

Ofqual Board

Paper 51/15

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Title:

General Qualifications Update

Report by:

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Responsible Director:

Ian Stockford, Executive Director for General Qualifications

Paper for information

Open paper



Issue

1. The purpose of this paper is to give the Board an update on key work of the GQ Directorate since the last Board meeting.

Recommendations

2. The Board is asked to note the progress on key GQ issues. No specific decisions are requested.

General Qualifications Directorate

3. Covered here are updates on:
 - a) The accreditation of subjects due for first teaching 2016;
 - b) The development of subject content and assessment arrangements for subjects scheduled for first teaching 2017;
 - c) Lesser taught languages;
 - d) Summer 2015 series;
 - e) National Reference Tests;

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- f) National Curriculum Assessments;
- g) Enquiries about Results (EaRs), Appeals and Quality of Marking;
- h) Special Consideration and Reasonable Adjustments;
- i) Stakeholder engagement.

Reformed Qualifications for First Teaching 2016

Accreditation

4. First submissions for all of the expected 155 specifications have been received. This phase is divided into three tranches. None of the first submissions from exam boards were successfully accredited.
5. At time of writing, 13 submissions have been successfully accredited in the following subjects:
 - (i) GCSE: Art & Design (4/4 specifications), Classical Greek (1/1), Computer Science (1/4), Food Preparation and Nutrition (1/3), History (2/5), Latin (2/2)
 - (ii) AS: Music (1/4)
 - (iii) A level: Music (1/4)
6. Eight of these accredited specifications were successful on second submission. Five were accredited on third submission. For 104 specifications we are yet to receive second submissions at time of writing.
7. The primary risk associated with accreditation is that there are no specifications accredited for a given subject in sufficient time for teachers to prepare for first teaching in September 2016. Subjects currently without any accredited specifications are:
 - (i) GCSE: Geography (7 specifications), French (4), German (4), Spanish (4), Dance (1), Music (4), Biology (5), Chemistry (5), Physics (5), Combined Science (6), Physical Education (4), Citizenship (3), Drama (4), Religious Studies (7), Religious Studies (short course) (6),
 - (ii) AS: Dance (1), Classical Greek (1), Latin (1), Geography (4), French (4), German (4), Spanish (4), Physical Education (4), Drama & Theatre (4), Religious Studies (4)
 - (iii) A level: Dance (1), Classical Greek (1), Latin (1), Geography (4), French (4), German (4), Spanish (4), Physical Education (4), Drama & Theatre (4), Religious Studies (4)

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8. To manage this risk there are two approaches we continue to take.
 - (i) Engagement with inter-board groups which are seeking a common approach to delivery
 - (ii) Proactively seeking themes of common issues within a subject or across related subjects
9. **Inter-board groups** In a number of subjects, particularly those containing non-exam assessment (NEA), exam boards have decided to work together to decide some key aspects of their proposed approach. We do not require exam boards to do this, however, there are advantages to exam boards working together in this area as it ensures consistent arrangements across exam boards, improving the manageability for schools. This approach was used to consider the arrangements for both the A level science practicals and the GCSE English language assessment of spoken language.
10. Inter-board groups exist for GCSE Computer Science and A level Geography. We continue to positively engage with these groups to enable us to influence thinking on these matters prior to submissions for accreditation being made.
11. **Identification of themes.** We continue to identify areas where all submissions within a subject have been rejected and to consider ways in which we can appropriately provide feedback to exam boards without compromising the integrity of the accreditation process. An example of this is information we have provided to exam boards about the assessment of maths within science and information on the quality of items in GCSE modern foreign languages. This approach was only possible once we had received submissions from exam boards to provide context for this additional information.
12. Evaluation of the risk of a subject failing to achieve accreditation in a timely manner is most valuable having received the second submissions. This is because exam boards have had chance to act on their specific feedback. As stated above, for 104 of 155 specifications, we are still awaiting second submissions.
13. We are also considering whether there are any more radical approaches to handling accreditation that would increase the prospect of timely availability of specifications and SAMs into schools should the likelihood of this risk increase.
14. We are ensuring that any intelligence about potential future non-compliance is fed into our on-going regulatory activity. A submission from an exam board is only accredited if it demonstrates that it is capable of complying with the conditions on an on-going basis. We are clear about compliance with our accreditation condition but there is a judgement to be made about the differing degree of residual risks to

continued compliance. For the risks where the likelihood or impact of the adverse effect is low and, from consideration of an exam board's submission, we have some level of confidence that the exam board has sufficient arrangements in place to manage that risk, we may accredit but feed the relevant information in to our risk based approach to on-going regulation and notify the exam board of our concerns.

15. This approach incentivises the exam boards to ensure that the risks are appropriately managed in live delivery and that they remain compliant with the Conditions. It provides us with an opportunity to use the full range of our regulatory tools rather than focussing all our attention and resource on accreditation. It has the potential, however, to increase the risk of an adverse effect occurring in live delivery.

Reformed Qualifications for First Teaching 2017

Content Development and Assessment Arrangements

16. The DfE has now issued subject content for consultation for all subjects that will be taught from 2017. With the publication of their content expectations for the last of these subjects, they have confirmed that they will not pursue the development of information technology at either GCSE or AS and A level. They explain that this is because they do not see a place for this subject in the curriculum that is reflected in general qualifications, given the new computer science qualification, which they think is the most suitable option for students that want to take qualifications in this subject area.
17. From 16 July to 24 September 2015 we consulted on our proposals for assessment arrangements in seven GCSE and five AS and A level subjects due for first teaching in September 2017¹. This was in parallel with the DfE's consultation on subject content.
18. A relatively small number of responses to our consultation were received: 121 responses across all of the subjects. Response levels varied considerably between the subjects, ranging from four respondents (GCSE Engineering and GCSE Sociology) to 34 respondents (AS and A level Design and Technology).
19. We are still in the process of considering the outcomes of this consultation. This is because we will need to make sure that our proposals align with the DfE's final expectations for subject content and the DfE is still considering changes to this. We will be able to confirm what we think our assessment arrangements should be as soon as the DfE finalises the subject content.
20. We expect to be able to ask the Board to consider final proposals for assessment arrangements in these subjects the week beginning 30 November by electronic business. We will be able to provide the Board

¹ GCSEs in astronomy, business, economics, engineering, geology, psychology and sociology and AS and A levels in design and technology, environmental science, history of art, music technology and philosophy.

with an update on the latest position in the meeting, highlighting any decisions that we will ask the Board to take as electronic business that may be complex or where arriving at a recommendation has been particularly difficult. We are asking for these proposals to be considered by the Board in this way to allow us to publish our requirements before Christmas and to begin consultation on our detailed regulations in each subject so that the accreditation process for these subjects next summer is not delayed.

Lesser taught languages

21. GCSEs and A Levels in French, German and Spanish are being redeveloped for first teaching in 2016. Reformed versions of the remainder of the languages were scheduled for redevelopment for first teaching in 2017.
22. As currently defined, any reformed language qualification is to comply with the published Modern Foreign Language subject content (as applied to French, German and Spanish) i.e. it is to cover all four skills: speaking, listening, reading and writing. The Government has committed to retain GCSEs and A Levels in the lesser taught languages.
23. The languages that have been proposed by exam boards for qualification development for first teaching in 2017, and therefore will be designed to comply with the existing content and regulatory requirements, are as follows:
 - (i) GCSE: Arabic, Bengali, Chinese (Mandarin), Italian Japanese, Modern Greek, Modern Hebrew, Polish, Punjabi, Russian, Urdu.
 - (ii) GCE: Chinese (Mandarin), Italian, Russian
24. Beyond these languages, exam boards are, however, reluctant to develop qualifications. This is for a number of inter-related reasons:
 1. The limited availability of suitable examiners to support some of these languages;
 2. The small number of candidates make the qualifications financially undesirable and make it difficult to maintain standards;
 3. The complexity of delivery;
 4. The potential consequences of these considerations on quality and therefore the resultant regulatory risk.
25. Some of these concerns relate to the requirement to assess all four skills in a language. To address this the DfE are currently considering different models for the core content where only two skills (reading and writing) would be specified. Any content of this nature would

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subsequently be presented to the Ofqual Board to agree its appropriateness for regulatory purposes. To facilitate the development of this approach and to provide the opportunity for the other challenges to be addressed, the Board agreed in July 2015 (see paper 28/15) to allow the new specifications in these languages to be introduced for first teaching in September 2018.

26. Exam boards cite a risk of regulation as a strong factor in their reluctance to offer these qualifications given the operational challenges they face. Exam boards express concern about the risk of us taking regulatory action against them outweighing the benefits of delivery. We have been as clear as possible about our regulatory view of the different challenges exam board face so that exam boards are not discouraged from developing these subjects based on incorrect assumptions.
27. To support a richer discussion of this perceived risk by exam boards, and to aid reflection on our regulatory position, we are working to articulate our position in the following five areas:
 - (i) maintenance of standards and awarding;
 - (ii) assessment functioning and differentiation;
 - (iii) quality of assessment materials;
 - (iv) quality of marking;
 - (v) timely available of results
28. An update on this position will be provided verbally at the meeting.

Summer Series 2015

29. During the summer 2015 series, event notifications were submitted by exam boards to identify areas where they identified an adverse effect, or the potential for an adverse effect, as part of their delivery of the live assessments. In our follow up activity, the contents of these event notifications have been used as intelligence to inform further work.
30. Based on the trends seen this summer, we have commissioned audit work looking at exam boards' (inc CIE & IB) policies, procedures and processes with regard to:
 - (i) risk identification and management;
 - (ii) adequacy of centre agreements/controls in relation to security breaches;
 - (iii) analysis of the appropriateness of their third party contracts in relation to scanning/IT providers.

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31. These audits are due to report in the spring in order that we can require any necessary improvements for summer 2016/17.

National Reference Tests

32. NFER carried out the initial field trials in 175 schools between 28 September and 9 October. Ofqual staff observed the trials in 10 schools and, overall, were satisfied with NFER's administration of the tests. There were no adverse reactions from schools that had taken part in the trials. We and NFER have not identified any breaches of security of test materials in social media. NFER has completed the marking of the trialled items and is now analysing the results to enable them to select the items to be used in the annual tests.
33. The DfE has agreed to consult on the introduction of secondary legislation to make it mandatory for schools, if selected, to take part in the Tests. The DfE plans to launch the consultation in late November with the aim to have the legislation in force for the tests in March 2017, the first year of live testing.
34. We will report in more detail to the next Board meeting in January by when we will confirm arrangements for the Preliminary Reference Test in schools, which are due to be held in March.

National Curriculum Assessments

35. At the Board strategy day on 9 October our strategic approach to regulating National Curriculum Assessments was discussed. Following that discussion we met with the STA Chief Executive to discuss the practical implications.
36. We are collaborating with the STA to establish how our approach to the oversight of risk will work operationally, particularly with respect to our monitoring of delivery. We are also taking forward our approach to evaluating the validity of the assessments. This approach will be based on a longitudinal post-hoc review of the assessments. Providing visibility of our approach to the evaluation and reporting of the validity of the assessments will, in itself, be helpful in mitigating any risks of the test design being adversely influenced at the expense of validity.
37. Government policy on primary school assessment is developing (see CEO report). Board members will be updated at the meeting on the latest position.

Enquiries about Results (EaRs), Appeals and Quality of Marking

38. As part of our wider consultation considering the potential removal of the Code of Practice, we are due to consult shortly on proposed Conditions for a post results service. We have continued our close engagement with representative organisations ahead of our consultation launch. We have engaged ASCL, HMC and GSA to provide informal comment on our draft proposals and to market test the accessibility of the consultation document. We are also keen to get

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first-hand feedback. Our Exam Stakeholder Engagement Group (ESEG), with representatives from all teacher unions, representative organisations and examination boards will meet on 20 November for a consultation seminar.

39. We have also discussed the proposals at length with exam board representatives. Exam boards have proposed long-term improvements to their existing processes and we have requested that they consider what improvements they can put in place for 2016 and 2017 for both legacy and reformed GCSEs and A levels.
40. In order to inform this work, critically evaluate any proposals and improve our understanding of any implementation challenges, we are currently conducting an audit of exam boards' compliance against the current requirements.
41. Engagement with stakeholders on EARs inevitably leads to wider discussion of quality of marking. It is clear from stakeholder feedback that our narrative, based on describing the small proportion of grade changes made during the EAR process does little to increase confidence in marking. We have established a project team to improve communications in this area.

Special Consideration and Reasonable adjustments

42. We published the Official Statistics on Access Arrangements and Special Consideration at the beginning of the month. We requested more detailed data from the exam boards than we have had available previously in order to better understand what is happening at a more granular level. This information has been provided and we have performed an initial analysis of the centre level data.
43. We have identified some areas where we are interested in further explanation and have asked the exam boards for information on work that they are doing in this area. We will publish the latest data analysis and a commentary of the key messages in December.

Stakeholder Engagement

44. In addition to the areas highlighted above relevant to stakeholder engagement we have continued to engage with stakeholder groups more generally. We have been closely engaged with HMC on a range of issues in the last 6 months. It was, therefore, disappointing to see the negative press generated by the new President during the annual HMC conference. We have written to the President to reflect our concern over the approach being taken by HMC and conducted extensive follow-up meetings with other senior members in order to reset the relationship.

Finance and Resource

45. The work to support delivery of the FT2016 and FT2017 phases of the reform programme is particularly resource intensive and has been

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challenging to deliver with the existing number of staff. To support this, resource has been redirected from elsewhere in the organisation (1 grade 7 from Regulatory Compliance and 1 HEO from VQD) to support delivery of this work. This movement of staff has been eased by the existence of generic job descriptions put in place as part of the organisational redesign.

46. The phasing of resubmissions for accreditation of FT2016 subjects is posing a particular challenge to the turnaround of accreditation decisions. We are currently looking at redirecting resource within GQD before considering where further additional resource within the team is required to support this activity.

Impact Assessments

Equality Analysis

47. No specific issues

Risk Assessment

48. The rate with which exam boards achieve accreditation of specifications for FT2016 and the potential knock-on effect of this on the timely availability of specifications for schools represents a considerable risk. This has been considered more fully above.
49. The reform timetable, particularly for the FT2017 subjects, also represents a considerable risk. This is a long term risk which will likely run through to the completion of accreditation. This risk is now being more effectively managed as the GQ directorate is more appropriately resourced for this activity.

Regulatory Impact Assessment

50. No specific issues.

Communications

51. An update on communication of GQ related issues is included in the Chief Operating Officer's report.

Paper to be published	Yes
Publication date (if relevant)	After the meeting