

Board Paper

Paper 96/18 – Chief Regulator’s Paper

Date

30 January 2019

Title

Chief Regulator’s report (open annex)

Report by

Sally Collier, Chief Regulator

Paper for information and decision

Recommendation

1. The Board is asked to note the matters reported and to:
 - a. Delegate to the Reform Committee decisions on the final Conditions and Guidance for the new Basic Digital Skills qualifications (para 28).

Overview

2. In December we published a range of materials reporting on the 2018 summer series. This included official statistics on malpractice and reviews of marking and moderation, a report on grade outcomes in extended project qualifications and our 2018 summer exams series report. We also published our report into grade inflation in some legacy applied general qualifications, including BTECs. In both instances the objectives for our communications strategies were achieved and coverage was factual.
3. Over the Christmas period there was a coverage of the relative difficulty of IGCSEs and GCSEs, following a series of Parliamentary questions to ourselves and the DfE from Lucy Powell MP. Coverage ran across several national newspapers in late December, most prominently on the front page of the Observer. We were not asked to comment at the time, but we intend to write to the Secretary of State and the Chair of the Select Committee, Robert Halfon MP, to set out our position, including referencing the Board’s discussion on this issue in June 2018.
4. We have been called to appear before the Education Select Committee on 12 March. This is an accountability hearing and so we should expect questions on any part of our business or governance. Preparations require a significant

organisational effort; colleagues from across the business are involved in preparing briefings. In mid-January the Committee questioned the Secretary of State on a number of issues which were of interest to us, including the uptake of IGCSEs in independent schools and the quality of BTECs.

5. As 29 March draws nearer we are stepping up work to ensure that any impact of the UK leaving the European Union without a deal on this summer's exams is minimised. We have contacted the four exam boards seeking assurances as to their preparations. We have received some assurances; further information is provided to the Board in a separate paper.
6. We are continuing to make preparations for the negotiations for the Comprehensive Spending Review. We anticipate receiving more information in January, to address both expectations of timings and potential funding scenarios. We will discuss these with the Board at the February Board Strategy Day.

General Qualifications

The extended project qualification (EPQ)

7. The use of the extended project qualification (EPQ) in schools and colleges, as a qualification taken predominantly by 18 year olds alongside A levels or other level 3 qualifications, is well established. The qualification allows students to complete an individual project on a topic of their choice and is graded from A*-E. There is some evidence that these qualifications may be becoming increasingly valuable for the students that take them. Perceptions of the value of the qualification are reported to be increasing within higher education, meaning students might, for example, be able to replace or supplement one of their results in another qualification (such as an A level) with an EPQ to meet an offer from a university.
8. There has also been speculation that the 'decoupling' of AS and A levels might make students more likely to study for an EPQ, replacing the fourth AS that it had previously been common for students to study for. Although there is some anecdotal evidence of this at a local level, nationally entries in recent years have been stable at around 40,000 students. Nonetheless, if AS entries continue to fall, this could still drive increases in EPQ take up in future years.
9. We continue to regulate the qualification in a way that reflects the high-stakes nature of the qualification. In particular, we have recently revised our regulations so that the arrangements for reviews of marking and appeals that apply in GCSEs and A levels also apply to this qualification.
10. We have also been monitoring outcomes in this qualification, and we published before Christmas a report called '[An investigation of the variability in grade outcomes in Extended Project Qualification](#)'. It shows evidence of the possibility of modest grade inflation in EPQ outcomes in recent years. We have written to all AOs offering the qualification to remind them that they must have due regard to this report and consider its implications for their awarding of the

EPQ. We have been clear with them we will now be paying close attention to trends in this area and the evidence that exam boards assemble for use at awarding.

11. We also have an extensive programme of work to look at the operation of moderation across general qualifications. The findings from this work, due later this year, may also have implications for our regulation of the EPQ. This is because currently all EPQs are marked by the students' teachers; their marking is then moderated by the AOs.

November 2018 awards in GCSE English language and maths

12. Entries for the November 2018 GCSE English language and maths were up on previous years. English language entries were up 50% to just under 50,000 and this continues a trend over the last five years of entries increasing each year. Maths entries were up 58% to 55,000 but this is in line with entries in 2016. The change in entry pattern in 2017 reflected the need for Year 13 candidates who had not previously taken the new 9 to 1 qualification in mathematics (with substantive changes to taught content compared to the legacy A* to G qualification) to complete a full year of study before re-entering to take these new qualifications.
13. Predictions were used to guide the awards, and were based on year 12 students' mean GCSE scores from summer 2018. The nature of the cohort and the changes to entries mean that predictions in November are less reliable than in summer. Nevertheless, they provide a common starting point for all exam boards, rather than relying on examiner judgement alone.
14. The exam boards reported that awarding was relatively straightforward. We reviewed the outcome data with Responsible Officers in the first week of January.

This section has been redacted, as its publication would be prejudicial to the effective conduct of public affairs

Results were issued on Thursday 17 January.

Marking research publications and roundtable

15. As discussed at the last Board Meeting, the Marking Roundtable chaired by David Laws, was held on 27th November, to coincide with the publication of 6 [research reports](#). For the first time, qualification level marking consistency metrics are in the public domain as well as board specific marking reliability study results and research into online standardisation and an in-depth investigation of hard-to-mark responses.
16. At the event, we disseminated some of the depth and nuance of the research, and this was used to provide a basis for informed discussions with around 30 key stakeholders (teacher and student representatives, researchers, board members). There was strong engagement and many stakeholders thanked us

for the opportunity to discuss the issues. There was strong agreement around the impact of mark schemes on teaching practices, interest in the potential of AI marking (as a second 'checking' marker), and some openness in exploring different models of reporting results. There were more divergent views around the extent to which current levels of marking consistency were sufficient to support the uses of qualification results and the extent to which stakeholders were concerned by some of the consistency metrics.

17. The discussions are helping to inform our next steps on quality of marking, which include a specific communication strategy on marking and further publications on marking consistency metrics this year. Later in the year, we are planning to undertake a novel research project with the aim of understanding just how consistent marking could be in a subject with mainly extended response essay style items if the very best processes around marking (eg marker recruitment, training, monitoring, mark scheme development) were all in place. This will help us in our pursuit of marking consistency benchmarks with which to evaluate the system.

Vocational and Technical Qualifications

Reform

18. **Functional Skills.** We continue to evaluate submissions from AOs as planned, with a view to getting qualifications to centres ahead of first teaching in September 2019. So far, all AOs are being required to resubmit. We are expecting an initial set of second submissions by the end of January and remain confident that we will approve some by our target date of the end of March.
19. **Apprenticeships.** We have now appointed an Associate Director for the External Quality Assurance of Apprenticeships. The successful candidate was [redacted], who has been managing key elements of this programme for us to-date. This appointment reflects the increasing volume and complexity of our work on Apprenticeships, which continues to develop. Our EQA approach is now fully functional, including our ability to manage delivery issues.
20. **Basic Digital Skills.** The combined policy and technical consultation on our proposed Conditions and Guidance for Basic Digital Skills qualifications closed on 11 January 2019. We had some helpful engagement events with AOs before Christmas. **The Board is asked to delegate to the Reform Committee decisions on the final Conditions and Guidance for Basic Digital Skills qualifications.** The Reform Committee will meet in February.

Grading Vocational and Technical Assessments

21. In line with our corporate plan we are conducting a programme of research into grading within vocational and technical assessments (VTAs). The design of many VTAs, in England, has been heavily influenced by the 'Competence-Based Assessment' movement; and qualifications thus designed have

traditionally not incorporated grading. So grading presents a number of unique challenges in this context.

22. Our research over the past year has led to the publication, in mid-November, of two key reports. The first explored approaches to grading within a sample of regulated qualifications in England, identifying a variety of technical and conceptual issues arising. The second presented a review of the (relatively small) literature on grading within Competence-Based Assessment contexts, with a particular focus on developments in Australia over the past three decades.
23. During mid-December 2018, we hosted a conference on grading VTAs, at which we launched our research. Contributors to this conference also included a number of practitioners, including AOs, and a number of academics. The conference was well-attended and well-received. We used the conference to launch a broader conversation on issues related to grading VTAs, which we will develop during 2019. This conversation will continue, during January, via a webinar with the Federation of Awarding Bodies.

Engagement

24. **Annual AO Conference.** The programme has been agreed for our annual AO conference on 26 March. In addition to keynote addresses from myself and the Chair, we have Professor Prue Huddleston from Warwick University and Dr Neil Bentley (WorldSkills UK) delivering speeches.

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Qualifications certified outside the UK

25. As part of our plan to expand our work on qualifications markets, we will be discussing with AOs two changes related to the certification of qualifications outside the UK. First we intend to amend our register to enable AOs to indicate where they are willing for their qualifications to be offered overseas. This is in response to a request from the Department for International Trade, who are keen to promote regulated qualifications to export markets and want to improve the information available to overseas centres looking to buy English regulated qualifications. Second, we intend to change our data collection requirements such that AOs will be required to report to us their volume of certificates certified overseas. Currently it is optional for AOs to report this to us. Receiving comprehensive data on certificates will give us a true picture of the size of the international market for regulated qualifications and will improve our risk profiling of AOs.

Communications

26. We published a number of significant outputs and held several important stakeholder events in the run up to Christmas 2018, all of which required

careful media planning. In summary, we believe we largely achieved our communication objectives in all cases.

27. Following the Board's discussion in November on tiering and 'safety net' grades in GCSE combined science, a communications plan has been devised and the initial elements – letters to all headteachers of secondary schools and colleges in England, and associated colleagues, along with a blog – were distributed in mid-January. Exam boards have produced a number of communications themselves to support the initiative.
28. We continued our campaign to support exams officers with a webinar in early November that attracted more than 300 participants (from 500 who registered). We subsequently coordinated with JCQ to publish answers to questions posed during the event. We are now working on two new films, one to help students avoid committing malpractice and another for exams officers to use with colleagues. We intend to publish these in early March.
29. A detailed communications strategy extending through to results days has been developed to support public confidence in general qualifications. Our first blog of the year, on malpractice, was published on 11 January.

Forward Look

30. Between now and mid-March, our immediate focus is on preparing for the appearance before the Education Select Committee. Following the steer from the Board confirming our corporate goals for the year ahead, we are working to finalise the 2019-2022 Corporate Plan, and business planning for the financial year 2019/20 is on track. We also expect to receive further information regarding the Comprehensive Spending Review over the next few weeks, and we will bring this to the Board for discussion in February.
31. We will shortly be publishing our decisions and analysis of responses to our consultations on the assessment arrangements to GCSE computer science and dance and drama. For computer science, in line with the strategy we have taken for other consultations we will be briefing stakeholders ahead of the announcement.
32. As we approach 29 March, we will continue to monitor the preparations of the exam boards and other awarding organisations to ensure the impact of the UK leaving the EU is minimised. While our focus is naturally on securing the safe delivery of exams in the summer, we will be looking across the landscape to understand emerging risks and how they might be mitigated.

ANNEX B 2018 CIVIL SERVICE PEOPLE SURVEY RESULTS

Paper to be published	NO
Publication date (if relevant)	
If it is proposed not to publish the paper or to not publish in full please outline the reasons why with reference to the exemptions available under the Freedom of Information Act (FOIA), please include references to specific paragraphs	Section 36 exemption as publishing the paper would be likely to prejudice the effective conduct of public affairs.