



Pearson

Pearson Consultation response

Ofqual consultation

Requirements on setting GCSE, AS and A level grade boundaries

6 June 2016

Questions

Question 1: Do you have any comments on our proposed Conditions and requirements for legacy GCSE (A* to G) qualifications?

Yes

Please give reasons for your answer.

In relation to Condition GCSE (A* to G) 1.3 (a) it would be helpful to clarify the reference to evidence of the Level of Demand of the assessments for that qualification.

In point 3.8 of the preamble to this consultation (p6), it is stated that the intention is that awarding organisations will have regard to the 'level of difficulty' of assessments for qualifications compared to any previous assessments. In subsequent sections, for example, Condition GCSE (A* to G) 1.3 (a), reference is made to the 'Level of Demand' of the assessment. 'Demand' and 'Difficulty' are often used interchangeably, but have subtle differences in their application in relation to assessments. We consider it important for Ofqual to provide a short definition of these terms to enable awarding organisations to provide appropriate evidence to demonstrate compliance with these conditions. This will, in turn, ensure a common understanding and consistent application across awarding organisations.

In Condition GCSE (A* to G) 1.3 (c) (ii), reference is made to 'the level of attainment demonstrated by learners taking that qualification in a prior qualification, whether or not that qualification was a regulated qualification'. We understand the reference to attainment in a 'prior assessment' in Condition 1.3 (c) (i) to mean prior attainment data (for example, Key Stage 2 performance) in the context of a comparable outcomes approach to setting specified levels of attainment. However we suggest that further clarification is needed to understand what is meant by 'a prior qualification' in this context.

In Condition GCSE (A* to G) 1.4, it is stated that an awarding organisation must maintain records of evidence used for setting specified levels of attainment, but does not provide clarification of the length of time it is expected that an awarding organisation should maintain these records for. It would be helpful to understand whether there are expectations in terms of retention of such evidence. It is otherwise assumed that Pearson will continue to follow JCQ guidance for maintaining records of evidence.



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Question 2: Do you have any comments on our proposed guidance for legacy GCSE (A* to G) qualifications?

Yes

Please give reasons for your answer.

The guidance provides 'examples of the evidence that may be used by an awarding organisation in setting the specified levels of attainment'. It would be helpful to understand if the proposed sources of evidence are mandatory and exhaustive.

The 8th bullet point in the list of evidence that may be used by awarding organisations makes reference to 'pertinent material deemed to be of equivalent standard from similar qualifications or other relevant qualifications'. It would be helpful to understand whether this refers to archive Learners' work, judgmental evidence from previous awards, technical information or all of these.

The 9th bullet point in the list of evidence that may be used by awarding organisations makes reference to 'information on Learners' performance in previous assessment series'. It would be helpful to understand whether this point relates to historical technical information such as that outlined in the 3rd bullet point in the same list, or whether this point refers to archive Learners' work as outlined in the 6th bullet point in the same list, or to something else.

The 11th bullet point in the list of evidence that may be used by awarding organisations makes reference to 'information on centres' estimated levels of attainment for all Learners. It is important to note that awarding organisations ceased collecting estimated grades from centres as a matter of course from 2014.

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

Yes

Please give reasons for your answer.

In relation to Condition GCE (Pre-reform) 2.3 (a) – Please refer to comments provided in our response to Question 1, above.

In relation to Condition GCE (Pre-reform) 3.3 – The condition makes reference to 'GCSE (Pre-reform) Qualification Level Condition'. We believe this should be 'GCE (Pre-reform) Qualification Level Condition'.



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

Yes

Please give reasons for your answer.

In relation to the Guidance for Condition GCE (Pre-reform) 2.3, point (a) makes reference to the Level of Demand of the assessments for that qualification. Please refer to comments provided in our response to Question 1, above.

In relation to the examples of evidence that may be used by an awarding organisation in setting the specified levels of attainment for a GCE (Pre-reform) qualification which it makes available, please refer to the comments made in our response to Question 2, above.

Question 5: Do you have any comments on our proposed Conditions and requirements for reformed GCE AS and A level qualifications?

Yes

Please give reasons for your answer.

In relation to Condition GCE 7.3 (a) – please refer to comments provided in our response to Question 1, above.

Section 3 a-d refers to the arithmetic calculation of the intermediate grade boundaries. Whilst we are aware that these rules are carried over from the legacy qualifications, we firmly believe that all grade boundaries are important to students, centres and stakeholders. We hope that there is scope to revisit this condition once interboard agreement has been reached on the approach to ensure that standards are maintained across the range of grades.

Section 4 refers to A/A* grad using appropriate statistical and technical evidence. The calculation of the A* will be different from the legacy qualifications as they are truly linear by design. We hope that once Ofqual agreement on the details of this calculation has been achieved, this rule will be transparent and consistently applied across all awarding organisations.



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Question 6: Do you have any comments on our proposed guidance for reformed GCE AS and A level qualifications?

Yes

Please give reasons for your answer.

In relation to the Guidance for Condition GCE 7.3, point (a) makes reference to the Level of Demand of the assessments for that qualification. Please refer to comments provided in our response to Question 1, above.

In relation to the examples of evidence that may be used by an awarding organisation in setting the specified levels of attainment for a GCE qualification which it makes available, please refer to the comments made in our response to Question 2, above.