

GCSE Reform Consultation Questions

June 2013



June 2013

Ofqual/13/5292

Annex 1: All questions

This consultation is about the regulatory aspects of proposed changes to GCSEs taken by students in England.

We would like to know your views on the proposals before we put in place regulatory requirements for reformed GCSEs.

We will publish the evaluation of responses to the consultation later this year. In order for us to evaluate responses properly, we need to understand who is responding and in what capacity. Therefore, however you respond, we will only be able to consider your responses to the consultation questions if you complete the information page.

Details on how to respond are given below.

Please note we may publish all or part of your response unless you tell us in your answer to the confidentiality question below that you want us to treat your response as confidential.

The Department for Education (DfE) is running a parallel consultation¹ on the content of the reformed GCSEs. If you have views on the draft content you should respond to the DfE's consultation. If you do include in your response to this Ofqual consultation comments that should have been directed to the DfE we may copy these to the DfE unless you state that your response is confidential.

The deadline for responses to this consultation is **17.00 on 3rd September 2013**.

How to respond to this consultation

Please respond to the consultation questions using one of these methods.

Complete the online response form at <http://comment.ofqual.gov.uk/gcse-reform-june-2013/category/respond/>

Email your completed response document to consultations@ofqual.gov.uk – please include the consultation title in the subject line of the email and be clear who is responding and in what capacity.

Post your response to **GCSE Reform consultation – June 2013**, Ofqual, Spring Place, Coventry Business Park, Herald Avenue, Coventry, CV5 6UB.

¹ <https://www.gov.uk/government/consultations/gcse-subject-content-and-assessment-objectives>

Information pages

About you*

Your details:

Name:	Paul Steer
Position:	Director of Policy and Strategy
Name of organisation or group (if applicable):	OCR Examinations
Address:	OCR (Oxford Cambridge and RSA Examinations) 1 Hills Road Cambridge CB1 2EU
Email:	paul.steer@ocr.org.uk
Telephone number:	02476 470033

Would you like us to treat your response as confidential?*

No

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

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

If you ticked 'personal views', are you a ...

Student

Parent/carer

- Teacher (but not responding on behalf of a school)
- Other (including general public) (please state capacity) _____

If you ticked 'official response from an organisation or group', please respond accordingly,

Type of responding organisation*

- Awarding organisation for 14–19 general qualifications
- Awarding organisation for 14–19 vocational qualifications
- Awarding organisation for vocational and/or professional qualifications
- Awarding organisation for other kinds of qualifications
- School/college (please complete the next question)
- Private training provider
- Higher education institute
- Employer
- Government body/organisation (national and local)
- Other representative group/interest group (please skip to type of representative group/interest group)

School/college type

- Academy and/or free school
- Comprehensive
- State selective
- Independent
- Special school
- Further education
- Sixth form college
- None of the above (please state what) _____

Type of representative group/interest group

- Group of awarding organisations
- Union
- Sector skills council
- Academy chain
- Employer/business representative group
- Equality group
- Other voluntary or community group
- None of the above

Nation*

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

*Denotes mandatory fields

Consultation questions

Section 1 Scope, purpose and context of the consultation

1. The proposed primary purposes of the reformed GCSEs will be to provide evidence of students' achievements against demanding and fulfilling content and a strong foundation for further academic and vocational study and for employment. The reformed GCSEs should also provide a basis for schools to be held accountable for the performance of all their students. These proposed purposes are consistent with the purposes set out in the Secretary of State's letter². To what extent do you agree with these propositions?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

2. Do you have any comments to make on these propositions?

Whilst we agree with the purpose relating to measuring individual agreement against the subject requirements, the second aim needs clarification. Exam results are only one indicator by which a school should be held accountable and not the only one. There are a wide range of factors such as teaching quality, access for students from disadvantaged backgrounds, pastoral care, leadership (etc) which need to be accounted for and focusing too heavily on examination results can have detrimental effects on the others.

Section 2 Key design features – tiering

3. To address concerns that tiering can limit students' ambitions we propose to apply the principle that qualifications should only be tiered if:
- manageable assessments cannot be designed that would both allow students at the lower end of the ability range to demonstrate their knowledge, skills and understanding in a subject, *and* that would stretch the most able students; and
 - content that would be exclusive to the higher tier can be identified.

² www.ofqual.gov.uk/files/2013-02-07-letter-from-michael-gove-reform-of-ks4-qualifications.pdf

To what extent do you agree with this proposition?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

Mathematics - The assumption here is that some parts of the content are intrinsically harder than other parts of the content. This is not necessarily the case. There certainly is a small subset of the content for mathematics that can be split off as objectively hard, but the vast majority of content can be assessed within the full range of ability. That is to say, different “easy” or “hard” questions could be asked on most topics, which would mean that these questions are suitable to differentiate between candidates at different points in the ability distribution.

For example, while “factorise quadratic expressions by completing the square” apparently meets this requirement for tiering, there is more to the situation. A general “factorisation” item can be set to differentiate at any point in the range, so while it is ok to have “factorisation” in the lower and higher tiers, this does not mean that all students taking the lower tier can access the full range of questions on the topic.

In other words, the content in the subject criteria for mathematics could in fact be written in such a way that both tiers included exactly the same content, and we would still argue for a tiered assessment because the first condition above is met.

There should be as much common content between any tiers as possible, so that the teaching can focus on the content and skills required and decisions about tiers of entry be left as late as possible. A small amount of exclusive content – much smaller than all the B-A* content in the current specifications – plus more demanding questions, should be the distinguishing features of the higher tier.

Science - The criteria published for science do not currently identify any higher tier content. Separate science content has been identified (in bold) and, as stated in our DfE consultation feedback we have concerns that some of the content assigned to separate sciences is actually more demanding, making it harder to ensure that the combined science GCSE will be comparable with the separate science GCSEs. It is important that the sections in **bold** are recognised as purely extension material rather than conceptually more difficult material, otherwise the combined science specification will be seen as a ‘poor cousin’ to the separate sciences, and therefore judged as an inferior route for progression to A level study. At present, a good proportion of the bold content represents more demanding material, so this aspect needs to be addressed.

Several approaches to tiering of content are possible:

- (i) Content is the same for Higher and Foundation with the Higher tier involving more challenging questions of the same material. The draft criteria appear very challenging so it is hard to see that this option would be a realistic route to tiering.
- (ii) The Foundation tier content is a sub-set of the Higher tier material (as in current GCSEs). In this case how will this be defined in the criteria, will Awarding Organisations be asked to define this (as is done currently) or will the criteria be re-drafted with higher tier content identified (is there sufficient time for this approach?). Will some of the 'Use of mathematics' statements be flagged as Higher tier only (as is done presently)?
- (iii) The Foundation tier is completely different content. This option seriously restricts candidate choice and teaching approaches.

The approach to tiering needs to be clear before assessments can be developed. The tiering approach should also consider whether Appendix 1 of the criteria (Equations in physics) would allow for more equations to be supplied to Foundation tier candidates than currently specified.

We have applied this principle on tiering to the following subjects: English language, English literature, mathematics, biology, chemistry, physics, double award science, geography and history. As such:

4. The reformed GCSE in mathematics should be **tiered**. To what extent do you agree with this proposition?
- Strongly agree
 - Agree
 - Disagree
 - Strongly disagree
 - Don't know/no opinion

5. The reformed GCSEs in science (biology, chemistry, physics and double award) should be **tiered**. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Science - In discussions around tiering in science we believe the optionality of routes through the subject needs to be considered and the question posed as to whether the same approach is needed to tiering in both routes (combined science *versus* separate sciences).

For separate sciences, the June 2012 results data for England (see below) show a clear difference between the separate science and combined science cohorts. 99.7–99.9% of the separate science cohort achieved grade A* –E in Biology, Chemistry and Physics (*i.e.* the grade set covered by the current Higher tier paper) *versus* 96.8% for Core Science and 98.0% for Additional Science. By using a range of question types we believe that an untiered Separate Science paper could potentially discriminate well across the full grade set for the current cohort and it could be argued, therefore, that tiering may not be needed for the separate science GCSE.

For combined science, the June 2012 results data for England shows that 17680 candidates (3.2% of the national cohort taking Core Science, data below) achieved an F or below in Core Science (*i.e.* one Science GCSE). We would identify these candidates as those who are likely to struggle with the new GCSE in Double Award Science and the tiering solution should allow candidates who have a very low ability in Science to be assessed using questions that are better able to reward the level of their achievement.

Subject	Entry (2012)	A*	A* - C	D, E	F	G
Biology	166,168	17.7	92.6	99.4	99.7	99.9
Chemistry	159,126	20.7	93	99.6	99.9	99.9
Physics	157,377	19.2	93.2	99.7	99.9	100
Core Science	552,504	2	60.7	91.5	96.8	99.1
Additional Science	289,950	3.7	66.4	94.4	98	99.3
Other sciences (includes Applied)	9403	6.8	57.3	84.6	91.7	96.2

6. The reformed GCSE in English language should be **untiered**. To what extent do you agree with this proposition?
- Strongly agree
 - Agree
 - Disagree
 - Strongly disagree
 - Don't know/no opinion
7. The reformed GCSE in English literature should be **untiered**. To what extent do you agree with this proposition?
- Strongly agree
 - Agree
 - Disagree
 - Strongly disagree
 - Don't know/no opinion
8. The reformed GCSE Geography should be **untiered**. To what extent do you agree with this proposition?
- Strongly agree
 - Agree
 - Disagree
 - Strongly disagree
 - Don't know/no opinion

9. The reformed GCSE History should be **untiered**. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

10. Where tiering is used, which of the following models – adjacent levels, core and extension, overlapping tiers – would you prefer? Please rank the options in order of your preference (1–3).

(1) Adjacent levels

(2) Core and extension model

(3) Overlapping tiers

Why do you prefer the model you have ranked as 1?

The adjacent levels and core and extension approaches both require students to take a 'core' examination to show that they have mastered this content and have the associated skills. A good range of 'pass standard' questions can be included in the core examination to give students the chance to demonstrate that they have met the requirements for the subject.

It is widely accepted that students should master their subject at a particular level before moving on, and these two tiering systems will mean that all students are given the opportunity to show that they have done this. A 'core' paper assessing the 'pass standard' would look very different to the current foundation tier. It would test appropriate content and skills at the 'core pass' level. The current foundation tier, in contrast, includes a large proportion of questions assessing very low-level skills, such that students can currently progress to Level 3, having achieved a grade C on the basis of competence in relation to these low level skills, *i.e.* with shaky foundations.

The advantage of the adjacent levels over the core and extension is that there can also be a further examination assessing lower level content, which can improve the validity of the awarding of low grades – and means that these grades represent positive achievement of basic content rather than just a failure in relation to the core. The disadvantage is simply the implications of this: there is an extra assessment to manage but, we would argue, one with a clear purpose.

Both systems then offer a higher paper to assess fully the true extension topics and questions which will help to prepare students to make the transition to A Level and differentiate between the achievements of the most able.

We have experience as an awarding body of piloting a GCSE Mathematics model based on adjacent levels. Candidates for syllabus 1969 were entered for a middle paper, targeting grades C and D, plus either a higher paper for grades B to A* or a lower paper for grades G to E. In this system the ceiling effect of tiering was reduced because there was only one route to a C and no risk in taking the higher option – the grade earned on the core paper would stand if the higher paper was failed.

We have not, in recent years, operated a core and extension model, though the 1969 adjacent levels model is similar to this. The difference between them is that the core and extension model would presumably focus more of the assessment on the ‘core’ and less on the extension, whereas our adjacent levels model included an equal focus on both – though the length of the papers could of course be adjusted.

We believe that a continuance of overlapping tiers will tend to endorse current behaviours – poor curriculum and streaming practices which operationally represent a ‘cap on aspiration’. Overlapping tiers will continue to be susceptible to streaming and gaming if there are two routes to the “pass” grade. As noted previously, we agree with the international consensus that students should demonstrate mastery of a level before moving on, and we believe that the current model does not encourage sufficient numbers of students to take the full programme for Key Stage 4 because of the availability of the pass grade on the lower tier.

As noted in Mark Dawe’s recent letter to Ofqual, it is important to note that we do not have confidence in the accounts given in some meetings that ‘*Scotland has abandoned adjacent tiers due to technical problems*’. We have spoken extensively to SQA staff and whilst SQA has moved from this model to a more modular system, this is due to long term development plans in ‘Curriculum for Excellence’ rather than any sense of defect in the adjacent levels model. It is vital to recognize, as you do in the consultation documents, that no model of tiering will of itself alone prevent schools from engaging in poor curriculum and streaming practices which operationally represent a ‘cap on aspiration’.

We have a strong preference for an adjacent levels model. We note your concerns regarding assessment duration, and we agree that this could be a serious concern for GCSE sciences. We also note your concerns regarding ‘gaming’ or poor entry decisions but, like you, acknowledge that all models have distinct problems which need to be confronted in school support etc.

If, ultimately, an overlapping tiers model is adopted we would strongly suggest that there is only one route to the ‘pass’ grade (equivalent to the current grade C) – on the higher tier. We can provide you with details of how such a model might work. For science, if tiering is to be defined as a sub-set of the total content (and combined science is defined as a sub-set of the separate science

content) then a foundation tier combined science candidate will only be assessed on their mastery of a sub-set of a sub-set of content. To ensure that candidates are suitably prepared for progression to A level study we would strongly recommend that such progression can only be assured if the candidate has been taught the full content – i.e. they should have sat the higher tier assessment. The expectation of such a model is that the vast majority of students would take the higher tier and complete the full programme of study. Therefore a ‘core pass’ earned off this higher tier would be a stronger indicator for progression purposes than a C grade on the foundation tier currently is. It is perfectly possible to have a tier which caters for, say, 80% of the cohort, and a lower tier which caters for the least able, who are not realistically expected to ‘pass’ at age 16. If the lower tier was essentially constructed to allow a meaningful assessment experience for students who were least able in the subject (and would therefore have a more restricted grade set than the current foundation tier arrangement) we would also strongly recommend that this tier should have a shorter assessment time than the current proposed minimum assessment time.

11. Do you have any additional comments to make on tiering?

We are willing to enter into full discussions with Ofqual and other interested parties in helping to develop a tiering structure that will genuinely stretch the most able candidates but also provide a rewarding experience for the less able.

Tiering must be considered in the light of accountability measures. Thinking about tiering that considers only the best possible choices that could be made in the students’ interest will miss many of the other driving forces behind tier choice.

It was also noted in the consultation that ‘combined marks’ must be used for the adjacent and core/extension models, which is not necessarily true. Results from one paper can instead be discarded, or could be used as a hurdle – i.e. a certain threshold grade must be attained on a lower paper before any grade can be awarded on the higher paper. Or, if aggregation of marks is required, different weightings could be considered.

Section 3: Key design features: assessment arrangements

12. The default position should be that the reformed GCSEs are assessed by way of externally set and marked examinations, except where subject content cannot be validly assessed in this way. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Don't know/no opinion

13. Where the final grade is based on externally set and marked exams only, there should be a minimum total exam time (the total time could be divided between different papers). To what extent do you agree with this proposition? See page 37.

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

14. The proposal is for a minimum total exam time of 3.5 hours for subjects where the final grade is based on externally set and marked exams only. That is English language, English literature, mathematics, geography and history.

Is 3.5 hours ...

Too much

About right

Too little

15. For subjects in the first tranche, where there are **other forms of assessment** in addition to exams (biology, chemistry and physics) there should be a minimum number of hours of exam time (the total exam time could be divided between different papers). To what extent do you agree with this proposition? See page 37.

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

16. For subjects in the first tranche where there are other forms of assessment undertaken in addition to exams the proposal is for 3 hours as the appropriate minimum amount of exam time. See page 37.

Is 3 hours ...

Too much

About right

Too little

Don't know

It is difficult to answer this question without the tiering model being confirmed.

Depending on how the foundation and higher tiers are split would influence our consideration as to a minimum assessment time. If the foundation tier is more directly tailored towards providing a rewarding assessment experience for lower ability candidates than the current arrangements, and it therefore assessed a narrower range of grades than currently, we would strongly recommend that the minimum assessment time for the foundation tier is shorter than 3 h (for separate sciences) and 6 h (for combined sciences).

17. Reformed GCSEs will be linear; with all exams taken at the end of the course (non-exam assessments may be completed at different times). To what extent do you agree with this proposition?

Strongly agree

Agree

- Disagree
- Strongly disagree
- Don't know/no opinion

Linearity will ensure that all content and skills are assessed together at the end of the course through terminal assessment, as compared to a modular system.

The downside of this is that linearity and one assessment session will mean that teachers and students do not receive the feedback on achievement that they currently get from GCSE modules.

Also see our responses to questions 63, 64 and 66.

18. All reformed GCSEs will include an element of synoptic assessment. To what extent do you agree with this proposition?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know

Whilst this superficially has appeal – we agree that students should be able to use knowledge and skills from the entire course – It is not clear what is meant by synoptic assessment in this case (or indeed what is meant by 'an element').

What is precisely intended by synopticity should be clearly defined in the criteria to ensure that all Awarding Organisations are able to develop comparable assessments.

Considering content, for example, if one written paper assesses the content for a certain number of topics in a specification, then assuming that the definition of synoptic is 'can cover anything from the specification' then the other component(s) cannot be synoptic by this definition. That is to say that if some content is ring-fenced to one component then it will not appear on the other(s) – as the same topics would not usually be assessed twice – and these others are then not synoptic.

Similarly, for skills, modern foreign languages (which will eventually need to follow these criteria) would usually have separate assessments for speaking, listening, reading and writing – a perfectly sensible arrangement but one which seems at odds with the requirement as stated.

The fact that the GCSE would be linear already ensures that the entire syllabus must be assessed at the end of the course and there is therefore no need to

apply a further, unclear, restriction to the examinations. Before we can agree to this requirement it needs to be defined more clearly.

19. Externally set and marked assessments should normally only be taken at one point during the year – in May and June. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Given the increased teaching freedom that a linear assessment presents it is important that some of the potential benefits are not eroded by early timetabling of assessments. On this basis we would argue that any timetabled assessment should only be set from late-May onwards at the earliest.

20. An exception should be made to the provision that exams should only be taken in May and June, so that students may re-sit mathematics and English language in November. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

21. November re-sits should be restricted to students in Year 12 and above. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

The November session should be available to students in Year 12 and above regardless of whether or not it is a re-sit. The only reason to restrict the November entry is to reduce gaming strategies of multiple entries in schools but the session should be available for adult and other post-16 learners who are taking GCSE Maths for the first time: November may fit better with their personal circumstances than June.

22. In the reformed GCSEs in English literature, geography and history we propose 5 per cent of the marks should be allocated to spelling, punctuation and grammar, as for current GCSEs in these subjects. To what extent do you agree with these propositions?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

If SPaG is truly valued, it should be assessed in greater depth in its own right. As a small add on to a selected number of subjects, we do not believe it achieves either of its goals. At 5% it has no benefit in that there will be no genuine, positive impact or washback on teaching/learning behaviours. A user cannot infer anything from it because it is swamped by the subject assessment and it has a cost, i.e. the assessment of the subject content and the inferences around the meaning of grades (i.e. validity) are compromised. Attached is a brief analysis (Appendix 1) of the only unit on Scoris from January 2013 that assessed SPaG. Several new units were assessed for SPaG in June 2013. We would be able to provide a further analysis to Ofqual by mid-September if requested.

We note that Ofqual has already decided to adopt the SPaG regulation before there has been the opportunity to review the impact of this compared with the previous QWC regulations. A decision on this should be delayed until this review is complete; otherwise it is not an evidence-based decision.

23. In the reformed GCSEs in English language, 20 per cent of the marks should be allocated to spelling, punctuation and grammar. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

24. If marks are to be allocated for spelling, punctuation and grammar in English literature, geography and history, are 5 per cent of the marks the right amount? And in English language are 20 per cent of the marks for spelling, punctuation and grammar the right amount? Please indicate by ticking one column per row.

[See our responses to questions 22 and 23 \(above\) and also question 65](#)

	Too much	About right	Too little
English literature 5% is			
Geography 5% is			
History 5% is			
English language 20% is			

25. Do you have any comments on the proposed assessment arrangements for the reformed GCSEs?

Section 4: Key design features: reporting student performance

26. Student performance in the reformed GCSEs should be reported using grades (rather than marks, scaled scores or percentile scores). To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

[Reference Mark Dawe's recent letter to Ofqual:](#)

[Moving to 1-8 is not moving far enough, and will simply encourage recidivist equating of the new grades with the old grades. This issue of the impact of transition is an important one. Where the old and new grades can be readily equated, there are huge pressures and disadvantages both for pupils on the old system and pupils who are exposed to the first five or so years of the new](#)

system. With the 1-8 scale, ready equating is likely to fuel political controversy about the 'pitch' of the standard and failure rates. By contrast, a score system superficially would be confusing – since a score could not be readily equated back to the old grades. But it would allow users (HE, VI forms, employers, etc.) to look at the scores and see where in the score range for that year the candidate lies (the average score was X etc.) – and this would represent good human capital management. The details of the impact and use of a fine-grained numerical score have not been explored in detail in policy discussions; we believe that there should be urgent, detailed rehearsal of the merits of retaining a grade scale (whether it be A*-G or 1-8) versus the merits of a fine-grained standardised score (e.g. 0-900), and for that discussion to include transition from the existing system to the new system, as well as measurement issues.

27. If grades were **not** used, which of the alternatives would you prefer?
- Marks
 - Scaled scores
 - Percentile scores
 - Other
28. Grades could be used alongside marks, scaled scores or percentile scores. Would you like to see grades and more granularity of reporting as well?
- Grades alone
 - Grades with marks
 - Grades with scaled scores
 - Grades with percentile scores
 - Other combination of approaches
 - Don't know/no opinion
29. Eight grades would allow for sufficient differentiation of performance between students. To what extent do you agree with this proposition?
- Strongly agree
 - Agree
 - Disagree
 - Strongly disagree

Don't know/no opinion

However, as indicated in our responses to questions 27 and 28, we prefer scaled scores.

30. The number of grades at the higher and middle performance range should be increased to allow for greater differentiation. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

We have some reservations about the 'recalibration' of grades (more higher grades) and impact on grade distribution. There are risks if this is not done carefully.

31. The number of grades at the lower end of the performance range should be reduced. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

32. Grades should be described using a new system to differentiate them from current GCSEs. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

33. Grades should be described using numbers. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

No opinion

34. If grades are described using numbers, the highest numbered grade should signify the highest level of achievement. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

No opinion

35. What information would students and users of qualifications find valuable in addition to the overall grade about students' performance?

36. How would any additional information about students' performance be used by students and users of qualifications?

37. If more detailed information about student performance in a subject was to be provided, it would result in significantly more assessment and higher costs. Would these greater resource implications be justified?

Yes

No

38. Do you have any other comments about reporting student performance?

The double award science will award a compensatory grade which does not truly indicate candidate performance within the component sciences (biology, chemistry, and physics). We strongly recommend that in addition to the double award science grade (e.g. 88) candidates are also provided with grades indicating their performance within the component sciences (e.g. Double Award Science 88 (Biology, 8; Chemistry, 8; Physics 6) to allow candidates to make genuine choices about which of the sciences they are adequately prepared to study further at A level.

Section 5: Full and short course GCSEs

39. The time it will typically take a student to complete a course of study for one of the reformed GCSEs should be the same as or similar to the time required for one of the current GCSEs (double award science will be the same as or similar to two current GCSEs). This means, as is the case with current GCSEs, that students would normally study reformed GCSEs over two years. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

40. Awarding organisations should be able to offer stand-alone short courses of the reformed GCSEs which will not contribute to a full GCSE. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

- Strongly disagree
- Don't know/no opinion

Section 6: Regulating the reformed GCSEs

41. Awarding organisations will be required to use and assess the subject content requirements as set out by the Department for Education in the development of reformed GCSEs (for those subjects for which the Department for Education consults on and publishes subject content requirements). To what extent do you agree with this proposition?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

42. Exam boards should be required to develop assessment strategies for their reformed GCSEs. To what extent do you agree with this proposition?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

This question is ambiguous. Awarding bodies have a role to play in developing an appropriate assessment model but it must be consistently applied across awarding bodies. The regulator can play its part too, but it must not dictate to the awarding bodies the means of assessment, or else we can build problems into the system.

43. Exam boards should be required to review systematically the effectiveness of their assessments for each of their reformed GCSEs. To what extent do you agree with this proposition?

- Strongly agree

- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

44. The Apprenticeships, Skills, Children and Learning Act 2009, requires us to consult before we impose an accreditation requirement on exam boards. Do you agree that the reformed GCSEs should be subject to an accreditation requirement, that is, that they must be checked by Ofqual before they can be made available?

Yes

No

45. Do you have any other comments on the regulation of the reformed GCSEs?

OCR notes with concern that Ofqual proposes to 'require exam boards wishing to offer the reformed GCSEs to apply for recognition to do so'. This, apparently, 'will be the case even where exam boards are already recognised to offer current GCSEs'. Regulation of reformed GCSEs should be no different to the regulation of the current GCSEs, GCEs or any other qualification type awarding bodies are recognised to offer.

OCR believes this proposal will place an unreasonable and unnecessary burden on awarding bodies, particularly those already recognised to offer the current GCSEs. If implemented, this proposal would be inconsistent with Ofqual's statutory duty 'not to impose or maintain unnecessary burdens' on awarding bodies (s.170, Apprenticeships, Skills, Children and Learning Act 2009).

The General Conditions of Recognition came into effect on 18 July 2011. Ofqual were clear in stating that existing awarding bodies would not be required to go through the process of satisfying the *Criteria for Recognition – May 2011* and existing awarding bodies were deemed to be recognised from 18 July 2011 onwards.

The *Criteria for Recognition* set out organisational requirements for identity, constitution and governance, integrity and resources and financing. These requirements are fundamental for awarding bodies currently offering GCSE and GCE qualifications, it is difficult to see how - or why - the requirements would differ if those bodies were to offer reformed GCSEs.

Ofqual has accepted for the last two years that awarding bodies offering GCSEs are suitable for recognition. If we accept that the organisational requirements for offering reformed GCSEs are no different to existing requirements, it is difficult to make a case for requiring currently recognised awarding bodies to make a new application for recognition.

If Ofqual does consider the organisational requirements to deliver reformed GCSEs to be different, we would welcome an explanation of the nature of those differences. Otherwise, if there is no difference in requirements, we believe that Ofqual should withdraw the proposal. If Ofqual is using the introduction of reformed GCSEs to make a retrospective assessment of awarding bodies against the *Criteria for Recognition*, we would welcome an explanation of how Ofqual's risk assessment methodology has allowed the regulator to consider awarding bodies to be suitable for recognition for the last two years.

Section 7: Subject-specific features of the reformed GCSEs

46. Please indicate whether you have read the Department for Education's subject content consultation document and associated documentation by ticking one box per row:

Subject	I have read the DfE subject content	I have not read the DfE subject content
English language	✓	
English literature	✓	
Mathematics	✓	
Sciences (biology, chemistry, physics and double award science)	✓	
Geography	✓	
History	✓	

Please note, we are not consulting at this time on reformed GCSEs in modern foreign languages or ancient languages, although the DfE is consulting on the content for these subjects.

English language

47. The Department for Education's draft English language content includes a spoken language assessment which **cannot** be assessed by an external written exam. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

48. The outcome of the spoken language assessment should be reported separately on the certificate, and not form part of the overall grade. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

We are not able to tick any of the above because:

1) we **disagree** that the outcome of the spoken language assessment should be reported separately on the certificate

2) we **agree** that the outcome of a spoken language assessment should not form part of the overall grade

49. Some disabled students may be granted an exemption from the spoken language assessment because of their disability, for example, deaf or hearing impaired students. Should this exemption be shown on the certificate or should the certificate just include the grade from the exams?

Exemption reported on certificate

Exemption not reported on the certificate

[See our response to Q66](#)

50. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education’s consultation – about the proposed design requirements for the reformed GCSEs in English language?

Speaking and Listening should be a part of any English Language course whether assessed or not. The GCSE in English Language should provide a clear description of the full range of speaking and listening activities which should be included in the learning programme in order to ensure development of the list of desired outcomes.

English literature

51. The Department for Education’s draft English literature content **can** be assessed by externally assessed written exams only. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don’t know/no opinion

We believe wider reading, research skills, etc. should continue at GCSE and be part of the subject syllabus. Knowledge gained through this kind of coursework should be assessed as part of the final exams, but the key change is that coursework should not be marked as a stand-alone element. The syllabus would make clear that wider reading, research skills, etc. remain hugely important because, as evidenced by ‘grounded theory’, knowledge is more effectively embedded and recalled when it is learnt in authentic contexts.

Our view is supported by the Cambridge Assessment paper (Appendix 2), Oates T (2013) *‘Radical solutions in demanding times: alternative approaches for appropriate placing of ‘coursework components’ in GCSE examination’*

We would welcome the opportunity for further discussion with Ofqual.

52. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education’s consultation – about the proposed design requirements for the reformed GCSE in English literature?

Mathematics

53. The Department for Education's draft mathematics content **can** all be assessed by externally assessed written exams only. To what extent do you agree with this proposition?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion
54. Do you have any comments, other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation, about the proposed design requirements for the reformed GCSEs in mathematics?

The sciences (biology, chemistry, physics and double award science)

55. The Department for Education's draft content for science GCSEs includes practical elements. These practical elements **cannot** be assessed **only** by an external written exam. To what extent do you agree with this proposition?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

(please also refer to our answer to the next question, 56)

All elements of practical that can give reliable differentiation between candidates to allow valid grading of their performance within a GCSE Science qualification (biology, chemistry, physics or double award science) can be reliably assessed within external written examinations.

The science community (including science specialists within Awarding Organisations) is in agreement on the central importance of practical work and the development of practical skills. What is not clearly agreed within the community is the mechanism by which it can be ensured that practical work is carried out within all centres in the country. What is of key importance here is not that some practical is done but that a wide range of practical is carried out in a meaningful way and that teachers have the freedom to introduce good practical experiences into their teaching whenever and wherever appropriate.

There are two standpoints on the place of practical:

(1) If practical is not assessed it will not be done in schools

and that of a significant proportion of the science community, viz.

(2) Assessing practical drives the way that practical is done in a negative way and with unintended consequences.

Given the recent report on resourcing of practical within schools (<http://score-education.org/media/11805/score%20resourcing%20secondary.pdf>, last accessed 12 August 2013), the first standpoint is not supported by the reality of facilities available in centres during a period of significant practical assessment. The latter standpoint is borne out by many studies (see below).

In its consultation for the English Baccalaureate Certificates (EBCs) the DfE clearly recognised issues with internal assessment (of practical work) at GCSE:

‘...We know from Ofqual’s report¹ that schools and teachers have concerns about the manageability of internal assessment in GCSEs (which replaced coursework in 2009) and its impact on teaching time and methods. [GCSEs in the future], referred to in the recent government consultation paper as EBCs, will need to restrict the use of controlled assessment, coursework or other forms of internal assessment as far as possible, to free up teaching time and reduce opportunities for the malpractice associated with internal assessment such as plagiarism and the rote learning of isolated tasks...’²

Similar concerns were seen in a recent Association for Science Education (ASE) survey of teachers:³

‘...assessment tasks are ludicrously complex to administer, mark and explain to students and yet simple-minded in what they actually measure...’

Broad concerns with the negative impact of internal assessment on the teaching and learning experience within schools have been supported by views presented during our own consultation work as part of the EBC development. Our Advisory Groups, which included teachers, examiners and HE representatives, all raised issues with the internal assessment of practical.

Feedback collected from a Cambridge Assessment questionnaire completed by 360 teachers in autumn 2012⁴ also underlined the view of teachers running internal assessment in current GCSEs:

‘...Coursework is an unnecessary part of a student’s assessment. The same skills can be tested in exams. It cannot be monitored effectively...’

‘...Also, far too much curriculum time taken up by the new style practical assessments leaving students little time for the rest of the course...’

'...it does not measure how "good" students are at science and it is a total game. Is (sic) must be removed as an element of assessment towards a final grade...'

In contrast, feedback from the small number teachers who follow IGCSE syllabuses⁴ where 100% external assessment is possible (i.e. no internal/controlled assessment) present a much more positive picture of the teaching and learning experience in their qualifications. There is a strong feeling amongst the teaching community that current practical assessment does not achieve what is intended at either GCSE or GCE level.

'...we currently follow an IGCSE specification, and as such we do not need to prepare students for internally assessed GCSE practicals ... although we do use practical work to help support theory tested in exams and students are asked questions on practical work in their external exams. The nature of controlled assessment is a bit open to interpretation and difficult to moderate – how can we be sure that all students have the same level of control imposed upon them...'

'...the lack of coursework gives time to use practicals to help understand the work better...'

IGCSEs allow student practical knowledge and understanding to be assessed via carefully written examination questions. Candidates will be better prepared for such assessments if they have carried out a wide range of practicals. Cambridge Assessment has considerable international experience in providing external written assessments of practical and a modified version of this type of practical skills assessment could work very well in the reformed GCSEs resulting in qualifications that compare well with the best available internationally.

Additionally, a paper recently submitted to DfE and Ofqual by the '59 Club (a group consisting of the Heads of Science of 33 independent schools)⁵ regarding the assessment of practical work made the key recommendation that:

'...Current schemes, based on continuous assessment and internal marking do not work. They fail in all of their main objectives: to provide a fair assessment and to encourage and promote good quality practical work in schools. They are time consuming, prescriptive and repetitive, and they undermine both the relationship between teachers and pupils and the professional integrity of teachers. They also encourage 'teaching to the test'...'

'...OFSTED inspections should check that pupils are in fact being given the opportunities to carry out the required practical activities in each subject...'

This '59 Club statement resonates with the draft Ofqual findings shared with OCR's Director of Standards in a letter dated 17 April 2013, namely:

'...Some subjects will include skills that are deemed essential learning outcomes and that cannot be assessed through exams, but which cannot be reliably assessed through internal assessment. It is important that these skills

are taught and are part of the curriculum requirements but they should not be assessed through GCSE subject qualifications. We anticipate that the quality of teaching of these skills by schools will be monitored and assured through other assurance mechanisms...'

Ofqual's draft findings in relation to controlled assessment of practical skills, in the same letter, highlight that:

'...1. Our evidence suggests that controlled assessment has had unintended consequences. While some of the opportunities for student malpractice have been reduced... there is much anecdotal evidence of centre malpractice. It is clear that writing more and tighter regulations will not mitigate the risk of inconsistent and dubious practice.'

6. Part of the rationale for including many of the skills in controlled assessment is the argument that if they are not assessed they will not be taught. This put QCA in an untenable position. As a curriculum agency it was charged with promoting good teaching and learning, meeting the requirements of the National Curriculum. But as a regulator it was expected to ensure robust and reliable assessment. In the case of many of the skills that controlled assessment aims to assess... these two objectives cannot easily be reconciled...'

OCR ran an AS Chemistry pilot between June 2006 and June 2008 that arose following concerns raised from examining personnel and teachers that coursework was not giving a fair indication of candidate performance across all centres. With the pilot paper it was hoped that candidates would be encouraged to carry out a wide variety of practical work, thus developing their essential practical skills, whilst at the same time assessing candidates' understanding of the practical element by an externally assessed written paper. The added advantage of this assessment tool was that teachers would be freed from the onerous task of marking coursework (with the associated frictions when scaling is applied and resolving concerns around variability of marking between teachers) to focus on genuine skills development.

The examining team found that the pilot assessment was a much more reliable way of assessing not only the practical skills that candidates had acquired, but also their ability to think about why they are doing a practical activity, than either traditional coursework or even the practical examination. Heads of Chemistry running the pilot gave very positive accounts of the experience and we would be very happy to discuss this feedback further with Ofqual.

The comments relating to the A level chemistry pilot and to GCSE versus IGCSE science practical assessments identify a clear difference of perception by teachers of the quality and value of coursework (internal assessment or controlled assessment). This view is borne out by our discussions with various HE representatives and, as cited earlier, by Ofqual analysis into the impact of Controlled Assessment in centres.

For all of the reasons above we would strongly recommend that only written examinations are used to contribute to GCSE Science (biology, chemistry, physics, double award science) qualification grades.

References

¹ OfQual (October 2011), *Evaluation of the Introduction of Controlled Assessment: Report on qualitative and quantitative research*, www2.ofqual.gov.uk (last accessed 19 March 2013).

² Gove, M. (2013), *OfQual Policy Steer Letter: reforming Key Stage 4 qualifications*, Department for Education, London, 6 February 2013, <http://www.ofqual.gov.uk/news/gcse-reform-6th-february-2013/> (last accessed 18 April 2013).

³ Association for Science Education (ASE), (September 2009), *Appendix to the ASE Response to GCSE Criteria Consultation*, ASE Survey of Science Teachers' Views for the National Curriculum Review, p. 4, www.ase.org.uk (last accessed 27 March 2013).

⁴ Wilson, F. (2013), *A study of stakeholders' views on science courses for 16 year olds (Science teachers, professional association representatives, employers and vocational Further Education tutors)*, Cambridge Assessment, Cambridge, http://www.cambridgeassessment.org.uk/ca/digitalAssets/206677_ScienceQuestionnaireSummary_Final.pdf (last accessed 18 April 2013).

⁵ Paper submitted to Ofqual and DfE by the '59 club.

56. The practical science element should be assessed by teachers in accordance with exam board requirements. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

(please also refer to our answer to the previous question, 55)

Given the concerns around malpractice presented by Ofqual in their letter to all Awarding Organisations dated 6 August (entitled '*Strengthening the arrangements for A level science practical assessments*') and a meeting between Ofqual and all Awarding Organisations on 29 July 2013 we find it impossible to justify a situation where development of a new high stakes assessment such as GCSE Science (chemistry, biology, physics or double award science) retains an element of teacher assessment contributing towards the GCSE grade. We will be sending a full response to the Ofqual letter indicating our preferred solutions to ensure robust assessment of practical skills within future assessments.

We welcome the summary of non-exam assessments presented in Ofqual's Corporate Plan for 2013–2016, pp. 6–7, which identifies very well the risks presented within practical assessment for science whilst also acknowledging that there is insufficient discrimination,

'... GCSE assessment is based on the assumption that everything that should be taught should be assessed, and should contribute to the outcome – the grade each student achieves. This is sometimes problematic: some skills cannot be assessed by written exam and yet non-exam assessments (such as controlled assessment in GCSEs) are less reliable and resilient than written exams.

GCSEs will continue to be subject to school accountability pressures, so GCSE assessment needs to be reliable and as resilient as possible. In our recent review of controlled assessment³ we found that it does not discriminate between students sufficiently. What is more, we are aware increasingly of controlled assessment malpractice – such that we cannot assure the fairness of student outcomes overall. We intend to make changes.

For GCSEs, as well as AS and A levels, we will develop alternative approaches to the assessment of those skills that cannot be assessed by written exam, including approaches that do not involve formal, graded assessment.

...In addition, we are developing approaches that do not assume that everything that should be taught should be assessed and contribute to the student's grade for the subject – in particular where it is not possible to design an assessment that is sufficiently robust for use for accountability purposes....'

We envisage a 'qualifications package' model consisting of three elements:

Element 1 – assessment, in the examination, of knowledge linked to practical science

Element 2 – assurance of practical science activity by the exam board

Element 3 – assurance of practical science activity by Ofsted

all presented as a linked whole:

Course content

Teaching materials and student materials

In service training re course content

Formative assessment instruments

Exam content

We believe practical experiments in science should continue at GCSE and be part of the subject syllabus. Knowledge gained through this kind of coursework should be assessed as part of the final exams, but the key change is that coursework should not be marked as a stand-alone element. The syllabus would make clear that practical learning remains hugely important because, as

evidenced by 'grounded theory', knowledge is more effectively embedded and recalled when it is learnt in authentic contexts.

Our view is supported by the Cambridge Assessment paper (Appendix 2), Oates T (2013) *'Radical solutions in demanding times: alternative approaches for appropriate placing of 'coursework components' in GCSE examination'*

We would welcome the opportunity for further discussion with Ofqual.

57. The practical science assessment element should contribute 10 per cent to the student's overall marks for the GCSE science qualifications. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Under the proposals, practical assessment has been split into two assessment objectives within the draft criteria:

AO3, assessable within written examinations

AO4, only assessable by teacher observation

Both AOs are weighted at 10%. As stated at our meeting with the DfE on 24 July (and in our consultation response) we (and the other Awarding Organisations) do not believe that AO4 will allow much differentiation and will be susceptible to malpractice over time resulting in this practical assessment objective driving other aspects of the assessment. We note that different approaches to non-exam assessment have been suggested within the draft criteria, i.e.

- For English, a separate endorsement which does not count towards the GCSE
- For Geography, a requirement on the Head of centre to confirm that fieldwork has been carried out.

Our view on practical science assessment is set out in our response to question 56.

If AO4 is to be retained we feel that a separate endorsement could be beneficial and would not drive GCSE grading in the same way as the proposal in the consultation may. We would be happy to discuss possible approaches

further. If AO4 became a separate endorsement we would recommend that the AO4 weighting was transferred to AO3 (i.e. AO3 becomes 20%).

58. Do you have any comments, other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation, about the proposed design requirements for the reformed GCSEs in sciences?

The criteria require clarification on the following points to ensure that all Awarding Organisations are able to create comparable assessments:

- (1) Greater clarity is required regarding the assessment expectations for 'Working scientifically', is this intended as guidance only or are all items expected to be assessed in every series?
- (2) Greater clarity is required on the assessment of 'Use of mathematics', current presentation within the draft criteria could imply that assessment of mathematics is limited to the sections highlighted. We strongly believe that the mathematical skills can be assessed wherever relevant within the content.
- (3) No ranges are currently given within the AO weightings. We feel this makes it very difficult to create assessments from the criteria for (tiered) separate sciences and double award sciences. We strongly recommend that a small tolerance is allowed on weightings for each AO, e.g. 5%.
- (4) As highlighted in our response to the DfE consultation, publication of command words within the criteria seriously restricts the possibility for Awarding Organisations to create less predictable assessments. This approach needs considering carefully in light of the DfE's published desire to develop assessments '...requiring less predictable assessments and less scaffolding...' (Letter from Michael Gove to Glenys Stacey, 6 February 2013).

We strongly recommend that command words are not included in the Criteria to allow greater flexibility and greater unpredictability in what can be assessed. If command word usage is to be retained it is vitally important that DfE and Ofqual discuss the assessment implications of command word inclusion before finalisation of the GCSE criteria

Geography

59. The Department for Education's draft geography GCSE content includes a fieldwork element. The outcomes in the draft content **can** all be assessed by an external written exam **only**. To what extent do you agree with this proposition?

Strongly agree

Agree

Disagree

- Strongly disagree
- Don't know/no opinion

We envisage a 'qualifications package' model consisting of three elements:

Element 1 – assessment, in the examination, of knowledge linked to fieldwork

Element 2 – assurance of practical fieldwork activity by the exam board

Element 3 – assurance of practical fieldwork activity by Ofsted

all presented as a linked whole:

Course content
Teaching materials and student materials
In service training re course content
Formative assessment instruments
Exam content

We believe fieldwork in Geography should continue at GCSE and be part of the subject syllabus. Knowledge gained through this kind of coursework should be assessed as part of the final exams, but the key change is that coursework should not be marked as a stand-alone element. The syllabus would make clear that practical learning remains hugely important because, as evidenced by 'grounded theory', knowledge is more effectively embedded and recalled when it is learnt in authentic contexts.

Our view is supported by the Cambridge Assessment paper (Appendix 2), Oates T (2013) *'Radical solutions in demanding times: alternative approaches for appropriate placing of 'coursework components' in GCSE examination'*

We would welcome the opportunity for further discussion with Ofqual.

60. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about the proposed design requirements for the reformed GCSEs in geography?

History

61. The Department for Education's draft history GCSE content can all be assessed by external written exam only. To what extent do you agree with this proposition?

- Strongly agree
- Agree
- Disagree
- Strongly disagree

() Don't know/no opinion

62. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about the proposed design requirements for the reformed GCSEs in history?

Section 8: Equality impact assessment

63. We have identified a number of ways the proposed requirements for the reformed GCSEs may impact (positively or negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified?

(✓) Yes

If so, what are they?

The move to 100% linear assessment can potentially have a detrimental effect on candidates who are undergoing treatment for long term conditions such as cancer and are therefore covered by the Equality Act as sharing the protected characteristic of disability. For candidates in this position the ability to take aspects of their GCSE at various points in a two year period can be very important in maintaining their engagement with their education. As the Equality Impact Analysis in the consultation document points out, Awarding Bodies ability to apply special consideration will also be limited by the lack of previous attempts and the fact that, in a 100% linear scenario, something that is negatively impacting on a candidate is likely to affect all the exams in the series. This will effectively create a barrier for candidates unable to take all their exams in one session due to a long term illness. The idea of a compulsory mock exam to address this is rightly rejected by the Ofqual EIA. However, as the authors have not considered the number of candidates with long term illness who would be covered by the Equality Act, it may be that such a measure, although not desirable, would not be as disproportionate as it initially seems.

64. Are there any additional steps we could take to mitigate any negative impact on persons who share a protected characteristic resulting from these proposals?

(✓) Yes

Please comment on the additional steps we could take to mitigate negative impacts.

As mentioned in our response to question 63 the introduction of 100% linear assessment is a particular challenge for a number of candidates who would be covered by the Equality Act. If Ofqual was to agree that exam boards could waive the 100% linear rule, in cases where the individual circumstances could justify it, this could be a possible solution. However, there are operational risks implicit in this approach as there is likely to be a manual element to the grading of the candidates concerned.

Furthermore, the criteria for eligibility would need to be agreed across all exam boards and Ofqual so that consistency can be achieved and standards maintained.

Apart from this, without changes to the proposals themselves, there is no further mitigation available beyond what is already identified in the Ofqual EIA. We would argue that, in some cases, the mitigation is not sufficient and changes to the proposals can be justified. These changes are identified in our response to question 65.

65. Taking into the account the purpose of qualifications, could the proposed design of the reformed GCSEs be changed to better advance equality of opportunity between persons who share a protected characteristic and those who do not?

(✓) Yes

If so, what changes to the design of the reformed GCSEs would you suggest to better advance equality of opportunity?

SPaG

The inclusion of SPaG has a significant impact on candidates whose written communication skills are affected by their disability or the fact that English is not their first language. Whilst there is clear justification for including the assessment of these skills in English and English Literature we do not accept that it can be legitimately justified in other subjects where it effectively forms a barrier for these candidates. The Ofqual EIA makes the point that some disabled candidates have extra time and can choose to use this to check the SPaG aspect of their responses. This is a gross misunderstanding of the basis on which extra time is allowed. Candidates who qualify for this access arrangement will have standardised scores confirming their lower than average speed of processing/writing and or reading; they may be visually or hearing impaired or have significant mobility issues. As such, the extra time is there to create a level playing field with other candidates and enable them to access the whole exam, not for them to conduct extra checks. In addition, if a candidate has a condition such as Dyslexia, no amount of extra time will enable them to correct spelling mistakes they are making due to their disability. Finally, whilst it is true that exam boards will award SPaG marks if the scribe informs us that the candidate has spelt out every word in their response and dictated their grammar and punctuation, this is clearly an arrangement that is only going to benefit candidates who have the required knowledge and skills; as such it will not help those candidates with a disability that affects their written communication or those with EAL needs.

100% Linear

An extension of the number of subjects for which re-sit opportunities are available would be beneficial to candidates challenged by this proposal as outlined in our response to questions 63 and 64 and in Ofqual's EIA.

Internal assessment

The impact of reducing internal assessments has been referred to in the Ofqual EIA but the issues are not fully addressed. The assessment states that the reasonable adjustments exam boards are required to permit will mitigate for the impact of the lack of controlled assessment on those with impaired memories. However this is not sufficiently expanded on and it is not clear to us which access arrangement could support an individual in this position. There is a strong equality case for maintaining some internally assessed elements at GCSE. This will not only support those with impaired memory function but those with EAL needs and those with learning difficulties.

66. Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?

The consultation document asks for specific feedback on the use of exemptions on the spoken language component of the GCSE English. The compulsory nature of A04 does create some complexity; if a disabled candidate cannot take part in a speaking assessment that is compulsory but this does not contribute to their final mark we would question the need to 'penalise' the candidate with a certificate indicator. A certificate indicator stating that something, that has no bearing on the final result, has not been completed due to a candidate's disability may well be interpreted as discriminatory. However, there is no other clear way of communicating to future users of the certificate that the candidate has not taken part in a compulsory aspect of the course. The suggestion, in the consultation document, that the certificate could make no reference to the component and that the field in which the speaking component is usually recorded would be left blank, is not valid in view of certificates as they are currently constructed for GCSE. These make no reference to the constituent parts of a qualification but simply contain information about the candidate, the title of the qualification and the grade achieved. If this format is going to change for the new GCSE's the issues of how exemptions are indicated will need to be considered at that stage.

Contact

Would you be happy for us to contact you again in relation to this consultation response? Yes No

Email address of key contact person to whom we may speak with about your response to this consultation*

paul.steer@ocr.org.uk

Additional information

How did you find out about this consultation?

- Ofqual's newsletters or other communications
- From Ofqual's website
- Media/press
- Via internet search
- Via another organisation (please state which) _____
- Other (please state how) _____

We want to write clearly, directly and put the reader first. Overall, do you think we have got this right in this document?

- Yes
- No

Do you have any comments or suggestions about the style of writing?

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

First published by the Office of Qualifications and Examinations Regulation in 2013

© Crown copyright 2013

You may re-use this publication (not including logos) free of charge in any format or medium, under the terms of the [Open Government Licence](#). To view this licence, visit [The National Archives](#); or write to the Information Policy Team, The National Archives, Kew, Richmond, Surrey, TW9 4DU; or email: psi@nationalarchives.gsi.gov.uk

This publication is also available on our website at www.ofqual.gov.uk

Any enquiries regarding this publication should be sent to us at:

Office of Qualifications and Examinations Regulation	
Spring Place	2nd Floor
Coventry Business Park	Glendinning House
Herald Avenue	6 Murray Street
Coventry CV5 6UB	Belfast BT1 6DN
Telephone 0300 303 3344	
Textphone 0300 303 3345	
Helpline 0300 303 3346	