Completing GCSE and A level Reform'. Attendees were encouraged to respond to the consultations.

The key findings from the consultation have been highlighted below.

Most individual respondents preferred criterion referencing (approach b), most organisational responses preferred the use of statistical information (approach a).

One in two (50%) respondents ranked criterion referencing (approach b) first compared with four out of ten (42%) who ranked an approach using statistical information (approach a) first and one in ten (8%) who ranked norm referencing (approach c) first. Among personal responses, the most preferred approach was criterion referencing (approach b) with six out of ten (56%) ranking this first. However among organisational responses, it was the use of statistical information (approach a) with seven out of ten (71%) ranking this first.

Despite criterion referencing being the most preferred approach, respondents drew out issues with each of the propositions. The main concern with using statistical information (approach a) was around the grades being predetermined. It was thought criterion referencing (approach c) would be difficult to administer and norm referencing (approach c) was considered unfair towards students.

There was overall *agreement* with the proposition that in the first year the standard for a grade 4 should be set so that the proportion of students who would previously have been expected to be awarded at least a grade C will be awarded at least a grade 4.

Just under seven in ten (68%) agreed with the proposition, three in ten (27%) disagreed and 4% had no opinion or did not know. Among those who agreed, the main themes coming across through the supplementary open comments were that it enabled a clear link between the two grading systems and it was a fair and sensible

approach. Those who disagreed argued that grades should not be manipulated, they should be based on specific grade descriptions and the knowledge the student has.

The majority of respondents said they *would* find it helpful if other points of reference between current and new grades were set and communicated before the first awards are made.

Nine in ten (89%) reported that they would find reference points helpful while one in ten (11%) reported they would not. The key reasons for why stakeholders wanted a reference point between new and current grades were because it would enable teachers to know what to expect and also what their students should expect. Having a reference point would provide clarity and understanding as well as the ability to compare. Reasons for not wanting a reference point were down to stakeholders believing this is a new system and that should therefore not need to be linked to the old system.

Respondents were more likely to *disagree* than agree with the proposition that the standard of performance for a grade 5 should align to the expected standard for similar qualifications or exams taken in high performing countries.

Just over one in three (35%) respondents agreed with the proposition of grade 5 aligning with international standards, one in two (49%) disagreed and one in six (17%) had no opinion or did not know. Respondents who agreed with this proposition felt that while it was a good idea it would be difficult to implement. Those who disagreed felt that systems across countries are to some extent incomparable and that the grades should only align with countries that have similar systems.

The majority of respondents *agreed* that setting the grade boundary for grade 7 so that, all things being equal, the same proportion of students who would previously have been awarded a grade A or above are awarded a grade 7 or above in the first year was appropriate *and* useful.

Two in three (68%) respondents said it would be appropriate and one in three (32%) said it would not. Seven in ten (70%) said it would be useful and three in ten (30%) said it would not.

The majority of respondents said setting the grade boundary for a grade 9 so that half of the proportion of students who would previously have been awarded an A* are awarded a grade 9 in the first year was appropriate and useful.

Six in ten (58%) respondents said it was appropriate, while four in ten (42%) said it was not. Just under six in ten (56%) said it was useful and over four in ten (44%) said it was not.

There was *no clear consensus* in terms of appropriateness and usefulness of setting the grade boundary so that the same proportion of students who would have achieved grades G and F are awarded a grade 1 in the first year.

Just over one in two reported the proposition as being appropriate (52%) and useful (50%). whilst just under one in two reported it as not being appropriate (48%) and useful (50%).

There was *no clear consensus* among respondents as to whether or not they would find it helpful to have additional or alternative points of reference between the current and new grades.

One in two (53%) respondents reported this would be useful while a further one in two (47%) reported that it would not. Supplementary comments on this proposition were around the need to have additional mapping of the how the new grades relate to old grades and that there needs to be '*clarity*' in the system so that new grades can be compared to the old grades.

The majority of respondents felt the current boundary between a grade G and an Unclassified outcome is *meaningful*.

Two in three (64%) reported the current boundary as being meaningful while one in three (36%) reported it was not. Those who felt the boundary was meaningful argued that grade G represents progress or a genuine achievement to some students. Those who felt the boundary was not meaningful argued that a grade G is meaningless or represents a fail.

The majority of respondents reported that the grade 1 boundary should align with the *current G*.

Two in three (65%) reported that the grade 1 boundary should align with the current G while one in three (35%) indicated that the grade 1 boundary should align with the current grade F.

The majority of respondents *agreed* with the proposition that the national reference test should be designed so that exam boards can use its outcomes to identify changes in the performance of the national cohort that could be reflected in the grades of new GCSEs awarded.

Two in four (49%) agreed with the proposition, three out of ten (28%) disagreed and a further one in four (23%) did not know. Respondents who agreed with the proposition highlighted that the proposal for the design of the national reference test was a fair, sensible approach that would help to recognise changes in standards. Although agreement was offered, comments stated that this was 'agreement in principle' or 'agreement with the concept', but expressed concerns over the practicalities of implementing the proposals. Where respondents disagreed, the key theme that emerged was the impact that adding a further test may have on students' stress and performance.

Consultation context and overview

Introduction

1. General Certificates of Secondary Education (GCSEs) are being comprehensively reformed in England. New GCSEs are now being developed with priority being given to English language, English literature and mathematics. These will be ready for first teaching in September 2015 and awarded for the first time in summer 2017. More demanding subject content for these qualifications has been published and new assessments are being designed.
2. The focus of the Ofqual consultation is on the approach to setting grade standards for new GCSEs in England in summer 2017, specifically English language, English literature and mathematics.
3. The Secretary of State for Education has set out his intentions that new GCSEs in England should remain accessible, with good teaching, to the same proportion of students who currently take them and there must be an increase in demand at the level of what is widely considered to be a pass (currently indicated by grade C) to reflect that of high-performing jurisdictions. In addition, the Secretary of State also stated there is a strong case for the new GCSEs to have a new grading system to "reflect the step change in expectations for pupils".
4. On the 1st November 2013 Ofqual confirmed some of the key features of new GCSEs in English literature, English language and mathematics to be introduced in England for first teaching from September 2015. This included a new grading scale that uses the numbers 9-1 to report levels of performance, with 9 being the top level. As the new grading system has already been determined, this consultation did not ask stakeholders for their views on the setting of a new grade system.
5. Ofqual are now at the stage where they have a proposed approach for (a) setting and maintaining performance standards for new GCSEs and (b) how the grading system will work. The purpose of the setting grade standards of reformed GCSEs consultation was to seek the views of the relevant stakeholder groups (e.g. students, parents, employers, higher and further education, school leaders and teachers) about Ofqual's proposals.
6. Ofqual commissioned the independent market research company YouGov to conduct the analysis of the responses received to the consultation. The analysis will be used to inform Ofqual's policy decisions on a framework for setting grade standards of reformed GCSEs. It will need to be comprehensive to support a robust decision-making process by Ofqual.

Consultation method and respondent profile

7. Respondents were encouraged to submit their response to the consultation questions online or to submit via hard copy/email. In total 189 individuals and organisations responded to the online consultation, together with a further 27 MS Word versions of the online survey received by Ofqual. Each of the 27 MS Word versions of the online survey were entered into a final dataset for analysis, giving a final response of 216.
8. A further 10 written submissions were received by Ofqual which did not conform to the online structure but have been reviewed and included in the text analysis.
9. The opening section of the consultation asked respondents to categorise themselves as to whether they were providing an 'official response from the organisation you represent' or whether the response was a 'personal view'. Following this categorisation, respondents were asked to classify themselves further using several questions on their personal and organisational characteristics.
10. This categorisation was used as the basis of sub-groups by which the responses to the consultation have been analysed. The final decision on the make-up of these classifications was made by Ofqual and the table overleaf shows how the responses have been categorised for analysis purposes.

Figure 1: Responses by stakeholder categories (exclusive of hard copy written responses)

Respondent type	Number of responses	Percentage
Personal responses	168	78%
Teacher	144	
Parent/student/carer/carer	9	
Other	11	
Organisational responses	48	22%
Awarding organisation	9	
School representative body/union	9	
Subject association	7	
Local Authority	4	
School	19	
Total	216	

Please note that the individual sub groups for the personal responses do not add up to the total number as four respondents did not provide data for the sub groups.

- Alongside the online consultation Ofqual held stakeholder events to capture feedback between the 3rd and 18th June 2014. An Ofqual team visited cities in six regions: Manchester, London, Exeter, Newcastle, Birmingham and Cambridge. A total of 134 delegates attended these events which were designed to stimulate debate and support two live consultations on: 'Setting the Grade Standards of the new GCSEs in England' and 'Completing GCSE and A level Reform'. Attendees were encouraged to respond to the consultations.

Guidance on analysis

12. The closed questions are presented in tables with the frequencies of responses against each answer. The tables use the respondent categorisation set out in figure 1 to present the findings cross-tabulated with respondent category.
13. As Figure 1 shows the number of respondents within some stakeholder categories are very low. Given this, it is potentially misleading in a consultation with this number of responses to display the results as percentages so simple frequency counts have been used and percentages only provided for the total sample.
14. Given the dominance of responses from teachers to the overall sample (66% of all responses) caution is also advised in interpreting the top line percentage sample figures. The analysis has been approached in a more qualitative way given the small number of respondents in each group. These views cannot be analysed or seen as representative of these groups as a whole.
15. The consultation included 10 closed questions which had invitations to explain why respondents answered the closed connected question in a particular way and one open ended question (Q9) which provided respondents with a free text box to answer the question. A full set of the consultation questions can be found in appendix B.
16. The open ended responses to all questions elicited varied responses, ranging from generalised comments about the propositions, to comments about specific grades etc. All comments were analysed in a very similar way, with each response read and the theme of the comments categorised but without formal coding. These responses were then analysed on a thematic basis by noting the themes of each response to highlight differences and trends in opinion between and within the respondent types.
17. The written submissions received outside of the online consultation were catalogued into a thematic grid and each response analysed for the key themes emerging from them. Often these written submissions were highly detailed. The purpose of this report is to summarise the strength of opinion received in response to the key consultation questions. The summary report cannot reflect every level of detail of these responses.

Consultation analysis

18. The main section of the report provides an analysis of the responses received to the online consultation and takes into account the views expressed via separate written submissions.
19. The report is structured around each question within the consultation and provides an analysis of the quantitative data broken down by each stakeholder category. Where relevant the report provides further explanation of these responses through an analysis of the qualitative responses received.

Question 1

20. **Ofqual have considered three possible ways by which the standard for the new GCSEs could be set in the first year:**
 - a) **An approach that uses statistical information to link the award of the new grades to current grades**
 - b) **An approach in which awarders judge students' work against descriptions of expected performance – criterion referencing**
 - c) **A norm referenced approach in which the proportion of each grade available to the cohort is pre-determined**
21. Ofqual asked respondents to rank the three possible approaches, using 1 for their preferred approach and 3 for their least preferred approach.
22. **The most preferred approach overall by which the standard for the new GCSEs should be set was criterion referencing (approach b).**
23. One in two (50%) respondents ranked criterion referencing first compared with 42% who ranked an approach using statistical information (approach a) first and 8% who ranked norm referencing (approach c) first.
24. Among personal responses the preferred approach was criterion referencing (approach b) with 56% ranking this first. However among organisational responses it was the use of statistical information (approach a) with 71% ranking this first.
25. Criterion referencing was particularly preferred among teachers with 81 out of 140 reporting this. Among parents/ students and other personal responses there was not a defined preference with both groups equally selecting approach (a) (statistical information) and (b) (criterion referencing). Four out of the nine parents/ students and other personal responses who responded selected approach (a) and the same proportion selected approach (b).
26. Among the organisational responses, the most preferred approach reported was (a) with 34 out of 48 reporting this. An approach using statistical information (a) was clearly favoured by all groups with the exception of schools where nine out of 19 preferred a statistical approach (a) and nine preferred criterion referencing (b).

Figure 2: Summary of rankings for each approach (a, b and c)

	Ranked First			Ranked Second			Ranked Third		
	a	b	c	a	b	c	a	b	c
Personal responses	55	91	16	85	44	26	16	28	118
Teacher	46	81	13	74	36	24	15	24	102
Parent/student/carer	4	4	1	4	4	0	0	1	7
Other	4	4	1	4	3	2	1	2	6
Organisational responses	34	13	1	11	24	10	2	8	33
Awarding organisation	8	1	0	1	5	2	0	2	6
School representative body/union	8	1	0	1	6	1	0	1	7
Subject association	6	1	0	0	4	3	1	2	2
Local Authority	3	1	0	1	2	1	0	1	3
School	9	9	1	8	7	3	1	2	15
Total (n)	89	104	17	96	68	36	18	36	151
Total (%)	42%	50%	8%	48%	34%	18%	9%	18%	74%

27. Some respondents provided supplementary comments that explained reasons behind their decision-making.
28. Respondents who ranked approach (a) *first* said this was due to the approach being a **fair** and **sensible** way of setting standards.

“It seems fairest to me.”

Teacher, not on behalf of school (Head of German/ Sixth Form)

29. Others mentioned that this approach allowed **comparability** and **continuity** and would **support transition**.

“Statistical information allows for variances in student performance year-on-year.”

Teacher, not on behalf of school

“There should be as much comparability between current GCSE and new GCSE grades as possible, and the statistical approach seems to ensure that this will happen.”

Teacher, not on behalf of school (Head of Modern Languages)

30. It was also seen to be a more **understandable** approach with many **agreeing with Ofqual’s** reasoning for approach (a) within the consultation.

“We agree with the premise set out in paragraph 2.35 of the consultation that neither a criterion referenced nor a norm referenced approach would be suitable and that the current approach should be developed and adapted.”

Organisational response (ASCL)

“Option (a) is more likely to be understood at the time of the change by more of the people affected - students, parents, teachers, employers.”

Teacher, not on behalf of school

“It is important for employers, and educators who use GCSEs for selection reasons to be able to understand a clear link between the new grades and the older grade system.”

Teacher, not on behalf of school (Curriculum Area Manager- A Levels)

31. Respondents who ranked option (b) *first* said this was due to the approach being a **fair** way of setting standards. It was also mentioned that this approach allowed **long term comparability, consistency** and **transparency**.

“Cohorts of young people will vary year on year, but the standard should remain the same. Therefore norm referencing is only fair in each separate year, whereas criterion referencing is fair across a longer period and therefore allows for comparisons across years and guarantees reliability of grades for HE and employers.”

School/ College

“I believe the system and standards need to be fair and consistent; not changing year on year to be fair to all students in any year by being judged against the same standards. Criterion referencing allows this to happen.”

Teacher, not on behalf of school (Head of English Department)

32. Others mentioned that the benefit of criterion referencing was that it kept **knowledge at the heart** and actually **measured what students can do**.

“Criterion referencing is fair to students and puts knowledge at the heart of what schools do. Norm referencing makes the main purpose of the exams rank ordering students. As teachers get better at preparing students for particular exams, they achieve better levels of knowledge and understanding but lower grades than students in previous years.”

Teacher, not on behalf of school (Head of Sixth Form and HE)

“Criterion referencing actually measures whether we have taught what it is that we purport to want to teach our children. Other approaches sort sheep from goats for political reasons.”

Teacher, not on behalf of school (Head of English Department)

33. Only 17 respondents ranked approach (c) as their *first* preferred choice. Analysis of comments highlight that the main reason for choosing this as their preferred approach was due to it **avoiding grade inflation**:

“Without norm referencing we'll be under pressure to produce inflating grades again.”

Personal response

34. Figures 3, 4 and 5 overleaf show the number of respondents who ranked each approach first, second and third.

Figure 3: Respondents who ranked approach a, b and c FIRST

	Approach a – Statistical information	Approach b – Criterion referencing	Approach c – Norm referencing	Total
Personal responses	55	91	16	162
Teacher	46	81	13	140
Parent/student/carer	4	4	1	9
Other	4	4	1	9
Organisational responses	34	13	1	48
Awarding organisation	8	1	0	9
School representative body/union	8	1	0	9
Subject association	6	1	0	7
Local Authority	3	1	0	4
School	9	9	1	19
Total (n)	89	104	17	210
Total %	42%	50%	8%	

Figure 4: Respondents who ranked approach a, b and c SECOND

	Approach a – Statistical information	Approach b – Criterion referencing	Approach c – Norm referencing	Total
Personal responses	85	44	26	155
Teacher	74	36	24	134
Parent/student/carer	4	4	0	8
Other	4	3	2	9
Organisational responses	11	24	10	45
Awarding organisation	1	5	2	8
School representative body/union	1	6	1	8
Subject association	0	4	3	7
Local Authority	1	2	1	4
School	8	7	3	18
Total (n)	96	68	36	200
Total %	48%	34%	18%	

Figure 5: Respondents who ranked approach a, b and c THIRD

	Approach a – Statistical information	Approach b – Criterion referencing	Approach c – Norm referencing	Total
Personal responses	16	28	118	162
Teacher	15	24	102	141
Parent/student/carer	0	1	7	8
Other	1	2	6	9
Organisational responses	2	8	33	43
Awarding organisation	0	2	6	8
School representative body/union	0	1	7	8
Subject association	1	2	2	5
Local Authority	0	1	3	4
School	1	2	15	18
Total (n)	18	36	151	205
Total %	9%	18%	74%	

35. Despite criterion referencing being the most preferred approach, respondents drew out issues with each of the propositions. The main concern with using **statistical information** approach (a) was around the grades being **predetermined**. It was thought **criterion referencing** approach (b) would be **difficult to administer** and **norm referencing** approach (c) was considered **unfair** towards students.

“(a) at least leaves some kind of room for overall improvement (or decline). (b) would be very difficult in practice. (c) is unfair to candidates.”

Teacher, not on behalf of school

“Criterion referencing is too restrictive. Norm referencing is too limiting.”

Teacher, not on behalf of school

“Option c is unfair. You should set the standard and if students reach it, they should be awarded the grade. Otherwise there is no consistency from year to year.”

Teacher, not on behalf of school

“There should be a stronger emphasis on fairness to individual students rather than ensuring that national statistics are comparable year on year. The approach is currently not necessarily fair at all levels of ability and across all subjects.”

Organisational response (ASCL)

Question 2

36. Ofqual proposed that in the first year the standard for a grade 4 should be set so that the proportion of students who would previously have been expected to be awarded at least a grade C in a subject will be awarded at least a grade 4 in the subject. There was overall *agreement* with the proposition.
37. Just under seven in ten (68%) respondents agreed with this proposition, three in ten (27%) disagreed and four per cent had no opinion or did not know.

Figure 6: To what extent do you agree or disagree with this proposition? (Q2)

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/ no opinion	Total
Personal responses	29	80	36	13	7	165
Teacher	26	67	33	10	6	142
Parent/student/carer	1	5	1	2	0	9
Other	1	7	1	0	1	10
Organisational responses	11	25	7	2	2	47
Awarding organisation	4	3	1	0	1	9
School representative body/union	2	6	1	0	0	9
Subject association	1	4	1	0	0	6
Local Authority	1	2	0	0	1	4
School	3	10	4	2	0	19
Total (n)	40	105	43	15	9	212
Total %	19%	50%	20%	7%	4%	

38. Among those who provided personal responses, two in three (66%) agreed, just under one in three (30%) disagreed and four per cent had no opinion or did not know. For organisational responses just under four in five (77%) agreed, one in five (19%) disagreed and four per cent had no opinion or did not know.
39. Some respondents provided supplementary comments that explained reasons for their particular response. Among those who agreed with the proposition the main reasons were because it enabled a **clear link** between the two different grading systems and because it was a **fair** and **sensible** approach which would provide a **reference point**:

“I don't like the new numbering system as it is confusing. However it seems reasonable to link a Grade C with a Grade 4.”

Teacher, not on behalf of school

“This will allow educational establishments and employers to have a reference point for standards.”

Teacher, not on behalf of school (Assistant Head Teacher)

“...the NASUWT has no objection in principle to the use of a numerical grading system in which grade 4 is benchmarked against current grade C.”

Union (NASUWT)

“ACME broadly supports the proposal that the new grade 4 is aligned to performance at grade C in earlier years. ACME is also content that the standard of performance required for a grade 5 should be at about a half to two-thirds of a grade higher than that required for a current grade C.”

Organisational response (Advisory Committee on Mathematics Education)

40. Others who agreed with the proposition said it was good because it **allowed additional grades above a C** and because it ensures there will **not be a large grade shift** during the transition:

“This will assist teachers in their professional judgments about students' predicted achievements and assists other users of qualifications in comparing achievements between years. Most importantly it will allow greater differentiation between the highest achieving candidates.”

Awarding Organisation (IFS University College)

“Means there will not be a huge grade shift during the transition period but if this is not pursued, it could lead to grade dips or increases in subsequent years.”

Teacher, not on behalf of school

41. Those who disagreed argued that grades should **not be manipulated**, they should be based on **specific grade descriptions** and the **knowledge the student has**.

“Again grades should be set via the grade specification.”

Teacher, not on behalf of school

“I certainly agree that the students should suffer no ill effects from this latest overhaul. However, I have some reservations as it seems to be that level 5 will begin to be seen as the new 'pass' and therefore a level 4 could adversely affect students from the first cohort in latter years.”

Teacher, not on behalf of school

“What does a grade 4 represent? How can we tell if it's the same as C? Again this just seems a manipulation of statistics.”

Teacher, not on behalf of school

42. It was also suggested by respondents that the **equivalent of a grade C should be grade 5 rather than grade 4** and that the **loss of a grade at the lower end** would **disadvantage** some students.

“I think it should be a 5.”

Other - including general public (Head of Learner Administration)

“I understand the aim of differentiating for higher ability candidates but they account for a small percentage of candidates. This will be at the expense of lower ability candidates who will now be bunched into grades 1-3. I see students leaving education with grades 2, 3 being largely ignored by employers and grade 1 people will be unemployable. Setting C = 5 would differentiate more below.”

Teacher, not on behalf of school (Assistant Vice-Principal)

Question 3

43. Ofqual asked their stakeholders whether they would find it helpful if other points of reference between current and new grades were set and communicated before the first awards are made. The *majority of respondents said they would find it helpful.*

44. Nine in ten (89%) reported that they would find reference points helpful while one in ten (11%) reported they would not.

Figure: Would you find it helpful if other points of reference between current and new grades were set and communicated before the first awards are made? (Q3)

	Yes	No	Total
Personal responses	144	18	162
Teacher	127	13	140
Parent/student/carer	7	1	8
Other	6	4	10
Organisational responses	42	6	48
Awarding organisation	6	3	9
School representative body/union	8	1	9
Subject association	7	0	7
Local Authority	4	0	4
School	17	2	19
Total (n)	186	24	210
Total %	89%	11%	

45. Among those who provided personal responses, nine in ten (89%) said they would find reference points helpful and one in ten (11%) said they would not. For organisational responses, nine in ten (88%) said they would find reference points helpful and just over one in ten (13%) said they would not.
46. Personal and organisational respondent types were all far more likely to say yes they would find reference points helpful than no they would not, particularly teachers where 127 out of 140 said yes.
47. The key reasons why stakeholders wanted a reference point between new and current grades was because it would enable **teachers to know what to expect** and also what their students should expect. Having a reference point would provide **clarity** and **understanding** as well as the ability to **compare**.

“As a teacher I need to know what my pupils should expect to get.”

Teacher, not on behalf of school (Assistant Head)

“At times of big change, more information is always better than less. Most teachers in the profession are comfortable and aware of the current system, therefore using this as a point of reference will no doubt enable teachers to understand the new system better.”

Teacher, not on behalf of school

“Comparability between the old and new qualifications is important.”

Teacher, not on behalf of school (Mathematics Coach)

48. Other reasons given for why stakeholders wanted a reference point between new and current grades were because further **education/employers** need to be able to make **comparisons** between the two systems, **students** need to know what they are **working towards** and the need for **transparency/fairness**.

“Students and teachers need to know exactly what they are working towards. We have become objective led.”

Teacher, not on behalf of school

“For the same reasons as above mainly: so that employers etc know what they mean, and teachers have some idea of how best to prepare students.”

Teacher, not on behalf of school (Assistant Head Teacher)

“Transparency is very important for all stakeholders to enable them to judge the value of the award and the standards set to compare with other students who qualify before and after.”

Teacher, not on behalf of school

49. The main reason for why some stakeholders did not want a reference point between new and current grades was because this is a **new system** and therefore should **not need to be linked** to the **old system**.

“It's new content so it makes sense that it is a completely new system to aid transparency.”

Teacher, not on behalf of school (Head of English)

“If the new exam is really new then we should not make references to the old one when awarding the grades. The cross reference between the two can only appear in the grade descriptors.”

Teacher, not on behalf of school

Question 4

50. Ofqual have proposed that the standard of performance for a grade 5 should align to the expected standard for similar qualifications or exams taken in high performing countries. There was overall *disagreement* with the proposition.
51. One in two (49%) disagreed compared with one in three (35%) who agreed. One in six (17%) had no opinion or did not know.
52. Among those who provided personal responses one in three (35%) agreed, one in two (50%) disagreed and one in six (16%) had no opinion or did not know. For organisational responses one in three (35%) agreed, just under one in two (46%) disagreed and one in five (20%) had no opinion or did not know.

Figure 7: To what extent do you agree or disagree with this proposition? (Q4)

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/ no opinion	Total
Personal responses	11	46	44	38	26	165
Teacher	8	40	41	32	21	142
Parent/student/carer	2	3	0	4	0	9
Other	1	2	2	1	4	10
Organisational responses	2	14	15	6	9	46
Awarding organisation	0	4	4	0	1	9
School representative body/union	0	4	3	0	1	8
Subject association	0	1	2	1	3	7
Local Authority	1	0	1	0	2	4
School	1	5	5	5	2	18
Total (n)	13	60	59	44	35	211
Total %	6%	28%	28%	21%	17%	

53. There was no consensus among the awarding organisations with four out of nine agreeing and four disagreeing.
54. Respondents who agreed with this proposition felt that while **a good idea** it would be **difficult to implement**. A small number also felt the proposition was **fair and reasonable**.

“This is extremely useful provided that the international standard is valid. However, other jurisdictions have different examinations and different standards for a ‘pass’ grade. Therefore it is difficult to match against a single international standard for a pass grade at Grade 5”

Local Authority (Buckinghamshire County Council)

“I agree with the principle. Although the reality is other countries have a variety of different approaches to education, there is no mention of how this could be comparable and how this can be measured over time?”

Teacher, not on behalf of school

“It seems a good idea to compare our performance internationally. However, 'high performing countries' could change over a number of years - will this alignment be reconsidered after a set time period and adjusted? School systems also vary, for example how many years students have been in secondary education, although presumably this would be taken into account. A step in the right direction though perhaps would encourage other countries into international discussion on education.”

Teacher, not on behalf of school (Music Teacher)

55. Respondents who disagreed with this proposition felt that systems across countries are to some extent **incomparable** and that the grades should only align with countries that have **similar systems to the UK**.

“International comparisons are fraught with difficulty. It would be necessary to know far more about how such comparisons will be made, and about the reliability of the underlying measures, before it would be possible to support this. Ofqual should clarify how it intends to use PISA or other international data to set standards in GCSEs. If comparisons are to be made between England and other countries, the aim should be to understand underlying differences between countries, and to explore the data to reveal

these. The existence of multiple ways in which countries differ should be reflected in comparisons.”

Organisational Response (Royal Statistical Society)

“This question assumes that there is an agreed international standard which, as far as we are aware, does not exist. The question also assumes that there is a set group of high performing countries. As we have seen in recent years countries move up and down in international tables so it is by no means clear which countries we should compare ourselves with. If grade 5 is to be the standard expected of the majority of students in the UK (a challenging and ambitious target) then we should say so and we will also have to accept and be able to evidence improvement in the system. Otherwise it will be much harder for schools to encourage their students to be ambitious. We should not be trying to set standards to align with countries that may have been performing well in the past. This new qualification should be about the future.”

Organisational Response (ASCL)

56. Other things mentioned by respondents who disagreed were that the UK should have its own system and **should not focus on being compared with other countries** but rather focus just on what is required within the UK.

“The system needs to be specific to the UK and not create a ‘factory production’ of results. International student profiles differ and this makes it unclear what schools will be measured on.”

Organisational Response

“We should not worry about other so-called high performing countries instead we should build an assessment system for our country and our educational needs.”

Teacher, not on behalf of school

57. Responses from those who said they were unsure or had no opinion were mainly down to **not understanding how such a comparison would be made.**

“I am still uncertain of how easy this will be to measure as this qualification is quite different to what they do in many other countries.”

Teacher, not on behalf of school (Deputy Head of Mathematics)

Question 5

58. Ofqual are considering at which other points they should make a link between the new and current grades. The first possibility is:

- a) Setting the grade boundary for grade 7 so that, all things being equal, the same proportion of students who would previously have been awarded a grade A or above are awarded a grade 7 or above in the first year

59. Ofqual asked their stakeholders how appropriate and useful they would consider each of these links to be. The majority of respondents *agreed* that possibility (a) would be appropriate and useful.

Figure 8: Would you consider this link to be appropriate and useful? (Q5a)

	Appropriate		Total	Useful		Total
	Yes	No		Yes	No	
Personal responses	107	55	162	110	50	160
Teacher	92	48	140	96	43	139
Parent/student/carer	8	1	9	7	1	8
Other	6	3	9	5	4	9
Organisational responses	35	12	47	36	12	48
Awarding organisation	7	2	9	7	2	9
School representative body/union	7	1	8	7	2	9
Subject association	5	2	7	5	2	7
Local Authority	3	1	4	3	1	4
School	13	6	19	14	5	19
Total (n)	142	67	209	146	62	208
Total (%)	68%	32%		70%	30%	

60. Just under seven in ten (68%) respondents said it would be *appropriate* and three in ten (32%) said it would not. Seven in ten (70%) said it would be *useful* and three in ten (30%) said it would not.
61. By respondent group, two in three (66%) personal responses and three in four (74%) organisational responses said possibility a) was appropriate. One in three (34%) personal responses and one in four (26%) organisational responses said possibility (a) was not appropriate.
62. In terms of usefulness, seven in ten (69%) personal responses and three in four (75%) organisational responses said possibility a) was useful. Three in ten (31%) personal responses and one in four (25%) organisational responses said it was not.
63. Those who responded on a personal basis were consistent in their view that (a) is appropriate and useful, particularly among parents/ students.
64. The outlook is the same among organisational views with the strongest support coming from school representative bodies/ unions and local authorities. Awarding organisations also believe possibility (a) is appropriate and useful with seven out of the nine awarding organisations reporting this.
65. There were very few comments around possibility (a) but in general these were fairly positive.

“The new grade system should be comparable longitudinally in quantitative terms within subjects, and should be easily comprehensible to those using the grade system. Matching the new grade 7 to the old A grade would seem to help toward this.’

Subject association (Royal Statistical Society)

“ACME is broadly content with the suggestion that the new grade 7 should be equated with existing grade A. However, ACME is clear that introducing a structure with two grades that reflect performance above that of the current grade A involves some risk. This risk relates to the difficulty of guaranteeing the validity and reliability of the new grades, given that there are doubts about the validity of the top grades in GCSE Mathematics at present.”

Organisational Response (ACME)

66. The next possibility proposed was **(b) Setting the grade boundary for a grade 9 so that half of the proportion of students who would previously have been awarded an A* are awarded a grade 9 in the first year.**

67. Almost six in ten (58%) of respondents said possibility (b) was appropriate while four in ten (42%) said it was not. Just under six in ten (56%) said it was useful and over four in ten (44%) said it was not.

Figure 9: Would you consider this link to be appropriate and useful? (Q5b)

	Appropriate		Total	Useful		Total
	Yes	No		Yes	No	
Personal responses	91	74	165	85	77	162
Teacher	78	64	142	71	69	140
Parent/student/carer	7	2	9	8	0	8
Other	5	5	10	4	6	10
Organisational responses	30	15	45	31	14	45
Awarding organisation	5	4	9	5	4	9
School representative body/union	7	1	8	7	2	9
Subject association	4	2	6	4	1	5
Local Authority	2	1	3	2	1	3
School	12	7	19	13	6	19
Total (n)	121	89	210	116	91	207
Total (%)	58%	42%		56%	44%	

68. By respondents group, over one in two (55%) personal responses and two in three (67%) organisational responses said possibility b) was appropriate. Just under one in two (45%) personal responses and one in three (33%) organisational responses said possibility b) was not appropriate.

69. In terms of usefulness, one in two (52%) personal responses and seven in ten (69%) organisational responses said possibility b) was useful. Just under one in

two (48%) personal responses and one in three (31%) organisational responses said it was not.

70. Both teachers and parents were more likely to report possibility (b) as appropriate, however the opinions of the 'other' group were split with five out of 10 saying it was appropriate and the remaining five out of 10 saying it was not.
71. While all eight parents/students/carers reported possibility (b) as useful, there was not a clear consensus among teachers and the other group - 71 out of 140 teachers said it was useful and 69 said it was not, similarly four out of 10 other responses said it was useful and six said it was not.
72. Very few respondents commented on possibility (b). Among those that did the key concerns raised were that **setting such a high limit would restrict achievement of some students** and would be **unfair**; the impact the proposition has on **grade 8**; and that **grade 9** should be for **exceptional results**.

“...It is entirely plausible that setting such a limit would seriously limit achievement of some students and would have a disproportionate effect on state schools.”

Teacher, not on behalf of school (Head of Mathematics)

“The limit to a grade 9 is unfair for candidates who would have achieved an A* previously.”

Teacher, not on behalf of school

“I don't think that for (b) a straight 50/50 split is inappropriate. Grade 9 should be for exceptional results, otherwise it will go the same way that A* went after its introduction. How many are exceptional? I've no idea but based on an average school cohort sitting my subject's exam I would expect a grade 9 to be achieved by only 2 or 3 out of an entry of 60+.”

Teacher, not on behalf of school

73. Other points mentioned by individuals included why the grade needs to be split and that grade 1 should be the highest.
74. The final possibility proposed was **(c) Setting the grade boundary so that the same proportion of students who would have achieved grades G and F are awarded a grade 1 in the first year**.

75. There was no clear consensus in terms of appropriateness and usefulness of possibility (c) with one in two reporting it as appropriate (52%) and useful (50%) and a further one in two reporting it as not (48% and 50% respectively).

Figure 10: Would you consider this link to be appropriate and useful? (Q5c)

	Appropriate		Total	Useful		Total
	Yes	No		Yes	No	
Personal responses	82	79	161	78	81	159
Teacher	73	67	140	68	70	138
Parent/student/carer	5	4	9	6	3	9
Other	3	5	8	3	5	8
Organisational responses	25	19	44	25	20	45
Awarding organisation	5	4	9	5	4	9
School representative body/union	3	4	7	3	5	8
Subject association	2	3	5	2	3	5
Local Authority	3	1	4	2	2	4
School	12	7	19	13	6	19
Total (n)	107	98	205	103	101	204
Total (%)	52%	48%		50%	50%	

76. Similar to the overall response, there was no consensus among respondent groups for both personal and organisational responses with half agreeing and half disagreeing.

77. Among the eight school representatives/ unions that responded, five said possibility (c) was not useful compared with only three who said it was. Similarly other personal responses were more likely to report possibility (c) as not appropriate (5 compared with 3).

78. The key issue raised by respondents around combining grade G and F was the injustice this would place on lower attaining pupils – it was highlighted that many pupils work hard to achieve an F rather than a G and combining the two would be demotivating and unfair towards less able candidates.

“For some students to gain a grade F rather than a grade G is a real achievement and takes two years’ worth of work to achieve, what is the motivation for these students to continue to work.”

Teacher, not on behalf of school (Assistant Head of Sixth Form)

“I think it is wrong that these are not two separate grades. It is unfair that students cannot be seen to progress when they previously would have done. It will be demotivating and will lead to a drop in standards at the bottom end. It is wrong to discriminate these students when those at the top end are split more than they have been previously.”

Teacher, not on behalf of school (Deputy Head of Mathematics)

“The proposed system does not help to reward students who are working at the low end of the attainment scale, neither does the chosen end of course examination benefit or encourage them.”

Teacher, not on behalf of school (Headteacher)

79. At the other end of the spectrum respondents mentioned that combining both these grades would be a positive thing as so few achieve them.

“Such small numbers achieving these grades means there is not much need for differentiation. The difference between F and G is not of huge significance when it comes to progression.”

Teacher, not on behalf of school (Director of Curriculum)

“The numbers of students getting F and G are small and show very little understanding. Therefore combining these grades makes sense.”

Teacher, not on behalf of school

Question 6:

80. Ofqual asked their stakeholders whether they would find it helpful to have any additional or alternative points of reference between the current and the new grades. There was *no clear consensus* among respondents.

81. Respondents were fairly evenly split as to whether they would find it helpful to have additional or alternative points of reference between the current and the new grades. One in two (53%) of respondents thought this would be useful with a further one in two (47%) reporting that it would not.

Figure 11: Would you find it helpful to have any additional or alternative points of reference between the current and the new grades? (Q6)

	Yes	No	Total
Personal responses	85	74	159
Teacher	75	63	138
Parent/student/carer	4	4	8
Other	3	6	9
Organisational responses	22	22	44
Awarding organisation	3	6	9
School representative body/union	3	5	8
Subject association	4	2	6
Local Authority	3	0	3
School	9	9	18
Total (n)	107	96	203
Total %	53%	47%	

82. This was a consistent view across personal and organisational responses, with around one in two in both groups reporting that they would find it helpful to have additional or alternative points of reference between the current and the new grades.
83. From the organisational responses, awarding organisations were least supportive with six out of the nine reporting that they would not find it helpful to have additional or alternative points of reference between the current and the new grades.
84. In greater support for having additional or alternative points of reference between the current and the new grades, were all of the local authorities (three) who responded and the majority of subject associations (four out of six).
85. Respondents provided supplementary comments that explained what the other points of reference between current and new grades should be.
86. The analysis of the comments highlighted three main themes. The first theme related to the need to have **additional mapping of how the new grades relate to old grades**. The nature of these comments was that there needs to be ‘clarity’ in the system so that new grades can be compared to the old grades. Typical comments included:

“There needs to be clarity re what these new grades all mean so [they] can be aligned with earlier system.”

Other personal view

“There must be clarity about the relative positions of the ‘new’ and ‘old’ grades. We would encourage Ofqual to make as much information as possible available and to present it in ‘user friendly’ formats.”

Local Authority (City of York)

87. A small number of comments related to the need for information that shows comparability across the new and old grades, with references made to information tailored to employers and parents.

“There should be an equivalency table/chart for employers and parents and this should be in place for at least five years, as employers in particular are slow to acknowledge new systems/grades.”

School representative body/Union (Association of Teachers and Lecturers)

88. The second theme related to the additional or alternative points of reference between the current and the new grades is the **need for additional grade / performance descriptors**. While a smaller number of comments related to this theme around 15 responses referred to this.
89. Within these comments there was a feeling that ‘*detailed*’ and ‘*clear*’ grade descriptors were needed and that these would be beneficial across all levels and grades and not just some.

“Detailed comparative grade descriptors would be beneficial for all grades.”

School/college (Burton and South Derbyshire College)

“Clearly defined definitions and grade descriptors, similar to those currently used in marking GCSE and GCE art and design.”

Teacher not on behalf of school (Teacher of Art and Design)

90. The third theme related to the need for **more explanation on what is expected or an ‘exemplification’ of the standards required for each grade**. These comments also suggested the need to provide examples of exam papers or student submissions to provide this context.

“Exemplification of each grade, along with sample exam papers and mark schemes.”

Personal view

“Any help in understanding what is needed to achieve each grade will be welcome; indeed essential.”

School representative body/union (Schoolzone)

Question 7:

91. Ofqual asked their stakeholders whether the current boundary between a grade G and an Unclassified outcome is meaningful. The *majority* of respondents felt the current boundary between a grade G and an Unclassified outcome *is* meaningful.
92. Two in three (64%) reported the current boundary as being meaningful while one in three (36%) reported it was not.
93. By respondents group, six out of ten (62%) personal responses and seven out of ten (70%) organisational responses indicated that the current boundary between a grade G and an Unclassified outcome is meaningful.

Figure 12: Is the current boundary between a grade G and an Unclassified outcome meaningful? (Q7)

	Yes	No	Total
Personal responses	96	60	156
Teacher	84	53	137
Parent/student/carer	6	2	8
Other	4	3	7
Organisational responses	33	14	47
Awarding organisation	6	3	9
School representative body/union	5	4	9
Subject association	5	2	7
Local Authority	3	1	4
School	14	4	18
Total (n)	129	74	203
Total %	64%	36%	

94. By respondent type there is a consistent picture with a majority of all types reporting the current boundary between a grade G and an Unclassified outcome as meaningful. The most supportive group were the official schools' responses where 14 out of 18 responses stated the boundary was meaningful.
95. Respondents provided supplementary open comments that explained why they felt the current boundary between a grade G and an Unclassified outcome is or is not meaningful.
96. Among those who felt that the boundary between a grade G and an Unclassified outcome was meaningful, one in three of the comments argued that **grade G represents progress or a genuine achievement to some students**. Individual and organisational responses recognised the need to protect this principle in the system.
97. Many of these comments strongly made the point that for 'students at the lower end of the attainment spectrum' or students with particular learning difficulties obtaining a grade G is a major achievement that should be recognised.

"It is meaningful to those working at the lower end of the grade scale, as it represents the (real) pass-fail boundary. If GCSE is to be a qualification for all, the (small) proportion working at this grade must not be ignored."

Awarding organisation (OCR)

"For some students, a grade G represents real progress - and they should gain something for their efforts."

Teacher not on behalf of school (Head of Modern Languages)

"Although the threshold for grade G is often very low and more an indication of what candidates cannot do rather than what they can, there are still students for whom a grade G is a genuine achievement."

Subject association (Association of Teachers of Mathematics)

"Learner achievement should be recognised and as such the lowest grade in the current GCSE grading scale provides some recognition of achievement for two years of work."

Awarding organisation (Pearson)

98. Further comments made the case that not allowing certain pupils to achieve a grade G would not recognise their achievements and **is unfair to the individuals concerned**. This was a view presented from individual teachers and a theme from the awarding bodies who responded.

“It is hugely meaningful to those who are operating at that level. Have you never seen a student open his envelope and finally get a G after previously getting only U? To that student, the G is their A*.”

Teacher not on behalf of school (Head of Mathematics)

“The policy intention is that the reformed GCSE should be designed to be appropriate for the whole cohort who currently take GCSE. As such, it would not be fair to set grade boundaries such that the very small proportion of students who currently receive a grade G do not receive a grade in future.”

Awarding organisation (AQA)

99. Along a similar theme, those who felt that the boundary between a grade G and an Unclassified outcome was meaningful, also argued that **achieving a grade G does shows some knowledge in the subject rather than none / shows the student has engaged with the exam.**

100. Typical quotes demonstrating this argument were:

“It shows students have met a minimum standard, which can show they have at least some level of skills and knowledge.”

Teacher not on behalf of school (Assistant Head of Sixth Form)

“A grade G is equivalent to a poor examination but nevertheless a candidate that has some basic knowledge. A U can be a spoilt paper or absolutely no knowledge.”

School/college (Heathlands School)

101. As Figure 12 shows around a third of respondents to the consultation felt that the boundary between a grade G and an Unclassified outcome is not meaningful. Where comments were offered to support this view they were themed around the argument that **a grade G is meaningless or represents a fail.**

102. The argument made by a majority of this small number of comments was that outside of education a G grade is seen as a fail and has limited value (in terms of employment and further education) to those who achieve it. Typical quotes making this point included:

“A grade G has very little currency for a learner in either the jobs market or for moving into further education.”

Teacher (not on behalf of school)

“The current grade G is in effect almost meaningless in terms of a measure of achievement, and therefore there is every reason to merge U/G as indicative of no real progress in the subject.”

Local Authority (Buckinghamshire County Council)

103. A very small minority of comments from those who felt that the boundary between a grade G and an Unclassified outcome is not meaningful, also **argued that anything less than a D grade is considered a fail** which reduces the value of grades below this level. As the following quote highlights:

“With the emphasis on obtaining grade C and above, the relevancy of any grade below C is meaningless.”

Other personal view (FE Administrator)

Question 8:

104. Ofqual asked their stakeholders whether in their view, the grade 1 boundary should be set to align with the current grade F or grade G. The majority of respondents reported that the grade 1 boundary should align with the *current G*.

105. Two in three (65%) reported that the grade 1 boundary should align with the current G while one in three (35%) indicated that the grade 1 boundary should align with the current grade F. This view did not differ by respondent group.

Figure 13: In your view, should the grade 1 boundary be set to align with the current grade F or grade G? (Q8)

	Grade F	Grade G	Total
Personal responses	53	97	150
Teacher	48	83	131
Parent/student/carer	2	6	8
Other	2	5	7
Organisational responses	14	28	42
Awarding organisation	1	7	8
School representative body/union	2	5	7
Subject association	0	5	5
Local Authority	3	1	4
School	8	10	18
Total (n)	67	125	192
Total %	35%	65%	

106. By respondent type there was also a broadly consistent picture with a majority of all types reporting that the grade 1 boundary should be set to align with the current grade G. The only exception being those LAs who responded where three out of four were in favour of aligning the grade 1 boundary with the current grade F.

Question 9:

Open ended comments on the distribution of new grades (Q9)

107. Respondents to the consultation were asked to provide any other views on the distribution of the new grades. Respondents provided a wide range of viewpoints covering many different issues.
108. However, amongst the diversity of comments two main themes emerged.. Firstly, respondents offered the view that **grade 9 should test the most able and be restricted to a small number of exceptional candidates**. There was a feeling from a small number that grade 9 should be set to be highly aspirational and an indicator of exceptional performance. As these quotes highlight:

“[Grade 9] This should be highly aspirational - higher than assuming half of the current A* cohort will be able to attain it.”

Teacher not on behalf of school (Deputy Headteacher)

“The current A* should, we feel, equate to grade 8, with the grade 9 being restricted to a very small number of exceptional candidates. This would set a very high and aspirational target for students in extremely academic environments, and this would mark the grade 9 as an indicator of exceptional performance.”

Local Authority (Buckinghamshire County Council)

109. Secondly, a number of comments made the point that the **distribution of the new grades does not provide enough differentiation at the bottom grades, which will be unfair to those with lower attainment**. With concerns raised that weaker students may be excluded or unable to access the new grades.

“The new system should not exclude from GCSE entry those who up to now have only been capable of achieving a G grade.”

Teacher not on behalf of school (Director of Curriculum)

“It seems as though this moves away from a normal distribution curve and is skewed to more differentiation between more able students and less differentiation between less able students. How will this enable employers to differentiate between potential employees?”

Teacher (not on behalf of school)

“An inevitable consequence of setting “new” 4 = “old” C is to reduce the number of grades available to cover lower levels of performance. This will mean that relatively small numbers of candidates will populate a very wide space in terms of attainment. We are concerned that this could devalue their achievements.”

Local Authority (City of York)

Question 10:

110. Ofqual proposed that the national reference test should be designed so that exam boards can use its outcomes to identify changes in the performance of the national cohort that could be reflected in the grades of new GCSEs awarded. The majority of respondents *agreed* with this proposition.

111. Figure 14 below shows the distribution of responses against an agreement scale. Two in four (49%) agreed with the proposition, three out of ten (28%) disagreed and a further one in four (23%) did not know or offered no opinion. This view was consistent between both the personal and organisational responses.

Figure 14: To what extent do you agree or disagree with this proposition? (Q10)

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
Personal responses	24	54	29	18	36	161
Teacher	22	43	29	14	31	139
Parent/student/carer	1	5	0	1	2	9
Other	1	5	0	2	2	10
Organisational responses	3	21	5	7	12	48
Awarding organisation	0	5	1	0	3	9
School representative body/union	1	5	0	1	2	9
Subject association	0	2	2	1	2	7
Local Authority	1	1	0	1	1	4
School	1	8	2	4	4	19
Total (n)	27	75	34	25	48	209
Total %	13%	36%	16%	12%	23%	

112. By respondent type the strongest support for the proposition was from official responses from school representative bodies/unions, with six out of nine in agreement. In contrast subject associations were more likely to disagree with the proposition, with three in disagreement and two in agreement.
113. Respondents provided supplementary open comments that explained why they agreed or disagreed with the national reference test proposal.
114. Where agreement was offered to this proposal around a third of the comments related to the view that the design of the national reference test was **a fair, sensible approach that would help to recognise changes in standards**. Comments ranged from the very straightforward agreement with its fairness:

“This seems entirely fair - if a cohort is stronger or weaker than a previous year, then the GCSE grades awarded should reflect this.”

Teacher not on behalf of school (Head of Modern Languages)

115. Others offered the sentiment that it was very important that changes in standards are recognised:

“It is very important that improvements in standards are recognised - after all much of the point of the whole exercise is to raise standards.”

Teacher (not on behalf of school)

116. However, although agreement was offered with the proposal, a number of comments stated that this was **‘agreement in principle’ or ‘agreement with the concept’ but offered concerns over the practicalities of implementing the proposals**.
117. These concerns were mainly raised by teaching professionals and ranged from issues around timetabling in the school year and stress on students to how the test will be designed.

“I think that it would help maintain standards however I’m not sure how these tests would fit into the school yearly timetable, would they be of benefit or a distraction to those taking part in preparing them for their final GCSE?”

Teacher (not on behalf of school)

“This would also add further pressure on schools and students by adding to the volume of exam-based assessment undertaken by students in their GCSE year.”

Awarding organisation (ifs University College)

“Whilst we agree with this proposal in principle, we are still unsure that a test based on a sample from a cohort will be subtle enough to make fair distinctions in determining whether more or fewer learners should receive a certain grade in that year.”

School/college (Burton and South Derbyshire College)

118. Where disagreement was offered by respondents, similar points were made about the **impact that adding a further test may have on students’ stress and performance**.

“Having yet another set of exams, especially if these are just before their GCSEs would just be additional stress (for them and their parents) with no benefit to themselves.”

Parent/ carer

“It will put yet more pressure on students who will already be stressed out with exam pressure. Why can't it be done earlier?”

Teacher (not on behalf of school)

119. Another theme that emerged among those who disagreed with the proposals regarding the national reference test were **concerns over the robustness and representativeness of the sample** on which the tests are based. While this was mentioned in the personal responses received this was also a concern from awarding organisations in particular.

“We would ask if this test was introduced, there would be guidelines to ensure that the cohort who sit these tests are truly representative of the broad range of learners in a year group, any deviation from this would distort the results provided.”

Awarding organisation (NCFE)

“...If Ofqual were to press ahead in developing a test, we would need to know more in order to advise further. What would the test contain? How would the sample of students be chosen? How would the representativeness of the sample be determined?”

Subject association (Royal Statistical Society)

“A reference test that samples a small proportion of the cohort cannot possibly supply direct information to exam boards for all subjects. In order to do so there would need to be sufficient learners from every subject without the population overlaps causing bias.”

Awarding organisation (Pearson)

120. A number of organisational and personal responses also indicated that it was **difficult to make a judgement as the design was at such an early stage**. Stakeholders felt they needed more information on the proposal before they could make an informed decision.

“We cannot offer an opinion at this stage without knowing more about the design of the national reference test. Such a test would need to be designed very carefully to give results that are nationally representative and statistically robust as there are some technically very complex decisions to be taken around sampling size and sampling strategy.”

Awarding organisation (WJEC)

“This proposal is currently insufficiently developed for us to offer a definitive opinion. It is not clear how much value it will add and at what cost.”

Local Authority (City of York)

121. Given the uncertainties about the design of the national reference test, a small number of respondents called for the need **to further evaluate the approach and pilot the test before full implementation**.

“We think that this would need to be evaluated to see how it was operating and also that there would need to be a clear communications strategy explaining how this would work, as it is a further complication to a process that is already poorly understood.”

School representative body/union (Association of Colleges)

“We recommend that the current tendering process for the reference test is postponed to allow for a full debate and consultation on how best to achieve the policy objective.”

Awarding organisation (AQA)

Question 11:

122. Ofqual outlined that they had not identified any ways by which their proposed approach to setting grade standards for new GCSEs may impact (positively or negatively) on persons who share protected characteristics. They asked stakeholders whether they were aware of any potential impacts that Ofqual may not have identified. The majority reported that they were *not aware*.

123. Eight out of ten (79%) respondents reported that they were not aware of any potential impacts of the proposals on persons who share protected characteristics. Two in ten (21%) said that they were aware of potential impacts. This was a consistent view across the personal and organisational responses.

Figure 15: Are you aware of any potential impacts we have not identified? (Q11)

	Yes	No	Total
Personal responses	32	125	157
Teacher	26	110	136
Parent/student/carer	4	5	9
Other	2	7	9
Organisational responses	10	35	45
Awarding organisation	1	6	7
School representative body/union	3	6	9
Subject association	0	6	6
Local Authority	1	3	4
School	5	14	19
Total (n)	42	160	202
Total %	21%	79%	

124. Respondents who were able to identify potential impacts of the proposals on persons who share protected characteristics were asked to outline what these were and what steps could be taken to mitigate against them. A relatively small number of responses was received and the key issue mentioned related to inequality around lower attaining students.

125. **Students with special educational needs and disabilities (SEND) were the most mentioned group identified as being negatively impacted by the proposals.** The majority of these comments came from schools and teaching professionals and stated that students with particular difficulties may find the exams inaccessible and the removal of grades at the lower end of the spectrum may disproportionately disadvantage them.

“Removal of G grade may disadvantage SEN pupils who may not be able to access a grade in the new GCSEs.”

School/college

“Students with special needs will be disadvantaged as the lower grades, representing the stages in their learning, will be amalgamated. More grades at lower levels would reflect and therefore encourage their progress more easily.”

School/college (The Eastbourne Academy)

126. The impact on students with SEND was the only consistent theme mentioned. However, amongst the 42 respondents who were aware of potential impacts a range of other issues was mentioned, although not with any consistency to be considered a theme in the comments received. Furthermore some of these comments were outside the scope of this consultation, such as comments related to the impact of the move from blended assessment to a linear approach.

Appendix A: List of consultation respondents

128. The following organisations responded to the online consultation or provided written submissions.

Organisation name
Advisory Committee on Mathematics Education
AQA
Association of Colleges (AoC)
Association of School and College Leaders
Association of Teachers and Lecturers
Association of Teachers of Mathematics
Buckinghamshire County Council
Burton and South Derbyshire College
Caistor Yarborough Academy
CBI
City of York Council
Cottenham Village College
Exeter School
Geographical Association
Girls' Schools Association, GSA
Grammar School Heads' Association (GSHA)
Hagley Catholic High School
Haybridge High School
Heathlands School
HMC (the Headmasters' and Headmistresses' Conference)
IBO

ifs University College
Independent Schools Association
James Allen's Girls' School
Lancashire County Council
Lifetime Awarding
Mathematics in Education and Industry
NAHT
NASUWT
National Governors' Association
National Union of Students
NCFE
OCR
Pearson
Royal Statistical Society
SCORE
Schoolzone
Sir Graham Balfour
SPA, the Supporting Professionalism in Admissions Programme
St. Paul's Girls' School
St. Wilfrid's School and a major examining board
The Eastbourne Academy
The Howard of Effingham School
The Mathematical Association
Tring School

UCAS
University Council of Modern Languages
Voice: the union for education professionals
Wakefield Local Authority and Secondary Schools
WJEC

Appendix B: Consultation Questionnaire

About you*

Your details:

Name:	
Position:	
Name of organisation or group (if applicable):	
Address:	
Email:	
Telephone number:	

Would you like us to treat your response as confidential?* If you answer yes, we will not include your details in any list of people or organisations that responded to the consultation.

Yes No

Are the views you express on this consultation an official response from the organisation you represent or your personal views?*

Personal views

Official response from an organisation/group (please complete the type of responding organisation tick list)

If you ticked “Personal views”, which of the following are you?

Student

Parent/carer

Teacher (but not responding on behalf of a school or college)

Other (including general public) (please state capacity) _____

If you ticked “Official response from an organisation/group”, please respond accordingly:

Type of responding organisation*

- Awarding organisation
- Local authority
- School/college (please complete the next question)
- Academy chain
- Private training provider
- University or other higher education institution
- Employer
- Other representative group/interest group
- Other representative group/interest group (please skip to type of representative group/interest group)

School/college type

- Comprehensive/non-selective academy
- State selective/selective academy
- Independent
- Special school
- Further education college
- Sixth form college
- None of the above (please state what) _____

Type of representative group/interest group

- Group of awarding organisations
- Union
- Employer/business representative group
- Subject association/learned society

- Equality organisation/group
- School/college or teacher representative group
- None of the above (please specify) _____

Nation*

- England
- Wales
- Scotland
- Northern Ireland
- Other EU country (please state which) _____
- Non-EU country (please state which) _____

How did you find out about this consultation?

- Our newsletter or another of our communications
- Via internet search
- From our website
- From another organisation (please state below)
- Other (please state) _____

May we contact you for more information?

- Yes
- No

*Denotes mandatory fields

Questions

129. We have considered three possible ways by which the standard for new GCSEs could be set in the first year:

- (a) an approach that uses statistical information to link the award of the new grades to current grades
- (b) an approach in which awarders judge students' work against descriptions of expected performance – criterion-referencing
- (c) a norm referenced approach in which the proportion of each grade available to the cohort is pre-determined.

Please rank these possible approaches, using 1 for your preferred approach and 3 for your least preferred approach:

Option (a).....

Option (b).....

Option (c).....

Please give reasons for your answer.....

.....

130. We have proposed that in the first year the standard for a grade 4 should be set so that the proportion of students who would previously have been expected to be awarded at least a grade C in a subject will be awarded at least a grade 4 in the subject. To what extent do you agree or disagree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

131. Would you find it helpful if other points of reference between current and new grades were set and communicated before the first awards are made?

Yes

No

Please give reasons for your answers.....

.....

132. We have proposed that the standard of performance for a grade 5 should align to the expected standard for similar qualifications or exams taken in high performing countries. To what extent do you agree or disagree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

133. We are considering whether and, if so, at which points we should make a link between the new and the current grades. We would welcome your views on the appropriateness and the usefulness of the following possibilities:

(a) setting the grade boundary for grade 7 so that, all things being equal, the same proportion of students who would previously have been awarded a grade A or above are awarded a grade 7 or above in the first year?

Would you consider this link to be:

Appropriate Yes/No

Useful Yes/No

(b) setting the grade boundary for a grade 9 so that half of the proportion of students who would previously have been awarded an A* are awarded a grade 9 in the first year?

Would you consider this link to be:

Appropriate Yes/No

Useful Yes/No

- (c) setting the grade boundary so that the same proportion of students who would have achieved grades G and F are awarded a grade 1 in the first year?

Would you consider this link to be:

Appropriate Yes/No

Useful Yes/No

Please give reasons for your answers.....

134. Would you find it helpful to have any additional or alternative points of reference between the current and the new grades?

Yes/No. If yes what are they?

.....

135. Is the current boundary between a grade G and an Unclassified outcome meaningful?

Yes/No

Please give reasons for your answers.....

136. In your view, should the grade 1 boundary be set to align with the current grade F or grade G?

F/G

137. Do you have any other views on the distribution of the new grades?

.....

138. We have proposed that the national reference test should be designed so that exam boards can use its outcomes to identify changes in the performance of the national cohort that could be reflected in the grades of new GCSEs awarded. To what extent do you agree or disagree with this proposition?

() Strongly agree

() Agree

() Disagree

() Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

139. We have not identified any ways by which our proposed approach to setting grade standards for new GCSEs may impact (positively or negatively) on persons who share protected characteristics. Are you aware of any potential impacts we have not identified?

Yes

No

If yes, what are they and what steps could be taken to mitigate them?

.....

.....

.....

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