



Pearson

Pearson Consultation response

Ofqual consultation

Setting the grade standards of new GCSEs in England in 2017 & 2018

16 June 2016

Questions

Proposal: We are proposing that the first award of new GCSEs will be based primarily on statistical predictions, in order to protect the interests of students. Examiner judgement will play a secondary role as it will be, on the whole, less reliable.

Where the size and nature of the candidature means that statistical predictions are less reliable, a modified approach based on a wider range of information (including, for example, a greater reliance on examiner judgements) may be needed for the first award.

Question 1: To what extent do you agree or disagree with our proposed approach to the first award of new GCSEs?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer:

We agree to some extent.

We support the methodology that ensures students are not disadvantaged during curriculum change just because they happen to fall into the year group affected by reform. We recognise that prior attainment statistical predictions will facilitate this process, retaining the same relationship between prior attainment and GCSE outcomes in a given subject from previous years. It is important, however, to recognise that unless there is a specific intervention to change the fixed relationship between prior attainment and outcomes in a particular subject it is unlikely that any concerns around inter-subject comparability of grade outcomes will be addressed. Ofqual should seek to identify whether there is any evidence to inform a recalibration of this relationship in specific subject areas.

We recognise that examiner judgement is not precise enough to recommend a specific mark for a grade boundary. Nevertheless, subject expert engagement is important - it ensures there is some subject expert validation of the quality of the work seen, both in the activity of setting of the grades but also in feeding



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back to centres on the expectations of performance to support improvements in teaching. We strongly believe that our subject experts will help us test the robustness of the statistical predictions, particularly during periods of change. Subject experts can be helpful in identifying and explaining any changes in level of difficulty and demand of assessments. We therefore support efforts to improve on the current methodology for incorporating this into the awarding process in a way that ensures consistency across awarding organisations, such as using comparative judgements.

The consultation makes no reference to the methodology for equating common grades across tiers on Science and MFL - it is essential that this methodology is robust for the assessment structures in place, particularly for grade 5 which has been quickly adopted by stakeholders as the 'good pass'.

Proposal: We are proposing that we carry forward the grade standard established in the first award in subsequent years. This will be done through largely the same approach as is in place for pre-reform GCSEs i.e. an approach based on a mixture of statistics and examiner judgement.

Question 2: To what extent do you agree or disagree with our proposed approach to the award of new GCSEs in the second and subsequent years?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer:

We agree to some extent.

Ofqual must be transparent about what the awarding system is designed to do and what it can and cannot deliver given the multiple uses that student grades are put to. There are competing demands on what a qualification grade means for different stakeholders, it can be:

- 1) an indicator of the level of knowledge, skills and understanding a student has at the start of their course
- 2) a value to inform selection for further study or into a chosen career
- 3) as a metric to measure the success of a school
- 4) as a metric to measure the success of a teacher

The awarding system is designed, as outlined in the consultation, to ensure that students are not unfairly advantaged or disadvantaged by differences in the level of demand of assessments year on year in a specific subject at cohort level, by managing the attainment outcomes through a fixed relationship with prior attainment predictions. Whilst Ofqual have been explicit about the role that the grade descriptors for 8, 5 and 2 in the first year of award for GCSEs in 2017 (press release 28th November 2014) - there is a stakeholder perception that the quality of the responses seen at these grades would match those outlined



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in the grade descriptors. It would be useful to clarify the role they may play in future awards. Similarly it would be important to clarify the intention for grade descriptors for other subjects.

We recognise that the next couple of years there is likely to be variability in centre results as different institutions engage in different ways with the new qualifications. During this time it is important to have measures in place throughout the examination system, including the method of awarding grades, to ensure that students are not disadvantaged by curriculum reform. We do, however, strongly believe that over time (in maintaining standards) the awarding system should allow for changes in the proportions awarded over time to reflect real and measurable differences in the 'standard' or ability demonstrated by students. The comparable outcomes methodology as it currently operates makes it difficult to allow for this to be justified. We are supportive of the initiative to continue to explore robust methodologies to improve the awarding process to this effect such as through the National Reference Test or concurrent screening activities.

It is important to note that should prior attainment at KS2 still be used to inform the awarding process in the future it is important to understand the technical and substantive implications of the reform of KS2 curriculum for GCSE Awarding. Given that the "new assessments will reflect the more challenging national curriculum" (DfE March 2014 response to the consultation on primary school assessment and accountability outcomes), any increase or decrease in results at this level will have an impact on GCSE outcomes for that cohort.

Question 3: To what extent do you agree or disagree that we should adopt the same approach to awarding grades 1 to 7 in all new GCSEs as we have confirmed will be adopted for new GCSEs in English language, English literature and mathematics?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer:

Alignment between 4/C, 7/A and 1/G is sensible – we cannot see a justification for setting grade standards in 2018 subjects with the same grading scale in a different way. All grades are important to students and have an increasing value for centres with the introduction of Progress 8 attainment measures. At Pearson we already have processes in place to monitor the effect of decisions at key judgemental boundaries on intermediary grade boundaries.

The consultation makes no reference to the methodology for equating common grades across tiers on Science and MFL - it is essential that this methodology is robust for the assessment structures in place for overlap grades 5, 4 and 3.



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Question 4: To what extent do you agree or disagree that we should adopt the ‘tailored approach’ to awarding grade 9 in new GCSEs to be awarded from summer 2018?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer:

It is difficult to agree or disagree on the suitability of the methodology when the purpose of the Grade 9 is unclear. Our understanding from the first consultation was that the top grade was introduced to better differentiate students at the top end of the performance range which all three approaches do by virtue of the fact there is an additional top grade.

Is the purpose to identify the top students within that subject, or is it to identify the top students with general GCSE ability? Ofqual must make this clear to avoid misaligned expectation from stakeholders once results are issued.

The tailored approach assumes some level of inter-subject comparability which Ofqual’s evidence suggests is not currently there – by adopting a policy that recognises the top % across subjects. Essentially you are setting quotas for each subject based on previously set proportions.

In an already complex system, the introduction of a formula makes it even more complex for teachers, parents and students to truly understand the impact for them.

The formula for calculating the grade 9 was based on the 2015 results for all students. Whilst the data lab applies this formula to a variation of the 2014 results there has been no systematic review of the impact of this formulae over time. Good research practice would take at least 3 years of data to begin to observe trends and identify reliable results and inform the construction of a methodology. We know that there has been a significant impact of policy changes in the UK education system over the past few years, with the profile of the cohort changing – eg: in 2015 fewer 15 year olds, and more 17 year olds were observed, in 2014 the introduction of the 100% terminal requirement and Ebac set in motion changes to the way centres entered and prepared their students. DfE deliberately did not produce expected progress targets for new performance tables for these very reasons. In their latest guidance 'Progress 8 measure in 2016, 2017 and 2018' (January 2016) they again explain why they are not setting expectations based on results from recent cohorts. They give some indicative estimates of progress based on 2015 cohort performance, and say: “Changes to national subject entry patterns and performance will cause these estimates to change in future years, as they will be derived from averages from later cohorts. As such they should be treated with caution if extrapolating to cohorts beyond 2015.” Average progress for each subject will be set using the actual data for the 2016 cohort. In future they will use the 2016 data as a benchmark for the 2017 and 2018 cohorts, then the 2017 data for 2019.



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Adopting a correlation based on a one year analysis alone to determine how the grade 9 standard should be set in the first year of the award, then to carry forward that fixed relationship between prior attainment and outcomes in subsequent years presents the risk that students are not appropriately rewarded the grade 9 because of unintended consequences of applying the formula in the 2017 or 2018 first awards.

We understand from the consultation that the grade 8 boundary will be arithmetically calculated – it is not apparent from the research what the impact of the grade 9 rule will have on setting this intermediary grade boundary which is also intended as a differentiator at the top end of the grading scale. It is also unclear from the research supporting this proposal the impact of applying the formula where there have been shifts in the balance of tier entries.

We recommend that a full technical review of the robustness of the methodology is carried out before a decision is taken to use the outcomes from the first series and carry it forward in subsequent awards.

Question 5: To what extent do you agree or disagree that we should also adopt the ‘tailored approach’ for those subjects to be awarded from summer 2017 – i.e. English language, English literature and mathematics?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer:

It is difficult to agree or disagree on the suitability of the methodology when the purpose of the Grade 9 is unclear, however we cannot see a justification for setting grade standards in 2018 subjects with the same grading scale in a different way.



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Question 6: To what extent do you agree or disagree that the award of grade 9 in the second and subsequent years should be based on the standard set in the first award?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer:

It is difficult to agree or disagree on the suitability of the methodology when the purpose of the Grade 9 is unclear. In fact the purpose in the first year is different in subsequent years if it is subject to the comparable outcomes approach. It is no longer the top 20% but the relationship between the value-added established in that first year. Ofqual would need to demonstrate absolute confidence in the robustness of the methodology for setting standards in the first year to then carry it forward for the rest of the lifecycle. We suggest that this policy is subject to a technical review of the outcomes in 2017 (for phase 1 subjects) and in 2018 and 2019 for the later subjects.

Question 7: We have not identified any ways in which our proposals on setting the grade standards of new GCSEs would impact (positively or negatively) on persons who share a protected characteristic.¹ Are there any potential impacts we have not identified?

- Yes No

Question 8: Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

- Yes No

Question 9: Have you any other comments on the impacts of the proposals on students who share a protected characteristic?

- Yes No

¹ 'Protected characteristic' is defined in the Equality Act 2010. Here, it means disability, racial group, age, religion or belief, pregnancy or maternity, sex, sexual orientation and gender reassignment.