

GCSE Reform Consultation

June 2013



June 2013

Ofqual/13/5292

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Foreword

We are pleased to present our first consultation on reforms to GCSEs in England. Our aim is that the reformed GCSEs should be high quality qualifications that will reflect the new curriculum and command public confidence. In this consultation we are seeking views on their defining characteristics.

GCSEs were first introduced in 1986. They are key qualifications taken by nearly all students in England at around age 16, and sometimes by older students. They are widely used to signal a student's readiness to progress into further education, work-based learning or employment. GCSEs are also taken into account in admissions decisions for many university courses. They are taken in great number, across England, Northern Ireland and Wales. In 2012 some six million GCSE certificates were awarded in almost 50 subject areas.

Much has changed in education since GCSEs were first introduced, and GCSEs have assumed added importance since they have been used for school accountability measures in England.

Through this comprehensive reform we are aiming to tackle the problems with current GCSEs, learning the lessons of past reforms. And we want to reflect the Government's policy ambitions and concerns and the new content on which it is consulting.¹

We have taken account of the Government's published policy objectives in developing these proposals: that young people should have access to qualifications that set expectations that match and exceed those in the highest performing jurisdictions, that qualifications should be more stretching for the most able, and that the reformed GCSEs should be taken by the same proportion of students that take GCSEs currently. Reflecting these objectives, we want to see reformed GCSEs that are accessible to all, using assessments that really test knowledge, understanding and skills essential to the subject, and are designed so that results are valid and reliable.

The aim is that reformed GCSEs in the first group of subjects will be introduced for first teaching in 2015, with as much time as possible for teachers to prepare before that. The programme is ambitious but should be achievable. We will publish updates on progress towards this goal.

¹ www.education.gov.uk/schools/teachingandlearning/qualifications/gcse

If you have an interest in GCSEs now and in the future, please do give us your views on the options and proposals set out here. We look forward to hearing from you.

A handwritten signature in black ink, appearing to read 'Glenys Stacey', with a stylized, cursive script.

Glenys Stacey

1 Scope, purpose and context of the consultation

General Certificates of Secondary Education (GCSEs) are being comprehensively reformed. The reformed GCSEs will reflect the subject content on which the Department for Education (DfE) is consulting separately.²

Ofqual is responsible for making sure that the reformed GCSEs are of high quality: that they fulfil their purposes, and provide valid and reliable results. We believe this reform programme provides an opportunity to make improvements to the design of the qualifications and assessments, so that they are as worthwhile to study and stimulating to teach as possible.

These proposals have been developed taking account of the Secretary of State's policy objectives set out in his letter of 6th February.³ We plan that reformed GCSEs in English language, English literature, mathematics, chemistry, biology, physics, science double award, geography and history will be ready to be taught from September 2015 and first awarded in August 2017. Reformed GCSEs in other subjects will be ready for first teaching from 2016.

We are consulting now on the key characteristics of the reformed GCSEs so that exam boards can design and develop them during 2013/14 and teachers can prepare during 2014/15 to teach them. It will be important that students, teachers and others are clear about how standards will be set in the reformed GCSEs. We will be consulting in the autumn on how standards will be set and maintained, once the key features of the reformed GCSEs have been agreed.

Reasons for change

We agree with the Secretary of State that there are good reasons now to reform GCSEs comprehensively. GCSEs were first introduced in 1986. It is good practice to review qualifications from time to time to consider how they can be improved, in the light of experience, educational developments and changes in the purposes they are serving.

The education context in which GCSEs are taken in England is changing in several ways. The Government is about to introduce a new curriculum which reformed GCSEs will need to reflect. A levels are being revised, and reformed GCSEs need to provide a good pathway to reformed A levels as well as for other routes. The Government is also planning to change the accountability arrangements for

² www.education.gov.uk/schools/teachingandlearning/qualifications/gcse

³ www.ofqual.gov.uk/files/2013-02-07-letter-from-michael-gove-reform-of-ks4-qualifications.pdf

secondary schools, and we expect that GCSEs will continue to play an important part in the new arrangements.

Other concerns about GCSEs will also be addressed in the reform process. We have a number of particular concerns about current GCSEs.

First, the GCSEs introduced in recent years are fully modular, allowing aspects of a subject to be taught and assessed in discrete units at various times. In practice, modular GCSEs have sometimes proved difficult to award. Modularisation can lead to unfairness, as some students can do better than others depending on the route they take through a qualification⁴. Qualifications designed in units or bite-sized pieces can inhibit students from developing a strong and holistic understanding of a subject. It is Government policy⁵ that examinations should be moved to the end of the course, so as to reduce disruption to teaching and learning caused by regular assessment. We have previously considered this issue⁶ and have changed GCSEs, so that from 2013/14 all assessment will be at the end of the course. However, the current GCSEs are still modular in design, although the modules are assessed together at the end of the course.

Secondly, in some subjects there is a high proportion of controlled assessment⁷. Internal assessment has long been a feature of GCSEs, first through coursework and more recently through controlled assessment. Internal assessment is often of real value, but despite best efforts since its introduction, controlled assessment has proved problematic in many ways and some of the problems are intractable. It does not always assess those aspects of a subject it was put in place to assess. It can disrupt and divert time away from teaching and learning and be arduous to organise and deliver; and it may be delivered inconsistently. Moreover, the pressures on schools and students can lead to preparation of controlled assessment to a point where the final work is not representative of a student's true level of replicable achievement, and sometimes also to over-marking, which in turn leads to unfairness to other students.

⁴ Ofqual (2012) *GCSE English 2012*, See www.ofqual.gov.uk/news/poor-design-gcse-english-exam-grade-variations.

⁵ Department for Education (2010) *The Importance of Teaching*. See www.gov.uk/government/publications/the-importance-of-teaching-the-schools-white-paper-2010.

⁶ See www.ofqual.gov.uk/files/2011-06-27-ofqual-letter-to-michael-gove-unitisation.pdf

⁷ Controlled assessment is work undertaken by students in schools under controlled conditions overseen by teachers. It is marked by teachers in schools and graded by awarders in exam boards.

We are publishing our review of controlled assessment in current GCSEs alongside this consultation paper.⁸

Thirdly, there is scope for assessments to be improved substantially. Over the years, and with competing exam boards, assessment has become too predictable and formulaic. We will regulate for improved assessment, and build in more stretch to allow the most able students better to demonstrate their knowledge, skills and understanding in a subject.

Fourthly, some GCSEs are tiered – that is, students take either a higher tier or a lower tier route, with different assessments at the end, each allowing access to only some grades. Research shows that this can result in unfairness and a limiting of ambition for some students, and we have been asked to consider whether tiering could be removed. The reforms are an opportunity to consider for each subject whether the benefits of tiering outweigh the drawbacks.

Fifthly, the current grading structure has over time led to a bunching-up of students in the scale (particularly in some subjects) with relatively few students achieving grades F or G. There is now an opportunity to consider better approaches to the reporting of results.

Finally, some research suggests that GCSE grades in different subjects are set at different levels of demand: for example, it suggests that a given grade is more easily achieved in English and religious studies than in German or chemistry.⁹ It is important that we are open and clear about comparability between subjects, and we want to discuss with assessment experts how this is quantified and how any significant differentials can be addressed, or at least made more transparent.

We now have an opportunity to develop reformed GCSEs that address these issues and that will be better suited to the wider context in which they are taken.

The purposes of the reformed GCSEs

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 of their students.

⁸ Ofqual (2013) *Review of Controlled Assessment in GCSEs*. See www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

⁹ www.cem.org/attachments/SCORE2008report.pdf

These proposed purposes are consistent with the purposes set out in the Secretary of State's letter.

Ofqual's role

Our role is to put in place, in line with our statutory objectives, the regulatory requirements for the reformed GCSEs. In particular, we will decide the specific design features that will apply to the reformed GCSEs, the requirements of exam boards recognised to offer them, and the approach to setting and maintaining the standard of the qualifications so that they are comparable. We will hold the boards to account for designing, delivering and awarding qualifications that are fit for purpose. We will consult later in the year on the detailed regulatory arrangements to implement the final decisions we make on the arrangements set out here.

The Department for Education has taken responsibility for determining the content of GCSEs in the 'English Baccalaureate' subjects (English, mathematics, the sciences, history, geography and languages). We will regulate to require that these curriculum requirements, once they have been consulted on, are met by the reformed GCSEs. We must make sure that the content is suitably challenging for students at this stage of their education and that the qualifications are designed so achievement against the content can be validly assessed.

Subject scope and content

Reformed GCSEs will be introduced in a limited number of subjects for first teaching in 2015: English language, English literature, mathematics, biology, chemistry, physics, science double award, geography and history.

These subjects are being prioritised by the Government because they are taken in high volumes and because they constitute most of the core 'English Baccalaureate' subjects. The qualifications to be reformed in the first phase of the programme are all national curriculum subjects.

The Government is consulting in parallel on the qualification content and assessment objectives for the reformed GCSEs.¹⁰ It is also consulting on the content of ancient and modern foreign languages GCSEs. However, these subjects will not be introduced until 2016, so we are not consulting on the assessment and regulatory arrangements for these subjects in this consultation. We will do so at a later date.

We will be consulting in the future on the range and nature of the subject areas that should be included in the wider set of reformed qualifications. Reformed qualifications in other subjects will be introduced for first teaching from 2016.

¹⁰ www.education.gov.uk/schools/teachingandlearning/qualifications/gcses

Equality impact

We have summarised in section 7 of this consultation the main equalities issues we have identified so far in relation to the proposals. We include at annex 2 a literature review of evidence and research relevant to the potential equality impacts, which we commissioned from Equality Research and Consulting Ltd.

We encourage everyone who responds to the consultation to consider the potential equality impacts of the proposed reforms and to provide any relevant information or evidence that they may have. We are interested in the equality impacts of the reforms to qualifications, not any equality issues in the wider education system. Qualifications cannot be used to mitigate for general educational disadvantage or unfairness.

We shall take all the information and evidence we receive in relation to equalities issues into account as part of our decision-making once the consultation has finished.

Regulatory impact

We will evaluate and take into account the potential impacts of the reformed GCSEs (including financial) and their introduction on students, schools, exam boards and other qualification users before we take final decisions. We will consider any issues raised in response to this consultation.

2 Key design features: tiering

We are seeking views on several features of the reformed GCSEs. We have set out the options we have considered and our preferred approach. We welcome your feedback on these options and on any others you might identify.

The first design question is whether or not the reformed GCSEs should be tiered. The reformed GCSEs will be designed to be taken by the same proportion of the cohort that takes current GCSEs, representing in some subjects a very wide ability range. To assess this ability range, some subjects have a two-tier structure, with students entered for higher tier or foundation tier papers.

The curriculum context

Until the age of 14 the general expectation embedded in the national curriculum is that all students should be taught the same curriculum. However, as students move through the system the gap between lower and higher achievers widens. This is recognised in the English system by allowing curriculum divergence from age 14, both through different subject choices and through study of different topics within subjects. It is also reflected in the way some current GCSEs are designed with a two-tier structure (higher and foundation tier) in some subjects. Students' opportunities to achieve a particular grade are limited by the tier for which they are entered.

There are two types of curriculum divergence, both of which typically start at the beginning of the GCSE years:

- explicit curriculum pathway and subject choices made by the student with input from their school, parents and others; and
- within-subject choices, usually made by the school alone, in relation to routes through the chosen qualifications. Where there is a choice of topic within a subject or where more than one tier of assessment is available in a qualification, the school decides on the topic or for which tier the student or group of students is entered.

In the current system, GCSE tiers effectively represent curriculum pathways. For some subjects, the content of higher-tier papers is materially different from that of the foundation tier. In other subjects, broadly the same content is taught to all groups but at different levels of demand.

In full cohort tiered GCSEs, rather more than half of students currently take higher-tier pathways. In 2012, for example:

- in English and English language, of those students who took a tiered pathway 57 per cent of students followed the higher-tier pathway and 43 per cent a lower tiered pathway; and

- in mathematics, about 58 per cent of students follow the higher-tier pathway and 42 per cent the lower-tier pathway.

Tiering in current GCSEs

In the current GCSE model, the tiers overlap at the C–E grades. This means that students sitting only foundation tier units cannot earn a grade higher than C, while higher-tier students cannot be awarded grades F or G.

Higher tier	A*	A	B	C	D	E			U
Foundation tier				C	D	E	F	G	U

The school usually decides at the outset for which tier a particular teaching group is to aim. If students take only foundation-tier assessments, they can achieve no higher than a grade C. This is a ceiling effect. However, students may be wrongly allocated to a foundation-tier teaching group, or they may make higher than average progress in the group, but still be unable to progress to an A level or other level 3 qualification in the subject because they have not covered the full curriculum. The ceiling effect results from school choices combined with tiering: tiering alone does not limit ambition.

Tiering and accountability

In the current model the point of overlap in the two tiers covers the grade C threshold which dominates accountability measures.

As a result, schools have a strong incentive to enter students for the tier which they believe gives the student the greatest chance of achieving a C grade. The current perception is that it is easier to achieve a C in the foundation tier, so schools may tend to steer middling students to the less demanding rather than the more demanding course of study¹¹. This is clearly not a desirable position, as it risks limiting opportunity. However, it is a function of the particular model of tiering currently in place, and its interaction with current accountability measures, rather than an inevitable consequence of any tiering model. The Government consulted earlier this year on changes to the secondary accountability system which we hope will reduce this effect. We look forward to the announcement about the final accountability arrangements.

¹¹ Ofqual (2013) *Annex 4 – Technical Paper on Tiering*. See www.ofqual.gov.uk/files/2013-06-11-annex-4-technical-paper-on-tiering.pdf

To tier or not to tier

We have therefore considered from first principles how to differentiate assessment for students of different abilities in those subjects where tiering cannot be removed, with a view to minimising perverse consequences for individual students or for the education system as a whole.

In some subjects, such as history, essentially the same curriculum content can be taught to all 14+ students, although they will not all develop the same level of understanding and skills in relation to the curriculum content.

In these subjects, it is generally possible to assess and differentiate levels of performance by assessing all students' achievements on a common set of tasks in assessments taken by all. This is not straightforward from an assessment perspective: an untiered qualification has to be designed to differentiate reliably at every grade, rather than just at a subset of grades. If we were to move to untiered assessments in subjects which are currently tiered, this may mean that more assessment than at present could be needed to make the assessments valid.

In other subjects the levels of conceptual understanding and of skills in applying concepts are such that it is unrealistic to expect all students to complete the same course of study in the normal two-year period. In these subjects, it is not possible to assess all students using common papers in a sufficiently valid and reliable way.

In these subjects a view must therefore be taken about the proportion of students that should be expected to follow each pathway. The "break point" need not necessarily be drawn in the middle of the achievement range, though the range of attainment in each tier must be able to be assessed in each paper. The tiering approach should reflect not only good assessment practice, but also the appropriate curriculum pathways and the policy ambition that students should be given the opportunity to demonstrate that they can go on to further study in the subject.

If the assessment is tiered, there is a risk of limiting the potential achievement of students who follow the lower tier. To avoid this we propose that the default model for the reformed GCSEs should be to use an untiered model, so that all students are prepared and entered for one common set of assessments.

However, some subjects will need to continue to be tiered. In order to decide which exceptions should be made, we propose that subjects should 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, *and* that would stretch the most able students; and
- content that would be exclusive to the higher tier can be identified.

We have reviewed the assessment practicalities for the subjects for which reformed GCSEs are to be introduced for teaching from 2015. We have concluded that English language, English literature, history and geography can be untiered; of these subjects, only history is currently untiered, so the amount of tiering in future will be substantially reduced.

We have spoken to assessment and subject experts and come to the view that in mathematics and sciences, common exam papers could not be designed to provide valid assessments for all students. The examinations would inevitably include some questions that would be too simple and others that would be too challenging for significant numbers of students. If one exam was to be taken by all students, either the amount of assessment time would have to be increased considerably or we would have to accept a lower degree of reliability. We have therefore concluded that the advantages of an approach without differentiation are outweighed by the disadvantages.

We have set out in section 7 more details of our subject-specific proposals.

Models of differentiation

We have considered the models that could be used. There are three broad models available:

- overlapping tiers
- core plus extension
- non-overlapping tiers (also called adjacent levels).

Further discussion of each of these models is at annex 3¹².

Overlapping tiers

Overlapping tiers is the model currently used in some GCSE subjects. The approach is outlined above. In addition to concerns about students being entered for the appropriate tier, there is some evidence that examiners tend to grade answers to more demanding questions (generally in the higher tier) more severely than answers to less demanding questions (generally in the foundation tier).

In an overlapping tiers model, the point of the overlap and the size of the overlap are key. Both can be varied, and could be different from those used in the current model. The position and size of the overlap should be set to encourage suitable proportions of students into the curriculum pathways each tier represents, and to mitigate the

¹² Ofqual (2013) *Annex 3 – Technical Paper on Tiering*. See www.ofqual.gov.uk/files/2013-06-11-annex-3-technical-paper-on-grading

impact of the ceiling effect. The effect of these decisions on schools also needs to be considered. If the maximum grade on the lower tier is set too high, a large proportion of students may be taught only what is necessary for the lower-tier assessment, limiting access to the top grades for a large proportion of students.

If, on the other hand, the highest grade available from the lower tier is set too low, schools, having decided that certain students will be entered for the lower tier, will know they cannot progress to a higher qualification in that subject and will teach and manage expectations accordingly. This could lead to students' ambitions and progression opportunities being inappropriately limited.

The size of the overlap is also significant. If the overlap is too narrow, the proportion of students who cannot earn a grade that reflects their true potential or who fail to achieve a grade at all will be increased. If the gap is too wide, the opportunity to set valid questions that can be accessed by the students taking the assessment will be reduced.

Core plus extension

In a core plus extension model, a common (core) paper is taken by all students, with an optional, more demanding, extension paper or series of papers also available. The higher grades can only be achieved by students who take the extension paper(s). Depending on how far apart the curriculum pathways implicit in this model are pitched, it could be designed so that sitting extension papers could be the norm or only for a minority.

Where students sit papers at more than one level this adds to total assessment time and costs, and the complexity of awarding. Any additional time spent on assessment would need to be manageable in schools and in marking and awarding.

The core plus extension model does not remove the risk that students' true potential will not be realised. Students are still likely to be on specific curriculum pathways in most subjects. In this model, students could be prepared and entered only for the core paper, and be ineligible for the higher grades in exactly the same way as for the other models.

Nevertheless, the model has attractions, particularly in some highly structured subjects: it can provide more opportunity for able students wishing to demonstrate the extent of their abilities; and it avoids the drawbacks of catering both for more able and for less able students in a single common paper. The assessment could be more valid and reliable than using common papers.

There are also some complexities and potential unfairness when it comes to standard setting. In this model, where students take only the core paper, their grade is derived from performance in this paper alone. For students who have entered extension papers the grade is derived from a combined mark of all papers sat by the

student. Some students may do well in the extension paper(s), but less well in the core paper, perhaps because they over-interpret or are distracted or demotivated by questions that they find too easy. Other students may do significantly less well in the extension paper, bringing down their overall grade, and that risk may deter entry for the higher paper(s).

Non-overlapping tiers (adjacent levels)

The third model we have considered uses levels which do not overlap. The grades available for the qualification can be awarded by taking papers at one of the levels only, in contrast to the overlapping tiers model. This model has been used, but is about to be replaced, in Scotland. In this model there will usually be three levels.

Students typically sit the middle and either the higher or the lower levels. The model can be permissive, *allowing* students to take one, two or three papers; or restrictive, *requiring* students to take at least two papers. Each level needs to provide a complete and reliable assessment in itself. Where students sit papers at more than one level (and if they do not, some of the benefits of the model are lost) this adds to the total assessment time and costs. Students who are over-optimistic about their achievement, and sit only the middle or higher level, risk ending up without a grade at all. As with other tiering models, there is a risk that students' potential will not be realised if they are not prepared or entered for the middle and/or higher levels.

Evaluating the options

We have considered the range of options and the advantages and disadvantages of each, as set out above and in annex 3¹³.

In our view the important considerations are the extent to which a model limits ambition, the manageability of the model and the technical considerations (that is, the difficulties of setting standards) inherent in each model. Other things being equal, we prefer a model that is transparent and simple for users to understand.

All models share the drawback that schools can decide at the outset for which assessment(s) a given teaching group is to be entered, and limit or tailor the curriculum those students follow accordingly. Each model can be designed to limit the extent to which ambition might be capped, but if all students are able to access all grades, the benefits of tiering are lost. Since all three models can limit ambition to some extent, particularly if not designed or used well, we have focused on manageability and technical considerations.

¹³ Ofqual (2013) *Annex 3 – Technical Paper on Tiering*. See www.ofqual.gov.uk/files/2013-06-11-annex-3-technical-paper-on-grading

On manageability, the overlapping tiers model has an advantage, because even though there is room for improvement, it is a known system: teachers will understand the choices they need to make and can draw on others' experience to improve those choices where necessary. If we introduced a new system, it would take time for all teachers to learn the best decisions to make for particular students, and it is likely that poor choices would be made in the meantime. It is also likely that the overlapping tiers model would have a lower burden of assessment than the other models.

The core plus extension model would increase the amount of assessment, because all students would be assessed at broadly what is currently the lower tier, with cost and burden implications, which would increase depending on the number of students who entered for the extension paper. The manageability of the adjacent levels model would depend on how it was implemented, but it could introduce additional burden and risks.

There are significant technical issues with the overlapping tiers model which are discussed above. Both the other models also have technical issues, because they require the results of papers at different levels to be combined in some way to calculate an overall grade. This also makes the awarding process more complex and less transparent in these models. The adjacent levels model would also present some significant challenges for assessment design, since each level would need to assess the right breadth of performance.

As a result of this analysis, on balance our preferred option would be to use an improved version of the overlapping tiers model for subjects for which differentiation is essential. The overlapping tiers model is a known quantity, it has fewer manageability concerns and fewer technical issues, and it is also easier to understand, because the grade is not based on combining performance in assessments at different levels. However, we would want to see improvements to the model that is currently used, in the light of experience of how the current model works in practice, and of its impact on school choice and on standard setting. We plan to work with assessment experts to explore how it can be improved, perhaps drawing on features of other models, and to make it more transparent. In particular, we want to look at the size and location of the overlap of the tiers and require exam boards to improve comparability between tiers. In doing this, we will take into account the Government's new accountability framework, once that is finalised.

3 Key design features: assessment arrangements

A good qualification covers appropriately demanding and relevant content and supports good teaching and learning. Qualifications are evidence of students' achievements, of what they have demonstrated they know, understand and can do. Qualification users need to be confident that someone who holds the qualification has been properly assessed. Good assessment is therefore a key feature of a good qualification.

Fitness for purpose of assessments

To be fit for purpose assessments must:

- be **valid** – they assess what they are intended to assess. For example, the ability to develop and sustain an argument about a historical event cannot be validly assessed by multiple-choice questions, whereas recall of historical dates might be validly assessed in that way.
- be **reliable** – the outcome of the assessment (the mark or grade) for a student would usually be replicated if the assessment was repeated.
- **minimise bias** – the assessment must not produce unreasonably adverse outcomes for particular groups of students – for example, assessments should not lead to male students performing less well than female students for reasons unconnected to the knowledge or skills being assessed.
- be **comparable** – the standard of the assessment (in terms of the subject matter, the complexity of the questions or other assessment tasks, and the level of performance required for students to be awarded a mark or grade), should be comparable whenever the assessments are taken and marked and whichever exam board sets the assessment and awards the qualification.
- be **manageable** – the time and resources used in preparing for and sitting the assessments are reasonable for both students and centres and are proportionate to the purpose of the qualification.

These principles apply equally to existing and reformed GCSEs and to other qualifications we regulate.

Types of assessment

Assessments can take many forms, broadly divided into written exams set and marked by exam boards and alternative forms of assessment. Written exams are traditionally used to assess knowledge and understanding, but cannot always validly assess all aspects of a subject, for example speaking in English and other languages and performance in drama. These aspects are usually assessed in ways other than written exams.

It is generally more difficult to ensure reliability in non-exam assessments, because marking is usually done by a larger number of assessors and there may not be a record of the student's performance that can be used to moderate assessor judgements.

Assessment in current GCSEs

GCSEs are currently assessed in several ways.

- Written exams set and marked by the exam boards.
- Written controlled assessments in which students complete written assessment tasks, set either by the exam board or by the teacher. Students complete the assessments in controlled conditions at a time and place determined by their school. The tasks are marked by a teacher, with samples of marked work being checked by exam board moderators, who can adjust the marks to bring them in line with national standards. The amount of controlled assessment varies by subject. It can be 25 per cent, 60 per cent or there may be none at all. We have just finished a consultation on a proposal to reduce the amount of controlled assessment in current GCSEs in English and English language to 40 per cent.
- Other controlled assessments, such as laboratory tasks in science subjects and speaking and listening in English and Modern Foreign Languages. In some cases no evidence of performance is available for moderators to check. Teachers' marks therefore stand.

Controlled assessment in current GCSEs

Controlled assessment is currently used to assess extended written tasks and for more practical work. We recently reviewed the use of controlled assessment in GCSEs and are publishing a report of our findings¹⁴ at the same time as this consultation. Our main concern is that, despite best efforts, controlled assessment does not deliver well enough, and some of the problems are intractable. Current GCSEs with significant proportions of controlled assessment are not providing sufficiently valid or reliable measures of achievement. We have found that, for example:

- controlled assessment does not always differentiate well enough between students of different abilities;
- many GCSEs include subject-related elements that cannot be assessed effectively by written exams, but in reality the need for high levels of control for

¹⁴ Ofqual (2013) *Review of Controlled Assessment in GCSEs*. See www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

controlled assessment tasks means that those elements are not always what is assessed in current controlled assessments;

- schools and their teachers may not interpret or apply the exam boards' rules relating to the conduct of controlled assessments consistently, and those rules cannot be made absolutely clear and unequivocal in all respects;
- controlled assessment presents practical difficulties for schools to manage and this can have a negative impact on teaching and learning; and
- in some subjects with written controlled assessment, there is very little to distinguish the controlled assessment task from the written examination.

Controlled assessment is not seen as an assessment that can be relied on to produce a fair representation of what students can do – that is, how they can perform on similar tasks in unsupported contexts. Instead it is often treated as a hurdle that must be cleared no matter what, regardless of the student's true level of achievement. This in turn affects how subjects are taught and how controlled assessment preparation is done. These problems are particularly the case in subjects with written controlled assessment.

These problems are compounded by pressures on teachers that sometimes lead to over-marking and other practices that distort outcomes; and indeed teachers often find themselves in a difficult, sometimes stressful, position when marking controlled assessment work, on which their own performance and that of their school will be judged.

We want to make sure the weaknesses identified in the current GCSE controlled assessment arrangements are not replicated in the reformed GCSEs.

Assessment in reformed GCSEs

In line with the Secretary of State's letter, we propose that where subject content can be validly assessed by written exams, such exams set and marked by exam boards should be the default method of assessment. This will mean that reliance on alternative forms of assessment is reduced. Nevertheless, alternative assessment arrangements have their place, particularly in subjects where practical knowledge and skills are important.

Where written exams cannot validly assess essential elements of a subject, alternative assessments must be used. Any alternative assessments must be fit for purpose, as set out above, and designed to be resilient to pressures from the wider system. The weighting of alternative assessments relative to external exams should be determined according to the needs of the particular subject.

Where alternative assessments are used in reformed GCSEs, safeguards will be needed to maintain their integrity.

We propose that, with respect to the reformed GCSEs, decisions about whether or not to include non-exam assessment in a qualification should be based on the following principles:

- non-exam assessment should only be used when it is the only valid way to assess essential elements of the subject;
- non-exam assessment must strike a balance between valid assessment of essential knowledge and skills, sound assessment practice and manageability;
- any non-exam assessment arrangements should be designed to fit the requirements of the particular subject including the relative weighting of written exams and other components assigned to it; and
- non-exam assessment should be designed so that the qualification is not easily distorted by external pressures from the wider system.

GCSEs in English language and mathematics are particularly important both for students' progression and school accountability measures. This will be true for reformed GCSEs as it is for the current ones. In light of the pressure this puts on schools, we propose that any teacher-marked assessments in English language should not contribute to the overall grade, but should be reported separately on the certificate (we have just finished a consultation on making the same changes for speaking and listening in the current GCSEs). There is no teacher-marked assessment in mathematics at the moment and we do not propose that there should be.

Practical skills are integral to science subjects and cannot be demonstrated in written exams, although learning from undertaking science practical work can be. Science qualifications are not subject to as much pressure as English language and mathematics qualifications. We therefore propose that the demonstration of science practical skills should be assessed other than by exam, marked by teachers and contribute to the overall grade.

We propose that English literature, geography and history should all be assessed by examination alone.

We will apply our principles to the other subjects which are not being introduced in the first tranche and consult on proposed assessment arrangements for those.

We have set out in section 3 the proposed assessment arrangements for the reformed GCSEs in the first tranche of subjects.

Minimum assessment time

Exam boards will determine the amount of assessment time needed to assess each subject validly. We will look for an evaluation of this in their assessment strategies (see section 6 on regulatory arrangements). The total amount of exam time is likely to increase to make sure performance can be reliably assessed across the full ability range. This may be offset by a reduction in time spent on controlled assessments.

We propose that for the first set of reformed GCSEs¹⁵ the following minimum requirements should apply:

- a minimum of 3.5 hours of exam time for subjects in which the final grade is based on externally set and marked exams only
- a minimum of 3 hours of exam time when additional forms of assessment contribute to the final grade.

We would expect these requirements to be spread over more than one exam. The time limits will be doubled for double award science. We will consult in due course on the appropriate times for reformed GCSEs in subjects outside the first tranche. For subjects for with a significant practical component, and little that can be validly assessed by exam, lower minimum requirements will apply.

Linear qualifications

GCSEs were originally linear, with all assessments at the end of the course. Over time some modular qualifications were introduced in the sciences, in English and in mathematics. For GCSEs first taught in September 2009 exam boards were given the option of making all GCSEs modular and of allowing multiple assessment opportunities.

A system in which students take the exams at different points during a two-year course, and in which the exams for each module are marked and graded as students build up their qualifications, challenges exam boards' ability to secure consistent year-on-year standards at the qualification level. Schools' decisions on when to enter their students for assessments, and the number of re-sit opportunities students have, can all affect the outcomes achieved¹⁶.

Although we now once more require all GCSE assessments to be at the end of the course, they are still modular in design. In other words, there is still one discrete

¹⁵ English language, English literature, mathematics, chemistry, biology, physics, double science award, history, geography.

¹⁶ See *GCSE English awards 2012*, Ofqual, for further background and explanation.

assessment per unit, with no synoptic assessments requirements. Synoptic assessments require students to integrate different aspects of a topic and test students' enriched understanding of a subject.

We propose that the reformed GCSEs should include synoptic assessment and that examinations should only take place in May and June. This reflects the expectation that the reformed GCSEs should be taught over two years, allowing students the opportunity to develop their understanding of the subject over a period of time.

We currently allow re-sits of English language and mathematics GCSEs in November and we propose to continue to do so when reformed GCSEs are introduced. This recognises that qualifications in these subjects can be essential to a student's progression and that some students could be disadvantaged by having to wait a year to re-sit. We are, however, concerned about the increasing trend of early entry and double entry in English and mathematics, because of the challenges they create for setting standards, as well as the potential impact on students¹⁷. We will consider whether November re-sits should be restricted to Year 12 and older students.

Where a subject includes assessments other than exams, we do not propose that the timing of these assessments should be restricted, but the marks for these assessments should only be confirmed by exam boards at the time the overall outcome for the qualification is published.

Spelling, punctuation and grammar

In 2012 marks were introduced in some GCSEs for spelling, punctuation and grammar to provide a strong signal to students and to teachers about their importance. This policy applied to examinations taken in 2013 onwards. Five per cent of marks in English literature, geography, history and religious studies were allocated to these skills.

This percentage is high enough to indicate to students and teachers that spelling, punctuation and grammar matter and should be taken seriously, but not so high that it distorts the focus of the qualification. The questions to which these marks are allocated are flagged in exam papers to make students aware of the full requirements of the questions.

GCSEs which incorporate spelling, punctuation and grammar marks have not yet been awarded. We do not yet know, therefore, what impact the provision has had on marking, on attainment, on grading or on the teaching and development of students'

¹⁷ Ofsted: Schools' use of early entry to GCSE examinations March 2013
www.ofsted.gov.uk/resources/schools-use-of-early-entry-gcse-examinations

spelling, punctuation and grammar skills. We will evaluate the spelling, punctuation and grammar policy and its continued use once we have evidence about its impact.

We propose that the current requirements should be carried forward to the reformed GCSEs in the subjects for which spelling, punctuation and grammar marks have already been introduced. As with current GCSEs, in English language a higher proportion of marks will be allocated to these skills, reflecting their importance to the subject. The DfE's parallel consultation proposes a 20 per cent weighting in English language.

4 Key design features: reporting student performance

Current GCSE grading

Individual student outcomes of qualifications are reported to:

- certificate their achievement
- differentiate between students, and
- indicate that a particular threshold has been reached, for example to progress to an A level or other level 3 qualification.

Student grades are also used for school accountability purposes.

Students are currently awarded one of eight grades: A*, A, B, C, D, E, F or G. There is also an Unclassified outcome (U).

Performance at some of these grades¹⁸ is currently set out in grade descriptions in subject criteria. These grade descriptions give a general indication of the standards of achievement likely to have been shown by students awarded these grades.

The distribution of grades for full GCSEs awarded in summer 2012 is shown in this table (rounded to the nearest whole percentage). These figures include all subjects.

A*	A	B	C	D	E	F	G	U
7%	15%	22%	25%	16%	8%	4%	2%	1%

The above figures mask variations by subject which reflect the different groups of students who take them. For example, chemistry is generally taken by students who have chosen to do it as a separate subject, rather than as part of core and additional science. Of these self-selected students, 21 per cent were awarded an A*. By contrast for English literature, taken by most of the cohort of students, the figure was about 6 per cent¹⁹.

¹⁸ Grade descriptions are provided for judgemental grades only – those grades where senior examiners make recommendations about grade boundaries. For GCSE these are A, C and E.

¹⁹ JCQ Provisional GCSE (full course) results – June 2012 (all UK candidates), results by grade and by gender, available at www.jcq.org.uk/examination-results/gcse/gcse (accessed 5th June 2013).

Options for the reformed GCSEs

The GCSE grading system is long-established and familiar, but has drawbacks as well as advantages. We have therefore considered the main alternatives to ensure that the proposal for the reformed GCSEs is well-founded; we summarise the advantages and disadvantages of each below.

We have also considered whether a single level of information is right for all purposes. Many qualifications report their outcomes overall and in more detail. For example, students who sit graded music examinations typically receive marks for each component as well as a grade. Key Stage 2 results are reported to pupils only as levels, but scaled scores are also calculated and used as the basis for value-added and other school performance measures. The assumption behind this is that the continuous distribution of scaled scores provides a better basis for school performance measurement than level outcomes alone.

Generally, assessments are not perfectly reliable. The marks given will reflect how the student did on the particular day of the assessment, the quality of the assessment, and the extent to which the assessment captured what the student is capable of. Good assessment is designed to generate as accurately as possible a true indication of a student's performance, whilst remaining manageable for schools and students.

Certain types of learning are best assessed using open questions where there is no absolute or right answer, and where the examiner judges the mark by reference to the mark scheme. This means that marks of themselves are not absolutely reliable measures of student achievement. This feature of assessment is usually accommodated by grouping or banding marks in a grading structure, where we can place greater (but still not absolute) reliance on the grade.

Grades

Grades are used to indicate that a student has performed within a certain band or range. Students who are awarded the same grade will not all have the same marks – some will have marks at the top of the band, some at the bottom, and others in between. The range of marks represented by each grade varies according to the number of grades that are used and the width of each grade. A grade can represent a wide or a narrow band of attainment.

Grading systems are used in other countries. Systems with four to six grades are most common, followed by those with ten to 20 grades. Some systems use 100 or more grades and some just two or three. There is no one, commonly accepted, best grading system and it depends partly on the range of attainment of the qualification as a whole.

Where the range indicated by a grade is large, it is more likely that a student will be awarded the correct grade, even when marking is not completely reliable (for example in essay-dominated subjects where there can never be perfect agreement between all markers). However, the impact of being given the wrong grade is likely to be significant, and the usefulness of a grading system that uses very wide bands is limited because one band covers a wide range of performance.

In a scheme that uses many grades, each one representing a very small range of performance (for example a band of only two or three marks), the possibility that a student will be given the wrong grade is higher, and a student's grade could even be more than one grade adrift. However, the impact of a wrong grade may be less significant.

A grading system has several advantages: grades are relatively easy to understand, and familiar to users and if there is sufficient discrimination between grades they can be used for selection purposes, for example admission to A level courses. Grades avoid suggestions of a degree of precision that cannot be assured.

But a grading system also has disadvantages. There will always be some unreliability in assessment and so there will always be some students close to a grade boundary who might, on another day, with another paper, or another marker, have got a different grade. If grades are too wide, then students of very different ability levels can appear the same. Conversely if grades are too narrow, they can suggest significant differences in ability that might not be the case. If only grades are reported then information may be thrown away that might be useful to teachers and students.

Finally, where a school sees that a student has just failed to achieve a higher grade there can be a strong incentive to challenge the marking, particularly where the grade being sought is significant for accountability purposes.

These issues are explored in more detail in annex 4²⁰.

Marks

In a mark-based system, the main outcome reported to students is their actual mark.

This has some advantages. It is easy to understand and completely transparent. But it also has some disadvantages. Marks from one year cannot be compared with marks from another year, because one exam may have been more demanding. Marks from one exam board could not be compared with marks from another exam board, for the same reason. Reporting using marks may suggest an inappropriate

²⁰ Ofqual (2013) *Annex 4 – Technical Paper on Tiering* See www.ofqual.gov.uk/files/2013-06-11-annex-4-technical-paper-on-tiering.

level of precision or accuracy. These drawbacks are so significant that they effectively preclude the use of a simple mark-based scheme.

Scaled scores

Marks do not have to be converted into grades. They can also be converted onto a numerical scale (scaled score) with more points than a typical grade scale, to give more granular information about student performance. The uniform marks calculated for modular GCSEs currently are one kind of scaled score, though we do not propose that these should be used as the basis for a new system.

Scaled scores have some advantages. They allow comparability year-on-year and between exam boards because the scaling takes account of the differences in the demand of papers. And, provided the level of uncertainty is communicated and understood, they can provide more granular information about relative student performance. They may also allow users to create their own threshold points for selection, rather than relying on grade thresholds.

They do, though, have disadvantages. The use of scaled scores with multiple exam boards requires matching assessment standards throughout the whole range of achievement and not just at grade boundaries. Their use for individuals would require communication of the confidence interval which would be hard to establish when the assessments are new. We are therefore not proposing the use of scaled scores for the reporting of individual student performance

Scaled scores are potentially better suited to the evaluation of school performance however, where performance at cohort rather than individual level is more important.

Percentile scores

A variation on scaled scores is percentile scores. While a scaled score might be anything from 1 to 500 regardless of the scores of other students, a system using percentile scores would report the student's position relative to other students entering that qualification, for example the 75th percentile.

However, since the mix of students entered for different subjects varies, there would be no assurance of comparability between subjects, or between years. We know, for example, that the cohort of the separate sciences has changed over the last few years – in this situation a student might achieve different percentile scores depending on the year of entry. This would be difficult to communicate to users of the qualification. It would also require a single rank order of students across all exam boards which is considerably more difficult to achieve than comparability at grade boundaries.

There are further options within each of these broad types of approach, which we set out in annex 4.²¹

Our preferred approach

We propose to retain a grading model. A grading system is not perfect, but we believe it strikes a reasonable balance between providing sufficient information to allow users to differentiate between students without suggesting unrealistic levels of precision.

The use of grades facilitates inter-exam board comparability. It is possible to say that the level of attainment indicated by each grade is broadly comparable between exam boards. We are not confident the same could yet be said of more granular scores.

We do want to explore ways of supplementing grades with scaled scores in future, especially in relation to reporting for school measurement. To do this we would need to find technical solutions to the problems of scale construction and inter-board comparability. We would also need to find suitable ways to quantify and communicate the associated uncertainty of this form of reporting..

Grade names

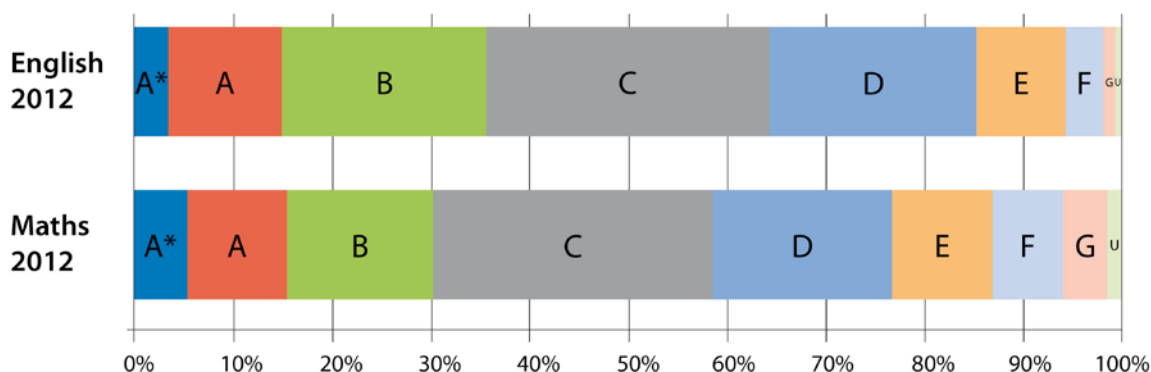
We propose that the new grades should be described by the numbers 1–8, with 8 representing the highest level of performance. New grades will not correspond precisely, or even necessarily approximately, to old grades, and so any continuation of the same grade names would be confusing. We think the best and clearest alternative to letters is a numbered grading system.

Grades in reformed GCSEs

GCSE grading does not currently discriminate effectively throughout the ability range in all subjects. Some commentators suggest that there is insufficient discrimination at the higher end of the grade range, despite the introduction of the A* grade. On the other hand, there may be more grades than necessary below the C grade. Very few GCSEs are awarded at the lowest grades: in 2012 across all subjects there were more students achieving grade D (16 per cent) than grades E–G combined (14 per cent).

²¹ Ofqual (2013) *Annex 4 – Technical Paper on Tiering*. See www.ofqual.gov.uk/files/2013-06-11-annex-4-technical-paper-on-tiering.pdf

Current grade distributions



Source: Joint Council for Qualifications

The current grade scale provides more discrimination at the lower end of the range than at the top end. In summer 2012, 5.3 per cent of students achieved grade A* in mathematics compared with 1.7 per cent achieving a U classification, and 3.4 per cent of students achieved grade A* in English compared with 0.7 per cent who achieved a U. This means that the outcomes at the lower end appear to make finer distinctions between students than may be necessary. In the context of how GCSE grades are used for qualification and selection, this may not be the best distribution.

Grades can have very different ‘widths’: in other words, the difference between those at the top and bottom of a particular grade is not consistent through the range of grades. For example, in English, the range of performance at between the top and bottom of an A grade is considerably greater than the corresponding difference for grades E and below. Typically the higher grades represent a wider range of performance than the lower grades.

Our intention therefore is to work with exam boards so that these issues are addressed.

There will be a separate consultation on setting standards in the autumn which will go back to first principles and consider various options that could be used to set standards in the first years of reformed GCSEs. In the meantime, no assumptions should be made about carrying forward grade standards from current GCSEs, equivalences between current and new grades, or which grade boundaries might be set by examiner judgement.

Subsidiary reporting

We have considered the benefits of reporting information on student performance in the different aspects of a subject; in particular, whether this might be useful to students or subsequent teachers.

Some exam boards currently make information on individual student performance on each question available to schools. This is particularly useful to schools in a modular system in which re-sits are common.

However, there are difficulties with providing more detailed information on performance. For example, to provide in a mathematics GCSE, very detailed information on a student's relative strengths in algebra, trigonometry, understanding of percentages and calculation, much more assessment would be needed than if only an overall grade was to be reported. Assessments would have to be designed in a way to test each topic at all grade levels, as a student's answers to just one or two questions on that topic would not suffice to provide the more detailed reliable information. This approach would also leave less room for more synoptic assessment. We are not yet persuaded that the benefits of reporting more detailed information would justify the impact on students and the costs to schools of the extra assessment.

We wish to understand the value that students, schools and colleges place on detailed feedback and the use that might be made of the information in the context of the reformed GCSEs. We will then consider whether the value of the information might justify a significant increase in assessment load and costs.

5 Full and short course GCSEs

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 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, students would normally study the reformed GCSEs over two years.

Exam boards also offer short-course GCSEs. These are available in a range of subjects including religious studies, citizenship studies, physical education and ICT and some of them are taken by large numbers of students. We propose that versions of the reformed GCSEs could be made available in a short course too.

In the light of the proposal that the reformed GCSEs should be linear, with all assessments taken at the end of the course, a short course of the qualification could not simply be half the modules of the full qualification. It would have to be separately designed and assessed.

Students could not build up a short course GCSE into a full GCSE by carrying marks forward. However, students could decide, having taken the short qualification, to take the full course, and if there was common content, students taking short and full forms could be taught together.

If an exam board wishes to offer a short course option, the design of the full GCSE should not be compromised to facilitate the design and delivery of a short version.

6 Regulating the reformed GCSEs

Assuring the quality of assessments

We have considered how best to ensure good quality assessments in the reformed GCSEs.

Exam boards are already required to comply²² with our Conditions of Recognition on assessment design and to make sure their assessments are fit for purpose, appropriate for the method of assessment chosen and consistent with the specification for that qualification²³. These conditions will continue to apply to exam boards offering the reformed GCSEs. However, we intend to develop our approach to regulating for good assessment, starting with these reformed GCSEs.

We intend to prescribe the minimum amount of assessment time and the amounts (if any) of non-exam assessment for each subject. These measures will ensure that the basic features of assessment in any one subject are comparable between exam boards, but on their own they will not ensure good quality. We have considered prescribing other features of assessment, for example the question types (short, long, open, closed, multiple-choice) to be used in each subject. However, in our experience, a simple, prescriptive approach does not ensure good quality, since any question of any type can be designed well or badly.

We have considered the first principles of assessment. Good assessments sample enough of the subject area to be tested. The types of questions are right for what is to be assessed. They test the right balance of skills and knowledge, and strike the right balance between synoptic and specific learning. They are not unduly predictable or structured, they are free from bias and they are manageable – that is, the time and resources needed for them are proportionate. What is more, they produce results that are both valid and reliable: they assess what they are intended to assess, and the outcome (the mark or grade) is reliable in the sense that the student could replicate the result if the assessment was repeated. And with several exam boards, assessments need to be consistently comparable in demand as between one exam board and another, otherwise there is a risk and a tendency for assessment demand to reduce over time. We will consider with experts international experience of assessing comparability between subjects, and what action we should take.

We propose to require each exam board to develop an assessment strategy for the reformed GCSEs to explain how each qualification will be designed to produce high-

²² Ofqual (2012) *General Conditions of Recognition – November 2012*. See

www.ofqual.gov.uk/files/2012-11-20-general-conditions-of-recognition-november-2012.pdf

²³ General Condition of Recognition E4.

quality, effective assessments. In doing so exam boards should draw on research and current good practice on assessment design: their own, national and international. Where appropriate, we would want to see more extended writing and a greater emphasis on problem-solving with a reduction in inappropriate overly structured or bite-sized questions. We intend to evaluate exam board assessment strategies ahead of the design of first assessments for the reformed GCSEs and review them annually thereafter.

We also propose that exam boards should systematically review the effectiveness of the assessments in each of their reformed GCSEs and the extent to which they have delivered valid and reliable results. They should identify and address weaknesses and build on good question design. In this way exam boards should, for example, identify questions that inappropriately guide students to the answer, papers that do not assess problem-solving skills where this is a required assessment outcome, and overuse of short-answer questions. Where they find such problems, they should be able to show us how they are improving things for the future. These requirements will be built into the regulatory framework for the reformed GCSEs.

We will develop an annual overview process, to evaluate and report on the comparability of assessment demand across exam boards and enable expert feedback on the quality of the exams. We will explore with the exam boards options for securing standards over time, including the use of reference tests, so that changes in standards over time can be recognised. Finally we intend in the coming years to develop market and regulatory incentives, to encourage good assessment and discourage any shortfalls. We have a power to fine and we will use it if we need to.

We propose to introduce these review requirements through new conditions of recognition that will apply to exam boards recognised to award the reformed GCSEs.

Setting and maintaining standards

This consultation does not cover setting and maintaining standards in the reformed GCSEs. We are considering the technical and other considerations, and intend to consult on the proposals for standard setting and maintenance in the autumn of 2013.

Recognition

Although they will be similar in some respects to current GCSEs, many of the reformed GCSEs are likely to differ significantly from current GCSEs in content and structure. In view of these differences, and our developing regulatory approach, we will require exam boards wishing to offer the reformed GCSEs to apply for recognition to do so. This will be the case even if they are already recognised to award current GCSEs. All applications will be assessed against the same criteria, but the application process is likely to be less burdensome for existing GCSE exam boards,

since they will be able to point in their applications to evidence provided by their existing activity.

An exam board's recognition to award the reformed GCSEs will be distinct from any recognition they have to award qualifications in Wales and/or Northern Ireland, and from their current recognition to award GCSEs.

We will assess all applications for recognition in respect of the reformed GCSEs against our Criteria for Recognition.²⁴ In applying the Criteria we will require organisations to demonstrate their understanding of, and capability to develop, deliver and award, the reformed GCSEs in accordance with our Conditions of Recognition.

Accreditation

We plan to apply an accreditation requirement to the reformed GCSEs, as for current GCSEs. We are developing our accreditation process and we will consult on and publish the accreditation criteria in the autumn of 2013.

²⁴ www.ofqual.gov.uk/files/2011-05-16-criteria-for-recognition.pdf

7 Subject-specific features of the reformed GCSEs

We have set out in the earlier sections of this consultation the design principles we propose should apply to the reformed GCSEs, namely:

- the qualifications will take about the same time to study as current GCSEs
- the qualifications will 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 the subject, *and* that would stretch the most able students, and
 - content that would be exclusive to the higher tier can be identified
- the qualifications will be linear and will include synoptic assessments
- assessment will be by way of exams, set and marked by the exam boards, where exams can validly assess the intended outcomes
- where assessment arrangements other than exams are used, the balance of assessment types will reflect the learning outcomes for the specific subject
- where a subject is assessed only by exam, the total examination time will be a minimum of 3.5 hours
- assessments will be taken in the summer only – with the exception of re-sits in English language and mathematics
- students' achievements will be reported using grades 8–1 or U
- short courses of the qualifications could be made available but must not drive the design of the full qualification.

We have reviewed controlled assessment used in current GCSEs, focusing on the subjects in the first phase of reform, and we have published our findings separately.²⁵ As part of that review, and drawing on the findings from across the full range of subjects, we propose that in future the decisions about whether or not to include non-exam assessment in a qualification should be based on a set of principles, as follows:

²⁵ Ofqual (2013) *Review of Controlled Assessment in GCSEs*. See www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

1. non-exam assessment should be used when it is the only valid way to assess essential elements of the subject;
2. non-exam assessment must strike a balance between valid assessment of essential knowledge and skills, sound assessment practice and manageability;
3. any non-exam assessment arrangements should be designed to fit the requirements of the particular subject including the relative weighting of written exams and other components assigned to it; and
4. non-exam assessment should be designed so that the qualification is not easily distorted by external pressures from the wider system.

We have used these principles to guide the proposals on whether the reformed GCSEs in each subject should include non-exam assessment alongside written exams.

In this section, we set out how the proposed design principles (including the principles for non-exam assessment) would apply to the qualifications in the subjects that are to be introduced for first teaching in 2015. The content for the qualifications will be published by the Government following consultation.²⁶ We have based the proposals on the draft curriculum content on which the Government is currently consulting.

The table below gives an overview of the proposals.

Subject	Tiered	Written exams	Non-exam assessment	Minimum exam time	Assessment of S, P & G ²⁷
English language	no	yes	reported separately	3.5 hours	yes (20%)
English literature	no	yes	no	3.5 hours	yes (5%)
Mathematics	yes	yes	no	3.5 hours	no
Biology, chemistry, physics	yes	yes (90%)	yes (10%)	3 hours	no

²⁶ www.education.gov.uk/schools/teachingandlearning/qualifications/gcse

²⁷ Assessment of spelling, punctuation and grammar

Double award science	yes	yes (90%)	yes (10%)	6 hours	no
Geography	no	yes	no	3.5 hours	yes (5%)
History	no	yes	no	3.5 hours	yes (5%)

English language

The reformed English language qualification will be a key qualification for students' progression into further and higher education and into work. We expect that the qualification will continue to have particular significance in any school accountability measures. The design of the qualification must reflect the particular uses to which the qualification is put and the pressures that may be placed on the qualification by school accountability measures.

Currently students can be entered for either GCSE English (taken by students who do not take a separate GCSE in English literature) or GCSE English language. This choice will end – there will be reformed GCSEs in English language and English literature but no combined English option.

Tiering

We believe that the curriculum content for English language can be the same for all students and that all students can be assessed in the same way. We propose that the reformed GCSE in English language should not be tiered.

Forms of assessment

We have considered how the learning outcomes for English language can be assessed in a valid way.

Our review of controlled assessment²⁸ found a consensus among teachers and exam boards that some skills can only be assessed through non-exam assessment. These include speaking and listening skills as well as skills relating to the writing process – planning, drafting and revising/editing.

²⁸ Ofqual (2013) *Review of Controlled Assessment in GCSEs*. See www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

However, we also found that the time limits and restrictions of the current controlled assessment limit the scope for students to develop those re-drafting and evaluation skills. We also know that the large teacher-marked controlled assessment component in the current English/English language qualifications makes them particularly susceptible to other pressures such as those from accountability measures²⁹. This can distort the assessment so that it is no longer fair for all students.

We want the design principles, as far as possible, to deliver fair assessments for all students. It is our view that, with one exception, the outcomes for English language can be fairly and validly assessed by written exam.

We therefore propose that, with the exception of speaking and listening, all assessment for the reformed English language qualification should be by written exams alone and that the total assessment time should be no less than 3.5 hours.

The draft content, on which the Department for Education is consulting, includes a requirement that students must be able to demonstrate presentation skills in a formal setting and listen and respond appropriately to spoken language, including to questions and feedback. These important skills cannot be assessed by written exam. Alternative assessment arrangements must be used.

We propose that exam boards should design the assessment in which spoken language skills are assessed and that the assessment should be administered and marked by students' teachers. The outcome of this assessment should not contribute to the grade; it should be reported separately on the certificate. We have just finished a consultation on making the same change to speaking and listening within current English and English Language GCSEs and we will consider the issues arising from that consultation when coming to a final decision in relation to reformed GCSEs.

We propose such separate reporting because we are not confident that a national standard can be assured for teacher-administered and marked assessments in speaking and listening, particularly when schools may be under significant pressure to secure good outcomes in the qualification. Such assessments do not encourage or recognise the development of these important skills.

We have considered how greater assurance of the standard could be achieved. All speaking and listening assessments could be recorded, allowing exam board moderators to review a sample of assessments in each school. Moderators could then confirm or revise the teacher's mark. Alternatively, the speaking and listening assessments could be conducted and marked by a visiting external examiner appointed by the exam board. Both of these options would raise cost and

²⁹ Ofqual (2012) *GCSE English 2012* – November 2012. See www.ofqual.gov.uk/news/poor-design-gcse-english-exam-grade-variations.

manageability issues for schools. Neither of the options would provide assurance that all students had been prepared in a fair way to take the assessment, for example with regard to prior knowledge of the assessment tasks and preparation for them.

Equality issues

Students who, because of their disability, cannot attempt the spoken language component should be granted an exemption as a reasonable adjustment, in line with the specification we have published under section 96 of the Equality Act 2010.³⁰

The fact of their exemption could either be indicated on the student's certificate as "exemption" or the certificate could make no reference to the component; the field in which the speaking component is usually recorded would be left blank. We would welcome your views on these options.

English literature

Tiering

We believe that the curriculum content for English literature can be the same for all students and that all students can be assessed in the same way. We propose that the reformed GCSE in English literature should not be tiered.

Forms of assessment

We do not believe there are any skills in the draft content for English literature that could not be validly assessed by written exam, set and marked by the exam board.

Our review of controlled assessment³¹ found that there are some elements of current GCSE requirements for English literature that can only be assessed by internal assessment, such as the ability to plan and produce extended responses to texts. However, we also found that the time limits and restrictions of controlled assessment limit the scope for students to develop those re-drafting and evaluation skills. We know from our review that the advice from exam boards about what assistance and feedback can be given to students is open to interpretation, which means that assessment may not necessarily be fair to all students. We have asked exam boards to remedy this situation and we will be watching developments closely.

We therefore propose that all assessment for the reformed English literature GCSE should be by written exams alone and that the total assessment time should be no less than 3.5 hours (see proposal and question in section 3).

³⁰ www.legislation.gov.uk/ukpga/2010/15/contents

³¹ Ofqual (2013) *Review of Controlled Assessment in GCSEs*. See www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

Mathematics

Tiering

We propose (see section 3) that the reformed mathematics qualification should be tiered because:

- mathematics exams that would enable students at the lower end of the ability range to demonstrate their knowledge, skills and understanding in the subject, *and* that would stretch the most able students, would necessarily result in an unmanageable or inappropriate assessment experience for students
- mathematics content that would be exclusive to the higher tier can be identified.

We propose that two overlapping tiers should be used, but the current model should be improved, as discussed in section 2.

Forms of assessment

We do not believe that there are any aspects of the draft content for the reformed GCSE that could not be validly assessed by way of written exams set and marked by the exam board. Mathematics does not include internal assessment currently and so was not considered as part of our controlled assessment review. The principles we have developed about when non-exam assessment should be used do not suggest that non-exam assessment should be included in the reformed GCSEs in mathematics.

We therefore propose that the reformed mathematics GCSE should be wholly assessed by written exam and that the total assessment time should be no less than 3.5 hours.

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

There are currently GCSEs in chemistry, biology, physics, science and additional science. The Government's policy is for there to be reformed GCSEs in chemistry, biology, physics and a science double award.

Tiering

We propose (see section 3) that the reformed science qualifications (chemistry, biology, physics and double award science) should be tiered because:

- science exams that would enable students at the lower end of the ability range to demonstrate their knowledge, skills and understanding in the subject, *and* that would stretch the most able students, would necessarily result in an unmanageable or inappropriate assessment experience for students
- science content that would be exclusive to the higher tier can be identified.

We propose that two overlapping tiers should be used, but the current model will be improved, as discussed in section 2.

Forms of assessment

Our review of controlled assessment³² found a good deal of consensus about the critical importance of practical work in the science subjects, and concerns that the teaching of practical skills would suffer if they were not part of the formal assessment arrangements at GCSE.

However, there was not a strong consensus about how those practical skills should be assessed. There are concerns that the current controlled assessment limits the breadth and depth of practical work because teachers are too focused on preparing students for the controlled assessment tasks, and that some students are learning responses by rote rather than developing their understanding of the subject.

We found that the current controlled assessment does not effectively assess the skills that it sets out to assess – extended writing requirements can mean it is more a test of literacy skills than science, for example. There are also challenges in ensuring that all students are assessed in a fair way. For example, the choice of task and the amount of guidance from teachers can influence the level of demand of a task. Students who collect “messy” data will have a more demanding processing task than students who collect “clean” data, for example.

There are also concerns about the impact of the high-stakes nature of the GCSE sciences qualifications on the validity of the current controlled assessment, with a view often expressed that teachers are under pressure to give students maximum marks.

To address these concerns, several of the exam boards have suggested that science practical skills should be internally assessed and reported separately, so that the marks for the practical assessment would not contribute to the student’s overall grade as we propose above for speaking and listening in English.

We have considered carefully the arguments that practical skills are so essential to the sciences that they should contribute to the GCSE grade, against the evidence we have about how the high-stakes nature of the qualifications can distort the assessments. Our proposal aims to balance these opposing views and to provide for valid assessment which reflects the full range of essential knowledge, skills and understanding and is fair to all students. We welcome views on this.

³² Ofqual (2013) *Review of Controlled Assessment in GCSEs*. See www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

We propose that draft content for each of the qualifications can, in the main, be validly assessed by written exams set and marked by the exam boards. Some of the written exam questions should call on knowledge and understanding derived from students' experience of undertaking practical science. We propose that 90 per cent of the marks for each qualification should be available from the written exams and that the total assessment time should be no less than 3 hours per subject (no less than 6 hours for double award science).

The draft curriculum content requires students to demonstrate their practical science skills. Such skills are integral to the study of science and developing such skills can help to foster students' interest in and understanding of the subject.

We propose that practical science skills should be assessed by teachers, in accordance with exam board requirements. We will require exam boards to provide assurances about the integrity and validity of the assessments and the standardisation of teacher marking. The assessment of practical skills should contribute 10 per cent of the marks for each qualification.

Equality issues

Exam boards will be required to make reasonable adjustments for disabled students, in accordance with their conditions of recognition and Ofqual's specification for reasonable adjustments.³³

Geography

Tiering

We believe that the curriculum content for geography can be the same for all students and that all students can be assessed in the same way. We propose that the reformed GCSE in geography should not be tiered.

Forms of assessment

Our controlled assessment review found a good deal of agreement that carrying out fieldwork is essential for students of GCSE geography. There was less agreement about whether it is possible to assess fieldwork skills as part of GCSE geography assessment, although there was a view that some of the skills – data manipulation, interpretation and analysis, for example – can be assessed through written exams. There were many concerns about the nature of school fieldwork exercises which many schools complete in a single day. Even the most capable students are unlikely to have the time during one day of fieldwork to experiment with alternative

³³ See, Ofqual specifications for reasonable adjustments available at www.ofqual.gov.uk/downloads/category/196-specifications?download=1329%3Aspecifications-in-relation-to-the-reasonable-adjustment-of-general-qualifications

approaches to data collection, which means that they are not able to reflect on, further analyse and evaluate their work.

There are also issues of fairness for all students. We found that if teachers designed poor fieldwork exercises then that could prevent students from performing well, or from accessing all of the marking criteria.

The curriculum content³⁴ requires students to undertake fieldwork, but the related knowledge and skills can be assessed by written exam set and marked by the exam board. We therefore propose that all assessment for the reformed geography GCSE should be by written exams alone and that the total assessment time should be no less than 3.5 hours.

History

Tiering

GCSE history is not currently tiered and we see no reason why the reformed history GCSE should be tiered.

Forms of assessment

Our review of controlled assessment³⁵ found a consensus that internal assessment in history allows students to develop valuable research and planning skills that could not be assessed in an exam. However, there are also concerns that current controlled assessment tasks are too prescriptive and that this prevents students from demonstrating their knowledge, and that the time needed to conduct controlled assessment means teaching time is reduced.

We found that the current controlled assessment encourages students to demonstrate historical enquiry skills in ways that would not be possible in a written exam, but we also found that the freedom to choose, plan, research and write up a piece of work allowed too many opportunities for plagiarism, writing frames and too much teacher input.

We therefore propose that all assessment for the reformed history GCSE should be by written exams alone and that the total assessment time should be no less than 3.5 hours. The Department for Education's curriculum consultation discusses the option of a historical investigation as part of the assessment of the history GCSE, but notes that there would be regulatory issues with such a proposal; it would be difficult to

³⁴ www.education.gov.uk/schools/teachingandlearning/qualifications/gcse

³⁵ Ofqual (2013) *Review of Controlled Assessment in GCSEs*. See www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

assess it reliably and with sufficient control without undermining the purpose of the proposed investigation.

8 Equality impact analysis

Ofqual is a public authority to which the public sector equality duty in the Equality Act 2010 applies. Of particular relevance to this consultation is our duty to have due regard to the need to³⁶:

- eliminate discrimination, and
- advance equality of opportunity between persons who share a protected characteristic³⁷ and those who do not.

We recognise the importance of ensuring that regulated qualifications do not unfairly discriminate against or prejudice students with particular protected characteristics. Assessments should be fair for all students. Our Conditions of Recognition require exam boards to remove factors which may disproportionately affect students who share protected characteristics during the design of assessments, and we also require exam boards to make reasonable adjustments to the assessment process to meet the needs of students with disabilities³⁸.

In setting the overall framework within which exam boards will design the reformed GCSEs we want to understand the possible impacts of the proposals on persons who share a protected characteristic.

We have commissioned a literature review to help us identify any research or writing that could help us understand and evaluate the potential impact of the proposals. This is published at annex 2³⁹.

The proposals are unlikely to have relevance for all persons who share a protected characteristic. For example, they are unlikely to have adverse impacts on students who are married or who have a particular sexual orientation, simply by virtue of their having that particular characteristic. Likewise, certain of the proposals may have relevance for some protected groups but not for others.

³⁶ Section 150(1) of the Equality Act 2010.

³⁷ The characteristics protected by the Equality Act 2010 are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, racial group, religion and belief, sex and sexual orientation.

³⁸ See for example, General Conditions of Recognition B1.3(e), D2.1, E4.2(d), G2.2, G3.4, G6 and G7.

³⁹ Ofqual (2013) *Annex 2 - GCSE Reform Equality Analysis: Literature Review*. See www.ofqual.gov.uk/files/2013-06-11-annex-2-gcse-reform-equality-analysis-literature-review

We have, however, considered the potential impact of the proposals on students who share protected characteristics and we want to explore this further as part of the present consultation. We have already held two workshops to which, taken together, people with experience of a range of protected characteristics were invited. We are grateful for the input we received from representatives of a number of equality and community groups who attended these workshops.

In the sections below we discuss some of the impacts which have been suggested to us, together with those which we have ourselves identified, in relation to each of the proposals in this consultation.

Our consideration of the equality impacts of the proposals is ongoing and we hope through this consultation to increase our understanding of these impacts to inform our eventual decisions about the reformed GCSEs.

Tiering

It is our view that, overall, limiting the use of tiering may have positive consequences for persons sharing a protected characteristic. In un-tiered qualifications, all students have the opportunity to access higher grades. Un-tiered qualifications may also minimise any under-expectations, which could result in persons sharing a protected characteristic being placed into a lower tier when their ability does not warrant this and the demotivating effect to which this can give rise.

Some representatives of persons with disabilities have raised concerns regarding the possible length of common (un-tiered) assessment papers and the risk that some disabled students may feel overwhelmed when faced with questions they cannot answer.

This concern may also apply to students who do not share this protected characteristic, however, and may be mitigated by the continuing availability of reasonable adjustments for disabled students who require them, such as additional time and rest breaks. In any event we propose that where the subject content would give rise to a situation in which an un-tiered exam would present some students with overly easy or overly difficult questions, tiering should be used.

We have not currently identified any adverse impact on those persons who share a protected characteristic arising from our proposal to continue using the overlapping tiers model for those subjects in which differentiated assessments should be allowed.

Types of assessment

Many of the impacts we have identified as resulting from the proposals in relation to the use of alternative assessment arrangements are also relevant to the proposals for linear assessment. This section should therefore be read together with our discussion of equality impacts relating to the introduction of linear assessments.

We understand that the use of alternative assessment arrangements, such as controlled assessment in place of examinations, is sometimes seen as having a positive impact on some persons who share a protected characteristic.

For example, certain religious festivals or periods of religious observance, such as Ramadan, do not have a fixed point in the Gregorian calendar. This means that in some years such religious occasions may occur during the May and June assessment season. From 2014 to 2018, Ramadan will fall during June and some students may choose to fast during the assessment periods which occur during these years. The use of alternative assessment arrangements taken at a different time could serve to balance any reduction in performance such students would suffer as a result of fasting.

Students with English as an Additional Language (EAL), who may share a protected characteristic by virtue of their national or ethnic origins, may also be disadvantaged by a move away from the current controlled assessment arrangements due to the increased priority placed on external assessments taken at the end of the course. The flexibility in the research required for some current forms of controlled assessment allows a student to spend more time working through complex language than is available in the pressure of an external assessment.

Some attendees at the equality workshops we have held in relation to GCSE reform also considered that a reduction in the current amount of controlled assessment could disadvantage disabled students who as a result of their disability have impaired memory due to the increased significance of external assessment at the end of the course. Exam boards are, however, already required to ensure that assessments permit reasonable adjustments to be made, while minimising the need for them⁴⁰.

In relation to sex, some researchers have found evidence that controlled assessment, together with the modular structure of current GCSEs, has had a positive impact on girls' performance. As can be seen from the literature review at annex 2, however, the validity of this finding has been questioned. In addition, the statistical evidence from some subjects, such as GCSE English⁴¹, demonstrates that the overall difference in performance between girls and boys does not appear to have been affected by the use of controlled assessment.

There may, however, be some ways in which our proposals to limit non-examination assessments have advantages for those who share a protected characteristic. For

⁴⁰ General Condition of Recognition E4.2(d).

⁴¹ Based on outcomes between 1990 and 2000.

example, as the literature review in annex 2⁴² highlights, some research has indicated that subconscious assumptions about the abilities of persons from certain ethnic groups may impact on the marks awarded by teachers in controlled assessment. One positive consequence of our proposal to limit the use of alternative assessment arrangements may therefore be to shield students from any such subconscious assumptions on the part of teachers.

Assessment time

We do not currently consider that the proposals to set minimum assessment times will have any adverse impact on persons who share a protected characteristic.

In accordance with our Conditions of Recognition⁴³, exam boards will continue to be required to make reasonable adjustments for disabled students where necessary, including allowing additional time to complete assessments and rest breaks.

Linear qualifications

We have identified a number of ways in which our proposal that the reformed GCSEs will be linear may impact on persons who share a protected characteristic.

The literature review included at annex 2⁴⁴ to this consultation contains a detailed overview of research relevant to the impact of linear assessment on persons who share a protected characteristic. For ease of reference, however, we have summarised some of the main equalities issues we have identified so far below.

Age

Some research has suggested that some students who are born later in the school year may perform at a lower level than their older peers in their year group. This effect may, however, reduce over time. If so, then a move from modular assessment to linear assessment may help to minimise any disadvantage that younger students may face by allowing the maximum time possible for younger students in a year group to “catch up” with their older peers where necessary.

Religion and belief

As discussed above, certain religious festivals and periods of religious observance do not have a fixed point in the Gregorian calendar. The potential impact on students

⁴² Ofqual (2013) *Annex 2 - GCSE Reform Equality Analysis: Literature Review*. See www.ofqual.gov.uk/files/2013-06-11-annex-2-gcse-reform-equality-analysis-literature-review

⁴³ General Condition of Recognition G6.

⁴⁴ Ofqual (2013) *Annex 2 - GCSE Reform Equality Analysis: Literature Review*. See www.ofqual.gov.uk/files/2013-06-11-annex-2-gcse-reform-equality-analysis-literature-review

who are celebrating a festival or observing a fast will vary. Schools may be able to provide additional support to students, which would not compromise the integrity of the examinations, for example to enable them to observe religious practices. Schools should seek advice from the relevant exam board if they are considering specific arrangements that might affect the timing of, or the arrangements for, an exam.

Pregnancy and maternity

Our proposal that the reformed GCSEs should use only linear assessments may have the potential to affect adversely students who have recently given birth. It may also adversely impact pregnant students if, for example, the timing of the assessment coincides with any problems arising during pregnancy or falls close to the date on which the student is due to give birth.

At present exam boards accept applications for special consideration from students who are absent from an assessment for acceptable reasons if they have completed the whole course and undertaken at least 50 per cent of the total assessment of the qualification (or 35 per cent in the case of legacy GCSE science qualifications).

In such cases students are able to apply for special consideration in the form of an “enhanced grade” granted on the basis of performance in previous assessments for the qualification.

The continuation of this form of special consideration will not be affected by the change in the exam timetable, although a student will not have taken assessments early in the year which could be used in a special consideration application.

One mitigating approach we have considered is the introduction of a compulsory mock examination series to be held in January of the year in which students are due to undertake their summer assessments. Should a student be unable to attend a summer assessment for acceptable reasons, such as pregnancy, maternity or any related illness, the grade from the mock examination could be used as a basis for an “enhanced grade”.

However, a compulsory mock examination would introduce disruption to teaching and learning, undermining one of the reasons for moving to a linear assessment system. Also, in order to ensure the maintenance of standards, such mock examinations would have to be closely moderated, if marked by teachers, or externally marked. The impact would be disproportionate when considering the relatively small number of students with these protected characteristics who are likely to be unable to attend their summer assessments.

Unfortunately, there is always a risk that some students will be disadvantaged at whatever time an examination is offered for assessment. There are, however, some ways in which the effect of our proposal in relation to linear assessment on pregnant students, or those who have recently given birth, could be mitigated. For example,

students who are unable to attend the summer assessment in English language and mathematics for acceptable reasons may be allowed to sit assessments in the proposed November series of re-sits for those subjects.

In terms of the possible effect if more time must be spent taking examinations, one of the reasonable adjustments currently provided by exam boards for disabled students is the use of rest periods during examinations. Similar provision could be made, if requested, by pregnant students or those who have recently given birth.

Disability

Some representatives of persons with disabilities have raised a concern regarding the impact of withdrawing modular assessments on students with behavioural, emotional and social difficulties (BESD). It has been suggested that modular assessment has allowed these students to achieve a qualification gradually, unit by unit, increasing students' self-esteem and confidence and better enabling them to progress to work or further qualifications. We have not seen any evidence that this has been the case.

Conversely, representatives of persons with disabilities have also raised with us the cumulative effect of repeat and frequent examinations on students with BESD. Again, we do not have any evidence of the relative impact on these students of either repeated periods of assessment throughout the year, with the consequent disruption to teaching and learning, or a concentrated period of assessment at the end of the course.

We have already asked exam boards to put in place a more detailed system of data collection and analysis in order to allow us better to monitor the difficulties faced by this group in the long term.

More generally, as stated above, in terms of the possible effect of longer examinations in the move to a linear system, one of the reasonable adjustments currently provided by exam boards for disabled students is the use of rest periods during examinations. The option for disabled students to apply for this reasonable adjustment will continue.

Racial group

The literature review provided at annex 2⁴⁵ cites research which states that minority ethnic groups may benefit from a move to linear assessment.

⁴⁵ Ofqual (2013) *Annex 2 - GCSE Reform Equality Analysis: Literature Review*. See www.ofqual.gov.uk/files/2013-06-11-annex-2-gcse-reform-equality-analysis-literature-review

It is unclear however, how a reduction in assessment opportunities may impact on Traveller students⁴⁶ and asylum-seeking students from minority ethnic or national backgrounds, as both groups may experience disruption to their education through frequent changes of school.

Under our proposal, apart from re-sits in English language and mathematics, assessments would be held just once during the same period each year rather than being spread over two years. This element of stability may mitigate against the disadvantage to a student of frequently changing school. On the other hand, the move to linear assessment may be disadvantageous to a particular student if he or she switches school during or close to the summer assessment period.

We would welcome any comments you may have that could assist our assessment in this regard.

Sex

As noted in the literature review at annex 2⁴⁷, evidence of the differential effect of modular and linear assessment structures on girls and boys is mixed and where any difference does exist it may be small.

Gender reassignment

As with students who are pregnant or who have recently given birth, a student who is undergoing, or has recently undergone, a gender reassignment process may be disadvantaged by our proposal if that process falls during or close to the summer assessment period.

The number of students likely to be affected in this regard is very small, however, and, again, students who miss their English language and mathematics assessments as a result of gender reassignment may be allowed to sit assessments in the proposed November series of re-sits for those subjects.

Spelling, punctuation and grammar

We considered when we first introduced the spelling, punctuation and grammar marks the potential impact of the policy on disabled students whose spelling, punctuation and grammar skills are affected by their disability, and on students whose first language is not English. We concluded that although some students may find it more difficult to achieve the marks than others, the policy objective was

⁴⁶ The concept of “race” in the Equality Act 2010 encompasses ethnic or national origins (section 9(1)) and case law has established that Travellers constitute a specific ethnic group.

⁴⁷ Ofqual (2013) *Annex 2 - GCSE Reform Equality Analysis: Literature Review*. See www.ofqual.gov.uk/files/2013-06-11-annex-2-gcse-reform-equality-analysis-literature-review

legitimate, in light of concerns about the spelling, punctuation and grammar abilities of some young people.

Disabled students may be entitled to a reasonable adjustment in the form of extra time in which to complete their examinations. They may choose to use some of this extra time when they are answering or checking their answers to the questions to which spelling, punctuation and grammar marks are assigned. We have been working with the exam boards to make sure that disabled students who, because of their disability, answer exam questions either by dictating their answers to a scribe or by using technology, can continue to do so if they wish, and that they are able to access the marks for spelling, punctuation and grammar when it is their spelling, punctuation and grammar skills that are being demonstrated.

We will try to understand what impact the introduction of the policy has had on disabled students when we review the implementation of the policy.

Grading

We do not currently consider that our proposal that reformed GCSEs should adopt a new grading structure has any adverse impact on persons who share a protected characteristic.

Likewise, we do not consider that our current proposal not to require the provision of more detailed information on individual students' performance will have any adverse impact on persons who share a protected characteristic.

Period of study

Our proposal is that the usual time that it takes to complete one of the reformed GCSEs will be the same as or similar to the time it takes to complete one of the current GCSEs. As we are proposing no change here, we have identified no adverse impact on persons with protected characteristics arising from our proposal.

We use the concept of the time it takes to complete a qualification as an indicative measure of a qualification's size. Our proposal does not mean that students will be required to take assessments for a reformed GCSE after studying it for a particular length of time. Some students, including those who share a protected characteristic, may, of course, decide or need to study a course for a longer period before taking assessments.

Likewise, we can see no equality impacts arising from our proposal to allow exam boards to retain a short course version of the reformed GCSEs, even though such short-course versions would no longer be capable of being built up into a full qualification.

Assuring the quality of assessment

We do not currently consider that the proposals to require exam boards to develop an assessment strategy to ensure that assessments are fit for purpose will have any adverse impact on persons who share a protected characteristic.

Subject-specific features of the reformed GCSEs

Other than in regard to the reformed English language qualification, discussed in section 7, we have not currently identified any impact on persons who share a protected characteristic arising from our proposed subject specific requirements.

We would, however, welcome any comments you may have on the possible equality impacts of our subject-specific proposals. Any comments about the subject content should be made in response to the Department for Education's consultation.

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 consultation 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

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.

Information pages

About you

Your details:

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Would you like us to treat your response as confidential?

Yes No

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

Personal views

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)

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 letter. 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?

We agree with the first proposition, but not with the second. This means that a simple analysis of responses will be highly biased and unreliable. A well-designed questionnaire would ensure each proposition could be responded to separately.

Students' examination performance is one element of school performance, but other factors such as quality of teaching and student progression are at least as important. Using students' examination results as the basis of school accountability measures can distort teaching and learning in a negative way and lead schools to prioritise their own interests above those of their students.

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.

To what extent do you agree with this proposition?

Strongly agree

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

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
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).
- (2) Adjacent levels
 - (1) Core and extension model
 - (3) Overlapping tiers

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

All students need to master core mathematical content. Higher achieving students need to cover all of the material in the GCSE Mathematics content, including needing to become proficient in algebra, if they are to progress to A levels in STEM subjects. A core GCSE Mathematics with a reduced content, taken by all, with a grade ceiling (perhaps set one grade above the grade deemed a 'pass' grade (this would mean a grade B under the existing grading system) would allow less high achieving students more chance to concentrate on mastery of the fundamental mathematics they need for future life and work.

The extension paper could assess properly the more demanding aspects of the GCSE Mathematics curriculum, particularly algebra. This would help to ensure that those students going on to study A level Mathematics are properly prepared. In the current system it is possible for students to achieve a high grade in GCSE Mathematics without mastering algebra and this makes a successful transition to A level Mathematics very difficult.

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

The current system for GCSE Mathematics, with two routes to the crucial grade C, is deeply unsatisfactory. Grade C means different things, depending on which tier the student entered, and the system encourages schools to engage in wasteful 'gaming' strategies, including entering students for both tiers. It is vital that there is only one route to the key 'pass' grade.

To minimise the 'gaming' possibilities of a core plus extension model, a model where the marks from the extension paper are only be used in cases where a student has already achieved the maximum grade on the core paper should be explored.

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

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 (3.5 hours is about right for 'core' assessment for GCSE Mathematics, but longer should be considered for the higher-achieving students in mathematics)

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

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

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/no opinion

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

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

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

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.

	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

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
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
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
- Don't know/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
- Don't know/no opinion
35. What information would students and users of qualifications find valuable in addition to the overall grade about students' performance?

The grading system must be made absolutely clear in all paperwork and publicity, so that it is properly understood by everyone.

-
-
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?

Reporting should be holistic, giving an overall assessment of each candidate's performance in a subject. Attempts to make reporting more atomistic are counter-productive and wasteful.

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

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?

It is vital that regulation of the Mathematics GCSEs ensures that the spirit, as well as the letter, of the Assessment Objectives is met. If not, it is likely that questions will quickly become formulaic and predictable, so that students are 'taught-to-the-test' (or even to the mark scheme!), rather than their teaching and learning being focused on developing mathematical fluency, reasoning and problem solving skills. This would subvert the intention of the new National Curriculum and prevent any real improvement in mathematics education at this level. This regulation could be done through a mathematics expert committee reviewing the examinations, both before and after they are taken. This would also help to ensure the different awarding bodies were interpreting the curriculum consistently.

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		<input checked="" type="checkbox"/>
English literature		<input checked="" type="checkbox"/>
Mathematics	<input checked="" type="checkbox"/>	

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

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

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?

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

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 linked pair model for GCSE Mathematics, which is currently being piloted, deserves serious consideration. GCSE Mathematics is at least as demanding as double science or English Language and English Literature and so is worthy of counting as 2 GCSEs [as argued by Professor Adrian Smith in 'Making Mathematics Count' (2004)].

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

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

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

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?

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

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

(x) 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

No

If so, what are they?

Not sure.

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

No

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

Not sure.

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

No

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

Not sure.

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

Contact

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

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

charlie.stripp@mei.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

(x) Via another organisation (please state which) [DfE](#)

() 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

(x) No

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

[Question 2 is very poorly worded. We agree with the first proposition in the question, but not with the second. This means that a simple analysis of responses will be highly biased and unreliable. A well-designed questionnaire would ensure each proposition could be responded to separately.](#)

[All questions should have a 'Don't know/no opinion' option, and space for comments.](#)

[MEI does not fit into any of the categories on page 59 for 'Type of representative](#)

group/interest group', and there is no space to explain MEI's role, we have added this below:

- MEI is an independent curriculum development body for mathematics and a major provider of Mathematics CPD
- MEI is also a major provider of online support to learners of mathematics;
- MEI is a registered charity.

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

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