



# GCSE Reform

## Analysis of consultation responses

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Submitted by:

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**Ofqual**  
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# Contents

<b>Consultation context and overview .....</b>	<b>4</b>
<b>Introduction .....</b>	<b>4</b>
Consultation method and respondent profile .....	5
Guidance on analysis.....	6
<b>Consultation analysis .....</b>	<b>8</b>
<b>Section 1: Scope, purpose and context of the consultation .....</b>	<b>8</b>
Comments regarding the scope, purpose and context of GCSEs reforms .....	10
<b>Section 2: Key design features – tiering.....</b>	<b>16</b>
Tiering of specific subjects .....	17
Preferences for different models of tiering .....	21
Reasons for first choice option .....	23
First preferences for tiering .....	26
Second preferences for tiering.....	28
Third preferences for tiering .....	30
Comments regarding tiering .....	31
<b>Section 3: Key design features –assessment arrangements.....</b>	<b>35</b>
Length of exams .....	36
Format of examinations .....	41
Timing of examinations .....	44
November resits.....	45
Spelling, punctuation and grammar .....	47
Comments regarding the proposed assessment arrangements for the GCSEs reforms.....	54
<b>Section 4: Key design features – reporting student performance .....</b>	<b>64</b>
Use of grades .....	64
The number of grades .....	68
How grades are described.....	71
Describing grades using numbers .....	73
Comments related to the reporting of student performance.....	75
Information students and users of qualifications would find valuable in addition to the overall grade about students’ performance.....	79
How would students and users of qualifications use additional information on students’ performance? ..	83
Would greater resource implications such as increased assessment and higher costs associated with providing more detailed performance information be justified? .....	87
<b>Section 5: Full and short courses.....</b>	<b>89</b>
<b>Section 6: Regulating the reformed GCSEs .....</b>	<b>92</b>
Assessment strategies.....	93
Reviewing assessment effectiveness .....	94
Comments on the regulation of reformed GCSEs .....	96
<b>Section 7: Subject-specific features of the reformed GCSEs .....</b>	<b>102</b>
English language.....	103
English literature .....	110
Mathematics .....	114
The Sciences (chemistry, biology, physics and double award science).....	117
Geography.....	123
History .....	127

<b>Section 8: Equality impact assessment</b> .....	<b>132</b>
Are there any impacts that are not identified?.....	132
Additional steps to mitigate negative impacts.....	136
<b>Appendix A: List of organisational consultation respondents</b> .....	<b>143</b>
<b>Appendix B: Consultation Questionnaire</b> .....	<b>149</b>
<b>Information pages</b> .....	<b>149</b>
<b>Consultation questions</b> .....	<b>152</b>
Section 1: Scope, purpose and context of the consultation .....	152
Section 2: Key design features – tiering .....	152
Section 3: Key design features: assessment arrangements .....	155
Section 4: Key design features: reporting student performance .....	159
Section 5: Full and short course GCSEs .....	162
Section 6: Regulating the reformed GCSEs .....	162
Section 7: Subject-specific features of the reformed GCSEs.....	164
Section 8: Equality impact assessment .....	168

## Consultation context and overview

### Introduction

1. General Certificates of Secondary Education (GCSEs) are being comprehensively reformed. The proposed reform of GCSEs was announced in February 2013 through a letter to Ofqual from the Secretary of State for Education, Michael Gove<sup>1</sup>. This letter to Ofqual outlined the Government's policy on reforms to qualifications at the end of Key Stage 4.
2. Ofqual launched a consultation on the design requirements for reformed GCSEs in England in June 2013. The consultation focussed on the key characteristics of the design requirements for reformed GCSEs in English literature, English language, mathematics, chemistry, biology, physics, science double award, geography and history. Ofqual's aim was that the exam boards could design and develop reformed GCSEs during 2013/14, ready for first teaching in September 2015. Reformed GCSEs in other subjects would be ready for first teaching from 2016.
3. In September, in an exchange of letters<sup>2</sup> between Ofqual and DfE, it was agreed that the development of reformed GCSEs would be re-phased, with English and Mathematics GCSEs available for first teaching from 2015, and other subjects introduced in 2016. The focus on English and Mathematics was on the basis that they provide the foundation for students' progression to further study and employment. The remaining subjects (that were subject to this summer's consultation) will be prepared for first teaching in 2016.
4. The Department for Education (DfE) ran a parallel consultation on the subject content requirements for the reformed GCSEs between 11 June and 20 August 2013. DfE will publish the results of their consultation separately.
5. Ofqual commissioned YouGov, an independent market research company to conduct the analysis of the responses received to its consultation. The analysis is comprehensive covering all aspects of the design proposals.

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<sup>1</sup> GCSE reform February 2013 <http://www.ofqual.gov.uk/files/2013-02-07-letter-from-michael-gove-reform-of-ks4-qualifications.pdf>

<sup>2</sup> Reform timetable correspondence September 2013 <http://ofqual.gov.uk/news/publication-notice/>

*Consultation method and respondent profile*

6. Ofqual's consultation ran from 11 June to 3 September 2013. Respondents were encouraged to submit their response to the consultation through an online survey or via hard copy/email. The breakdown of responses is shown in Figure 1. A full list of organisational respondents is at Appendix A.
7. The consultation posed a series of propositions on the regulatory design principles for reforming GCSEs and included closed questions and open ended questions. The consultation questions are in Appendix B.
8. A series of 'information questions' were included in the consultation to understand whether the response was an 'official response from the organisation you represent' or a 'personal view'. Following this categorisation, respondents classified themselves further using several detailed questions on their personal or organisational characteristics.
9. These categorisations provided the basis for sub-groups by which the responses to the consultation have been analysed. The final decision on the make-up of these classifications was made by Ofqual and the table below shows how the responses have been categorised for analysis purposes.

**Figure 1: Responses by stakeholder categories (inclusive of on-line and hard copy responses)**

<b>Respondent type</b>	<b>Number of responses</b>	<b>Percentage</b>
<b>Personal responses</b>	<b>347</b>	<b>72%</b>
Teacher	300	
Other education specialist <sup>3</sup>	25	
Parent/student/other	22	
<b>Organisational responses</b>	<b>133</b>	<b>28%</b>
Awarding organisation	7	
Equalities organisation	10	

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<sup>3</sup> A group created from personal responses classified as 'other' but where the individual stated they were very familiar with the education system i.e. examiner, governor, education consultant etc.

Respondent type	Number of responses	Percentage
School representative body/union	25	
Subject association	24	
Local Authority	8	
FE/Sixth Form	10	
School: Academy/comprehensive/state selective	35	
School: Independent	10	
Private sector/employer representative body <sup>4</sup>	4	
<b>Total</b>	<b>480</b>	

### *Guidance on analysis*

10. The closed questions are presented in tables with the frequencies of responses against each answer. The tables use the respondent categorisation set out above to present the findings cross-tabulated with respondent category.
11. As figure 1 shows the number of respondents within some stakeholder categories is very low. Given this, it is potentially misleading in a consultation with this number of responses to display the results as percentages so simple frequency counts have been used and percentages only provided for the total sample.
12. Given the dominance of responses from teachers to the overall sample (65% of all responses), caution is also advised in interpreting the top line percentage sample figures. The analysis has been approached in a more qualitative way given the small number of respondents in each group. These views cannot be analysed or seen as representative of these groups as a whole.

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<sup>4</sup> Responses received as written submissions rather than via the online consultation form – they do not lend themselves well to quantification within the overall analysis and therefore do not appear in the following tables. However, their views are captured through the qualitative analysis and commentary.

13. The open ended responses to four of the questions on the propositions (Q2, Q11, Q35 and Q36<sup>5</sup>) were considered suitable for coding of the responses. The decision was made to code these questions as they contained more structured responses, which meant they were better suited to coding than the other open ended questions in the consultation.
14. The open ended responses to these four questions elicited varied responses, ranging from generalised comments about the propositions, to comments about specific subjects etc. A code frame was created for each question to group them into categories to allow a summary of the themes to be visualised and quantified.
15. The remaining open ended questions were analysed in a very similar way, with each response read and the theme of the comments categorised but without formal coding. These responses were then analysed on a thematic basis by noting the themes of each response to highlight differences and trends in opinion between and within the respondent types.
16. The written submissions received outside of the online consultation were catalogued into a thematic grid and each response analysed for the key themes emerging from them. Often these written submissions were highly detailed. The purpose of this report is to summarise the strength of opinion received in response to the key consultation questions and the summary report cannot reflect every level of detail of these responses.

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<sup>5</sup> Q2 - Comments on the scope, purpose and context of reformed GCSEs; Q11 – Additional comments on tiering; Q35 – Information students and users of qualifications would find valuable in addition to the overall grade about students' performance; Q36 - How additional information about students' performance be used by students and users of qualifications?

## Consultation analysis

17. The main section of this report provides an analysis of the responses received to the online consultation and takes into account the views expressed via separate written submissions.
18. The report is structured around each section of the consultation and provides an analysis of the quantitative data broken down by stakeholder category. Where relevant the report provides further explanation of these responses through an analysis of the qualitative responses received.

### Section 1: Scope, purpose and context of the consultation

19. This section of the consultation provided an overview of GCSE reform and its objectives.
20. The consultation document proposed that the primary purposes of the reformed GCSEs would 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.
21. The consultation goes on to propose that reformed GCSEs should also provide a basis for schools to be held accountable for the performance of all their students. It was outlined to respondents that these proposed purposes are consistent with the purposes set out in the Secretary of State's letter<sup>6</sup>.
22. Respondents to the consultation were asked to consider these propositions on what the purpose of reformed GCSEs should be and indicate to what extent they agree or disagree with the propositions.
23. Three fifths of all respondents (59%) broadly agreed to the propositions on the proposed purposes of revised GCSEs, with a third (33%) disagreeing. Both personal responses (61%) and organisational responses are similar in their agreement with the proposed purposes of revised GCSEs.

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<sup>6</sup> GCSE reform February 2013 [www.ofqual.gov.uk/files/2013-02-07-letter-from-michael-gove-reform-of-ks4-qualifications.pdf](http://www.ofqual.gov.uk/files/2013-02-07-letter-from-michael-gove-reform-of-ks4-qualifications.pdf)



**Figure 2: 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? (Q1)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>39</b>	<b>166</b>	<b>71</b>	<b>45</b>	<b>13</b>	<b>334</b>
Teacher	31	148	60	36	13	288
Other education specialist	5	10	6	4	0	25
Parent/ student/ other	3	8	5	5	0	21
<b>Organisational responses</b>	<b>18</b>	<b>50</b>	<b>16</b>	<b>21</b>	<b>0</b>	<b>105</b>
Awarding organisation	0	5	1	0	0	6
Equalities organisation	0	2	0	3	0	5
School representative body/ union	5	9	5	0	0	19
Subject association	2	11	3	2	0	18
Local authority	1	3	1	2	0	7
FE/ Sixth form	1	6	0	2	0	<b>9</b>
School: Academy/ comprehensive/ state selective	4	9	6	12	0	<b>31</b>
School: Independent	5	5	0	0	0	<b>10</b>
<b>Total (n)</b>	<b>57</b>	<b>216</b>	<b>87</b>	<b>66</b>	<b>13</b>	<b>439</b>
<b>Total %</b>	<b>13%</b>	<b>49%</b>	<b>20%</b>	<b>15%</b>	<b>3%</b>	

24. There is most disagreement among the academy / comprehensive/ state selective schools that responded to the consultation, with twelve strongly disagreeing, six disagreeing and thirteen in total agreeing to the propositions.
25. A higher number of teachers agree with the propositions than disagree, although there remains a notable proportion that disagree (n=179 agree and n=96 disagree). Parents/carers are relatively evenly split in their opinion toward the proposed purpose of the reformed GCSEs with eleven agreeing and ten disagreeing.

*Comments regarding the scope, purpose and context of GCSEs reforms*

26. When prompted for any other comments regarding the reforms of GCSEs n=236 organisations and individuals provided a response. The majority of respondents use the open comments box to detail the reasons why they are not in favour of the reforms, or highlight their concerns with the propositions.
27. The responses were analysed and themes created to categorise the nature of the responses. The table below shows an analysis of the four most common concerns mentioned by respondents to the consultation. Readers are reminded that responses from teachers dominate the total responses and thus the number of mentions below, however these are issues mentioned by all groups.

Figure 3: Common concerns regarding the scope, purpose and context of GCSEs reforms (Q2)

	Should not be linked to accountability / other measures should be used for accountability / accountability is unclear	Will disadvantage less able students / less advantaged students / those with SEN/disabilities	Linear assessment does not prepare for higher education/employment / life skills not included	Should keep coursework/controlled assessments / exams only measure what is remembered
Total (n)	58	39	33	29

28. There are reservations among organisations, particularly awarding bodies and subject associations regarding the aim that reformed GCSEs **should provide a basis for schools to be accountable**, with agreement that they should provide some evidence for this but not all. It is commonly highlighted by organisational and individual responses that the importance of individual learners should not be overshadowed by the need for the school to justify its performance and be held accountable for the performance of its students. Furthermore respondents

note that there are many ways in which a school should be assessed and not solely through examination results.

‘The second purpose ‘provide a basis for schools to be held accountable for the performance of all their students’ needs careful handling to ensure that the focus on accountability does not become more important than the needs of individual learners.’

Awarding organisation

‘The second aim needs clarification. Exam results are only one indicator by which a school should be held accountable and not the only one. There are a wide range of factors such as teaching quality, access for students from disadvantaged backgrounds, pastoral care, leadership (etc.) which need to be accounted for and focusing too heavily on examination results can have detrimental effects on the others.’

Awarding organisation

‘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.’

Subject association

29. Educational specialists argue there will be little incentive to develop student’s social and practical needs with the renewed emphasis on examinations in the reformed GCSEs to provide the basis for schools’ accountability.

‘This means that schools, being held accountable for academic grades, have little incentive to prioritise other areas of development.’

Other educational specialist

30. The aim of the reformed GCSEs being the basis for a school’s accountability is a particular concern among equalities organisations. These organisations raise the concern that students with SEND or students from other disadvantaged backgrounds may be excluded in order for schools to reach higher ratings.

‘While we accept that school accountability must be closely related to pupil outcomes we are gravely concerned that basing

this so closely on such a narrow qualifications model will work against the interests of students with SEND who may be perceived by schools as lowering their overall performance'

Equalities organisation

The practice of ranking schools in this way fails to give credit to the efforts of schools and staff who teach pupils with SEN, disabilities and groups with other difficulties and can even lead to these pupils being encouraged to leave or being excluded.

Equalities organisation

31. A further concern raised by respondents is that **students could be disadvantaged by a move away from a modular examination structure.** School representative body/ unions in particular mention the concern that GCSEs must remain a qualification accessible to all and one which takes into account different learning styles, this concern is echoed by other organisations.
32. Equalities organisations particularly highlight the concern that the propositions on the reformed GCSEs do not fully provide for students, namely those with special educational needs or disabilities (SEND). There is a worry from organisations and individual responses that there will be less emphasis on alternative means of assessment that better suit students with SEND and as such, examinations will become less accessible for those with SEND, resulting in poorer grades and deterring such students from further and higher education. In addition, School Representative bodies mention the concern that a renewed emphasis on end assessment will favour boys over girls.

'Proposed changes which undoubtedly will make examinations less accessible for some candidates include the reduced use of tiering, course work, continuous assessment and modules, the reduced availability of re-takes at various times of year, the return to linear courses and the reintroduction of spelling and grammar points (which we understand has already occurred).'

Equalities organisation

'Research also shows that end assessment favours boys, whilst continuous assessment and coursework favours girls (Gender and Student Achievement in English, the Centre for Economics of Education, February 2006).'

School representative body/union

33. Responses among academy/ comprehensive/ state selective schools and teachers also raise the concern that the propositions move GCSEs away from being a universal qualification. Instead, such schools argue the reformed GCSEs would favour higher achievers, while providing less differentiation and incentive among students achieving lower grades or who are less academically inclined. Indeed it is queried what the purpose would be of differentiating between lower grades and reforms should also encourage a focus on ways of demonstrating other strengths and achievements.

‘We think that the proposals are justified regarding able learners, but we have concerns about how less able learners will benefit how will they be able to demonstrate success? ‘

School: Academy/comprehensive/state selective

34. Organisations and individuals raise a concern that the reformed GCSEs will **not provide a foundation for further academic and vocational study and employment**. The responses among teachers are particularly strong in their belief that the reformed GCSEs (with reduced project work and controlled assessment) will not provide students with the skills required to succeed in higher education and in the workplace.

‘Student achievement should take full account of transferable skills and not just the learning of facts as currently emphasised.’

Local authority

‘The assessment purely by examination is poor preparation for the work place, as most employers look for skills in project work, working on lengthy tasks, developing and improving work, extended writing, independence of work. Also, it is extremely poor preparation for any student going on to study further academic study at university (particularly humanities or arts degrees) as they will need to produce dissertations, assignments etc. based on lengthy work on one task, rather than merely memorising information for an exam.’

Teacher

35. Equalities organisations highlight that assessment based heavily on examinations will not expose students to a wider scope of learning. Nor are examinations in line with the type of learning students will encounter in higher education and among employers, where a wider range of assessments are

utilised. The disparity between GCSEs and with what is expected of students in higher education was also echoed by individual responses from teachers.

‘Having tougher written examinations will not automatically lead to students having a stronger foundation for further and higher education or employment. In reality, students would have less opportunity to develop the independent study, research and critical analysis skills needed to benefit from life-long learning opportunities. Similarly, students will have fewer opportunities to develop the oral communication, presentation, and team-working capabilities that are wanted by employers.’

Equalities organisation

36. There is concern from respondents that the reformed GCSEs will **not provide evidence of students’ achievements as exams only measure what is remembered** and controlled assessments should remain to counter this. One element of this is that coursework in conjunction with controlled exams should remain to provide evidence and examples of students work. It is argued that important skills that are developed and assessed through coursework and other forms of assessment may be ignored with the emphasis placed on examinations. This is particularly relevant for practical subjects, such as drama, art and to some extent English language although the Ofqual consultation did not offer proposals on how other subjects should be assessed.

‘The lack of any form of coursework or other internal assessment of written work fails to assess key elements of students’ achievement in English, such as independent study, research skills and extended writing, all of which are highly valued by both universities and employers.’

School representative body/union

‘An end of two year exam medley will serve as more of a memory test than an expression of skills. These students will not enter into any work in the world that emulates a similar format. What they will experience throughout their lives are the skills required to plan a large project, work on it, draft it, and perfect it in a certain time frame; the exact skills that the controlled assessment exercise tests.’

Teacher

37. Finally, there are some concerns that the reforms are not altogether necessary on such a large scale. Sixteen respondents argue that the current system does

not need to change or that only tweaks to the current system are required and fifteen disagree with making the exams more demanding.

38. Nine respondents argue there is not enough evidence for change. Furthermore, respondents highlight that any reforms should not be rushed and that the timetable does not allow for considered implementation with an on-going appraisal of the system. This was a need identified by respondents and since the launch of the Ofqual consultation, the timetable for implementation has been revised.

‘...we believe that the system should be updated where needs be, but fundamentally left intact’

School: Academy/comprehensive/state selective

‘We believe that the proposed timescale is far too short to implement such a large scale reform of GCSEs and to also ensure that the exams are fit for purpose.’

School representative body/union

## Section 2: Key design features – tiering

39. The following section analyses the responses to propositions regarding tiering. Tiering is discussed as a concept in itself and in relation to specific subjects. Preference and reaction to three distinct models of tiering are analysed.

40. To address concerns that tiering can limit students' ambitions Ofqual proposed 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.

**Figure 4: To address concerns that tiering can limit students' ambitions Ofqual proposed 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? (Q3)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>79</b>	<b>151</b>	<b>49</b>	<b>46</b>	<b>9</b>	<b>334</b>
Teacher	66	131	46	37	9	289
Other education specialist	9	11	1	3	0	24
Parent/student/other	4	9	2	6	0	21
<b>Organisational responses</b>	<b>28</b>	<b>50</b>	<b>16</b>	<b>6</b>	<b>5</b>	<b>105</b>
Awarding organisation	1	4	0	0	0	5
Equalities organisation	0	5	1	0	0	6
School representative body/ union	5	9	3	0	2	19
Subject association	5	8	2	0	1	16
Local authority	2	4	1	0	0	7



FE/ Sixth form	2	5	1	0	0	8
School: Academy/ comprehensive/ state selective	4	15	7	6	2	34
School: Independent	9	0	1	0	0	10
<b>Total (n)</b>	<b>107</b>	<b>201</b>	<b>65</b>	<b>52</b>	<b>14</b>	<b>439</b>
<b>Total %</b>	<b>24%</b>	<b>46%</b>	<b>15%</b>	<b>12%</b>	<b>3%</b>	

41. There is broad agreement from all groups as to whether qualifications should be tiered, with 67% of all respondents agreeing and 25% disagreeing. Organisational responses are stronger in their agreement (74%) than those responses from personal respondents (68%).
42. Awarding bodies are strong in their agreement, with five agreeing and none disagreeing with the propositions. Similarly five of the six respondents responding on behalf of equalities organisations agreed, with just one in disagreement.
43. Disagreement is highest among academy/ comprehensive/ state selective schools and teachers, although the majority agree (thirteen academy/ comprehensive/ state selective schools disagree, nineteen agree, n=83 teachers disagree, n=197 agree).

#### *Tiering of specific subjects*

44. The principle on tiering set out above have been applied to the following subjects: English language, English literature, mathematics, biology, chemistry, physics, double award science, geography and history. The only reformed GCSEs suggested to be tiered would be mathematics and science (biology, chemistry, physics and double award) of those covered by the consultation document. Respondents were asked to show to what extent they agree with the proposition to tier mathematics and science.
45. For ease of comparison the tables for each subject uses a net of the strongly agree and agree categories to create an 'agree' category and a net of disagree and strongly disagree categories to create a 'disagree' category.

Figure 5: The reformed GCSE in mathematics and the sciences (biology, chemistry, physics and double award) should be tiered. To what extent do you agree with these propositions? (Q4/Q5)

	Mathematics			Science		
	Agree	Disagree	Don't know/no opinion	Agree	Disagree	Don't know/no opinion
<b>Personal responses</b>	<b>236</b>	<b>33</b>	<b>52</b>	<b>216</b>	<b>41</b>	<b>57</b>
Teacher	203	25	48	186	30	54
Other education specialist	19	2	3	17	4	2
Parent/student/other	14	6	1	13	7	1
<b>Organisational responses</b>	<b>83</b>	<b>2</b>	<b>18</b>	<b>73</b>	<b>5</b>	<b>23</b>
Awarding organisation	5	0	1	4	1	1
Equalities organisation	5	1	0	5	1	0
School representative body/ union	17	0	2	14	0	4
Subject association	6	0	9	3	1	9
Local authority	7	0	0	7	0	0
FE/ Sixth form	5	1	1	4	1	2
School: Academy/ comprehensive/	28	0	5	28	1	5

state selective						
School:						
Independent	10	0	0	8	0	2
<b>Total (n)</b>	<b>319</b>	<b>35</b>	<b>70</b>	<b>289</b>	<b>46</b>	<b>80</b>
<b>Total %</b>	<b>75%</b>	<b>8%</b>	<b>17%</b>	<b>70%</b>	<b>11%</b>	<b>19%</b>

46. On the whole all groups agree that mathematics and science should be tiered. Three quarters of respondents (75%) agree that mathematics should be tiered and 70% agree that science should be tiered. Organisational responses are stronger in their agreement than personal responses that mathematics (80% versus 73% of personal responses) and science (72% versus 68% of personal responses) should be tiered.
47. There is absolute agreement among the seven local authorities' that responded and the fourteen school representative body /unions, all of whom agree with tiering the two subjects. The highest level of disagreement is among parents, of who around a third disagree with tiering in science (n=7, compared with 13 that agree) and mathematics (n=6 compared with 14).
48. There is a notable proportion answering 'don't know/ no opinion' among subject associations and teachers. A reason for this will be the subject specific knowledge that these groups have limits them from having a strong opinion on science and mathematics. The most common response among subject associations is 'don't know/ no opinion' (n=9, with 3 agreeing and 1 disagreeing). Among teachers around one in five do not know or have no opinion on the proposals (n=54, with n=186 agreeing and n=30 disagreeing).
49. Ofqual proposed that the reformed GCSE in English language, English literature, geography and history should be untiered. Respondents were asked to what extent they agree with this proposition and the information is relayed below.

Figure 6: To what extent do you agree with the proposition that GCSEs in English language, English literature, Geography and History should be untiered? (Q6/Q7/Q8/Q9)

	English language		English literature		Geography		History	
	Agree	Disagree	Agree	Disagree	Agree	Disagree	Agree	Disagree
<b>Personal responses</b>	<b>145</b>	<b>100</b>	<b>140</b>	<b>107</b>	<b>120</b>	<b>86</b>	<b>133</b>	<b>77</b>

## GCSE Reform Consultation Analysis

Teacher	121	87	117	93	94	79	106	69
Other education specialist	13	4	12	5	11	3	11	4
Parent/ student/ other	11	9	11	9	15	4	16	4
<b>Organisational responses</b>	<b>45</b>	<b>35</b>	<b>43</b>	<b>40</b>	<b>36</b>	<b>34</b>	<b>43</b>	<b>27</b>
Awarding organisation	4	1	3	2	3	1	4	0
Equalities organisation	1	4	1	4	1	2	1	2
School representative body/ union	12	3	9	6	9	6	10	5
Subject association	6	3	5	4	4	1	4	1
Local authority	4	3	4	3	3	4	3	3
FE/Sixth form	4	2	4	2	3	1	4	1
School: Academy/ comprehensive/ state selective	10	16	13	16	8	17	12	13
School: Independent	4	3	4	3	5	2	5	2
<b>Total (n)</b>	<b>190</b>	<b>135</b>	<b>183</b>	<b>147</b>	<b>156</b>	<b>120</b>	<b>176</b>	<b>104</b>
<b>Total %</b>	<b>46%</b>	<b>33%</b>	<b>44%</b>	<b>35%</b>	<b>38%</b>	<b>29%</b>	<b>43%</b>	<b>25%</b>

50. More respondents agree than disagree with the proposals to make English language and literature, geography and history untiered. Across each of the subjects there is between a 9 and 18 percentage point difference between those that agree and disagree with tiering.
51. There is the clearest distinction regarding history, for which nearly two thirds agree (n=176) and a third disagree (n=104). The current situation is that history is untiered and a majority of respondents feel this should remain the case.

52. Respondents answering on behalf of equalities organisations or academy/comprehensive/ state selective schools are in less agreement with the proposals. For each of the subjects asked about, more respondents from these groups are likely to disagree than agree that reformed GCSEs should be untiered. There is no clear consensus among local authorities, among whom opinion is relatively evenly split between those who agree with the proposals and those who disagree.
53. Again given the subject specific knowledge needed to answer questions on subject tiering, subject associations and teachers are more likely than other groups not to offer an opinion.

*Preferences for different models of tiering*

54. Where tiering is used, Ofqual proposed three models – adjacent levels, core and extension, overlapping tiers. Respondents were asked which of the models they would prefer with nearly two thirds of respondents choosing overlapping tiers as their first preference for the type of model to be used (65%). Core and extension models are the most popular second preference (49%), leaving adjacent levels the runner up (69% third choice).

**Figure 7: Preferred models for tiering GCSEs (1–3). Total mentions (Q10)**

	Adjacent levels	Core & extension model	Overlapping tiers
<b>Total first preference (n)</b>	30	116	261
<b>Total %<sup>7</sup></b>	<b>8%</b>	<b>30%</b>	<b>65%</b>
<b>Total second preference (n)</b>	89	190	105
<b>Total %</b>	<b>23%</b>	<b>49%</b>	<b>26%</b>
<b>Total third preference (n)</b>	262	81	38
<b>Total %</b>	<b>69%</b>	<b>21%</b>	<b>9%</b>

<sup>7</sup> Please note percentages don't sum to 100% due to different base sizes for each question

55. The table below shows the full breakdown in order of preferences among respondents that gave a first, second and third choice. Overall personal and organisational responses agree that overlapping tiers would be their first choice, the core and adjacent model their second choice and adjacent levels their third choice. The least popular order of preferences is when adjacent levels are the first choice. In total just four per cent choose an option where adjacent levels are the first choice compared to 62% who choose an option with overlapping tiers as their first option.

Figure 8: Preferred models for tiering GCSEs (1–3). Order of preferences

	Adjacent levels, Core & extension model, Overlapping tiers	Adjacent levels, Overlapping tiers, Core & extension model	Core & extension model, Adjacent levels, Overlapping tiers	Overlapping tiers, Adjacent levels, Core & extension model	Core & extension model, Overlapping tiers, Adjacent levels	Overlapping tiers, Core & extension model, Adjacent levels
<b>Personal responses</b>	<b>14</b>	<b>12</b>	<b>20</b>	<b>51</b>	<b>72</b>	<b>128</b>
Teacher	8	6	17	44	68	114
Other education specialist	3	3	0	3	3	10
Parent/student/other	3	3	3	4	1	4
<b>Organisational responses</b>	<b>3</b>	<b>4</b>	<b>3</b>	<b>15</b>	<b>16</b>	<b>46</b>
Awarding organisation	1	0	0	2	0	2
Equalities organisation	0	0	0	1	1	0
School representative body/ union	0	0	0	3	2	10

Subject association	2	3	1	1	2	2
Local authority	0	0	0	0	3	4
FE/Sixth form	0	0	2	3	2	1
School: Academy/ comprehensive/ state selective	0	1	0	2	5	22
School: Independent	0	0	0	3	1	5
<b>Total (n)</b>	<b>17</b>	<b>16</b>	<b>23</b>	<b>68</b>	<b>88</b>	<b>174</b>
<b>Total %</b>	<b>4%</b>	<b>4%</b>	<b>6%</b>	<b>17%</b>	<b>23%</b>	<b>45%</b>

*Reasons for first choice option*

56. Respondents who **prefer overlapping tiers as their first option** report that such tiering would provide students that are more able with the opportunity to achieve higher grades and could give less able students the chance to achieve higher grades than expected and provide them with the motivation to do so.
57. All respondent groups who preferred overlapping tiers as their first choice say it is because it provides the most opportunity for pupils to achieve. Other strong arguments that cut across the responses are that overlapping tiers are as close to a non-tiering option as possible or that overlapping tiers allow pupils achievements not be hampered by a 'bad day'.
58. One of the key words used was flexibility that allows pupils to achieve better or worse than expected. This is also a point made by Local Authorities, school representative bodies and individual state school responses.

'Would allow students to have aspirations to achieve a higher grade and therefore reduce the demotivation if being entered for the lower tier.'

Teacher

'I feel papers shouldn't be tiered and have questions across the whole spectrum. Overlapping tiers is as close as we can get to that.'

Teacher

'Weaker students on foundation tier will still have the opportunity to reach grades that stretch them in terms of ability, and for higher tier students this system also means that they are less likely to fall off the bottom• if things go less well than expected in their final exam.'

School: Academy/comprehensive/state selective

'This gives students a platform to exceed expectations and also to 'have a bad day' in the exam.'

Teacher

'Students who are around 'C' level - should have ability to try to get higher grades - while students who are expected to get higher grades - but do less well - shouldn't just fail.'

Parent/student/other

'Overlapping tiers would provide the necessary flexibility to enable those sitting the higher tier to still attain a qualification even if they perform at a slightly lower level than expected and those sitting the lower tier to achieve a high grade if they perform at above the expected level.'

School representative body/union

59. There is a feeling from respondents that each model has its disadvantages and that the overlapping tiers model may be the least worst option. This is an issue highlighted by two awarding organisations that prefer overlapping tiers as their first option.



60. Critiques were provided by awarding organisations of the other options and conclusions made that the adjacent levels model 'would appear to be the worst in terms of limiting opportunities' or that other models 'contain features which impact on the reliability of the assessment'.

61. The conclusion between those awarding organisations that preferred overlapping tiers was that this model best overcomes these disadvantages and offers opportunities to stretch students, differentiates effectively and provides reliable assessment. With one awarding organisation concluding that:

'It is the probably the most logical and manageable way of extending the overlap thereby reducing the cap on achievement whilst not placing additional burdens on students by the use of extension papers.'

Awarding organisation

62. Leading on from this there is also the feeling that as overlapping tiers is the current model it has advantages of being familiar to users and providers of qualifications, making it the most manageable option. This was a point raised by teachers, awarding organisations and school representative bodies.

'This is the method used currently where tiering takes place. It would have the advantage of being familiar to providers and practitioners and therefore has the advantage of manageability.'

School representative body/union

63. Respondents who **choose the core and extension model as their first option** report that this tiering model allows all students to learn the core requirements necessary for further education and employment, while providing more able or interested students with the opportunity to extend their knowledge.

64. There are fewer comments in support of the core extension model however, the key themes that emerge focus on phrases such as a 'common experience' or that this was 'fair to all'.

65. It is also argued that the core extension tiering model will not de-incentivise the lower ability students and can in fact raise aspirations.

'This allows all students to access the same core examination and so would not limit aspiration. However, it also allows the more able to demonstrate their true ability by accessing the more demanding material in the extension paper.'

Teacher

‘Allows for common experience of the subject and shared teaching but with additional challenge for more able students. All students could be allowed to do the extension tasks if they wanted to, thus taking away the demand for teachers to make a judgement and allow students to reach up towards the highest levels, rather than being limited by prior expectations of likely performance.’

Subject association

‘Allows all students to be assessed on core knowledge, understanding etc., then all stronger and mid candidates to take further assessment, raising aspirations especially for mid-range candidates.’

Teacher

‘The core and extension model is fair to all candidates as it fulfils the need for GCSE to be a universal qualification, accessible to pupils across the full range of ability, whilst also enabling the more academically able to meet appropriately higher expectations, allowing them to show their full potential.’

School representative body/union

66. Respondents who choose adjacent levels as their first option are in favour of the opportunity this provides students to move across levels. It is described as the simplest option in which students are provided with examinations most suited to their ability.

‘Adjacent levels provide tiering that is appropriate to both/all levels of ability, and the courses can be better designed around that.’

Parent/student/other

‘It eliminates the issue of having to pick a tier (since both can be entered) and allows for a simple approach to grading (the highest grade achieved counts).’

School: Academy/comprehensive/state selective

*First preferences for tiering*

Figure 9: Preferred models for tiering GCSEs (1–3). First preference (Q10)

	Adjacent levels	Core & extension model	Overlapping tiers
Personal responses	23	96	191

FIRST PREFERENCE	Teacher	11	88	170
	Other education specialist	6	3	13
	Parent/student/other	6	5	8
	<b>Organisational responses</b>	<b>7</b>	<b>20</b>	<b>70</b>
	Awarding organisation	1	0	4
	Equalities organisation	0	1	4
	School representative body/union	1	2	15
	Subject association	4	4	4
	Local authority	0	3	4
	FE/Sixth form	0	4	4
	School: Academy/comprehensive/state selective	1	5	26
	School: Independent	0	1	9
	<b>Total (n)</b>	<b>30</b>	<b>116</b>	<b>261</b>
	<b>Total %</b>	<b>8%</b>	<b>30%</b>	<b>65%</b>

67. Overlapping tiers is the most popular first choice overall. There is strong support for overlapping tiers from independent schools, equalities and awarding organisations (all but one respondent from each group choosing this method). Other groups which show a strong level of preference for overlapping tiers include teachers (n=170), academy/ comprehensive/ state selective schools (n=26) and school representative body/ unions (n=15).
68. The answers among respondents from further education/ sixth form are more evenly distributed across core and extension models, and overlapping tiers (around half for each model). Among the three responses from further education/ sixth form that detail why they choose core and extension models

over overlapping tiers there is a concern that less able students will be penalised, as the content of one exam may be too demanding, if there is not a specific examination for more able students.

69. Furthermore, that the overlapping tier model allows for some degree of uncertainty of a students' predicted grade. These respondents argue the core and extension model is a more transparent model that enables students to have a broader knowledge of the subject.
70. There is also more variety in the responses from parents/ students/ other - who in general favour overlapping tiers, although there is also strong support for the two other methods – and respondents from subject associations – whose responses are equally distributed between the three methods.
71. Among the four responses from further education/ sixth forms and sixteen responses from subject associations that detail why they choose the core and extension model or adjacent levels, there is the argument that such models provide tiering that is appropriate to all levels of ability, meaning students share a common experience of the subject and therefore courses can be better designed. Furthermore there is a concern that in the core and extension model the extension really justifies a different qualification.

### *Second preferences for tiering*

**Figure 10: Preferred models for tiering GCSEs (1–3). Second preference (Q10)**

	Adjacent levels	Core & extension model	Overlapping tiers
<b>Personal responses</b>			
Teacher	61	121	75
Other education specialist	3	13	6
Parent/student/other	7	7	4
<b>Organisational responses</b>			
Awarding organisation	2	3	0
Equalities organisation	1	0	1

School representative body/union	3	9	3
Subject association	2	5	4
Local authority	0	4	3
FE/Sixth form	5	1	2
School: Academy/comprehensive/ state selective	2	22	6
School: Independent	3	5	1
<b>Total (n)</b>	<b>89</b>	<b>190</b>	<b>105</b>
<b>Total %</b>	<b>23%</b>	<b>49%</b>	<b>26%</b>

72. The core & extension model is the most popular second preference. There is strong support for this model as a second preference from teachers (n=121), academy/ comprehensive/ state selective schools (n=22) and other education specialists (n=13).
73. Respondents from further education/ sixth form more commonly choose adjacent levels as their second choice (n=5, with n=1 choosing the core & extension model and n=2 overlapping tiers). Respondents among parents/ students/ other are more evenly distributed across core and extension models and adjacent levels (half for each model).

## Third preferences for tiering

Figure 11: Preferred models for tiering GCSEs (1–3). Third preference (Q10)

	Adjacent levels	Core & extension model	Overlapping tiers
<b>Personal responses</b>	<b>200</b>	<b>62</b>	<b>32</b>
Teacher	182	49	23
Other education specialist	13	6	3
Parent/ student/ other	5	7	6
<b>Organisational responses</b>	<b>62</b>	<b>19</b>	<b>6</b>
Awarding organisation	2	2	0
Equalities organisation	1	1	1
School representative body/union	11	4	0
Subject association	5	3	3
Local authority	7	0	0
FE/Sixth form	3	3	2
School: Academy/ comprehensive/ state selective	27	3	0
School: Independent	6	3	0
<b>Total (n)</b>	<b>262</b>	<b>81</b>	<b>38</b>
<b>Total %</b>	<b>69%</b>	<b>21%</b>	<b>9%</b>

74. Adjacent levels are the third most popular choice among respondents. Local authorities agree that this is their third choice, with no other third preference picked. Respondents among awarding organisations, equalities organisations,

further education/ sixth form and parents/ students/ other are slightly more distributed between the three models, with parents/ students/ other preferring the core & extension model as their third choice.

*Comments regarding tiering*

75. When prompted for any other comments regarding the tiering of GCSEs n=386 organisations and individuals provided a response. The four most common concerns are detailed in the table below.

**Figure 12: Themes in comments regarding tiering. Base: 386 individual responses received to Q11.**

	Non tiering will disadvantage/demoralise students of lower ability	Current tiering relies on teacher predictions / limits students / allows prejudice	Current system is fair / shouldn't change current system / agree with tiering	Design of assessment should promote access/equality
Total (n)	34	32	32	21

76. Concerns are raised that **a non-tiered approach to examinations will disadvantage or demoralise students**. A 'one size fits all' approach is often referred to in relation to non-tiering and as such that it would be difficult to ensure a single untiered examination is accessible for all capabilities and, as particularly highlighted by equalities organisations, students with SEND.

'The end of tiering is likely to mean that large parts of exam papers are not accessible to certain groups of students, or are too straightforward for others.'

School representative body/union

'Considerable difficulties would arise in untiered examinations, as it would be hard to ensure that the content and style of the paper would be equally accessible to all students.'

Local Authority

'The language used in the examination papers will need to be accessible to the whole range of candidates, including those who are deaf. It is important to ensure that deaf students are not disadvantaged from demonstrating their competence in a subject because a question is worded in a challenging, complex way.'

Equalities organisation

'Tiering should be removed where possible; however before this is implemented, Ofqual must invest in developing non-tiered papers, which young people of all abilities will be able to sit confidently;'

Equalities organisation

'...untiered exams have their own associated problems, most notably the danger of only serving pupils in the middle attainment level. Higher achieving pupils may not be stretched by untiered exams, and lower attaining pupils may be disadvantaged by the use of difficult language or a lack of assistance given in a question.'

Private sector/employer representative body

'The difficulty of having an untiered examination is being able to allow the exam to be accessible to the lowest ability students whilst stretching the top end. The danger is otherwise able students are left unchallenged by the easiest questions whilst the weakest students find the paper entirely inaccessible.'

Teacher

77. Tiering is thought to be particularly appropriate for particular subjects, namely English and maths. While there is less support for tiering in subjects such as history which is currently untiered.

'Tiering is important in mathematics because of the enormous spread of ability at age 16, and it is simply not possible to devise untiered papers that measure what is important across the entire ability spectrum.'

Other education specialist

'...welcomes the recommendation that GCSE Mathematics should be tiered. Tiering allows for more appropriate assessment in mathematics: it allows stretch and challenge at the top of the ability range, while allowing those nearer the bottom of the range to demonstrate their knowledge effectively.'

Subject association

78. It is also argued that **the current system relies too heavily on teacher predictions and thus allows prejudice**. Although it is also mentioned by a



small number of teachers and indeed a subject association that **teachers are well placed to assess which tier a student should be in** and regularly assess whether or not the student is in the correct tier.

‘We acknowledge that there have been instances where providers have misallocated some young people by placing them in the Foundation tier when they could have achieved in the higher tier.’

School representative body/union

‘The current Tiered model in geography exams limits students based on teacher’s predictions. It is particularly difficult to judge C/D borderline students.’

Teacher

‘More respect should be given to a teacher's ability to make judgements on tiering. These decisions are not made lightly.’

Teacher

79. There is **some support for the current system as it stands**, with the feeling that there is nothing wrong with the current system and no changes are required. The following quotes are an example of the type of response received to evidence this point.

‘There is NOTHING wrong with the current system of tiering. It is fair and students are well aware of their capabilities and for some a foundation paper is EXTREMELY challenging for them without enforcing a non tiering system that would completely devastate some individuals.’

Teacher

‘Tiered papers have the potential to assess the full range of students’ abilities. Differentiation in lessons is universally recognised as essential and is expected in every classroom.’

Subject association

80. While there was agreement with the current model of tiering. A point of view provided, often through respondents on behalf of further education/ sixth forms, is that tiering itself limits potential and there should be a move away from categorising students into particular tiers.

'Ideally, we do not believe that subjects should be tiered, as we disagree with the overlap between tiers. We believe that tiering in this way hampers students' progression, as it limits ambition and does not give an opportunity for all students to stretch and challenge themselves.'

Further education/ sixth form

'The current model of tiering encourages some schools to enter pupils for the tier in which they are most likely to achieve the C grade threshold. Potentially, this could mean that some schools do not stretch students who may be able to achieve a higher grade.'

Private sector/employer representative body

81. The point was also made that it is important that tiering does not itself limit student ambitions and achievement. An awarding organisation contends that to overcome this content between the tiers should be maximised as much as possible.

'To address concerns that tiering can limit students' ambitions, it is critical that the amount of common content between the tiers should be maximised so that as far as possible, differentiation should be achieved by task and outcome.'

Awarding organisation

82. There is a general consensus among respondents that regardless of the tiering approach used, assessments **should promote access/equality**. There is a desire that students should be monitored and allowed to change tiers when appropriate.

'It [tiering] is an essential aspect of an exam system that promotes inclusion and equality of access.'

Local Authority

'Tiering, when applied well can be effective, but one must ensure that it does not stratify children too early, as they may be late bloomers.'

Parent/student/other

### Section 3: Key design features –assessment arrangements

83. In terms of how reformed GCSEs should be assessed, the proposed default position is that they should be assessed by externally set and marked examinations, except where subject content cannot be validly assessed in this way.
84. There is broad agreement for this proposition; a third (30%) strongly agrees and a further third (32%) agree that GCSEs should be assessed by externally set and marked examinations. Just under four in ten (38%) disagree or strongly disagree.
85. However, personal responses are more likely to agree (66%) than organisational responses which are more split on this issue (50% agree versus 48% that disagree).

**Figure 13: 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? (Q12)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>112</b>	<b>107</b>	<b>52</b>	<b>62</b>	<b>0</b>	<b>333</b>
Teacher	99	94	43	52	0	288
Other education specialist	7	8	5	5	0	25
Parent/student/other	6	5	4	5	0	20
<b>Organisational responses</b>	<b>19</b>	<b>35</b>	<b>21</b>	<b>30</b>	<b>2</b>	<b>107</b>
Awarding organisation	1	3	2	0	0	6
Equalities organisation	0	1	2	3	0	6
School representative body/ union	3	4	6	5	1	19
Subject association	1	8	2	6	1	18
Local authority	2	1	2	2	0	7
FE/Sixth form	2	4	2	1	0	9

School: Academy/ comprehensive/ state selective	3	11	5	13	0	32
School: Independent	7	3	0	0	0	10
<b>Total (n)</b>	131	142	73	92	2	440
<b>Total %</b>	<b>30%</b>	<b>32%</b>	<b>17%</b>	<b>21%</b>	<b>1%</b>	

86. Agreement is highest among teachers with n=193 agreeing to some extent compared with n=95 who disagree. Teachers are strong in their opinions in that none have selected the no opinion/ don't know category. Similarly, independent schools are also more likely to agree than disagree (n=10 compared with n=0).
87. Academy/ comprehensive/ state selective schools, school representative body /unions, local authorities and equalities organisations all have more responses who disagree rather than agree.
88. Generally all groups have an opinion one way or the other with very few stating they have no opinion or do not know (Subject association n=1 and school representative body /union's n=1).

#### *Length of exams*

89. Ofqual proposed that for the first set of reformed GCSEs<sup>8</sup> 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.
90. Ofqual would expect these requirements to be spread over more than one exam and the time limits will be doubled for double award science.

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<sup>8</sup> English language, English literature, mathematics, chemistry, biology, physics, double science award, history, geography

91. Just under three quarters of respondents (70%) agree that there should be a minimum total exam time that could be divided between different papers, one in five (20%) disagree (figure 13).
92. Agreement is again highest among teachers (n=201 compared with n=62 who disagree), followed by other education specialists (n=20 compared with n=4) and academy/ comprehensive/ state selective schools (n=19 compared with n=9).
93. For the following groups all respondents either strongly agree or agree, none say they disagree that where the final grade is based on externally set and marked exams only, there should be a minimum total exam time:
- Subject associations (n=15)
  - Independent schools (n=10)
  - FE/ Sixth forms (n=6)
  - Awarding organisations (n=5)
94. The table below shows a breakdown of respondents who either agree or disagree that there should be a minimum total exam time *where the final grade is based on externally set and marked exams only* and for subjects in the first tranche, where there are other forms of assessment in addition to exams (biology, chemistry and physics).

**Figure 14: Where a final grade is based on externally set and marked exams only there should be a minimum total exam time (that could be divided between different papers). To what extent do you agree with this proposition? (Q13). 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 (that could be divided between different papers). To what extent do you agree with these propositions? (Q15)**

	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).		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).	
	Agree	Disagree	Agree	Disagree
<b>Personal responses</b>	<b>234</b>	<b>72</b>	<b>180</b>	<b>46</b>

*GCSE Reform Consultation Analysis*

Teacher	201	62	150	39
Other education specialist	20	4	16	3
Parent/student/other	13	6	14	4
<b>Organisational responses</b>	<b>73</b>	<b>17</b>	<b>67</b>	<b>13</b>
Awarding organisation	5	0	5	0
Equalities organisation	1	3	2	0
School representative body/union	11	4	12	3
Subject association	15	0	7	0
Local authority	6	1	7	0
FE/Sixth form	6	0	6	1
School: Academy/comprehensive/state selective	19	9	19	9
School: Independent	10	0	9	0
<b>Total (n)</b>	<b>307</b>	<b>89</b>	<b>247</b>	<b>59</b>
<b>Total %</b>	<b>70%</b>	<b>20%</b>	<b>61%</b>	<b>15%</b>

95. For subjects in the first tranche where there are other forms of assessment in addition to exams such as biology, chemistry and physics it is proposed that

there should a minimum number of hours of exam time. Again, it is proposed that the total exam time could be divided between different papers.

96. Agreement is generally strong with three fifths (61%) either strongly agreeing or agreeing compared with one in six (15%) strongly disagreeing/ disagreeing (figure 14). This filters out to individual groups too with all more likely to agree than disagree.
97. Ofqual proposed that a minimum total exam time of 3.5 hours is set for subjects where the final grade is based on externally set and marked exams only. These subjects would include English language, English literature, mathematics, geography and history.
98. Two thirds (65%) of respondents state 3.5 hours is about right, just under a third (29%) state it is too much and six per cent state it is too little (figure 15). Organisational responses (73%) are more likely to state that 3.5 hours is about right than personal responses (62%).
99. The table below shows a breakdown of whether respondents felt a minimum total exam time of 3.5 hours for subjects where the final grade is based on externally set and marked exams only and 3 hours for subjects in the first tranche where there are other forms of assessment undertaken in addition to exams, is - too much, too little or about right.

**Figure 15: 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 – in English literature, mathematics, geography and history. Is 3.5 hours too much/ about right/ too little? (Q14) 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. Is 3 hours too much/ about right/ too little? (Q16)**

	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 a minimum total exam time of 3.5 hours is...			For subjects in the first tranche where there are other forms of assessment undertaken in addition to exams, a minimum of 3 hours of exam time is...		
	Too much	About right	Too little	Too much	About right	Too little
<b>Personal responses</b>	<b>97</b>	<b>203</b>	<b>25</b>	<b>80</b>	<b>183</b>	<b>18</b>
Teacher	84	176	22	67	160	14
Other education specialist	7	16	0	7	13	1

Parent/student/ other	6	11	3	6	10	3
<b>Organisational responses</b>	<b>24</b>	<b>72</b>	<b>2</b>	<b>22</b>	<b>62</b>	<b>1</b>
Awarding organisation	1	4	0	1	3	0
Equalities organisation	1	1	1	1	1	0
School representative body/ union	5	11	0	4	11	0
Subject association	2	14	0	2	7	0
Local authority	2	5	0	2	5	0
FE/Sixth form	1	6	1	1	5	1
School: Academy/ comprehensive/ state selective	10	23	0	9	22	0
School: Independent	2	8	0	2	8	0
<b>Total (n)</b>	<b>121</b>	<b>275</b>	<b>27</b>	<b>102</b>	<b>245</b>	<b>19</b>
<b>Total %</b>	<b>29%</b>	<b>65%</b>	<b>6%</b>	<b>28%</b>	<b>67%</b>	<b>5%</b>

100. 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 – 67% state this is about right. 28% state too much and 5% too little (figure 15).

101. Organisational responses (73%) are slightly stronger than personal responses (65%) in their view that 3 hours is the appropriate minimum amount of exam time for subjects in the first tranche.



102. Agreement that 3 hours is about right for subjects in the first tranche is highest among independent schools (n=8) followed by subject associations (n=7) and awarding organisations (n=3).
103. Other education specialists (7 out of 21) and parents/ students/ other (6 out of 19) are most likely to state 3 hours is too much for subjects in the first tranche where there are other forms of assessment undertaken in addition to exams.

#### *Format of examinations*

104. The Ofqual consultation proposed that reformed GCSEs will be linear, with all exams taken at the end of the course, although non-exam assessments may be completed at different times.
105. Just over half (54%) of respondents agree with the proposition of reformed GCSEs becoming linear with all exams taken at the end of the course (non-exam assessments may be completed at different times), two per cent don't know or have no opinion and 44% disagree. There was limited difference between personal and organisational responses to this question.

**Figure 16: 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? (Q17)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>80</b>	<b>105</b>	<b>56</b>	<b>90</b>	<b>3</b>	<b>334</b>
Teacher	69	97	45	75	2	288
Other education specialist	8	5	6	6	0	25
Parent/student/other	3	3	5	9	1	21
<b>Organisational responses</b>	<b>20</b>	<b>33</b>	<b>19</b>	<b>28</b>	<b>5</b>	<b>105</b>
Awarding organisation	2	3	1	0	0	6
Equalities organisation	0	0	1	5	0	6
School representative body/ union	4	2	6	6	1	19

Subject association	3	7	3	3	2	18
Local authority	1	1	3	2	0	7
FE/Sixth form	2	4	1	0	0	7
School: Academy/ comprehensive/ state selective	4	11	3	12	2	32
School: Independent	4	5	1	0	0	10
<b>Total (n)</b>	<b>100</b>	<b>138</b>	<b>75</b>	<b>118</b>	<b>8</b>	<b>439</b>
<b>Total %</b>	<b>23%</b>	<b>31%</b>	<b>17%</b>	<b>27%</b>	<b>2%</b>	

106. Synoptic assessments require students to integrate different aspects of a topic and test students' enriched understanding of a subject. Ofqual proposed 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.

Figure 17: All reformed GCSEs will include an element of synoptic assessment. To what extent do you agree with this proposition? (Q18)

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>72</b>	<b>160</b>	<b>26</b>	<b>20</b>	<b>47</b>	<b>325</b>
Teacher	64	141	21	17	39	282
Other education specialist	8	8	1	2	5	24
Parent/student/other	0	11	4	1	3	19
<b>Organisational responses</b>	<b>35</b>	<b>53</b>	<b>9</b>	<b>0</b>	<b>12</b>	<b>109</b>
Awarding organisation	1	2	1	0	2	6

Equalities organisation	0	2	1	0	3	6
School representative body/ union	8	5	2	0	4	19
Subject association	9	10	0	0	0	19
Local authority	2	4	1	0	0	7
FE/Sixth form	4	4	1	0	0	9
School: Academy/ comprehensive/ state selective	6	22	3	0	2	33
School: Independent	5	4	0	0	1	10
<b>Total (n)</b>	<b>107</b>	<b>213</b>	<b>35</b>	<b>20</b>	<b>59</b>	<b>434</b>
<b>Total %</b>	<b>25%</b>	<b>49%</b>	<b>8%</b>	<b>5%</b>	<b>14%</b>	

107. Three quarters (74%) of respondents agree that reformed GCSEs should include an element of synoptic assessment, 14% have no opinion or don't know and 13% disagree.
108. Organisational responses are stronger than personal responses in their agreement that reformed GCSEs should include an element of synoptic assessment. Eight out of 10 responses from organisations (81%) agree with this compared with seven out of ten or 71% of personal responses.
109. A notable number of respondents from awarding organisations and equalities organisations have no opinion or don't know while respondents from FE/ Sixth forms, local authorities, academy/ comprehensive/ state selective schools and teachers are all more likely to agree that reformed GCSEs should have an element of synoptic assessment.
110. All respondents from subject associations and nine out of 10 respondents from independent schools agree with an element of synoptic assessment in reformed GCSEs.

## Timing of examinations

111. A small majority of respondents agree that externally set and marked assessments should normally only be taken at one point during the year – in May and June. Just over half (57%) of respondents agree they should and 41% disagree, a small proportion (2%) have no opinion or don't know.

**Figure 18: 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? (Q19)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>75</b>	<b>113</b>	<b>68</b>	<b>71</b>	<b>5</b>	<b>332</b>
Teacher	65	102	61	55	3	286
Other education specialist	7	8	4	5	1	25
Parent/student/other	3	3	3	11	1	21
<b>Organisational responses</b>	<b>20</b>	<b>43</b>	<b>26</b>	<b>15</b>	<b>4</b>	<b>108</b>
Awarding organisation	1	4	0	0	1	6
Equalities organisation	0	0	0	5	1	6
School representative body/ union	3	7	6	2	1	19
Subject association	4	11	2	0	1	18
Local authority	1	0	4	2	0	7
FE/Sixth form	2	3	2	1	0	8
School: Academy/ comprehensive/ state selective	5	13	11	5	0	34
School: Independent	4	5	1	0	0	10
<b>Total (n)</b>	<b>95</b>	<b>156</b>	<b>94</b>	<b>86</b>	<b>9</b>	<b>440</b>

Total %	22%	35%	21%	20%	2%
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112. The split in opinion is particularly noticeable among the following groups:

- Academy/ comprehensive/ state selective schools (n=18 agree compared with n=16 who disagree)
- School representative body /union’s (n=10 compared with n=8)
- Teachers (n=167 compared with n=116)

113. Groups which are more likely to disagree with this proposition than agree are:

- Equalities organisations (n=5 compared with n=0)
- Local authorities (n=6 compared with n=1)
- Parents/ students/ others (n=14 compared with n=6)

*November resits*

114. The majority (83%) of respondents agree with the proposition that 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 – 13% disagree. Opinions are generally similar across the board with all groups in agreement.

**Figure 19: 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 (Q20). November re-sits should be restricted to students in Year 12 and above (Q21). To what extent do you agree with these propositions? (Q20/21)**

	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?		November re-sits should be restricted to students in Year 12 and above. To what extent do you agree with this proposition?	
	Agree	Disagree	Agree	Disagree
<b>Personal responses</b>	<b>272</b>	<b>44</b>	<b>162</b>	<b>153</b>

## GCSE Reform Consultation Analysis

Teacher	237	37	140	132
Other education specialist	18	6	16	7
Parent/student/other	17	1	6	14
<b>Organisational responses</b>	<b>91</b>	<b>12</b>	<b>56</b>	<b>42</b>
Awarding organisation	5	0	2	3
Equalities organisation	3	2	2	1
School representative body/union	15	3	7	11
Subject association	15	1	14	1
Local authority	5	2	2	5
FE/Sixth form	8	1	7	1
School: Academy/comprehensive/state selective	30	3	13	19
School: Independent	10	0	9	1
<b>Total (n)</b>	<b>363</b>	<b>56</b>	<b>218</b>	<b>195</b>
<b>Total %</b>	<b>83%</b>	<b>13%</b>	<b>50%</b>	<b>45%</b>

115. Responses are divided on the proposal that November resists should be restricted to students in year 12 and above – half of respondents agree with this

proposition and 45% disagree. This is particularly prominent among teachers (n=140 agree compared with n=132 disagree).

116. Stakeholder groups which are more likely to disagree than agree with the proposition November resists are restricted to students in year 12 and above are:
- Academy/ comprehensive/ state selective schools (n=19 disagree compared with n=13 agree)
  - School representative body /union's (n=11 disagree compared with n=7 agree)
  - Parents/ students/ others (n=14 disagree compared with n=6 agree)
117. Conversely stakeholder groups which are more likely to agree with this proposition than disagree are:
- Other education specialists (n=16 agree compared with n=7 disagree)
  - Independent schools (n=9 agree compared with n=1 disagree)
  - Subject associations (n=14 agree compared with n=1 disagree)

*Spelling, punctuation and grammar*

118. 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.
119. Ofqual proposed 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 and this is contained within DfE's subject content consultation.
120. The majority of respondents (70%) agree that 5% of marks should be allocated to spelling, punctuation and grammar for English literature, geography and history as is currently the case in these subjects.
121. Four times as many responses (n=229) from personal respondents agree that 5% of marks should be allocated to spelling, punctuation and grammar for

English literature, geography and history as disagree (n=58). For organisational responses 68 responses agreed compared with 20 who disagreed.

122. For English language DfE's proposition is to allocate a 20% weighting to spelling, punctuation and grammar marks. Over half of respondents to our consultation agree with this proposition (53%) with twice as many personal responses agreeing (n=178) as disagreeing (n=89). However organisational responses were very split on this issue with 47 responses agreeing with the proposal for English language, compared with 45 who disagreed.

**Figure 20: 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. In English language, 20 per cent of the marks should be allocated to spelling, punctuation and grammar. To what extent do you agree with these propositions? (Q22/23)**

	English literature, Geography, History 5 per cent of marks		English language 20 per cent of the marks	
	Agree	Disagree	Agree	Disagree
<b>Personal responses</b>	<b>229</b>	<b>58</b>	<b>178</b>	<b>89</b>
Teacher	196	51	152	77
Other education specialist	15	5	11	8
Parent/student/other	18	2	15	4
<b>Organisational responses</b>	<b>68</b>	<b>20</b>	<b>47</b>	<b>45</b>
Awarding organisation	3	2	4	1
Equalities organisation	0	5	1	5
School representative body/ union	13	4	11	6
Subject association	10	3	5	7
Local authority	6	1	5	2



FE/Sixth form	6	0	6	2
School: Academy/ comprehensive/ state selective	22	5	10	19
School: Independent	8	0	5	3
<b>Total (n)</b>	<b>297</b>	<b>78</b>	<b>225</b>	<b>134</b>
<b>Total %</b>	<b>70%</b>	<b>18%</b>	<b>53%</b>	<b>32%</b>

*Spelling, punctuation and grammar – subject specific summary*

123. The Ofqual consultation proposed that if marks were allocated within subjects for spelling, punctuation and grammar – was the proposed weighting too much, about right or too little. Figure 21 below provides a summary of the consultation responses on this issue.

124. Three quarters of respondents (76%) feel that 5% of marks for spelling, punctuation and grammar is about right for geography and history. A majority (68%) feel that 5% is about right for English Literature, but 25% feel 5% is too little.

125. Over half of respondents feel that 20% of marks in English language for spelling, punctuation and grammar is about right but a significant proportion of respondents (38%) feel 20% is too much.

**Figure 21: If marks are to be allocated for spelling, punctuation and grammar in subjects are the percentage of the marks the right amount?**

	<b>Too much</b>	<b>About right</b>	<b>Too little</b>
<b>English literature 5% is</b>	8% (n=30)	68% (n=254)	25% (n=92)
<b>Geography 5% is</b>	17% (n=62)	76% (n=278)	7% (n=26)
<b>History 5% is</b>	16% (n=58)	76% (n=274)	9% (n=31)
<b>English language 20% is</b>	38% (n=142)	56% (n=207)	6% (n=21)

126. Within the English literature assessment there was broad consensus that 5% of the marks allocated for spelling, punctuation and grammar was about right.

School representative bodies/unions and subject associations were particularly strong in their support for this, with all of the school representative bodies/unions thinking 5% was about right and 11 of the 12 subject associations also thinking this.

127. Equalities organisations were the only respondent type who feels that 5% of marks for spelling, punctuation and grammar in English literature is too much. Conversely FE/Sixth forms were the only group to feel that 5% was too little, with 4 out of the 6 reporting this.

Figure 22: If marks are to be allocated for spelling, punctuation and grammar in ENGLISH LITERATURE, are 5 per cent of the marks the right amount? (Q24)

	Too much	About right	Too little	Total
<b>Personal responses</b>	<b>22</b>	<b>185</b>	<b>80</b>	<b>287</b>
Teacher	19	158	68	245
Other education specialist	3	12	6	21
Parent/student/other	0	15	6	21
<b>Organisational responses</b>	<b>8</b>	<b>69</b>	<b>12</b>	<b>89</b>
Awarding organisation	1	3	0	4
Equalities organisation	4	1	0	5
School representative body/union	0	16	0	16
Subject association	1	11	0	12
Local authority	0	4	3	7
<b>English literature 5% is</b>				
FE/Sixth form	0	2	4	6
School: Academy/comprehensive/state selective	2	24	4	30
School: Independent	0	8	1	9

<b>Total (n)</b>	<b>30</b>	<b>254</b>	<b>92</b>	<b>376</b>
<b>Total %</b>	<b>8%</b>	<b>68%</b>	<b>25%</b>	

128. Following a similar pattern, the overall consensus is that that 5% of marks for spelling, punctuation and grammar in Geography is about right. The majority of respondents within all respondent types agree that 5% was about right apart from again respondents from equalities organisations where 4 out of 5 think 5% is too much.

**Figure 23: If marks are to be allocated for spelling, punctuation and grammar in GEOGRAPHY are 5 per cent of the marks the right amount? (Q24)**

	<b>Too much</b>	<b>About right</b>	<b>Too little</b>	<b>Total</b>
<b>Personal responses</b>	<b>48</b>	<b>212</b>	<b>23</b>	<b>283</b>
Teacher	40	184	17	241
Other education specialist	5	13	3	21
Parent/student/other	3	15	3	21
<b>Organisational responses</b>	<b>14</b>	<b>66</b>	<b>3</b>	<b>83</b>
Awarding organisation	1	3	0	4
Equalities organisation	4	1	0	5
School representative body/union	1	15	0	16
Subject association	2	6	0	8
Local authority	0	7	0	7
FE/Sixth form	0	5	1	6
School: Academy/comprehensive/state selective	5	22	1	28
School: Independent	1	7	1	9

Geography 5% is

<b>Total (n)</b>	<b>62</b>	<b>278</b>	<b>26</b>	<b>366</b>
<b>Total %</b>	<b>17%</b>	<b>76%</b>	<b>7%</b>	

129. Following a similar pattern the overall consensus is that that 5% of marks for spelling, punctuation and grammar in History is about right. The overwhelming majority of respondents within all respondent types agreed that 5% was about right apart from again respondents from equalities organisations where 3 out of 4 think 5% is too much.

**Figure 24: If marks are to be allocated for spelling, punctuation and grammar in HISTORY, are 5 per cent of the marks the right amount? (Q24)**

	<b>Too much</b>	<b>About right</b>	<b>Too little</b>	<b>Total</b>
<b>Personal responses</b>	<b>46</b>	<b>204</b>	<b>30</b>	<b>280</b>
Teacher	39	176	23	238
Other education specialist	5	13	3	21
Parent/student/other	2	15	4	21
<b>Organisational responses</b>	<b>12</b>	<b>70</b>	<b>1</b>	<b>83</b>
Awarding organisation	1	3	0	4
Equalities organisation	3	1	0	4
School representative body/union	1	15	0	16
Subject association	2	7	0	9
Local authority	0	7	0	7
FE/Sixth form	0	6	0	6
<b>History 5% is</b> School: Academy/comprehensive/state selective	4	23	1	28
School: Independent	1	8	0	9

<b>Total (n)</b>	<b>58</b>	<b>274</b>	<b>31</b>	<b>363</b>
<b>Total %</b>	<b>16%</b>	<b>76%</b>	<b>9%</b>	

130. While there is still overall consensus that allocating 20% of marks in the English language assessment to spelling, punctuation and grammar is about right there was a less consistency in this view.
131. Four out of 5 equalities organisations feel that 20% is too much and twice as many respondents from subject associations (n=8) also feel that 20% is too much than those who feel it is about right (n=4). Academy/ comprehensive/ state selective schools are also slightly more likely to feel that 20% was too much (n=15) than about right (n=13).

**Figure 25: If marks are to be allocated for spelling, punctuation and grammar in ENGLISH LANGUAGE are 20 per cent of the marks the right amount? (Q24)**

	<b>Too much</b>	<b>About right</b>	<b>Too little</b>	<b>Total</b>
<b>Personal responses</b>	<b>100</b>	<b>163</b>	<b>19</b>	<b>282</b>
Teacher	89	138	14	241
Other education specialist	7	11	3	21
Parent/student/other	4	14	2	20
<b>Organisational responses</b>	<b>42</b>	<b>44</b>	<b>2</b>	<b>88</b>
Awarding organisation	1	3	0	4
Equalities organisation	4	1	0	5
School representative body/union	6	10	0	16
Subject association	8	4	0	12
Local authority	3	4	0	7
FE/Sixth form	2	4	1	7

English Language 20% is

School: Academy/comprehensive/state selective	15	13	0	28
School: Independent	3	5	1	9
<b>Total (n)</b>	<b>142</b>	<b>207</b>	<b>21</b>	<b>370</b>
<b>Total %</b>	<b>38%</b>	<b>56%</b>	<b>6%</b>	

*Comments regarding the proposed assessment arrangements for the GCSEs reforms*

132. Respondents were asked in an open comments box about whether or not they have any comments on the proposed assessment arrangements for the reformed GCSEs and the majority used this forum to express their concerns with the propositions. Across the board there were eight main concerns that were highlighted among all stakeholder groups and the figure below provides an overview of these.

**Figure 26: Main concerns around the new proposed assessment arrangements (Q25)**

Concerns	Overview
<b>Increased pressure on learners and educators as a result of increased examinations</b>	<ul style="list-style-type: none"> <li>• Impact of added pressure on schools and learners</li> <li>• Lack of necessity for additional pressure</li> </ul>
<b>Allocation of marks for SPAG</b>	<ul style="list-style-type: none"> <li>• Impact on those with learning difficulties, physical challenges and disabilities</li> <li>• A 10% allocation rather than 20% in English Language</li> <li>• Impact of SPAG marks on moving between grade boundaries</li> <li>• More important to focus on context, structure, understanding and writing clearly</li> <li>• A perception of variability in assessment of SPAG between examiners</li> </ul>
<b>Minimum examination time</b>	<ul style="list-style-type: none"> <li>• Challenges for those with learning difficulties, physical challenges and disabilities</li> </ul>

	<ul style="list-style-type: none"> <li>Does one size fit all?</li> </ul>
<b>Availability of exams</b>	<ul style="list-style-type: none"> <li>Only May and June is restrictive</li> </ul>
<b>Resits</b>	<ul style="list-style-type: none"> <li>November only resits may cause students to be entered for exams at year 10</li> </ul>
<b>Legibility of exams</b>	<ul style="list-style-type: none"> <li>Concerns that 'fair' exams for students with learning difficulties, physical challenges and disabilities will not be produced</li> </ul>
<b>Lack of relevance to the workplace and university</b>	<ul style="list-style-type: none"> <li>Skills required in coursework assessment (e.g. drafting, editing, reviewing etc.) help prepare students for the next stages of education and the workplace</li> </ul>
<b>Limitation of skills</b>	<ul style="list-style-type: none"> <li>Coursework allows student to highlight a different set of skills</li> <li>Exams may 'hide' the skills of weaker students</li> </ul>

133. Many stakeholder groups are concerned about the impact increased examinations will have on the **levels of pressure and stress** faced by not only learners but also educators. It is felt that students are already under a tremendous amount of pressure with the current system and the new propositions will only add to this.

'Putting the emphasis on one exam at the end of two years is too pressurised. These are still children who need support and will make mistakes. What happens to students during Ramadan when exams are at the same time with no opportunity to take them at another time? What happens to students who have family circumstances that distract their focus at that one point? You are setting children up to fail with no second chances.'

Teacher

'The focus on final examination as opposed to continuous assessment over an extended period, will lead to increased stress and anxiety levels amongst pupils, with many not performing as well as they could. Both Childline and Young Minds have reported

increases in the number of young people calling their helplines concerned about exam stress and its impact on their mental health.'

Equalities Organisation

134. Some feel the pressure is unnecessary and will lead to other issues such as illnesses, which will affect their performance further and provide an unfair reflection of their skills.

'One exam period at the end of the academic year places an enormous amount of pressure on students. For some, this pressure can cause extreme nervousness and concern before exams, in some cases leading to illness, and effecting their ability to produce a true reflection of their skills.'

Equalities Organisation

135. A concern that has been highlighted throughout the responses to the consultation is the impact these propositions will have on those who have learning difficulties, physical challenges and disabilities. This section of the consultation was no different and the majority of stakeholder groups raise concerns that one exam period at the end of the year could severely disadvantage such students, causing them to not only drop grades but also limit their access to future education.

'This will severely disadvantage pupils with SEN, especially with ASD because of anxiety that will make the all or nothing exam too volatile for them as they would go from A\* to E just because of panic.'

Parent/ Student/ Other

'The British Dyslexia Association has said, in two public statements issued on 17th September 2012 and 11th June 2013, that exams taken at the end of a two-year course will be exceedingly difficult for many dyslexic candidates.'

FE/Sixth Form

'Increasing the amount of terminal assessment will have a particularly negative effect on students with protected characteristics. It is likely to limit their access to the current wide range of subjects due to extra demands on them'



Equalities organisation

136. The allocation of marks for spelling, punctuation and grammar is a focal point for all respondents. Concerns related to this proposition are extremely varied.

137. One of the main concerns is the **impact of SPAG on those with learning difficulties, physical challenges and disabilities**. The majority of stakeholder groups feel it is unfair and that even if extra time is allocated, the likelihood of it helping is minimal if not impossible.

‘Ofqual’s Equality Impact Assessment has found that students most affected by the requirement to allocate 5% for grammar, spelling and punctuation will be disabled students with neuro-diversity conditions such as dyslexia, dyscalculia and autism.

Equalities organisation

‘The SPAG marks for any subject other than English are unfair for students with specific learning difficulties - even if they are given extra time, there is a good chance that they will not be able to see and correct a spelling error.’

Teacher

‘Allocating 20% marks to spelling, punctuation and grammar (SPAG) in English language may be a disadvantage to some students with specific learning difficulties. Reasonable adjustments such as extra time will not always serve well in these circumstances because even with the extra time, the candidate may not have the right spelling. The consultation document says that students can demonstrate their SPAG to the scribe, but it will be difficult to spell out each word of 20% of the content.’

Awarding organisation

‘20% SPAG marks will significantly disadvantage EAL students or those with dyslexia.’

Academy/comprehensive/state selective

138. Respondents are concerned with the actual percentage of marks allocated to SPAG – some (n=5) feel that no marks should be awarded as it was felt that even with extra time it is unfair on those with specific learning difficulties or disabilities to be expected to meet SPAG requirements, while others agree with the 5% for English Literature, Geography and History but feel 20% for English

Language is too much. Of the small number (n=4) who voice concerns and suggested a more realistic proportion, 10% was considered a better weighting for SPAG in English language – with the main concern being that anything else is too high for a subject which is more about focussing on context, style, expression, ideas etc.

‘20% is a ridiculously high percentage! No more than 10%.’

Teacher

‘20% for spelling, grammar and punctuation is too high for English language as there is then not enough reward for: style & expression; organisation of ideas and structure; ideas, thinking and developing lines of argument; creativity & originality.’

Academy/comprehensive/state selective

‘I see no need to assess spelling, punctuation and grammar in the Literature paper - yes, we look for clarity in expressing ideas but the importance is the ideas.’

Teacher

‘Rather than a 5% for spelling etc. in geography & History - I would rather the overall argument or style of the writing is taken into consideration. It is important that young people can write clearly and put forward answers in good quality English.’

Parent/ Student/ Other

139. Respondents also raise concerns about the potential variability in assessing SPAG performance across examiners themselves and how this could reduce the reliability of awarding grades.

‘The assessment of spelling, punctuation and grammar is problematic not only because the subjects chosen are already the most rigorous in terms of the requirement for good written communication (such that poor use of spelling , punctuation and grammar already results in candidates being penalised because they are not communicating clearly),, but also because the assessment of spelling, punctuation and grammar is notoriously variable between examiners, and this will make the awarding of grades much less reliable.’

Schools representative body/union

140. A significant concern among respondents is the impact SPAG marks would have on the allocation of grades for those students near grade boundaries. Some respondents suggest that misspelt words can make the difference between a C and D - if this is the case students will risk not getting the opportunity to study further due to the requirements of further education institutions.

'Is it fair that the difference between a C and D could be based upon misspelt words rather than subject specific skills?'

Teacher

'For instance, many schools and colleges expect students to gain a GCSE Grade A or B in order to enrol onto the A Level course, or GCSE Grade C to undertake a vocational level 3 course. It would be a disaster for some students should they be prevented from studying subjects at a higher level due to losing marks for technical aspects of the English language.'

Equalities organisation

'There is also the risk for borderline candidates. If, for example, there are two candidates on the A/B borderline and one gains a sufficient number of SPaG marks to be awarded a grade A and the other does not, a decision to select the candidate with the higher grade will be not be based on his or her level of achievement with respect to the subject.'

Awarding organisation

141. In a written submission, one respondent provides a view from an employer's perspective, which is that increasing marks allocated for SPAG for subjects such as English language will not solve the problems employers are facing in terms of functional literacy.

'The UK faces a global competitiveness challenge and, to meet it, the nation's education system must deliver higher standards, ensuring that more children leave education well-equipped for life and the workplace... Whilst the level of marks allocated to good spelling, punctuation and grammar should clearly be higher in an English language GCSE, we are not convinced this approach will

satisfy employers' demands on functional literacy, as outlined above.'

Private sector/employer representative body

142. The **length of exams** is also an issue that crops up with some feeling the minimum amount of 3.5 hours is too long. Stakeholders highlight that a 'one size fits all' cannot apply to the length of an exam and perhaps a range of exam times would be more suitable allowing awarding organisations to set a time that best suits their learners needs within a set boundary.

'Might it be better to give a recommended range of exam time and to allow Awarding Organisations the freedom to work inside or outside of this range (if they can justify their decisions).'

Academy/comprehensive/state selective

'The minimum total external examination time of 3.5 hours for most subjects seems excessive. It also seems disproportionate for an examination for 16 years olds which is largely intended to provide a formal measure of their performance before either continuing further academic study in the subject (in sixth form), dropping the subject but continuing academic study in other subjects and/or taking vocationally related courses or participating in another formal training programme.....It should be possible to assess GCSEs, both reliably and validly, through shorter formal examinations. 3.5 hours for an examination could also raise challenges for students with access requirements. It could increase requests for additional time.'

Awarding organisation

'The minimum lengths of exams is too much - 3.5 hours per subject highlighted would be 17.5 hours if a student was taking all five, PLUS you then have to ADD ON exam time for other subjects (most students take 9-10 subjects at GCSE). I firmly believe this is far too much for the average 16 year old to cope with.'

Teacher

143. Respondents were also concerned that if a minimum exam time is being set a maximum exam time should also be set to protect the interests of those with learning difficulties, physical challenges and disabilities.

‘...we understand the reasons for setting a minimum total exam time but we think there should also be a maximum exam time for each subject to ensure that the exams are manageable for all students.’

Equalities organisation

144. **Limiting exams to be taken in May and June** is felt restrictive by many teachers. Restricting re-sits to November is also seen in the same light and many teachers feel placing age as a governing factor will make schools enter students for GCSEs earlier (i.e. in Year 10).

‘Resit rules are not acceptable. In key subjects that affect the life of pupils they should be allowed more chances to take them and no restrictions.’

Teacher

‘November entry should be for any re-sitting candidate, not just those aged 16+.’

Teacher

145. There is a concern from the majority of stakeholder groups responding to the organisation, that key skills which are necessary for the working world such as drafting, essay writing, extracting information and teamwork, might not be given as much weight within the classroom under the proposed reforms **and therefore students will be less prepared for entering the workplace or moving to university.**
146. While neither the Ofqual nor the DfE consultation propose to remove the acquisition of these skills, respondents felt that by removing controlled assessment, such skills might not have as much weighting in the classroom. This it was felt could place students at a disadvantage when they start work.

‘The ability to recite information on a given day of the year represents a far narrower approach and does not accurately reflect the understanding or skill set required of a successful higher education student or employee.’

FE/ Sixth Form

‘We believe that that the proposed reforms will not adequately prepare students for future study or employment... Coursework and controlled assessment are essential to building skills such as independent research and confidence in presenting to peers. It is

these skills which can be more valuable, for further study or employment, than the ability to re-call large quantities of information.'

Schools representative body/union

147. This is also reinforced by a response from a representative body that skills for the workplace need to be developed at school.

'Young people need to develop employability and personal skills during their time at school. When employers are asked what skills and aptitudes are most important when employing graduates, school and college leavers, consistently they mention employability skills such as communication skills, team working, attitude and character...It is important that any changes to GCSEs leave enough time in the school day for teachers to focus.'

Schools representative body

148. Respondents highlight that university also requires skills of drafting, editing and revising and the removal of controlled assessment and coursework will undermine these skills further.

'All areas of work require project type approaches and team work; neither which will be assessed by the proposed GCSE. Further to this, even at university student's [sic] complete modules, essays and dissertations that contribute towards their final degree.'

Academy/comprehensive/state selective

'Preparing students for coursework or controlled assessments is an important skill that should be retained as it bears more resemblance to what people do in the workplace. How many jobs rely exclusively on memory?'

Teacher

149. Some respondents state that a single 'method' of assessment **limits the ability of students to highlight different skills sets** and some believe that terminal exams will 'hide' the skills of weaker students.

'Having a variety of assessment methods would enable all the attainments and achievements of young people to be recognised and valued.'

Schools representative body/union

'We believe that that a staged approach that allows teachers and schools, who have a better understanding of the unique personal circumstances of students, to decide which exam they should be entered for at which time reduces the risks of vulnerable students being unfairly disadvantaged through the examination system.'

Equalities organisation

## Section 4: Key design features – reporting student performance

### Use of grades

150. The Ofqual consultation proposed to retain a model where performance in reformed GCSEs should be reported using grades rather than marks, scaled scores or percentile scores.
151. There is strong agreement from those who responded to the consultation that student performance in the reformed GCSEs should be reported using grades. In total 84% of respondents agreed that grades should be used to report GCSE performance and 12% disagreed.
152. Organisational responses were slightly stronger in their agreement that grades should be used in reformed GCSEs, with 87% which agree compared with 81% of personal responses.
153. Teachers are very strong in their support for grades to be used in reformed GCSEs, with 82% or 238 of the 288 who responded to this question in agreement. In a similar fashion, awarding organisations (n=5 out of 6), FE/Sixth forms (n=8 out of 8), Local Authorities (n=7 out of 7), academy/comprehensive/state selective school (n=30 out of 32) and independent schools (n=9 out of 10) also agree that performance should be measured using grades.

**Figure 27: 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? (Q26)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>142</b>	<b>130</b>	<b>29</b>	<b>16</b>	<b>15</b>	<b>332</b>
Teacher	127	111	27	12	11	288
Other education specialist	9	10	1	2	3	25
Parent/student/other	6	9	1	2	1	19
<b>Organisational responses</b>	<b>36</b>	<b>57</b>	<b>5</b>	<b>2</b>	<b>6</b>	<b>106</b>
Awarding organisation	0	5	1	0	0	6
Equalities organisation	1	2	0	1	2	6



School representative body/union	6	11	1	0	1	19
Subject association	5	9	1	0	3	18
Local Authority	3	4	0	0	0	7
FE/Sixth Form	2	6	0	0	0	8
School: Academy/comprehensive/state selective	17	13	2	0	0	32
School: Independent	2	7	0	1	0	10
<b>Total (n)</b>	<b>178</b>	<b>187</b>	<b>34</b>	<b>18</b>	<b>21</b>	<b>438</b>
<b>Total %</b>	<b>41%</b>	<b>43%</b>	<b>8%</b>	<b>4%</b>	<b>5%</b>	

154. There is a mixed response from respondents to the question as to which alternative measure of student performance to use if grades are not used (figure 28). Very similar proportions of respondents feel that if grades are not used marks (31%), scaled scores (27%) or percentile scores (29%) should be used.
155. Although there is a difference between personal and organisational responses. Organisations are more likely to favour scaled scores (36%) than personal respondents (23%). Whereas personal respondents are more likely to think that percentile scores (32%) should be used than organisations of which just 16% favour this.
156. Teachers are evenly split between the use of marks (n=81 out of 252 responses) and percentile scores (n=82), with less support for scaled scores (n=58). In contrast other education specialists are more likely to favour percentile scores (n=9 out of 24 responses) than other alternatives.
157. The FE/Sixth forms who responded do not favour percentile scores and are split between the use of marks (n=4 responses) and scaled scores (n=3). Independent schools are strongest in their support for scaled scores with 9 out of 10 preferring this option.
158. Subject associations and awarding bodies provided mixed opinions with results split across the three options, with the most support from both for scaled scores if grades are not used.

Figure 28: If grades were not used, which of the alternatives would you prefer? (Q27)

	Marks	Scaled scores	Percentile scores	Other	Total
<b>Personal responses</b>	<b>92</b>	<b>70</b>	<b>95</b>	<b>38</b>	<b>295</b>
Teacher	81	58	82	31	252
Other education specialist	6	4	9	5	24
Parent/student/other	5	8	4	2	19
<b>Organisational responses</b>	<b>25</b>	<b>31</b>	<b>16</b>	<b>14</b>	<b>86</b>
Awarding organisation	1	2	1	1	5
Equalities organisation	0	0	0	1	1
School representative body/union	7	2	5	1	15
Subject association	3	4	2	2	11
Local Authority	0	4	2	1	7
FE/Sixth Form	4	3	0	0	7
School: Academy/comprehensive/state selective	9	7	6	8	30
School: Independent	1	9	0	0	10
<b>Total (n)</b>	<b>117</b>	<b>101</b>	<b>111</b>	<b>52</b>	<b>381</b>
<b>Total %</b>	<b>31%</b>	<b>27%</b>	<b>29%</b>	<b>14%</b>	

159. If grades could be used alongside marks, scaled scores or percentile scores, respondents were asked whether they would like to see grades and more granularity of reporting as well. As figure 29 shows there is most support for the proposition that grades alone (31%) should be used to report student performance. However, a further 63% of respondents supported the need for

further granularity of reporting (through grades with marks (25%), with scaled scores (17%), or grades with percentile scores (18%) or a combination of other approaches).

160. The 5 awarding organisations who responded differed in their view with 3 in favour of grades with scaled scores and 2 stating a preference for other combinations of approaches.
161. School representative body/union responses showed a preference for grades with marks (n=7 out of the 18 responses) or simply grades alone (n=5). In contrast responses from academy/comprehensive/state selective schools (n=15 out of 33 responses) and subject associations (n=8 out of 18 responses) showed a stronger preference for grades alone than the other options.

**Figure 29: Grades could be used alongside marks, scaled scores or percentile scores. Would you like to see grades and more granularity of reporting as well? (Q28)**

	Grades alone	Grades with marks	Grades with scaled scores	Grades with percentile scores	Other combination of approaches	Don't know/no opinion	Total
<b>Personal responses</b>	<b>92</b>	<b>86</b>	<b>51</b>	<b>68</b>	<b>9</b>	<b>18</b>	<b>324</b>
Teacher	81	76	43	60	6	15	281
Other education specialist	8	4	2	6	3	2	25
Parent/student/other	3	6	6	2	0	1	18
<b>Organisational responses</b>	<b>39</b>	<b>21</b>	<b>21</b>	<b>10</b>	<b>6</b>	<b>8</b>	<b>105</b>
Awarding organisation	0	0	3	0	2	0	5
Equalities organisation	1	1	0	0	2	2	6
School representative body/union	5	7	0	4	0	2	18
Subject association	8	2	4	1	0	3	18
Local Authority	3	0	3	1	0	0	7
FE/Sixth Form	2	3	2	0	1	0	8

School:								
Academy/comprehensive/state selective	15	8	5	4	0	1		33
School: Independent	5	0	4	0	1	0		10
<b>Total (n)</b>	<b>131</b>	<b>107</b>	<b>72</b>	<b>78</b>	<b>15</b>	<b>26</b>		<b>429</b>
<b>Total %</b>	<b>31%</b>	<b>25%</b>	<b>17%</b>	<b>18%</b>	<b>3%</b>	<b>6%</b>		

### The number of grades

162. Ofqual proposed in the consultation that eight grades would allow for sufficient differentiation of performance between students. There is strong agreement from the majority of different types of respondents that eight grades would allow for sufficient differentiation of performance between students, with three quarters of respondents (76%) agreeing and 18% disagreeing.
163. All of the awarding organisations (n=6) that responded agree with this proposition. There was also very high levels of agreement from FE/sixth forms (n=6 out of 8 responses), Local Authorities (n=6 out of 7).
164. Teachers and responses from academy/comprehensive/state selective schools are consistent in their agreement with the proposition, with 215 or 76% of the 281 teachers and 26 out of the 34 schools agreeing.
165. A majority within all respondent types agree with the proposition that eight grades would allow for sufficient differentiation of performance between students, however the highest levels of disagreement is received from parents/students/other respondents (n=7 out of 20 responses) and other education specialist's (n=6 out of 25).

**Figure 30: Eight grades would allow for sufficient differentiation of performance between students. To what extent do you agree with this proposition? (Q29)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>66</b>	<b>178</b>	<b>41</b>	<b>22</b>	<b>19</b>	<b>326</b>
Teacher	61	154	35	15	16	281

## GCSE Reform Consultation Analysis

Other education specialist	3	14	4	2	2	25
Parent/student/other	2	10	2	5	1	20
<b>Organisational responses</b>	<b>12</b>	<b>70</b>	<b>9</b>	<b>3</b>	<b>11</b>	<b>105</b>
Awarding organisation	0	6	0	0	0	6
Equalities organisation	1	0	1	0	3	5
School representative body/union	2	13	2	0	2	19
Subject association	2	10	1	0	3	16
Local Authority	2	4	1	0	0	7
FE/Sixth Form	0	6	0	0	2	8
School:						
Academy/comprehensive/state selective	4	22	4	3	1	34
School: Independent	1	9	0	0	0	10
<b>Total (n)</b>	<b>78</b>	<b>248</b>	<b>50</b>	<b>25</b>	<b>30</b>	<b>431</b>
<b>Total %</b>	<b>18%</b>	<b>58%</b>	<b>12%</b>	<b>6%</b>	<b>7%</b>	

166. The Ofqual consultation document states that “the current grade scale provides more discrimination at the lower end of the range than at the top end. Ofqual therefore proposed that the number of grades should be increased at the higher and middle range to allow greater differentiation of performance.
167. Respondents to the consultation overall provide a mixed response to whether they agree or disagree that the number of grades at the higher and middle performance range should be increased to allow for greater differentiation.
168. Three of the six awarding organisations agree and two disagree with this proposition. Teachers provide a similarly mixed response, with 116 teachers agreeing and 144 disagreeing that the number of grades at the higher and

middle performance range should be increased to allow for greater differentiation.

169. Education specialists are also somewhat undecided on this issue with 12 agreeing and 11 disagreeing.
170. Responses from FE/sixth forms are clearer in their response, providing strong agreement that that the number of grades at the higher and middle performance range should be increased to allow for greater differentiation. As do respondents on behalf of school representative bodies/unions where twice as many agreed (n=10) than disagreed (n=5).
171. Independent schools (8 agree and 2 disagree) and Local Authorities (5 agree and 2 in disagree) are also more likely to agree with the proposition.
172. In contrast, parents/students/other individuals and responses on behalf of academy/comprehensive/state selective schools are more likely to disagree, with a majority of respondents from both groups providing disagreement to the proposition.

**Figure 31: The number of grades at the higher and middle performance range should be increased to allow for greater differentiation. The number of grades at the lower end of the performance range should be reduced. To what extent do you agree with these propositions? (Q30, Q31)**

	The number of grades at the higher and middle performance range should be increased to allow for greater differentiation.			The number of grades at the lower end of the performance range should be reduced.		
	Agree	Disagree	Total	Agree	Disagree	Total
<b>Personal responses</b>	<b>133</b>	<b>168</b>	<b>328</b>	<b>96</b>	<b>200</b>	<b>326</b>
Teacher	116	144	284	78	181	281
Other education specialist	12	11	24	9	12	25
Parent/student/other	5	13	20	9	7	20
<b>Organisational response</b>	<b>56</b>	<b>41</b>	<b>106</b>	<b>38</b>	<b>54</b>	<b>105</b>
Awarding organisation	3	2	6	5	0	6
Equalities organisation	3	2	6	0	5	6
School representative	10	5	19	5	9	18

body/union						
Subject association	9	5	16	5	7	16
Local Authority	5	2	7	4	3	7
FE/Sixth Form	7	1	8	5	3	8
School:						
Academy/comprehensive/state selective	11	22	34	8	23	34
School: Independent	8	2	10	6	4	10
<b>Total (n)</b>	<b>189</b>	<b>209</b>	<b>434</b>	<b>134</b>	<b>254</b>	<b>431</b>
<b>Total %</b>	<b>44%</b>	<b>48%</b>		<b>31%</b>	<b>59%</b>	

173. Conversely to reduce the current level of differentiation that exists at the lower end of the performance range Ofqual proposed that the number of grades at the lower range should be reduced. Overall, 59% of respondents disagree with reducing grades at the lower end of the performance range and 31% agree.

174. Equalities organisations are unanimous in their disagreement with this proposition. A majority of respondents on behalf of academy/comprehensive/state selective schools (n=23 out of 34) disagree with reducing the number of grades at the lower end of the performance range, as do teachers (n=181 of 281).

175. In contrast, awarding organisations are strong in their support for reducing grades at the lower end of the performance range with 5 out of 6 agreeing.

#### *How grades are described*

176. The consultation proposed grades should be described using a new system to differentiate them from current GCSEs. Overall 63% of respondents disagree to this proposal and 31% agree.

**Figure 32: Grades should be described using a new system to differentiate them from current GCSEs. To what extent do you agree with this proposition? (Q32)**

GCSE Reform Consultation Analysis

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>36</b>	<b>51</b>	<b>88</b>	<b>131</b>	<b>21</b>	<b>327</b>
Teacher	26	45	77	117	17	282
Other education specialist	6	3	8	7	1	25
Parent/student/other	4	3	3	7	3	20
<b>Organisational responses</b>	<b>17</b>	<b>32</b>	<b>28</b>	<b>24</b>	<b>6</b>	<b>107</b>
Awarding organisation	4	0	0	0	2	6
Equalities organisation	0	2	2	2	0	6
School representative body/union	2	7	6	2	2	19
Subject association	2	7	2	4	2	17
Local Authority	1	1	2	3	0	7
FE/Sixth Form	1	4	3	0	0	8
School: Academy/comprehensive/state selective	5	6	10	13	0	34
School: Independent	2	5	3	0	0	10
<b>Total (n)</b>	<b>53</b>	<b>83</b>	<b>116</b>	<b>155</b>	<b>27</b>	<b>434</b>
<b>Total %</b>	<b>12%</b>	<b>19%</b>	<b>27%</b>	<b>36%</b>	<b>6%</b>	

177. Awarding organisations strongly agree with the proposition that grades should be described using a new system to differentiate them from current GCSEs, with 4 out of 6 strongly agreeing and none disagreeing. Independent schools are also more likely to agree with 7 that agreed and 3 disagree.



178. Other respondent groups were more mixed in their views on this proposition. For example, 9 school representative bodies/unions agreed and 8 disagreed and 9 subject associations agreed with 6 disagreeing.
179. Respondents from academy/comprehensive/state selective schools and teachers are strongest in their disagreement with the proposals. Overall 23 or 68% of the 34 schools and 194 or 69% of the 282 teachers disagree that grades should be described using a new system to differentiate them from current GCSEs.

### *Describing grades using numbers*

180. A majority of the different respondent types disagree that grades should be described using numbers. Six out of ten (63%) respondents disagree and 31% agree.

**Figure 33: Grades should be described using numbers. If grades are described using numbers, the highest numbered grade should signify the highest level of achievement. To what extent do you agree with these propositions? (Q33, Q34)**

	Grades should be described using numbers.			If grades are described using numbers, the highest numbered grade should signify the highest level of achievement.		
	Agree	Disagree	Total	Agree	Disagree	Total
<b>Personal responses</b>	<b>48</b>	<b>238</b>	<b>328</b>	<b>126</b>	<b>129</b>	<b>321</b>
Teacher	37	210	283	109	106	276
Other education specialist	5	16	25	7	14	25
Parent/student/other	6	12	20	10	9	20
<b>Organisational responses</b>	<b>29</b>	<b>52</b>	<b>107</b>	<b>41</b>	<b>35</b>	<b>104</b>
Awarding organisation	2	0	6	2	1	6
Equalities organisation	1	4	6	0	3	5
School representative body/union	7	4	18	8	5	19
Subject association	4	8	18	6	3	16

Local Authority	3	4	7	5	1	7
FE/Sixth Form	1	4	8	3	5	8
School:						
Academy/comprehensive/state selective	8	21	34	11	15	33
School: Independent	3	7	10	6	2	10
<b>Total (n)</b>	<b>77</b>	<b>290</b>	<b>435</b>	<b>167</b>	<b>164</b>	<b>425</b>
<b>Total %</b>	<b>18%</b>	<b>67%</b>		<b>39%</b>	<b>39%</b>	

181. Organisational responses are more mixed in their opinion with 45% agreeing and 48% disagreeing. Whereas personal responses are more clear in their disagreement (66%) than those who agree (26%).
182. In particular, 16 out of 25 education specialists and 12 out of 20 parents all disagree that grades should be described using numbers.
183. A majority of respondents on behalf of academy/comprehensive/state selective schools also disagree (n=21 out of 34) with this proposition and 74% or 210 teachers also disagree.
184. The consultation also asked whether respondents agreed or disagreed that if grades are described using numbers, the highest numbered grade should signify the highest level of achievement (figure 33). In total a fifth (n=94) of all respondents said they do not know nor had no opinion on this proposition.
185. This response should be considered in the context of the previous question (Q33) which asked whether grades should be described using numbers, to which 67% disagree.
186. Of those who did offer an opinion, responses were split equally between those who agreed with this proposition (39%) as opposed to those who disagreed. (39%). Of those respondents who agree that grades should be described using numbers in Q33, 70% that the highest numbered grade should signify the highest level of achievement.
187. Twice as many education specialists said they disagree (n=14) than agree (n=7) that the highest numbered grade should signify the highest level of

achievement. Whereas 6 out of 16 subject associations agreed and 3 said they disagree.

188. Local authorities that responded to the consultation are strong in their agreement (5 agree compared with 2 that disagree) as are the independent schools that responded (6 agree compared with 2 that disagree).

*Comments related to the reporting of student performance*

189. The open ended comments provided to the online consultation and received through respondent letters highlight the rationale behind much of the agreement and disagreement with the proposals for reporting student GCSE performance.
190. One key theme that emerged that supports the level of agreement that grades should be used was that **changing the current system is unnecessary and would create further confusion**. This sentiment is particularly strong amongst teachers where many of the comments related to concerns that end users of student performance data would be confused by any changes.
191. But this is also an issue that schools, school representative bodies, local authorities and subject associations highlighted:

‘Employers, for whom these reforms we're told are 'essential' and 'urgent' still ask me what my students' O level grades are!! Changing the system causes confusion for the end-users; employers and universities.’

Teacher

‘Changing from the current grading system has many disadvantages, not least of all how employers and other end-users interpret grades over time. It is already confusing having to explain that an A in the period prior to A\* is potentially of equivalent value. It will be particularly confusing given the plan for staged introduction of reformed GCSEs, with a confusing mix of grading systems for students in this transition period.’

Subject association

‘[parents say] if the qualification is still going to be called GCSE, still going to have 8 grades and will still be accessed by the same cohort of young people then there is no need to change the grading scale. Doing so may, in fact, cause more confusion.’

Local authority

192. There was **some support for other combinations of approaches or the presentation of other information instead of or mostly alongside grades.**

Awarding organisations, teachers and school representative bodies/unions thought it would be very useful to have detail on actual achievement (standardised marks or actual marks) alongside grades.

193. The rationale for this was that this would allow better comparison across cohorts and the extra granularity of actual marks would improve the effectiveness of school accountability. The following examples highlight this and this was an issue discussed in greater detail in the following section on additional performance information.

‘...having some extra information about the absolute level of attainment achieved by a candidate (such as standardised mark as a percentage of the maximum) provides a useful contrast to the relative performance indicated by grade.’

Awarding organisation

Reporting students’ actual marks alongside their grades would be extremely useful to governing bodies, as it would allow them to monitor a cohort’s performance in more detail and therefore hold the school to account more effectively.

School representative body/union

194. Respondents, who mentioned this extra information on student performance might improve accountability, are firm that that this data should not be published in or alongside any league tables.

195. A further point raised by an awarding organisation was that any decision made to report student marks rather than grades would need robust meta data and guidance published alongside these to aid the interpretation of this data.

‘If a decision were made to report marks, rather than grades, then additional statistical information reflecting the level of precision of those marks would have to be reported alongside those marks, in order to ensure that the marks were interpreted appropriately.’

Awarding organisation

196. With relation to specific changes to the system and related to causing further confusion there was

197. A number of reasons were given why describing grades by numbers was not supported. These include concerns over how such a change might **devalue**

**previous and future achievements** and concerns that the changes to the system would mean the qualifications may **lack credibility**.

198. Firstly while there is a feeling that moving from letters to numbers would differentiate between the old and new systems, there would be concerns that previous achievements may be tarnished as the perception would be previous exams were easier.

‘However unfair, the public perception will be ‘the exams were getting easier and easier so the government made them harder’ these results are from before the changes were made so the exams must have been there absolute most easy at that point...’

School: Academy/comprehensive/state selective

‘A shift to numbers devalues entirely current learners’ achievements and also means that future learners’ achievements may be misunderstood and therefore devalued.’

Teacher

199. Again a number of respondents feel any move from a system that is understood (letters) to one that is not (numbers) would be the wrong thing to do and would further affect the credibility of qualifications.

‘We have serious concerns over the grading model proposal, specifically grading by numbers 1-8. It is important for stakeholders, post-16 institutions, HEIs, employers and parents to fully understand the grading scale for it to be credible. Marks in the proposed grading structure will inevitably be compared (potentially inaccurately and unhelpfully) to grades in the current structure.’

School representative body/union

200. A view from employers as the end users of qualifications argues that above all what is needed by employers is clarity and any changes would need employers to understand the comparability between the old and new GCSEs.

‘With the proposed changes to the grading system for GCSEs, what business needs is clarity - they need to know what grade in any new system is comparable to the skills represented by the current GCSE grading system.’

Employer representative body

201. While the majority of respondents did disagree with a move to reporting grades as numbers, those who agreed tended to say that **it is important that the reformed GCSEs are differentiated from the current system.**

‘Moving to a numerical system is sensible to ensure that the reformed GCSEs are seen as different by all users and not directly comparable with the previous system.’

Local authority

202. However, it was still recognised that for any change to be effective associated awareness raising was needed to ensure that end users understood the new system.

We agree that grades should be described using numbers in order to differentiate them from the current letter system, but strongly recommend that significant efforts are made to ensure employers, as well as further and higher education institutions fully understand what the new grades mean.

School representative body/union

203. A further area where comments are provided that help explain the responses to the consultation are around the proposition to reduce the number of grades at the lower end of the performance range. The main area of concern was that grouping grades at the lower performance range giving less differentiation may **create a basic ‘fail grade’** and may **impact certain students’ motivation to continue in education and training.** These changes would be at the expense of lower performing students.

‘...there is a risk that this could be at the expense of lower attaining students whose performance could end up being grouped together in a basic ‘fail’ grade. A difficulty of identifying a particular grade as a pass is that everything below that can be seen as irrelevant, when for many students a lower grade may still represent a considerable achievement which is worthy of appropriate recognition.’

Equalities organisation

‘We have very real concerns that these changes will lead to an even larger cohort of young people leaving school at 16 as apparent failures of the system, many lacking the motivation to continue in education and/or training until the age of 18.’

School representative body/union

204. An awarding organisation also commented that increasing the number of grades would reduce the classification accuracy of GCSEs due to greater opportunities for misclassification. They argued that:

‘If a grade were removed from the bottom of the ability scale to allow an additional grade at the top of the ability scale, this would lead to a reduction in grade boundary separation, reducing classification accuracy.’

Awarding organisation

*Information students and users of qualifications would find valuable in addition to the overall grade about students’ performance*

205. Respondents to the consultation were asked to provide open ended comments related to what information students and other users of qualifications would find valuable in addition to the overall grade. In total 287 of the 458 respondents to the online consultation provided comments, a response of 63%.

206. A series of common themes emerge from the responses to this question and the table below summarises the most mentioned groupings of comments. Readers are reminded that responses from teachers dominate the total responses received to the consultation overall, and they provide the majority of the mentions below. However these themes were identified as the most common themes across all stakeholder groups.

**Figure 34: Information students and users of qualifications find valuable (Q35). Base: 286 individual responses received to Q35.**

Theme	Total mentions (n)
Question by question analysis / grades by course elements/units / group particular types of questions and provide grades	56
Actual score/percentage / show how close to grade boundaries / where fall in grade	55
Nothing / nothing more than current system	44
Percentile scores	27
Breakdown of strengths and weaknesses for students’ use / tips on how to improve	20

Statement explaining what student in that grade is capable of	17
Performance over the year / Student's progress over specific time period / effort mark from teacher	16
Comments on function/non-academic skills/approach to learning/attendance	15

207. The most mentioned request for further information in addition to grades was that **information is provided on student performance on a question by question basis or grades for individual components within the over grade for the subject**. This is mentioned by all respondent types with the exception of parents/student/other individuals.

208. Many of the suggestions relate to the need for students' capabilities across the subject to be better highlighted.

'It would be helpful in some circumstances, where a grade describes quite different skills, to break down overall grades e.g. written & practical; speaking; portfolios & presentations. A focus on content and knowledge needs to be balanced with recognition of the place of competencies and skills'.

School: Academy/comprehensive/state selective

209. Respondents also link the need for a greater granularity of information to providing a better understanding of a student's strengths and weaknesses below their overall grade. This is a comment made, in particular, by awarding organisations, subject experts, parents, teachers and individual school responses. The following two quotes summarise the range of comments on how breaking grades down into 'components' or on a 'question by question basis' may support the development of students:

'Information about performance in individual components would help students and others (those involved in teaching and learning) to understand the areas of strength and weakness that are reflected in the overall grade'.

Awarding Organisation

'Maybe a breakdown of the single subject outcome into component results, whether that be by assessment objective or assessment type, would be useful to identify particular strengths



and weaknesses and thereby provide formative pointers for (the teachers) future focus and action.'

Education specialist

'A question by question breakdown to show which questions students performed best in and a report to the centre from each examiner about the strengths and weaknesses of the cohorts responses overall and recommendations for teaching.'

Teacher

210. A subject association also makes the point that in specific subjects (in this case History) elements of the course are important to higher education choices and that individual scores on these elements would support this:

'In our own subject, the most relevant part of the GCSE outcomes for much of HE practice will be the evidence of ability in independent historical study, extended writing and formulating research questions. For this reason information on the performance of students on independent historical study as part of their overall GCSE performance would be of considerable interest to those seeking to make discriminations between students with similar grades.'

Subject association

211. Another strong theme emerging from the comments is the need for **information to be provided on a student's actual score (or percentages) so that it can be seen how close students are to the grade boundaries**. This is an issue particularly highlighted by academy/comprehensive/state selective schools and referenced by other education experts. Respondents who mentioned this often felt a percentile score was the best measure to help teacher and students understand where 'within a grade a student has performed'.

'Percentile information to allow students to know whereabouts they scored in a particular grade. This would allow employers and HE institutions [to] differentiate too.'

School: Academy/comprehensive/state selective

212. Caution was offered by some respondents however, that additional student performance information whether marks, scaled scores or percentile scores should only be used for internal purposes and not 'published'. The following illustrates the type of responses received:

‘We do not think actual marks should be reported in performance tables or other public forums. As described in the consultation document, despite the advantages of being easy to understand and transparent, as a main reporting method it has disadvantages. Marks cannot be accurately compared across exam boards and between years because one exam may have been more demanding than another. Therefore, although the information would be useful to individual students and schools, it would be misleading to publish actual marks in performance tables.’

School representative body/union

213. The request for percentile scores to be provided alongside grades (without the specific link to grade boundaries) is mainly made by teachers and schools and in particular from the independent schools that responded.

214. When asked what additional information might be helpful in reporting student performance, a further theme mentioned by schools and teachers in particular is the desire for supplementary information to be provided **on other skills and competencies of a student**. These cover a number of non-academic measures of attendance, effort, and approach to learning. There is a feeling from some that this should take the form of a ‘statement of learning’ and links are made to the usefulness of this information to post-16 decisions.

‘Post-16 institutions including Sixth Form Colleges would benefit from a student statement summarising attitudes towards learning, level of engagement in classes, style of learning etc.’

School representative body/union

215. A small number of respondents (parents or teachers) felt that additional information could be provided by teachers that shows **how students performed over the year or how much effort that they put in**:

‘An effort mark in addition to the grade (e.g. A2) provided by the teacher. This would give students the incentives to work hard and move the responsibility back to the student for effort. This would also allow future employers and university staff a much better picture of that student’

Teacher

216. The responses from Local Authorities requested that any additional information provided on student performance should be kept simple but noted that limited additional information is generally required by employers:

‘We do not believe that employers would find the additional information overly useful. In discussion with them it is clear that they use other criteria, often around personal attributes and skills, to differentiate between young people who have reached their minimum required qualification standards.’

Local Authority

217. The needs of employers in terms of additional information and the current system of performance reporting was an issue also mentioned by teachers. Many of these comments echoed the view of Local Authorities that employers don't require additional information and that they understand how things currently work:

‘They don't need other info. Employers understand A, B, C etc. and no purpose is served by changing this’

Teacher

‘There's nothing wrong with the A\* to G grading system we have now... Changing to numbers will confuse both students and employers.’

Teacher

218. The view that the system of reporting student performance should not change was a strong theme within the comments (44 mentions). The majority of these comments were from teachers but a minority of respondents from all respondent types (apart from awarding organisations) mentioned that they felt there would be no additional information on student performance that would actually be valuable to students or the users of qualifications. There was a feeling that the system did not need further complication by adding to what is already provided.

‘None. You are over complicating a system that already works.’

Teacher

*How would students and users of qualifications use additional information on students' performance?*

219. When asked *how* students and users of qualifications would actually use any supplementary performance information, half of respondents (227 of 458 respondents to the online consultation) provided a comment. A series of

common themes emerges within the comments as summarised in the table below

**Figure 35: How would additional information about students' performance be used by students and users of qualifications? (Q36) Base: 227 individual responses received to Q36.**

Theme	Total (n)
To help with future progression / show strengths and weaknesses / improvement / target weaknesses	62
To show performance within the grade / to differentiate between students	56
Nothing / won't help	34
To apply for further education at suitable level/subject	27
Identifies which areas are taught well/poorly / used by teachers to gauge teaching quality	23
To show capability of student	15
Record of skills / skills map	13
To show progress throughout the GCSE course / not reliant on one exam day	13

220. The strongest theme to emerge is how **a more detailed breakdown of performance (by component or question by question) would identify a student's strengths and weaknesses.**

'Would be useful to identify particular strengths and weaknesses and thereby provide formative pointers for future focus and action.'

Education specialist

221. This point was raised by 62 respondents and across all respondent types. Many of the comments relate the importance of having information on strengths and weaknesses to decisions (by students, teachers and employers) around future academic or employment progression.

222. Equalities organisations and awarding organisations both discussed the issue of the links to employment and agree on how more detailed performance information would benefit both students and employers through being able to

see in which areas of a qualification a student may perform more strongly or weakly in than others:

‘Additional information would help student[s] to effectively demonstrate that they have developed required skills or learned the basics of subjects such as numeracy or English for a particular job, or further training course, even if they have not been able to achieve the highest grade possible.’

Equalities organisation

‘Additional information about performance in individual components could provide users of the qualification (e.g. employers) with an indication of the strengths and weaknesses of the learner who has achieved the overall grade.’

Awarding organisation

223. A range of comments were also received that argue how an understanding of a student’s strengths and weaknesses across a subject would allow a more informed decision to be made on whether to resit a particular exam and/or inform choices of what further study to undertake:

‘It would enable students and their teachers to make decisions about whether to request a re-mark, or whether to re-sit in the future.’

School: Academy/comprehensive/state selective

‘Allow students to study the area of weakness in preparation for higher level study.’

Teacher

‘For students, the additional information could be used to inform choice in terms of progression opportunities. From a provider’s point of view, the additional information would allow providers to differentiate between the performances of individuals in an informed way.’

FE/Sixth Form

224. The second theme that emerged from the comments is using information on actual marks or percentage scores **to show performance within a grade and to differentiate between students**. This theme is closely related to identifying students’ strengths and weaknesses however, many of the comments raised the specific issue of identifying where a student’s performance falls within the

grade and how close to the boundary this is. Many of these comments came from teachers themselves with limited references from other respondents. .

225. The following two quotes summarise the nature of the comments and how again there was a link between information that ‘allows a cleaner comparison between students’ and decisions made (by students, education institutions and employers) on progression into education or gain employment:

‘The scores would allow prospective employers/higher education/further education establishments to differentiate between students attaining the same grade.’

Teacher

‘This could help candidates when choosing their options for further study or employment, and also provide useful information for admissions tutors and employers when having to select recruits who, on the basis of their grades, may all appear to be similar.’

School representative bodies/union

226. In the main, there is support for the provision of more detailed information on student performance. However one awarding organisation suggested higher education or employers might use this detailed information to raise their expectations of students.

‘If you provide further granularity about student performance it could result in some users placing emphasis or making requirements on students to achieve a top A\* grade for example. It could also result in additional requests for grade changes. Therefore Ofqual needs to consider the implications of providing additional information on performance before making final decisions.’

Awarding organisation

227. A final theme that emerges from the comments on how more detailed information on student performance could be used **as a tool for improving teaching quality**.
228. This is mentioned 23 times with the majority of these comments coming from teachers and independent, academy/comprehensive/state selective schools. These groups argue the value of this information is on assessing areas of student strength and weakness to enable changes to be made to teaching styles and delivery.

'[To] analyse strengths/weaknesses of the department/teachers and improve teaching.'

Independent school

'To see where students are losing marks - enable teachers to improve that element of the delivery of the course.'

Teacher

'This information would enable students and teaching professionals to learn from their experience and improve their future learning / teaching practice.'

School representative body/union

*Would greater resource implications such as increased assessment and higher costs associated with providing more detailed performance information be justified?*

229. The analysis of the consultation responses above has shown a desire from a range of respondents for additional student performance information and the case made for its value. However, when considering whether the increased resource implications of providing more detailed information about student performance in a subject is justified, three fifths (62%) of respondents do not feel the additional resource implications would be justified.
230. The majority of teachers (n=171 out of 266) do not feel the additional resources would be justified. Academy/comprehensive/state selective schools are stronger in their opposition, with 29 out of 34 respondents feeling that the additional resources would not be justified.
231. Parents/students/other respondents were strongly in support of providing more detailed information about student performance, with the associated increases in resources (n=13 out of 18).

**Figure 36: 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? (Q37)**

	Yes	No	Total
<b>Personal responses</b>	<b>119</b>	<b>189</b>	<b>308</b>
Teacher	95	171	266
Other education specialist	11	13	24

## GCSE Reform Consultation Analysis

Parent/student/other	13	5	18
<b>Organisational responses</b>	<b>35</b>	<b>61</b>	<b>96</b>
Awarding organisation	2	2	4
Equalities organisation	3	1	4
School representative body/union	10	8	18
Subject association	5	7	12
Local Authority	2	5	7
FE/Sixth Form	4	3	7
School: Academy/comprehensive/state selective	5	29	34
School: Independent	4	6	10
<b>Total (n)</b>	<b>154</b>	<b>250</b>	<b>404</b>
<b>Total %</b>	<b>38%</b>	<b>62%</b>	



## Section 5: Full and short courses

232. The consultation proposed that 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.

233. Nearly all respondents agree that the reformed GCSEs should match the current two-year timeframe, as is currently the case. Only 5% disagree with this proposal (3% disagree and 2% strongly disagree).

**Figure 37: 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? (Q39)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>116</b>	<b>187</b>	<b>9</b>	<b>7</b>	<b>9</b>	<b>328</b>
Teacher	97	163	7	7	9	283
Other education specialist	10	14	1	0	0	25
Parent/student/other	9	10	1	0	0	20
<b>Organisational responses</b>	<b>38</b>	<b>54</b>	<b>5</b>	<b>2</b>	<b>8</b>	<b>107</b>
Awarding organisation	3	2	0	0	1	6
Equalities organisation	0	4	0	0	2	6
School representative body/ union	9	11	1	0	0	21
Subject association	8	8	0	0	3	19
Local authority	2	3	2	0	0	7
FE/Sixth Form	3	4	1	0	0	8

School: Academy/ Comprehensive/state selective	7	19	1	2	1	30
School: Independent	6	3	0	0	1	10
<b>Total (n)</b>	<b>154</b>	<b>241</b>	<b>14</b>	<b>9</b>	<b>17</b>	<b>435</b>
<b>Total %</b>	<b>35%</b>	<b>55%</b>	<b>3%</b>	<b>2%</b>	<b>4%</b>	

234. When asked whether awarding organisations should be able to offer stand-alone short courses of the reformed GCSEs that will not contribute to a full GCSE, half of respondents agree with this proposal (12% strongly agree and 38% agree).

235. Members of awarding organisations are more supportive in that all respondents from within this group agrees with the proposal; 2 strongly agree and 4 agree with no one stating that they don't know or disagree.

236. Independent schools display the largest scepticism 6 out of 10 respondents saying that they disagree with the proposal (6 disagree and 0 strongly disagree). Nearly a fifth of respondents (18%) had no opinion or did not know whether awarding organisations should be able to offer short courses that do not contribute to a full GCSE.

**Figure 38: 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? (Q40)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>42</b>	<b>115</b>	<b>67</b>	<b>42</b>	<b>57</b>	<b>323</b>
Teacher	36	97	61	35	49	278
Other education specialist	5	9	5	3	3	25
Parent/student/other	1	9	1	4	5	20
<b>Organisational responses</b>	<b>7</b>	<b>46</b>	<b>18</b>	<b>9</b>	<b>21</b>	<b>101</b>
Awarding organisation	2	4	0	0	0	6

## GCSE Reform Consultation Analysis

Equalities organisation	1	3	1	0	1	6
School representative body/ union	1	12	2	0	4	19
Subject association	1	2	1	3	8	15
Local authority	0	4	2	0	0	6
FE/Sixth Form	0	5	0	1	2	8
School: Academy/ comprehensive/state selective	1	13	6	5	6	31
School: Independent	1	3	6	0	0	10
<b>Total (n)</b>	<b>49</b>	<b>161</b>	<b>85</b>	<b>51</b>	<b>78</b>	<b>424</b>
<b>Total %</b>	<b>12%</b>	<b>38%</b>	<b>20%</b>	<b>12%</b>	<b>18%</b>	

## Section 6: Regulating the reformed GCSEs

237. Ofqual proposed that 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).
238. Nearly three quarters of respondents agree that awarding organisations should be required to use and assess the subject content requirements as set out by the Department for Education in the development of reformed GCSEs.
239. Awarding organisations mostly agree with this proposal; 2 strongly agree and 2 agree while only 1 respondent from this group disagrees and 1 other states that they don't know.
240. There is unanimous support for this proposal from respondents in the FE/sixth form, local authority sectors and majority support from school representative body/unions, independent schools and subject associations. Over two thirds of respondents from academy/comprehensive, state selective schools and awarding organisations also agree with this proposal.

**Figure 39: 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? (Q41)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>66</b>	<b>167</b>	<b>43</b>	<b>18</b>	<b>26</b>	<b>320</b>
Teacher	55	146	36	16	23	276
Other education specialist	8	10	4	1	2	25
Parent/student/other	3	11	3	1	1	19
<b>Organisational responses</b>	<b>26</b>	<b>56</b>	<b>8</b>	<b>5</b>	<b>10</b>	<b>105</b>
Awarding organisation	2	2	1	0	1	6
Equalities organisation	1	1	0	0	3	5
School representative body/	6	12	1	0	0	19

union						
School: Academy / comprehensive/state selective	3	18	4	5	4	34
Local authority	3	4	0	0	0	7
FE/Sixth Form	1	7	0	0	0	8
School: Independent	3	5	2	0	0	10
Subject association	7	7	0	0	2	16
<b>Total (n)</b>	<b>92</b>	<b>223</b>	<b>51</b>	<b>23</b>	<b>36</b>	<b>425</b>
<b>Total %</b>	<b>22%</b>	<b>52%</b>	<b>12%</b>	<b>5%</b>	<b>8%</b>	

### Assessment strategies

241. The vast majority of respondents (87%) agree that exam boards should be required to develop assessment strategies for their reformed GCSEs (31% strongly agree and 56% agree). Only 6% disagree with this proposal (4% disagree and 2% strongly disagree).

242. FE/sixth form and school representative bodies / unions both support this proposal unanimously. There was also strong support from awarding organisations (who will be required to implement this) with n=5 out of 6 agreeing and from subject associations n=16 out of 17 agree.

**Figure 40: Exam boards should be required to develop assessment strategies for their reformed GCSEs. To what extent do you agree with this proposition? (Q42)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>94</b>	<b>184</b>	<b>16</b>	<b>10</b>	<b>20</b>	<b>324</b>
Teacher	78	163	13	9	16	279
Other education specialist	14	8	0	0	3	25

Parent/student/other	2	13	3	1	1	20
<b>Organisational responses</b>	<b>38</b>	<b>56</b>	<b>3</b>	<b>0</b>	<b>9</b>	<b>106</b>
Awarding organisation	1	4	0	0	1	6
Equalities organisation	1	2	0	0	2	5
School representative body/ union	10	9	0	0	0	19
Subject association	7	9	0	0	1	17
Local authority	3	2	1	0	1	7
FE/Sixth Form	2	6	0	0	0	8
School: Academy / comprehensive/state selective	9	21	1	0	3	34
School: Independent	5	3	1	0	1	10
<b>Total (n)</b>	<b>132</b>	<b>240</b>	<b>19</b>	<b>10</b>	<b>29</b>	<b>430</b>
<b>Total %</b>	<b>31%</b>	<b>56%</b>	<b>4%</b>	<b>2%</b>	<b>7%</b>	

### Reviewing assessment effectiveness

243. There is near universal support for the proposal that exam boards should be required to review systematically the effectiveness of their assessments for each of their reformed GCSEs. 96% of respondents are in support with 51% in strong agreement and a further 45% saying that they agree.

**Figure 41: 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? (Q43)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>154</b>	<b>157</b>	<b>4</b>	<b>1</b>	<b>9</b>	<b>325</b>

Teacher	131	137	3	1	8	280
Other education specialist	16	8	0	0	1	25
Parent/student/other	7	12	1	0	0	20
<b>Organisational responses</b>	<b>65</b>	<b>38</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>106</b>
Awarding organisation	2	3	0	0	1	6
Equalities organisation	4	1	0	0	0	5
School representative body/ union	13	6	0	0	0	19
Subject association	10	6	0	0	1	17
Local authority	6	1	0	0	0	7
FE/Sixth Form	4	4	0	0	0	8
School: Academy / comprehensive/state selective	20	13	1	0	0	34
School: Independent	6	4	0	0	0	10
<b>Total (n)</b>	<b>219</b>	<b>195</b>	<b>5</b>	<b>1</b>	<b>11</b>	<b>431</b>
<b>Total %</b>	<b>51%</b>	<b>45%</b>	<b>1%</b>	<b>0%</b>	<b>3%</b>	

244. The Apprenticeships, Skills, Children and Learning Act 2009, requires Ofqual to consult before it can impose an accreditation requirement on exam boards. Over 96% of respondents agreed 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.

**Figure 42: 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? (Q44)**

## GCSE Reform Consultation Analysis

	Yes	No	Total
<b>Personal responses</b>	<b>301</b>	<b>12</b>	<b>313</b>
Teacher	257	11	268
Other education specialist	24	1	25
Parent/student/other	20	0	20
<b>Organisational responses</b>	<b>101</b>	<b>2</b>	<b>103</b>
Awarding organisation	6	0	6
Equalities organisation	4	0	4
School representative body/union	19	0	19
Subject association	16	0	16
Local authority	7	0	7
FE/Sixth Form	7	0	7
School: Academy/comprehensive/state selective	33	1	34
School: Independent	9	1	10
<b>Total (n)</b>	<b>402</b>	<b>14</b>	<b>416</b>
<b>Total %</b>	<b>96%</b>	<b>4%</b>	

### *Comments on the regulation of reformed GCSEs*

245. In total 157 respondents out of 458 (34% response) provided supporting comments around the regulation of reformed GCSEs. While there were differences in the sentiment between respondent types a number of themes emerged in the comments. These are:

- Need for regulation to ensure consistent standards



- The role of an 'apolitical' Ofqual
- Requests for time to be taken to plan the implementation
- Concerns over centrally developed content and the regulation of standards set by this

246. One of the most consistent themes amongst local authorities, education specialists, parents/students/other respondents, school representative bodies/unions, subject associations and teachers was that **regulation is needed to ensure consistency within the assessment system.**

247. Many of the comments acknowledge that there would be competing exams boards and that there would be added flexibility in the assessment system, but there is a strong feeling that Ofqual needs to closely regulate this to ensure consistency.

'I think it is Ofqual's statutory responsibility to ensure that an exam board is doing its job properly, and if there is more than one exam board offering GCSEs in Mathematics, then these must be seen to follow the same curriculum and criteria and be equivalent in standard in their assessments and grading.'

Other education specialist

248. This view is echoed by comments received from subject associations:

'In an environment with competing exam boards the standard of GCSEs can only be assured if Ofqual operate a rigorous accreditation process which gives clear guidance to exam boards on how to improve their draft specifications'

School representative body/union

249. The general message is that there is a need for regulation to ensure consistency between exam boards. Respondents also made the case that the criteria for regulation should be simple to allow transparency between exam boards. Teachers in particular make the point that it is essential that regulation creates parity across exam boards.

'The regulation criteria should be simple, and therefore transparent, so that different specifications from different examination boards would be clearly equivalent in rigor.'

Teacher

250. While the theme amongst the comments was that regulation is very much needed, a minority of comments reflected that GCSEs should be well regulated but not in an overly restrictive way that stifles creativity and innovation. The following two quotes highlight the points made by subject associations and teachers on this point:

'However this should not mean that they are strait-jacketed. There must be the opportunity for the innovation and development that is necessary within a rapidly changing world. Notions of choice, diversity and market forces apply as much in the assessment system as they do in other contexts.'

Subject association

'Exam boards should be allowed freedom to choose what they test. If this has to be done in line with Government guidelines then fine. This at least then allows flexibility of choice for teachers/schools.'

Teacher

251. Awarding organisations all recognised the need for an accreditation requirement. However, awarding organisations provided concern over the extra burden of regulation. One noted a particular concern of the burden being placed on already accredited awarding organisations, by being required to re-apply for accreditation of the reformed GCSEs.

'This proposal will place an unreasonable and unnecessary burden on awarding bodies, particularly those already recognised to offer the current GCSEs. If implemented, this proposal would be inconsistent with Ofqual's statutory duty 'not to impose or maintain unnecessary burdens' on awarding bodies (s.170, Apprenticeships, Skills, Children and Learning Act 2009).'

Awarding organisation

252. Although another awarding organisation in supporting the need for recognition, suggests that

'...guidance for awarding organisations seeking recognition to offer GCSEs would be welcome. In particular, for awarding organisations recognised to offer the current GCSEs, guidance on

any particular conditions that require new or updated information would be welcome.'

Awarding organisation

253. Other awarding organisations in their comments on the regulation of the reformed GCSEs recommend that Ofqual provides further detail and guidance the assessment strategy and process for accreditation.

'We strongly recommend the regulator consults with awarding organisations on the detail of the process and produce guidance on the nature of evidence required to support the submissions'

Awarding organisation

254. A small number of academy/comprehensive/state selective schools and teachers that responded also commented that in the regulation of GCSEs it was important **that Ofqual acted independently and was seen to be 'a-political'**.

'...OFQUAL must be made independent of political favour and expediency to avoid some of the antics we have seen recently.'

Teacher

'It is outrageous that government has such a control over the content of specifications. This should be determined by an independent body removed from government interference and political influences.'

Teacher

255. Teachers and school representative bodies/unions were also concerned that the **timetable for reform**, and changes to the system should not be rushed and time should be given to take into account input from teachers and educational experts to inform implementation.

256. Firstly respondents stressed the need for any changes to be made in time for teachers to be able to plan and prepare for the reformed GCSEs. As can be illustrated by the following:

'The reformed GCSEs should be accredited well in advance of the date for the start of first teaching to allow teachers to properly plan their work.'

School representative body/union

'The implementation of any reformed GCSE needs enough time for schools to prepare; from the time the new specifications are released to first teaching needs to be at least a year.'

Teacher

257. Comments from equalities organisations, school responses and from individual teachers also highlighted the need for any further changes to take into account the views of frontline teachers. There is a feeling that consultation happens but that concerns raised are not acted upon.

'Consulting is not the same as listening to teachers and other education experts.'

Equalities organisation

'Meaningful consultation must take place - it is unacceptable to simply push through changes without any attempt at compromise or without taking account of the concerns of the teachers.'

School representative body/union

258. The **actual content of the subjects that it is proposed for awarding organisations to use and assess is also questioned** and the separate issue of concerns around the worth of centrally developed content by the Department for Education was raised by a small number of teachers, school representative bodies/unions and education specialists.

259. Comments related to concerns that, while it was agreed that awarding organisations should base their qualification on the subject content being developed by DfE, some respondents feel this content is not suitable as a basis for assessment. This in one or two cases was subject specific criticism or from others a more general concern.

'I would agree with this if the DfE were making a good job of this business. Sadly there is much wrong with their current proposals for science.'

Other education specialist

'Whilst the subject content remains as it is, I cannot agree with Awarding Organisations forming their courses on the basis of this subject content, although I fundamentally agree that all Awarding Organisations should formulate their courses based on a common set of subject content.'

Teacher

## Section 7: Subject-specific features of the reformed GCSEs

260. This section of the consultation document focuses on a number of subject specific features in reformed GCSEs. As an indicator of understanding, respondents were asked to indicate whether they had read the Department for Education's subject content consultation documents for English language, English literature, mathematics, sciences, geography and history.
261. Ofqual has not consulted on reformed GCSEs in modern foreign languages or ancient languages although the DfE has consulted on the content for these subjects.
262. As noted previously, the Department for Education is responsible for the qualification content and assessment objectives for the reformed GCSEs and has developed and consulted on content; whereas Ofqual's consultation was on the proposed design principles for reformed GCSEs. As such, respondents to Ofqual's consultation were requested not to comment on the subject content itself, such as the type of text to be studied in English literature, but to refer those comments to DfE. Therefore, the few comments that were received through the consultation on the subject content itself are not included here.
263. As figure 43 shows, the highest proportion of respondents had read the English language subject content (53%) and the lowest had read the geography (31%) and history subject content (32%). Within the respondent types teachers and subject associations were less likely to have read the subject content across all subjects and to have read the subject content related to the subjects they specialise in.

**Figure 43: Please indicate whether you have read the Department for Education's subject content consultation document and associated documentation (Q46)**

	I have read the DfE subject content	I have not read the DfE subject content	Total
English language	206 53%	181 47%	<b>387</b>
English literature	192 50%	190 50%	382
Mathematics	188	195	383

	49%	51%	
Sciences	157	223	380
	41%	59%	
Geography	115	255	370
	31%	69%	
History	118	254	372
	32%	68%	

### English language

264. The Ofqual consultation stated that the Department for Education's draft English Language content includes a spoken language assessment that **cannot** be assessed by an external written exam.
265. Overall, 65% of respondents agree with this proposition that the English Language content should include a spoken language assessment which cannot be assessed by an external written exam (30% strongly agree and 35% agree).

**Figure 44: 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? (Q47)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>64</b>	<b>86</b>	<b>25</b>	<b>30</b>	<b>39</b>	<b>244</b>
Teacher	58	71	18	26	33	206
Other education specialist	2	9	2	3	4	20
Parent/student/other	4	6	5	1	2	18
<b>Organisational responses</b>	<b>39</b>	<b>32</b>	<b>6</b>	<b>6</b>	<b>14</b>	<b>97</b>

## GCSE Reform Consultation Analysis

Awarding organisation	3	1	0	0	1	5
Equalities organisation	4	2	0	0	0	6
School representative body/union	7	8	2	0	2	19
Subject association	1	3	0	2	7	13
Local Authority	3	3	1	0	0	7
FE/Sixth Form	1	5	0	0	2	8
School:						
Academy/comprehensive/state selective	17	7	1	4	0	29
School: Independent	3	3	2	0	2	10
<b>Total (n)</b>	<b>103</b>	<b>118</b>	<b>31</b>	<b>36</b>	<b>53</b>	<b>341</b>
<b>Total %</b>	<b>30%</b>	<b>35%</b>	<b>9%</b>	<b>11%</b>	<b>16%</b>	

266. All respondents from equality organisations agree that a spoken language assessment should be included (4 strongly agree and 2 agree). Respondents from academy/comprehensive/state selective schools also showed strong support for this proposal (17 strongly agree and 7 agree). While in general, there is agreement for a spoken assessment for all groups, a fifth of teachers disagreed or strongly disagreed with this proposal.
267. When asked whether the outcome of the spoken language assessment should be reported separately on the certificate, and not form part of the overall grade, only 20% of respondents say that they strongly agree or agree with this method of reporting. In contrast, the majority (64%) said that they disagree with this proposal (with 40% saying that they strongly disagree).
268. In particular, there is strong disagreement to this proposal from academy/comprehensive/ state selective schools (4 disagree and 22 strongly disagree), local authorities (3 disagree and 3 strongly disagree) and equalities organisations (2 disagree and 3 strongly disagree).



**Figure 45: 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? (Q48)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>20</b>	<b>35</b>	<b>64</b>	<b>92</b>	<b>35</b>	<b>246</b>
Teacher	15	29	54	78	31	207
Other education specialist	3	4	2	8	3	20
Parent/student/other	2	2	8	6	1	19
<b>Organisational responses</b>	<b>4</b>	<b>8</b>	<b>20</b>	<b>46</b>	<b>19</b>	<b>97</b>
Awarding organisation	0	2	0	1	1	4
Equalities organisation	0	0	2	3	1	6
School representative body/union	0	2	4	8	5	19
Subject association	0	0	2	5	7	14
Local Authority	0	1	3	3	0	7
FE/Sixth Form	1	2	2	2	1	8
School: Academy/comprehensive/state selective	2	0	4	22	1	29
School: Independent	1	1	3	2	3	10
<b>Total (n)</b>	<b>24</b>	<b>43</b>	<b>84</b>	<b>138</b>	<b>54</b>	<b>343</b>
<b>Total %</b>	<b>7%</b>	<b>13%</b>	<b>24%</b>	<b>40%</b>	<b>16%</b>	

269. The consultation stated the proposition that some disabled students may be granted an exemption from the spoken language assessment because of their

disability, for example, deaf or hearing-impaired students. Respondents were then asked whether this exemption should be shown on the certificate or whether the certificate should just include the grade from the exams.

270. Overall, 58% say that an exemption (from the spoken language assessment) for some students with a disability should be shown on the certificate while 42% state that it should not be shown and the certificate should just include the grade from the exams.

**Figure 46: 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? (Q49)**

	Exemption reported on certificate	Exemption not reported on the certificate	Total
<b>Personal responses</b>	<b>132</b>	<b>92</b>	<b>224</b>
Teacher	113	76	189
Other education specialist	10	8	18
Parent/student/other	9	8	17
<b>Organisational responses</b>	<b>45</b>	<b>34</b>	<b>79</b>
Awarding organisation	2	1	3
Equalities organisation	1	3	4
School representative body/union	10	6	16
Subject association	2	3	5
Local Authority	4	3	7
FE/Sixth Form	6	2	8
School: Academy/comprehensive/state selective	17	10	27
School: Independent	3	6	9

Total (n)	177	126	303
Total %	58%	42%	

271. Greatest support for an exemption to be shown on the certificate can be observed within FE/Sixth form respondents (6 exemption reported and 2 exemption not reported), awarding organisations (2 exemption reported and 1 exemption not reported), academy/ comprehensive/ state selective schools (17 exemption reported and 10 exemption not reported) and school representative bodies/unions (10 exemption reported and 6 exemption not reported).

272. Of the responses received, equalities organisations and independent schools prefer that exemptions should not be reported on the certificate; equalities organisations (1 exemption reported and 3 exemption not reported) and independent schools (3 exemption reported and 6 exemption not reported).

*Comments about the proposed design requirements for the reformed GCSEs in English Language*

273. When asked for any further comments regarding proposed design requirements for English language, 128 out of 458 respondents chose to supply a response. An overwhelming number of comments centred on speaking and listening within English Language and its importance within the subject as a whole and final grading. Specific themes relating to speaking and listening are as follows:

- Speaking and listening are considered a key life skill (in particular for employment opportunities) and as such should not be marginalised within the teaching of English Language as a whole.
- The concept that speaking and listening will be devalued if they do not form part of the overall award. An extension to this theme is that speaking and listening will have a reduced focus within the classroom if removed from the final grade.
- The retention of speaking and listening within coursework/controlled assessments where it is felt a coursework element would ensure a more balanced model than new proposals; coupled with views that exams are not an appropriate/realistic method of assessment.
- The removal of coursework is also thought to possibly impact upon those less confident/able in a written examination situation.

274. There is a widespread belief that speaking and listening are core skills within English Language and there is a high level of concern that removal of these elements from the final grade does not reflect this. This concern is evident across the majority of groups within the survey.

‘As a vital part of English, speaking and listening should contribute to the final grade. Speaking and listening skills are vital in life and students should be credited PROPERLY for their skills in this area.’

Teacher

‘Speaking and listening is a key part of life! It is a key skill.’

Teacher

275. In addition to the view that speaking and listening skills are important and a key area of the subject, many respondents link these skills to practical uses outside of the classroom. The main example given is that speaking and listening are vital within the workplace and for future employers/employment prospects.

‘The spoken language element is vital, as it helps students to prepare for job interviews, develops communication skills, and can link activities.’

Student

‘Spoken language skills are perhaps the most important aspect of communication in today's workplace. Why on earth would you sideline them? For many students, spoken language is a strength that they will use throughout life?’

Teacher

276. As well as general concern regarding the removal of speaking and listening from the final grade, specific explanation is supplied by respondents among teachers/representative bodies, that the removal of speaking and listening elements will lead to a devaluation/downgrading of these skills in the eyes of students and also in how they might be taught in the classroom.

‘Poor communication skills is a main critique of young people by employers and so the perception that speaking and listening have been downgraded, would be unfortunate in the extreme.’

School representative body/union

'We believe that the decision to disaggregate assessment of speaking and listening from the total assessment for the GCSE will devalue speaking and listening and demotivate students whose strengths lie in these performance aspects of language.'

School representative body/union

'Very disappointed that S&L is set to be reported separately. It devalues it in the eyes of the students and yet it is possibly the most important aspect of modern communication. Thought needs to be put in to making the assessment of it secure but as a programme of study it is vital.'

Teacher

277. Many respondents also suggested there should be non-exam assessment for writing skills and a wide range of respondents felt that speaking and listening should have specific non-examination assessment associated with them. Specific reasoning for this opinion centres on reservations that an examination is the best method of assessment for the subject.

'The proposal not to include coursework is a huge mistake. It will mean that students are not properly developing real-world writing skills and will adversely affect the motivation of many disadvantaged students, particularly protected groups. It will furthermore impact adversely on students' enjoyment of the subject and on the development of their creativity.'

Teacher

'There needs to be some centre assessed work that contributes to the qualification e.g. Coursework. Speaking and listening must make a contribution to the final grade.'

Teacher

Retaining speaking and listening and coursework/controlled assessments will ensure a more balanced model than these new proposals. Life should not come down simply to one or two large exams.

Teacher

278. There is a concern among some that due to the different strengths and abilities of students, the removal of the spoken language element from the final grade could be unfair to a certain segment.

‘Although spoken language will be reported separately, we register strong concern that spoken language will not form part of the overall grade. We fear that this proposal will lead to a reduced focus on speaking and listening in the classroom as teachers and schools are more likely to focus on those aspects of English that are weighted and therefore counting towards the final, reported results. Consequently, many deaf young people may struggle to continue to develop their speaking and listening skills at the same rate as their peers as their incidental learning of language.’

Equalities organisation

‘Speaking and listening are important skills and these should be reflected in a student’s final GCSE grade, particularly as students have individual strengths which may not be recognised if this element is withdrawn.’

Teacher

### English literature

279. The Ofqual consultation suggests that the Department for Education’s draft English literature content **can** only be assessed by an externally assessed written exam.

280. There is no majority consensus regarding whether English Literature should be only assessed by externally assessed written exams. With a slightly higher proportion (46%) who agree (16% strongly agree and 30% agree) compared with 40% who disagree (19% disagree and 21% strongly disagree).

**Figure 47: 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? (Q51)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>44</b>	<b>66</b>	<b>45</b>	<b>48</b>	<b>31</b>	<b>234</b>
Teacher	38	54	40	39	28	199
Other education specialist	3	6	0	5	3	17
Parent/student/other	3	6	5	4	0	18
<b>Organisational responses</b>	<b>9</b>	<b>32</b>	<b>17</b>	<b>21</b>	<b>13</b>	<b>92</b>

Awarding organisation	0	4	1	0	0	5
Equalities organisation	0	0	3	0	1	4
School representative body/union	2	8	4	2	2	18
Subject association	0	1	1	5	6	13
Local Authority	1	3	1	1	1	7
FE/Sixth Form	0	4	1	0	1	6
School: Academy/comprehensive/state selective	2	8	6	13	0	29
School: Independent	4	4	0	0	2	10
<b>Total (n)</b>	<b>53</b>	<b>98</b>	<b>62</b>	<b>69</b>	<b>44</b>	<b>326</b>
<b>Total %</b>	<b>16%</b>	<b>30%</b>	<b>19%</b>	<b>21%</b>	<b>13%</b>	

281. Independent schools show the highest level of agreement (4 strongly agree and 4 agree). 4 out of 5 respondents from awarding organisations also agree that English literature should be assessed by external written exams only, but no-one within this group ‘strongly agrees’ in comparison to that seen in independent schools.

282. The only group where the majority disagree with the proposal is academy/ comprehensive/ state selective schools – of which 19 disagree/strongly disagree and 10 agree.

*Comments about the proposed design requirements for the reformed GCSEs in English Literature*

283. When asked for any other comments regarding reforms within English Literature, the main theme identifiable among the 110 responses collected focuses on the nature of the final examination together with the importance attached to coursework for this subject. These two interlinked points can be observed across the majority of groups within the survey.

- Concerns are voiced that examination only will be a test of memory and have reduced relevance to further education/real world demands.
- In an extension to the point above, the importance of coursework and specifically, the facility for deeper thinking in a less pressurised environment to allow students to demonstrate their deeper knowledge of key texts is voiced. However, there is acknowledgement that coursework is open to various forms of manipulation and abuse as a method of accurate assessment.

284. Ofqual's proposals for externally written and assessed examinations do not mean students would take a single examination per subject. However, some respondents (including those from representative bodies, equality organisations and some teachers) seem unclear on this. Their concerns include the fairness or applicability of this type of assessment, whether a single assessment could be discriminatory and whether it would reduce the method of measurement to a test of memory rather than as a way of assessing a deeper understanding of the subject.

'Although English Literature can be assessed by externally written exams alone, this does not mean that it should. In theory all subjects can be assessed by examinations, but these could be a very poor system of assessment. The more important question is whether assessing by means of a single externally written examination is the right way to assess. We are strongly of the opinion that it is not. We are concerned that using this method of assessment alone penalises a large number of students including those who, for whatever reason, do not perform to the best of their abilities on the day.'

School representative body/union

'To assess English Literature through exam only will once again make this assessment a test of memory. There will be no time for detailed analysis of the toolkit of a writer.'

Teacher

'We believe that 100% external final assessment will significantly disadvantage deaf young people, many of whom may struggle with working memory.'

Equalities organisation



'Over-reliance on a memory-driven examination format must be avoided. In order to encourage children to read for pleasure the syllabus needs to be flexible and the set texts need to be carefully considered.'

School: Academy/comprehensive/state selective

'Total removal of controlled assessment / coursework is not realistic to skills required in the world of work, where research and presentation of information is a valuable skill. Also, the removal of this again plays to the strengths of certain types of learners and discriminates against those who perform better without an exam situation.'

Teacher

'We believe that there is a place for teacher assessed work in GCSE English literature. This is particularly so in the assessment of extended literary response where planning and drafting are a key feature of the work and where responses are likely to be more considered and developed at greater length than can be achieved in a traditional examination.'

Subject association

285. An additional concern is also voiced over whether terminal examination is the only way in which to fully assess the capabilities of the student. Reservations are made that exams can be stifling and pressurised environments not conducive to a broad level of assessment. The importance of coursework is often highlighted within such comments as:

'We believe that there is a place for teacher assessed work in GCSE English literature. This is particularly so in the assessment of extended literary response where planning and drafting are a key feature of the work and where responses are likely to be more considered and developed at greater length than can be achieved in a traditional examination.'

Subject association

'English Language and Literature ought to have internally assessed elements, in order to allow for research and deeper thinking in a less pressurised environment and to allow students to demonstrate their deeper knowledge of key texts.'

Teacher

'There needs to be an element of controlled assessment, you are placing far too much pressure on children to simply perform in an exam.'

Teacher

### Mathematics

286. The Ofqual consultation suggests that the Department for Education's draft mathematics content **can** only be assessed by an externally assessed written exam. In contrast to that observed in English Literature, the large majority (74%) think that Mathematics should be assessed by external written exams only (43% strongly agree and 31% agree).

**Figure 48: 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? (Q53)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>111</b>	<b>71</b>	<b>13</b>	<b>11</b>	<b>39</b>	<b>245</b>
Teacher	96	59	10	6	36	207
Other education specialist	7	7	2	3	1	20
Parent/student/other	8	5	1	2	2	18
<b>Organisational responses</b>	<b>32</b>	<b>30</b>	<b>5</b>	<b>5</b>	<b>13</b>	<b>85</b>
Awarding organisation	2	3	0	0	0	5
Equalities organisation	0	0	1	0	3	4
School representative body/union	6	7	3	2	1	19
Subject association	1	2	0	0	4	7
Local Authority	2	4	0	0	1	7
FE/Sixth Form	3	3	0	0	1	7

School:						
Academy/comprehensive/state selective	9	11	1	3	3	27
School: Independent	9	0	0	0	0	9
<b>Total (n)</b>	<b>143</b>	<b>101</b>	<b>18</b>	<b>16</b>	<b>52</b>	<b>330</b>
<b>Total %</b>	<b>43%</b>	<b>31%</b>	<b>5%</b>	<b>5%</b>	<b>16%</b>	

287. The highest proponents of this are in the independent school group where 100% of respondents strongly agree with the proposal. All respondents from awarding organisations agree with the proposal although this is split with 2 strongly agree and 3 saying that they agree.

288. Only two groups have less than half of respondents agreeing; subject association members (3 strongly agree/agree and 4 don't know) and members of equalities organisations (0 strongly agree/agree and 3 don't know and 1 disagrees).

#### *Comments about the proposed design requirements for the reformed GCSEs in Mathematics*

289. In all, 75 people made an additional comment regarding proposed changes for Mathematics some of which focussed on the subject content itself on which DfE were consulting (such as formulae) as opposed to the design requirements on which Ofqual consulted.

290. While it is more difficult to isolate a number of strong, main themes amongst further comment for Mathematics in comparison to English, a number of areas of focus are identifiable alongside other more varied and individual points of view. These include:

- A level of support for tiering within the assessment. However, some concerns are raised regarding the size and location of the overlap and also that as much content is accessible as possible by all students to prevent exclusivity.
- There is concern regarding the amount of formulae students are required to memorise where it is felt that a test of memory is not the same as testing mathematical reasoning.

291. Support for tiering is evident among awarding organisations, teachers, school academies/comprehensives/state selective and independent schools. Comments on tiering are clearly focused on the practical advantages such a mechanism allows. The ability to match ability to difficulty is touched on by many who support tiering. Positive feedback for tiering is most noticeable among teachers but also there is support among awarding organisations, independent schools and local authorities.

‘We welcome, and strongly agree with the proposals that the reformed mathematics qualification should be tiered. We agree that the overlapping tiers model is appropriate; however, the size and location of the overlap of the tiers and comparability between tiers needs to be investigated further and improved.’

Awarding organisation

‘Tiering of GCSE mathematics is absolutely essential. Asking A\* candidates to sit the same papers as G candidates is extremely inadvisable.’

Teacher

‘Only that tiering is still necessary.’

School: Independent

‘I feel very strongly that it must be tiered to make it meaningful for all students. Untiered will not work. The most able will have to demonstrate skills and knowledge mastered in year 7 or earlier, and the less able will be utterly demoralised and put off Maths by being faced with content they cannot access.’

Teacher

292. However, despite the level of support observed for the practical benefits of a tiered system, there are some reservations concerning the design of tiering and its potential impact on certain students. The desire to make sure that tiering is not exclusive nor ultimately restrictive is a view particularly expressed by educational specialists and awarding organisations.

‘The overlap between tiers should be considered carefully to help raise aspirations and improve life chances for the most vulnerable.’

Education specialist

‘We believe that as much content as possible should be common for all students. The specification should not restrict what students

have the chance to learn. This is a clear cap on aspiration. It should be teachers, who know their students, who are in control of students' learning.'

Awarding organisation

293. Reservations regarding the amount of formulae (as noted in DfE's consultation) that pupils are required to memorise are exclusively among teachers. Points of opposition centre on the argument that it is a test of memory rather than how to use formulae appropriately and the need to recall formulae in the modern world is questioned by some.

'The amount of formulae pupils are required to memorise is far too much. The emphasis should be on using them appropriately, not becoming a test of memory.'

Teacher

'I have grave concerns about the proposed removal of formula pages and the apparent need to learn all formulas. In an age where all of these formulas are instantly accessible in the real world, this seems to be assessing the wrong skills - memory rather than Mathematics.'

Teacher

'The memorising of formula takes away the actual function of applying the maths and goes back to those who can remember things do better than those who can think and apply.'

Teacher

*The Sciences (chemistry, biology, physics and double award science)*

294. In relation to the sciences, the Ofqual consultation states that the Department for Education's draft content for science GCSEs includes practical elements. Ofqual suggested that these practical elements **cannot** be assessed **only** by an external written exam.

295. 70% of respondents agree that practical elements for science GCSEs cannot be assessed only by a written exam. Only a small minority of respondents disagree with this proposal (6% disagree and 7% strongly disagree).

**Figure 49: 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? (Q55)**

*GCSE Reform Consultation Analysis*

	<b>Strongly agree</b>	<b>Agree</b>	<b>Disagree</b>	<b>Strongly disagree</b>	<b>Don't know/no opinion</b>	<b>Total</b>
<b>Personal responses</b>	<b>88</b>	<b>65</b>	<b>12</b>	<b>14</b>	<b>39</b>	<b>218</b>
Teacher	71	51	11	12	37	182
Other education specialist	9	6	0	1	2	18
Parent/student/other	8	8	1	1	0	18
<b>Organisational responses</b>	<b>31</b>	<b>29</b>	<b>5</b>	<b>6</b>	<b>16</b>	<b>87</b>
Awarding organisation	2	1	1	1	0	5
Equalities organisation	1	1	1	0	1	4
School representative body/union	8	9	0	0	2	19
Subject association	3	1	0	0	4	8
Local Authority	4	2	0	0	1	7
FE/Sixth Form	0	4	1	0	1	6
School: Academy/comprehensive/state selective	10	9	1	3	5	28
School: Independent	3	2	1	2	2	10
<b>Total (n)</b>	<b>119</b>	<b>94</b>	<b>17</b>	<b>20</b>	<b>55</b>	<b>305</b>
<b>Total %</b>	<b>39%</b>	<b>31%</b>	<b>6%</b>	<b>7%</b>	<b>18%</b>	

296. The three groups in most agreement with the view that practical elements for science GCSEs cannot be assessed only by written exam are; school representative bodies/unions, parents/students/other, and local authorities.

297. When asked whether the practical science element should be assessed by teachers in accordance with exam board requirements (as per figure 50 below), the large majority agree that this should be the case (34% strongly agree and 37% agree). Overall, only 11% state that they disagree with this method of assessment (6% disagree and 5% strongly disagree).
298. Teachers agree with this proposal with just 12% disagreeing.
299. Parents/students/others show the highest proportion of overall agreement (6 strongly agree and 10 agree versus 2 that disagree). While school representative bodies/unions show the highest proportion of those strongly agreeing (9 strongly agree and 6 agree versus 1 who disagrees).

**Figure 50: The practical science element should be assessed by teachers in accordance with exam board requirements. To what extent do you agree with this proposition? (Q56)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>72</b>	<b>83</b>	<b>12</b>	<b>12</b>	<b>35</b>	<b>214</b>
Teacher	58	67	9	12	32	178
Other education specialist	8	6	1	0	3	18
Parent/student/other	6	10	2	0	0	18
<b>Organisational responses</b>	<b>32</b>	<b>30</b>	<b>5</b>	<b>4</b>	<b>17</b>	<b>88</b>
Awarding organisation	3	1	0	1	0	5
Equalities organisation	1	3	0	0	1	5
School representative body/union	9	6	1	0	3	19
Subject association	1	1	1	0	5	8
Local Authority	5	1	0	0	1	7
FE/Sixth Form	1	3	0	1	1	6

School:						
Academy/comprehensive/state selective	10	12	1	1	4	28
School: Independent	2	3	2	1	2	10
<b>Total (n)</b>	<b>104</b>	<b>113</b>	<b>17</b>	<b>16</b>	<b>52</b>	<b>302</b>
<b>Total %</b>	<b>34%</b>	<b>37%</b>	<b>6%</b>	<b>5%</b>	<b>17%</b>	

300. When asked whether the practical science assessment should contribute 10% to the student's overall marks for the GCSE science qualifications (as seen in figure 51), 43% of respondents agree (12% strongly agree and 31% agree). Around a third of respondents however, disagree with this level of contribution (21% disagree and 11% strongly disagree).
301. A quarter of respondents say that they do not know/have no opinion on whether the practical science element should contribute 10% to the overall mark. The groups which display the largest proportion of do not know/have no opinion are equality organisations (n=5) and subject association members (n=5). This is most likely a result of these groups having specialist knowledge in other subject areas.

**Figure 51: 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? (Q57)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>25</b>	<b>72</b>	<b>40</b>	<b>24</b>	<b>51</b>	<b>212</b>
Teacher	20	60	29	19	48	176
Other education specialist	5	4	5	2	2	18
Parent/student/other	0	8	6	3	1	18
<b>Organisational responses</b>	<b>11</b>	<b>22</b>	<b>22</b>	<b>10</b>	<b>23</b>	<b>88</b>



Awarding organisation	1	0	1	2	1	5
Equalities organisation	0	1	0	0	4	5
School representative body/union	4	7	4	0	4	19
Subject association	1	0	2	0	5	8
Local Authority	1	2	3	0	1	7
FE/Sixth Form	1	1	2	0	2	6
School: Academy/comprehensive/state selective	2	6	8	8	4	28
School: Independent	1	5	2	0	2	10
<b>Total (n)</b>	<b>36</b>	<b>94</b>	<b>62</b>	<b>34</b>	<b>74</b>	<b>300</b>
<b>Total %</b>	<b>12%</b>	<b>31%</b>	<b>21%</b>	<b>11%</b>	<b>25%</b>	

*Comments about the proposed design requirements for the reformed GCSEs in Sciences*

302. When asked whether respondents would like to add any additional comments regarding the proposed design requirements for the Sciences, 131 out of 458 commented. The majority of comments can be broadly summarised within the following three issues.

- Much feedback is centred on the amount of weighting given to the practical element of the assessment. Nearly all who expressed a view thought that the percentage allocated to science practicals (at 10% of the overall grade) was too low with most suggesting it should be between 20-30%. One school representative body/union went as high as 50%.
- The main reason for advocating a higher level of weighting associated with the practical element is that this type of scientific study is extremely important in helping facilitate a rounded development of students within

the sciences in preparation for further study/employment. There is an acknowledgement that issues remain regarding the integrity and validity of internal assessment. Some suggest therefore that any practical element should be externally assessed.

- A number of respondents strongly queried the removal of the Single Combined Science award and the impact this could have on less able students although this is a DfE not Ofqual decision.

303. While there is debate as to the weighting of the practical element within sciences, there is an overwhelming sentiment that it should at least be higher than the 10% proposed. Many respondents covering a variety of different groups (with teachers, parent/students and school/academies most noticeable among them), consider at least 20% to be better with some advocating much higher than this. Most highlighted the importance of practical skills for later study/employment practicalities.

‘The practical element should contribute to a much higher percentage of the overall grade, perhaps 20%, although some of ATL’s members have suggested it should be as high as 50%. ATL believes that there should be less content and more skills, and the opportunity for students to develop further reasoning skills. Science is about investigation and experimentation not just theory. It is vital that students are able to learn skills and processes and demonstrate those, not just to recall facts.’

School representative body/union

‘Practical science assessment should be at least 20% of the total. We need scientists who can set up and run experiments and interpret their data. You cannot do meaningful science in theory alone.’

Teacher

‘Practical application of science is its greatest vocational link and should make up more of the grade.’

Parent/student/other

‘The practical science element should contribute much more than 10% of the overall grade - in fact, it should probably be at least 20%. Scientific investigation in everyday life is very practical and this element forms a very fundamental part of the subject.’

Teacher

304. There is opposition to the suggested removal/absence of the Single Science award with concern mostly regarding possible effects on less able students. This is a subject content matter within the DfE's consultation and it was not part of this consultation, although comments have been included here as they highlight some of the issues in relation to the effect on students. Equality organisations are just one of the groups to question the removal of the Single Combined Science. Other groups include teachers, local authorities and FE/sixth form.

'What has happened to the single award Science?'

School representative body/union

'I strongly feel that the removal of a single science option will disadvantage less able students and result in a disengagement from science by those from less advantaged homes who most need to become scientifically literate and for whom a single science option studied over 2 years offers an achievable qualification.'

Teacher

'The single combined science award should be maintained. Although it does not say it will not exist, it must be assumed this is the plan. I work with students in a Special School and there is not enough curriculum time to offer the double award. If needs be, then a single separate science option will be offered, but the combined science award provides opportunities for a more holistic learning experience. This would also apply to lower ability learners in a mainstream environment. More students should be gaining the F and G grades, removal of this award will mean even less lower ability students will be entered for GCSE science qualifications'.

Teacher

### Geography

305. The Ofqual consultation states that the Department for Education's draft geography GCSE content includes a fieldwork element. Ofqual suggested that the outcomes in the draft content **can** be assessed by an external written exam only.

306. When asked whether the Geography GCSE can be assessed by an external written exam only, 28% agreed (10% strongly agree and 18% agree) while 47% disagree (22% disagree and 25% strongly disagree).

307. Academy/comprehensive/state selective schools and awarding organisations show the highest proportion of disagreement; Academy/comprehensive/state selective (disagree 6 and strongly disagree 12), awarding organisations (disagree 1 and strongly disagree 2).

**Figure 52: 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? (Q59)**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total
<b>Personal responses</b>	<b>25</b>	<b>42</b>	<b>42</b>	<b>42</b>	<b>56</b>	<b>207</b>
Teacher	21	36	33	34	49	173
Other education specialist	4	0	4	3	5	16
Parent/student/other	0	6	5	5	2	18
<b>Organisational responses</b>	<b>3</b>	<b>10</b>	<b>20</b>	<b>29</b>	<b>18</b>	<b>80</b>
Awarding organisation	0	1	1	2	0	4
Equalities organisation	0	0	3	0	1	4
School representative body/union	1	1	5	7	4	18
Subject association	0	1	0	3	5	9
Local Authority	0	2	1	2	1	6
FE/Sixth Form	1	1	1	1	1	5
School: Academy/comprehensive/state selective	0	2	6	12	4	24
School: Independent	1	2	3	2	2	10
<b>Total (n)</b>	<b>28</b>	<b>52</b>	<b>62</b>	<b>71</b>	<b>74</b>	<b>287</b>

Total %	10%	18%	22%	25%	26%
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*Comments about the proposed design requirements for the reformed GCSEs in Geography*

308. 83 respondents left additional comments regarding the proposed design requirements for Geography. The main themes are:

- The issue of fieldwork with the vast majority stating the importance of practical work within the subject. As with practical elements of other subjects, some raise concerns as to the validity and integrity of the assessment of such a component but in general, most comments are overwhelmingly in support of fieldwork assessment.
- In addition to the belief that practical coursework is of great value to the study of Geography, a number of respondents highlight the impact of non-classroom based practicals have on the interest levels of students and the particular benefit in promoting accessibility among lower ability pupils and to those with other educational requirements.

309. The importance attached to fieldwork/practical work is evident across the majority of groups surveyed. Fieldwork and practical elements are considered integral to the study of the subject and non-exam assessment is viewed as the best way to test the appropriate skill set.

‘Just using written example papers for the subjects fails to provide adequate means of assessing the full range of skills.’

Local Authority

‘Field trips are invaluable for increasing the students understanding and for getting hands on experience in different geographical topics.’

Education Specialist

‘I would still like to see a controlled assessment or longer 'project' piece be part of the assessment - as this shows students ability to research and present findings (something that employers value) - rather than just being a memory test.’

Parent

‘Geographical insight and interpretation gained through fieldwork is integral to the epistemology of the subject and needs to be assessed other than by external written examination.’

School representative body/union

‘Geography department would like to see field study remain an important part of the qualification and think these skills are better tested through controlled assessment.’

School: Academy/comprehensive/state selective

‘We regard fieldwork as an essential element of a worthwhile geographical education....’

Subject association

310. While the argument for including fieldwork in the study of geography was a strong theme from those teachers and schools that left additional comments on geography, the question as to how such fieldwork should be assessed split respondents. Some respondents argued in favour of teacher or non-exam assessment for fieldwork (whilst recognising such an assessment method would have its own problems) while others felt that to assess within an examination the skills and techniques gained in the field could be just as problematic. The following example illustrates some of these comments, which were almost exclusive to teachers and schools.

‘Assessing the quality of fieldwork completed by use of a final exam will not be straightforward but awarding organisations must not be allowed not to assess this vital aspect of Geography.’

School: Academy/comprehensive/state selective

‘I have observed frequently that pupils are strongly directed when completing field work and do this with strong peer support. I do not believe that it is suitable as an assessment tool for a high-stakes examination.’

Teacher

311. The impact of coursework/practical elements on raising students’ interest levels is raised by a number of teachers and those within academies/comprehensive/state selective groups. Additionally, the positive effect of coursework has on less able students is also touched upon.

‘This makes Geography less accessible to lower ability pupils, and also to pupils with additional educational requirements e.g. dyslexia. It also precludes the teaching of enquiry and therefore

reduces the amount of rigour within the subject. It narrows the range of assessment techniques used and hence measures a more narrow range of a pupil's ability'

Teacher

'Terminal examinations can be detrimental to the achievement of students with learning difficulties'

Teacher

'There should be room for a teacher-assessed element to encourage breadth and individual interest'

School: Academy/comprehensive/state selective

'Coursework provides students with a chance to develop their own thoughts and interest in the subject. We are in great danger of valuing only what we feel is easy to measure, not working out how to measure what is truly valuable'

Teacher

### History

312. The Ofqual consultation proposed that the Department for Education's draft history GCSE content **can** be assessed by an external written exam only. Overall, 46% agree with the proposal that the GCSE History content can be assessed through external written exam only (15% strongly agree and 31% agree) with 32% saying that they disagree (18% disagree and 14% strongly disagree).

313. Highest proportions of agreement can be observed within independent schools (2 strongly agree and 4 agree), FE/Sixth form institutions (3 agree) and awarding organisations (0 strongly agree and 3 agree). All three groups display an overall percentage of 60% agreement.

314. Half of respondents from equality organisations and academy/ comprehensive/ state selective schools disagree that GCSE History content should all be assessed through external written examination only.

Figure 53: 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? (Q61)

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know/no opinion	Total

*GCSE Reform Consultation Analysis*

<b>Personal responses</b>	<b>35</b>	<b>65</b>	<b>35</b>	<b>27</b>	<b>47</b>	<b>209</b>
Teacher	29	55	30	19	42	175
Other education specialist	3	3	3	3	4	16
Parent/student/other	3	7	2	5	1	18
<b>Organisational responses</b>	<b>9</b>	<b>26</b>	<b>16</b>	<b>13</b>	<b>18</b>	<b>82</b>
Awarding organisation	0	3	1	1	0	5
Equalities organisation	0	1	2	0	1	4
School representative body/union	2	7	3	3	4	19
Subject association	1	0	1	2	5	9
Local Authority	2	1	0	1	2	6
FE/Sixth Form	0	3	0	1	1	5
School: Academy/comprehensive/state selective	2	7	7	5	3	24
School: Independent	2	4	2	0	2	10
<b>Total (n)</b>	<b>44</b>	<b>91</b>	<b>51</b>	<b>40</b>	<b>65</b>	<b>291</b>
<b>Total %</b>	<b>15%</b>	<b>31%</b>	<b>18%</b>	<b>14%</b>	<b>22%</b>	

*Comments about the proposed design requirements for the reformed GCSEs in History*

315. In a similar response profile to that observed within Geography, many of the comments above for History centred on the suitability of a terminal exam at the expense of any coursework/non-examination based assessment. The point was frequently made across a variety of groups that assessment should take into



account the skill set involved in the study of History and should not merely be a test of recall/memory.

316. Overall 67 out of 458 respondents added additional comment regarding proposed design requirements for History. Key themes picked out from the relatively few comments can be summarised as:

- Concern over the suitability of a terminal exam at the expense of any coursework/non-examination based assessment. The point was frequently made across a variety of groups that assessment should take into account the specific skill set involved in the study of History and should not merely be a test of recall/memory.
- Development of research and planning skills, key thinking skills such as historical enquiry, understanding of evidence and the use of structured argument were all mentioned as areas of high importance for students' to develop and assess.
- In addition to coursework, open book examinations were also mentioned by a few as a possible alternative to more traditional types of factual recall questioning.

317. The following are typical examples of the types of comments made regarding the development of certain skills and the suitability or otherwise of a terminal exam for assessment in comparison to coursework. Skill sets specific to History are widely referenced as key elements which should be appropriately tested. This type of reservation is evident across most groups and can be considered the major concern about the proposals for this subject from the comments offered.

'The proposed design requirements are flawed. They concentrate excessively on factual recall and do not encourage independent learning. Also they do not allow for the opportunity to create extended narratives outside examination conditions, an essential component of further academic and vocational study. They do not encourage research skills and the production of extended answers based on the outcome of these skills.'

Awarding organisation

'Undertaking an historical investigation allows students to demonstrate use of skills learnt in a practical sense. The fact that there is no weighting for this component makes it of low value and there is a concern that teachers could simply pay lip service to this element.'

Local Authority

'We are concerned that assessing history entirely through externally set, written examination will test a very limited range of skills. In particular, it does not test students' research and planning skills. Although we recognise the issues associated with controlled assessment, which aims to assess these skills, we believe they are too valuable not to assess at all.'

School representative body/union

'Not exams alone. Projects/assessment where some kind of personal learning portfolio that was added to at regular intervals could form part of a final assessment piece. These could be virtual, presentations, written, drawn - individual. The portfolios would need to reflect key thinking skills, historical enquiry, understanding of evidence and facts learnt etc. but other than that, could be individual.'

School representative body/union

'As we have argued in our response to the Subject Content consultation from the DfE, we believe strongly that the judgment that History GCSE should only be assessed by external examination is flawed. As the section on Forms of Assessment in History in the Consultation Document concedes, the skills involved in the work currently assessed in Controlled Assessment are important to the disciplinary culture.'

Subject association

'Research, independent learning, structuring an argument based on alternative points of view is extremely important and can only be done by a controlled assessment / coursework.'

Teacher

318. A few respondents suggested alternatives to just traditional recall based only examinations or coursework/project work.

'Long form submissions and research for subjects such as history are best presented in long-form formats such as open-book examinations and coursework. Testing a students' recall does nothing for assessing their ability.'

Education specialist

'As for English Language, I have strongly believed for many years that the examination of History should include a spoken presentation element. This is because presenting to your peers is a necessary skill required in all walks of life and yet we only assess through written work. I find presentations to be an excellent means of getting students to work together and also an excellent stretch and challenge activity.'

Teacher

## Section 8: Equality impact assessment

*Are there any impacts that are not identified?*

319. When respondents were asked whether there are any other impacts (other than those investigated in the consultation) on how the proposed requirements for the reformed GCSEs could affect persons who share a protected characteristic, 71% stated that there were none.

**Figure 54: 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? (Q63)**

	Yes	No	Total
<b>Personal responses</b>	<b>64</b>	<b>175</b>	<b>239</b>
Teacher	56	151	207
Other education specialist	4	13	17
Parent/student/other	4	11	15
<b>Organisational responses</b>	<b>29</b>	<b>49</b>	<b>78</b>
Awarding organisation	3	2	5
Equalities organisation	6	0	6
School representative body/union	6	9	15
Subject association	4	5	9
Local Authority	3	3	6
FE/Sixth Form	1	6	7
School: Academy/comprehensive/state selective	6	16	22
School: Independent	0	8	8

<b>Total (n)</b>	<b>93</b>	<b>224</b>	<b>317</b>
<b>Total %</b>	<b>29%</b>	<b>71%</b>	

320. However, equality groups felt in particular that there were a number of potential impacts that had not been identified within the consultation. For equality organisations all 6 respondents within this group thought that there were other areas to be explored. Other groups such as awarding organisations (3 out of 5 members) also considered that there were impacts that had not been identified.

321. Respondents provided a range of comments to highlight what other positive or negative impacts the reformed GCSEs may have on persons who share a protected characteristic. In total 88 comments were provided by respondents. The main themes of the additional impacts that have not been identified were related to the:

- Impact of linear assessment
- Length of exams
- Removal of learning types / removal of coursework/outside the classroom learning

322. The most frequently mentioned issue is a concern that **a move towards 100% linear assessment and terminal examinations will disadvantage certain types of students**, such as those with physical disabilities, religious beliefs, family situation, country of origin and English difficulties and health issues. This was an issue identified by awarding organisations, equalities organisations, local authorities and school responses and the scope of those who were suggested may be affected is summarised by the following extract from a written response from an equalities organisation:

‘Qualifications based on final examinations alone would particularly affect young people who move home during Key Stage 4 including looked after children, young people in custody, young people accessing health treatment, travellers and refugees, and those living in short term accommodation.’

Equalities organisation

323. Respondents argued that linear examinations will disadvantage those with certain illness or health issues who may not be able to sit examinations at the end of the year. With particular concerns raised over the lack of options to re-sit

and calls for 're-sits due to medical reasons'. As the following examples highlight:

'By making GCSEs linear with assessment by exams and no re-sits this will negatively impact on students with medical conditions such as KLS who miss school and may be ill at the time of exams.'

Equalities organisation

'The move to 100% linear assessment can potentially have a detrimental effect on candidates who are undergoing treatment for long term conditions such as cancer and are therefore covered by the Equality Act as sharing the protected characteristic of disability. For candidates in this position the ability to take aspects of their GCSE at various points in a two year period can be very important in maintaining their engagement with their education.'

Awarding organisation

324. The same concern was raised in relation to those with a disability (both with physical disabilities and those with specific language difficulties e.g. autism) who may find the process of one exam covering the whole course 'stressful' and may be disadvantaged by the move to terminal examinations.

'There are many disabled learners that will not be able to sit the examinations even with the option of extra time if they are expected to cover the whole course syllabus in one sitting. It is not only disabled learners with physical impairments who will be severely affected by exclusively terminal examinations.'

Equalities organisation

325. Concern was also raised from awarding organisations, equalities organisations and teachers that the length of examinations may be too long for students with special educational needs, this position is summarised by the following quote:

'I genuinely think SEN and some disabled children will find the exams too long, the lack of differentiation in papers and in questions bewildering and the need to retain vast amounts of knowledge for two whole years and then regurgitate it in a long exam or two in each subject very very stressful!'

Teacher

326. Concerns are also raised from academy/comprehensive/state selective schools, school representative bodies/unions and education experts of the potential negative impact the move to linear examinations may have on female pupils.

‘The gender differences in learning styles means that girls do not always perform as well as they ought in examinations.’

Academy/comprehensive/state selective

327. With a respondent from a school representative body/union providing evidence to support the argument that female pupils will suffer a greater negative impact:

‘Research shows that end assessment favours boys, whilst continuous assessment and coursework favours girls. (Gender and Student Achievement in English, the Centre for Economics of Education, February 2006).’

School representative body/union

328. A second theme that emerges from the comments is on how the **removal of coursework and elements of ‘outside the classroom learning’ will disadvantage those less able students and those with learning difficulties.** As this teacher outlines:

‘Removing coursework will impact very adversely on BESD pupils. The proposal talks about the way modular exams can help these pupils develop self-esteem and resilience - this is not my experience, however, coursework as an assessment method very strongly contributes to BESD pupils developing the self-belief to stick with the course.’

Teacher

329. The issue of reducing the range of assessment methods and this change in relation to learning styles is discussed by equalities organisations, local authorities, teachers and education specialists. A Local Authority argued that the focus on written examinations in itself is restrictive and does not appreciate different learning styles.

‘These proposals make the assumption that the only way to assess students is through timed written examinations. The fact that children and young people learn by a wide variety of different ways, means that using only written examinations is very restrictive. Thus, we would argue, this does not promote equal access, and it is important it is even.’

Local Authority

330. One subject association in particular and a small number of teachers also argued that fieldwork is a useful method for engaging students across the ability spectrum, arguing that:

‘There is a wealth of evidence demonstrating that learning outside the classroom engages and improves outcomes for all pupils, regardless of age, ability or personal circumstances.’

Subject association

#### *Additional steps to mitigate negative impacts*

**Figure 55: Are there any additional steps we could take to mitigate any negative impact on persons who share a protected characteristic resulting from these proposals? (Q64)**

	Yes	No	Total
<b>Personal responses</b>	<b>65</b>	<b>153</b>	<b>218</b>
Teacher	55	135	190
Other education specialist	6	9	15
Parent/student/other	4	9	13
<b>Organisational responses</b>	<b>32</b>	<b>46</b>	<b>78</b>
Awarding organisation	4	1	5
Equalities organisation	5	0	5
School representative body/union	8	7	15
Subject association	4	5	9
Local Authority	2	5	7
FE/Sixth Form	1	5	6
School: Academy/comprehensive/state selective	8	15	23
School: Independent	0	8	8



Total (n)	97	199	296
Total %	33%	67%	

331. One third of respondents thought that there are additional steps which could be taken to mitigate any negative impact on persons who share a protected characteristic resulting from these proposals.

332. All respondents from equality organisations thought that this was the case while 4 out of 5 from awarding organisations and 8 out of 15 from school representative bodies/unions thought this to be true.

333. When asked to provide details of additional steps that Ofqual could take to mitigate negative impacts respondents provided various practical actions. There was a feeling from teachers in the main and from education specialists and academy/comprehensive/state selective schools that Ofqual should **maintain controlled assessments and coursework**.

334. The rationale for this was that it offers flexibility and differentiated support to pupils with a protected characteristic.

‘Continue to have a controlled assessment component as it offers those with protected characteristics differentiated support.’

Academy/comprehensive/state selective

335. In response to the perceived negative impact on disabled or ill children of taking all their examinations at the end of the year, equalities organisations in particular stressed the need for re-takes to be available in all subjects if exams are missed through illness.

‘There needs to be an opportunity to re-sit all subjects not just English language and maths without waiting a year if exams are missed through illness.’

Equalities organisation

336. A range of other comments focussed not on practical measures but on the need to continue to fully consult on the impact of GCSE reform and to take time to assess the impact of any changes. These were comments made by the majority of respondent types and can be summarised by:

‘Further investigation and dialogue with the disability groups will be needed: in addition further impact analysis will be needed as the new reformed system is developed.’

Awarding organisation

‘The timetable for implementing the new exams should at least be extended to allow time for proper trialling so that the impact on different groups can be properly evaluated before they are introduced.’

Equalities organisation

337. Over a third of respondents to the question think that when taking into account the purpose of qualifications, the proposed design of the reformed GCSEs can be changed to better advance equality of opportunity between persons who share a protected characteristic and those who do not (figure 56).

338. All respondents from equality organisations think that this is the case while over half from local authorities agree as well.

**Figure 56: 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? (Q65)**

	Yes	No	Total
<b>Personal responses</b>	<b>64</b>	<b>146</b>	<b>210</b>
Teacher	52	130	182
Other education specialist	6	8	14
Parent/student/other	6	8	14
<b>Organisational responses</b>	<b>38</b>	<b>39</b>	<b>77</b>
Awarding organisation	2	2	4
Equalities organisation	6	0	6
School representative body/union	7	6	13
Subject association	5	5	10

Local Authority	4	3	7
FE/Sixth Form	2	3	5
School: Academy/comprehensive/state selective	12	12	24
School: Independent	0	8	8
<b>Total (n)</b>	102	185	287
<b>Total %</b>	<b>36%</b>	<b>64%</b>	

339. Finally respondents to the consultation were asked to outline changes that they would suggest to the design of reformed GCSEs that would better advance the equality of opportunity. Ninety comments were received to the online consultation on this issue and these suggestions are themed as follows:

- Linear approach should be replaced with reinstatement of controlled assessment to make assessment more accessible
- Tiering
- Length of exams and focus on SPaG is a disadvantage

340. The strongest theme within the comments received is that changes should be made to make examinations and assessment more accessible to those persons with a protected characteristic. Many of these issues have been previously discussed but again there are calls for the inclusion of a modular structure with exams at the ends of the modules and controlled assessments to support those who for various reasons struggle under the pressure of exams. The following evidence summarises these claims:

'We believe that students with certain disabilities would be less at a disadvantage if they were able to complete some of their assessment other than under examination conditions, although there may be scope for imaginative approaches to external examination which might alleviate this concern'

Subject association

'Coursework and controlled assessment allow students, who struggle under the pressure of exams, to work at their own pace. Implementing an exam structure which centres assessment purely at the end of a two year course severely impedes those students

who may have to deal with significant upheaval during their education'

School representative body/Union

341. A response from a school representative body/union takes this argument further than just modular assessments to the introduction of a more flexible system of GCSEs. A union outlines that: 'flexible course structures and delivery system enabling students and their teachers to construct learning programmes that meet the young people's learning styles'. In such a system it was argued that:

'Progression would be based on the stage that the young person has reached rather than when the young person reaches a particular age.'

School representative body/Union

342. The issue of tiering is again covered in relation to the needs of persons with a protected characteristic. This issue is mentioned by teachers, local authorities and school responses and comments ranged from an objection from a Local Authority to what they deemed a 'one-size-fits-all' nature of discarding tiering to a feeling that an untiered system would demoralise certain students:

'We should all have the same opportunities but we are not all the same in terms of our ability. Education is not about limiting the opportunity for students but it is about supporting every student to be the best, not setting them up for failure.'

School: Academy/comprehensive/state selective

343. The third area where respondents suggested changes to the design of GCSEs to better advance equality of opportunity focussed on the length of exams and a related issue of the inclusion of spelling and grammar in examinations.

344. A minority of respondents referred to the need for extra or more time in examinations where pupils require additional support. Furthermore an awarding organisation proposed there should be a maximum time limit on each exam paper undertaken in order to ensure that where students require additional time, they do not become unfairly tired or compromised due to an overly lengthy exam paper.

'We recommend that there is a maximum examination time for a single paper of two hours to ensure that students requiring extra time and support are not disadvantaged.'

Awarding organisation

345. Related to the time given to certain pupils for the reformed exams, two awarding organisations also recommended that SPaG was not included in the examination mark for pupils with certain disabilities, such as dyslexia. It was argued that it is counter intuitive to give these pupils extra time for SPaG checks when the time should be for the main part of the assessment. As summarised by the following awarding organisation:

‘As such, the extra time is there to create a level playing field with other candidates and enable them to access the whole exam, not for them to conduct extra checks. In addition, if a candidate has a condition such as Dyslexia, no amount of extra time will enable them to correct spelling mistakes they are making due to their disability.’

Awarding organisation

346. Finally, consultation respondents were asked to provide any further comments on the impact of the proposals on persons who share a protected characteristic. Many of the respondents had previously provided responses on this issue and the most in depth comments are from equalities organisations and awarding organisations.

347. Most of the equality organisations that responded to the consultation are focussed on a particular protected characteristic such as deaf pupils, disabled pupils or pupils with a visual impairment. As such, respondent comments focus on the specific elements of the proposals that would disadvantage the pupils that organisation represents.

348. As previously highlighted the proposed move to terminal exams and the removal of modular coursework caused most concern with equalities organisations:

‘...believes that disabled candidates will be most disadvantaged by the GCSE reforms. Disabled candidates will no longer have the option to pace their work over the duration of GCSE courses.....Written exams rely on memory, reading and writing and imposes strict time limits that disadvantages disabled candidates with neo-diverse conditions such as dyslexia, dyscalculia and autism.’

Equalities organisation

‘There is a real risk with these proposals that fewer children with disabilities will be able to demonstrate their knowledge and skills in examinations.’

Equalities organisation

349. One equalities organisation also went on to raise the practical point that if the proposals are implemented, sufficient resources need to be allocated to ensure exam papers are suitable for those with a visual impairment.

If these GCSE proposals go ahead in their current form and exam-only assessment becomes the norm, it is essential that resources are made available to modernise the production of accessible papers so that visually impaired students (and others with print disabilities such as dyslexia) are able to take part on level terms.

Equalities organisation

350. A very small number of respondents also provided comments relating to the assertion that the proposals have not considered or fully assessed the impact upon specific groups, namely those with religious beliefs or those who are disadvantaged but do not necessarily share a protected characteristic.

'The potential impact on students who are celebrating a festival or observing a fast has not been fully assessed. The timing and arrangements for an examination are in practice very difficult to vary. Ramadan in Islam is a lengthy festival and could affect a candidate for the whole of the examination period and any variation would be impossible.'

Awarding organisation

'The analysis of the equalities impact of the proposed changes to GCSEs does not appear to have considered the impact on particular groups of young people who are disadvantaged although they may not be members of groups with protected characteristics, such as looked after children, those in custody, those undertaking health treatments and those living in short term accommodation.'

School representative body/union

## Appendix A: List of organisational consultation respondents

The following organisations responded to the consultation either online or via other written communication. A further 12 organisations and the majority of personal respondents requested confidentiality in response and are therefore not included in this list.

Organisation name
Advisory Committee on Mathematics Education (ACME)
Alliance for Inclusive Education (ALLFIE)
Altain Education
Association of Colleges
Association of Employment and Learning Providers (AELP)
Association of School and College Leaders
Association of Teachers and Lecturers (ATL)
Association of Teachers of Mathematics
AQA
BATOD - British Association of Teachers of the Deaf
Bexley Grammar School
Board of Directors of Teignmouth Community School
Bridgemaury School
Brighton College
Bucks Learning Trust for Bucks County Council
Burton and South Derbyshire College
CBI
Centre for Innovation and Research in Science Education, University of York

Centrepoint
City & Guilds
City of York Council
Council for Learning Outside the Classroom (CLOtC)
Cultural Learning Alliance
Edgbaston High School
Eggars School
English and Media Centre
Federation of Small Businesses (FSB)
Field Studies Council (FSC)
Gatsby Foundation
Girls' Schools Association
GL Assessment
Gosforth Academy
Grammar School Heads' Association
Hampshire Secondary Educational Leaders (HSEL)
Heart of England School
Henry Cort Community College
HMC
Howard of Effingham School
Incorporated Society of Musicians (ISM)
Independent Parental Special Educational Advice (IPSEA)
Independent Schools Council
International Baccalaureate



Institute of Directors
ISCG Information for School and College Governors
JACT (Joint Association of Classics Teachers)
Kingston Adult Education
KLS Support UK
Learning & Teaching Committee,
Learning Improvement Leeds City Council
Leicestershire County Council
Lincolnshire County Council
Lode Heath School
London Borough of Redbridge SACRE
Mathematics in Education and Industry (MEI)
Mill Hill School
Minsthorpe Community College
NAAE (National Association of Advisers in English)
NAHT
NASUWT
National Association for the Teaching of English (NATE)
National Association of Language Advisers
National Children's Bureau and Council for Disabled Children
National Deaf Children's Society (NDCS)
National Governors' Association
National Society for Education in Art and Design
National Union of Students

NCFE
North Tyneside Council Children, Young People and Learning Directorate Schools, Learning and Skills
NUT
OCR Examinations
Oxted School
Parmiter's School
Peacehaven Community School
Pearson
Queen Elizabeth School
Ralph Thoresby School
Reepham High School & College
Religious Education Council of England and Wales
Rochdale Sixth Form College
Royal College of Speech and Language Therapists
Royal Geographical Society (with IBG)
Royal Historical Society
Royal National Institute of Blind People (RNIB)
Schools and Further Education Committee
SCORE
Shenley Brook End School
Sir George Monoux College
Sixth Form Colleges' Association
Skinner's Kent Academy

South Craven School
South Thames College
St Andrew's Catholic School
St Paul's Girls' School
Stroud High School Academy
Surrey Museums Consultative Committee
Surrey Secondary Heads' Phase Council
Teignmouth Community School
The Blandford School
The Crossley Heath School
The English Association
The Geographical Association
The Mathematical Association
The Minster School
The Sholing Technology College
The University of Nottingham
UCAS
United Kingdom Literacy Association
University and College Union (UCU)
University of Central Lancashire
Voice: the union for education professionals
Wakefield College
Wakefield Local Authority and the Curriculum Teaching and Learning Leaders Group made up of secondary school deputies and assistant headteachers.

Wellcome Trust
Westleigh High School
Wilmington Grammar School for Girls
WJEC
Wood Green Academy

## Appendix B: Consultation Questionnaire

### Information pages

#### About you\*

#### Your details:

Name:	
Position:	
Name of organisation or group (if applicable):	
Address:	
Email:	
Telephone number:	

#### 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) (please state capacity) \_\_\_\_\_

**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<sup>9</sup>. 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?

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### 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

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<sup>9</sup> GCSE reform February 2013 <http://www.ofqual.gov.uk/files/2013-02-07-letter-from-michael-gove-reform-of-ks4-qualifications.pdf>



- 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).
- Adjacent levels
  - Core and extension model
  - Overlapping tiers

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

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

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**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
- 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?

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**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?

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36. How would any additional information about students' performance be used by students and users of qualifications?

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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?

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**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?

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### 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		
English literature		
Mathematics		
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?

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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?

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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?

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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?

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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?

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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

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?

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**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?

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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.

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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?

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

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**Contact**

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

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

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**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

( ) Via another organisation (please state which) \_\_\_\_\_

( ) 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

( ) No

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

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