

Analysis of Responses to our Consultation on Requirements on setting GCSE, AS and A level grade boundaries



June 2016

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Executive Summary

Our consultation on *Requirements on setting GCSE, AS and A level grade boundaries* took place between 26 May and 9 June 2016. The consultation questions were available to complete online or to download. A copy of the consultation is available at <https://www.gov.uk/government/consultations/requirements-on-setting-gcse-as-and-a-level-grade-boundaries>.

This was a technical consultation about the specific rules we planned to put in place to implement our earlier decisions¹ for setting grade boundaries for GCSE, AS and A level qualifications.

There were 13 responses to the consultation. Four were from awarding organisations, two were from schools or colleges. Three were from subject associations or other learned societies, one was from a representative group for schools and colleges and one was from a charity and membership organisation. There were two personal responses.

Respondents generally supported our proposals. These rules are intended to largely replicate the process that exam boards already follow and respondents welcomed this consistency with the current approach.

There were two areas where respondents provided more detailed responses to our proposals. These were:

- the process for converting raw marks to uniform marks for legacy GCSE, AS and A level qualifications. Respondents commented that our rules did not take account of a specific exam board process whereby scripts which have a raw mark of a set value receive the maximum uniform mark scale (UMS) score for the unit; and
- the process for determining the A*/A grade boundary in reformed A level qualifications. Respondents felt that there was insufficient clarity in the approach proposed.

We set out the responses in more detail below.

¹ <https://www.gov.uk/government/consultations/markings-reviews-appeals-grade-boundaries-and-code-of-practice>

Introduction

The consultation on the *Requirements on setting GCSE, AS and A level grade boundaries*

This report is a summary of the views expressed by those who responded to our consultation on the *Requirements on setting GCSE, AS and A level grade boundaries* which ran between 26 May and 9 June 2016.

Background

All awarding organisations must meet our regulatory requirements – the rules we set to make sure qualifications are valid and fit for purpose. One such set of requirements was contained in the *GCSE, GCE Principal Learning and Project Code of Practice* (the Code). The Code set out (amongst other things) the process exam boards must follow for setting grade boundaries for these qualifications.

We have announced our decision to withdraw the Code in respect of GCSE and GCE qualifications and to put in place new qualification level Conditions and guidance with the requirements for setting grade boundaries. This consultation was about the specific rules we will use to do this.

Who responded?

We received 13 responses to our consultation. Nine of these were from organisations and two were personal responses.

Table 1: Breakdown of consultation responses

Personal / organisation response	Respondent type	Number
Organisation response	Awarding organisation	4
Organisation response	Subject association or learned society	3
Organisation response	School or college	2
Organisation response	School, college or teacher representative group	1
Organisation response	Other	1
Personal response	Student	1
Personal response	Teacher	1

Table 2: Location of respondents

Respondent type	Number
England	10
England and Wales	1
England, Wales, Northern Ireland, Scotland	2

Approach to analysis

We published the consultation on our website. Respondents could respond using an online form, by email, or by post.

This was a consultation on the views of those who wished to participate. While we made every effort to ensure that as many respondents as possible had the opportunity to respond, it cannot be considered as a representative sample of the general public or any specific group.

Data presentation

We present the responses to the consultation questions in the order in which we asked them.

The consultation asked six questions. Each question invited respondents to comment on our proposed Conditions, requirements and guidance.

During the analysis, we reviewed every response to each question.

Views expressed – consultation response outcomes

In this section, we report the views in broad terms of those who responded to the consultation. We have structured this around the questions covered in the consultation document.

A consultation is not the same as a survey and the responses only reflect the views of those who chose to respond. Typically, these will be those with strong views and/or particular experience or interest in a topic. What follows is a fair reflection of the views expressed by respondents to the consultation.

A list of the organisations that responded is included in Appendix A.

Question 1 - Do you have any comments on our proposed Conditions and requirements for legacy GCSE (A* to G) qualifications?
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Six respondents provided comments on these requirements.

One respondent (an organisation) welcomed the requirements and the similarity of the approach to that in place in the Code.

One respondent (an organisation) commented that it would be helpful if the reference in Condition GCSE(A*-G)1.3(a)

In respect of each GCSE qualification which it makes available, the range of evidence to which an awarding organisation has regard for the purposes of Condition GCSE (A to G)1.2 will only be appropriate if it includes evidence of – (a) the Level of Demand of the assessments for that qualification,*

to Level of Demand was made clearer. They commented that this would ensure awarding organisations are able to provide suitable evidence to demonstrate compliance with the Condition and to ensure consistent application across awarding organisations.

One respondent (an organisation) commented that further clarification would be helpful in Condition GCSE(A* to G) 1.3(c)(ii)

In respect of each GCSE qualification which it makes available, the range of evidence to which an awarding organisation has regard for the purposes of Condition GCSE (A to G)1.2 will only be appropriate if it includes evidence of-*

(c) the level of attainment demonstrated by Learners taking that qualification in a –

(i) prior assessment (which was not for that qualification), whether or not that assessment was for a regulated qualification, or

(ii) prior qualification, whether or not that qualification was a regulated qualification,

as to how both of the sub-points would apply to a GCSE qualification.

One respondent (an organisation) requested clarification as to how long it should retain data in order to meet the requirement of maintaining records of the evidence it uses in setting grade boundaries.

One respondent (an organisation) made a general comment about the need to take account, when setting grade boundaries using these requirements, of the makeup of the cohort, highlighting specific factors they believed should be considered in 2017.

One organisation commented that standard processes are agreed as part of the annual data exchange procedures between awarding organisations and Ofqual. It commented that therefore it would not usually document the *“rationale for the selection of and weight given to”* the evidence used.

One respondent (an individual) commented on specific exams that they had taken, but did not respond to the question asked.

<p>Question 2 - Do you have any comments on our proposed guidance for legacy GCSE (A* to G) qualifications?</p>
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Six respondents provided comments on this guidance.

One respondent (an organisation) commented that it would be helpful to know whether the list of evidence that may be used by an awarding organisation was mandatory or exhaustive. This organisation also commented that it would be helpful to understand whether the reference to

pertinent material deemed to be of equivalent standard from similar qualifications or other relevant qualifications,

refers to archive Learners' work, judgmental evidence from previous awards, technical information or all of these.

This respondent also commented that it would be helpful to clarify what

information on Learners' performance in previous assessment series'

refers to.

Two respondents (both organisations) commented that awarding organisations no longer routinely request centres to submit estimated levels of attainment for students to be used as part of their process for setting grade boundaries. They suggested that this guidance should be removed.

One respondent (an organisation) commented that reference should be made to grades being calculated to meet the 100% terminal rule.

One respondent (an organisation) repeated the comments it had made about the need to take account, when setting grade boundaries using these requirements, of the makeup of the cohort.

One respondent (an individual) repeated the comments they had made on specific exams that they had taken, but did not respond to the question asked.

Question 3 - Do you have any comments on our proposed Conditions and requirements for legacy GCE AS and A level qualifications?

Ten respondents commented on these requirements.

One respondent (an organisation) repeated comments made about the need for clarification about what is meant by Level of Demand, which they made in response to question one for GCSE(A*-G) qualifications.

Five respondents (all organisations) commented on the requirements for the conversion of raw marks to uniform marks. These respondents believed that the previous rules in the Code had set out what they referred to as a 'cap' in this conversion.

One respondent (an organisation) commented that the table we had included in our requirements (paragraph 11), setting out the maximum uniform mark for a qualification should be extended to take account of qualifications which contain more than six units, as was the case in the Code.

One respondent (an organisation) commented that the heading used in the requirements was different to that used for the equivalent requirements for other qualifications.

One respondent (an organisation) repeated the comments it had made about the need to take account when setting grade boundaries using these requirements, of the makeup of the cohort.

Question 4 - Do you have any comments on our proposed guidance for legacy GCE AS and A level qualifications?

Five respondents commented on this guidance.

One respondent (an organisation) repeated comments made about the need for clarification about what is meant by Level of Demand, which they made in response to question one for GCSE(A*-G) qualifications. This respondent also repeated the comments they made in relation to the GCSE(A*-G) guidance on the evidence to be used when determining grade boundaries.

One respondent (an organisation) repeated the comments it had made about the need to take account, when setting grade boundaries using these requirements, of the makeup of the cohort.

One respondent (an organisation) repeated the comments made in response to question three about their belief there had been a 'cap' in place under the previous rules set out in the Code.

One respondent (an organisation) repeated their comment made for the GCSE(A*-G) guidance that awarding organisations no longer routinely request centres to submit estimated levels of attainment for students to be used as part of their process for setting grade boundaries.

<p>Question 5 - Do you have any comments on our proposed Conditions and requirements for reformed GCE AS and A level qualifications?</p>

Eight respondents provided comments on these requirements.

One respondent (an organisation) commented that these requirements were clear and comprehensive.

One respondent (an organisation) repeated comments made about the need for clarification about what is meant by Level of Demand, which they made in response to question one for GCSE(A*-G) qualifications. Another organisation also repeated comments it had made in question one relating to the rationale for the selection and weight of evidence used.

Two respondents (both organisations) commented on the arithmetic calculation of intermediate grade boundaries (those that are not determined by examiner judgement). They commented that the approach set out could preclude alternative processes for setting these grade boundaries.

Four respondents (all organisations) commented on the requirements for setting the A*/A grade boundary in A level qualifications. The structure of legacy A level qualifications allows for a formula to be used to calculate the position of this grade boundary. Respondents commented that they would like to see the process for

setting the A*/A grade boundary for reformed A levels set out in more detail in the requirements, to ensure consistency across awarding organisations.

One respondent (an organisation) commented that the sequence for determining grade boundaries for reformed GCE qualifications is not provided, whereas it is for pre-reform GCE qualifications.

One respondent (an organisation) commented that the reference to a moderated mark in paragraph 5 of the requirements would not apply for externally assessed components.

Four respondents (all organisations) pointed out a typographical error on the number of grades available at A level.

<p>Question 6 - Do you have any comments on our proposed guidance for reformed GCE AS and A level qualifications?</p>
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Four respondents provided comments on this guidance.

One respondent (an organisation) commented that the guidance was clear and comprehensive.

One respondent (an organisation) repeated comments made about the need for clarification about what is meant by Level of Demand, which they made in response to question one for GCSE(A*-G) qualifications.

Two respondents (both organisations) repeated comments made on previous guidance that awarding organisations no longer routinely request centres to submit estimated levels of attainment for students to be used as part of their process for setting grade boundaries and suggested that this guidance should be removed.

One respondent (an organisation) repeated comments made for the previous question about the calculation of the A*/A grade boundary at A level.

Appendix A: List of organisational consultation respondents

When completing the consultation, we asked respondents to indicate whether they were responding as an individual or on behalf of an organisation.

Below we list those organisations that submitted a response to the consultation. We have not included a list of those responding as an individual; however all responses were given equal status in the analysis.

AQA

Association of Colleges

Association of Teachers of Mathematics

Hills Road Sixth Form College

Institute of Mathematics and its Applications

Mathematics in Education and Industry

OCR

Pearson

Royal Statistical Society

WJEC

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