

Decisions on technical requirements on setting GCSE, AS and A level grade boundaries



In May 2016 we published a technical consultation¹ setting out the Conditions, requirements and guidance we proposed to put in place to implement our earlier decisions² relating to setting GCSE, AS and A level grade boundaries.

We have reviewed the responses to the consultation and are now announcing our decisions. We are also publishing a more detailed analysis of the responses alongside this document³.

Conditions, requirements and guidance

Our consultation proposed qualification level Conditions that would require exam boards to consider an appropriate range of evidence when setting grade boundaries, and to comply with any other requirements that we put in place.

We set out in our consultation the qualification level Conditions we proposed that would require exam boards to:

- comply with any requirements that we set in relation to setting specified levels of attainment; and
- have regard to an appropriate range of evidence when setting specified levels of attainment.

We also set out the qualification level guidance we proposed to put in place, which gave examples of the evidence an exam board might use to meet these requirements.

These Conditions and guidance were set out for:

- pre-reform GCSE (A* to G) qualifications;
- pre-reform GCE AS and A level qualifications; and

¹ <https://www.gov.uk/government/consultations/requirements-on-setting-gcse-as-and-a-level-grade-boundaries>

² <https://www.gov.uk/government/consultations/markings-reviews-appeals-grade-boundaries-and-code-of-practice>

³ <https://www.gov.uk/government/consultations/markings-reviews-appeals-grade-boundaries-and-code-of-practice>

- reformed GCE AS and A level qualifications⁴.

For each qualification, we proposed qualification-specific requirements for the way in which grade boundaries should be set.

We set out our decisions below.

General comments

A large number of the Conditions and the guidance we consulted on will apply to each qualification – pre-reform GCSE(A* to G) qualifications, pre-reform GCE AS and A level qualifications, and reformed GCE AS and A level qualifications. Where this is the case, we have referenced these comments only once in this section. We do not repeat them for each qualification.

Respondents generally supported our proposals. Where there were specific comments, we have taken the following decisions:

- One respondent suggested that the term *Level of Demand*, which is used in Condition GCSE(A* to G)1.3 (and the equivalent Condition for other qualifications), should be clarified.

This is a defined term⁵ under the *General Conditions of Recognition* and should be interpreted as such. We have decided that further clarification is not needed and to implement this part of the requirements as consulted on.

- Some respondents commented that GCSE(A* to G)1.3 (and the equivalent Condition for other qualifications) includes evidence that may not always be appropriate, or available, for some qualifications. They requested further information, with respect to GCSE, on what is meant by '*the level of attainment demonstrated by Learners taking that qualification in a prior qualification*'.

Our Conditions deliberately do not prescribe what a 'prior qualification' might be in this context. We recognise that the level of attainment in the case of GCSE would typically relate to a prior *assessment* – that is, to Key Stage 2 performance. But we do not wish to preclude absolutely the possibility of evidence being used, now and in the future, that may be appropriate. We have therefore decided to implement this part of our requirements as consulted on.

⁴ We have consulted separately on arrangements for setting standards in new (9-1) GCSEs and will be consulting further on the technical details of these shortly.
<https://www.gov.uk/government/consultations/setting-the-grade-standards-of-new-gcses-in-england-2017-2018>

⁵ Level of Demand - The degree of challenge that an assessment presents for the Learner.

- Where our proposed requirements in GCSE(A* to G)1.4 (and the equivalent Condition for other qualifications) refer to maintaining records, some respondents requested further clarification about how long they should retain them. Respondents also commented on the need to document the rationale for the selection of evidence and the weight given to it.

We have deliberately chosen not to specify for how long evidence should be retained – it is for exam boards to determine this. We believe that documenting the rationale for evidence used is a reasonable requirement – the extent to which it is documented will vary based on whether an award is unusual in any respect. We have decided to implement this part of our requirements as consulted on.

- In the guidance for GCSE(A* to G) qualifications (and the equivalent guidance for other qualifications), respondents commented that it would be helpful to have more information about the evidence we have included. Respondents noted that the list refers to “*information on Centres’ estimated levels of attainment for all Learners*” but noted that this is no longer routinely collected or used by exam boards.

The purpose of the guidance is to indicate the type of evidence that an exam board *might* use. It will be for exam boards to determine what is most appropriate for each individual award. We have deliberately chosen not to prescribe an exhaustive list, to ensure that the most appropriate evidence is used – not just that we have listed. However, in view of the comments, we have decided to remove the reference to centres’ estimated levels of attainment for learners.

We have decided to implement the rest of the Conditions, requirements and guidance which apply across all of the qualifications as consulted on.

We set out below our decisions on issues that are specific to particular qualifications.

GCSE (A* to G) Conditions, requirements and guidance

Respondents generally supported our proposals.

One respondent commented on the statement in paragraph eight of our requirements that ‘*where a Learner has taken more than the required number of units, the [exam board] must generate the best grade for the Learner*’. They said this would be clearer if it also referred to what was previously described as the ‘terminal rule’⁶.

⁶ This was the requirement, first introduced for GCSEs taught from 2009, that units amounting to at least 40% of the qualification must be taken in the series in which certification is being requested. The rule was amended, from the summer 2014 awards onwards, to 100% of the assessment needing to be taken in the series in which certification is being requested.

The *Criteria for GCSE Qualifications (graded A* to G)*⁷ make clear that all assessment must be in the final (or ‘terminal’) series. We have decided therefore to refer in our requirements to the relevant part of this document.

Other than the comment set out above, there were no specific comments on the Conditions, requirements and guidance for GCSE (A* to G) qualifications.

We have decided to implement these as consulted on.

Pre-reform GCE AS and A level Conditions, requirements and guidance

Respondents generally supported our proposals.

- A number of respondents who commented, referred to the requirements for the conversion of raw marks to uniform marks. These respondents believed that the previous rules in the Code had set out what they referred to as a ‘cap’ in this conversion⁸.

The process being referred to by respondents is an exam board process. It has not been set out previously by Ofqual, either in the Code or in our other regulatory requirements – though the Code allows for it to be used⁹. Our proposed rules would not prevent this process from being used. The position in this regard will be the same as that which existed under the Code. We expect that this process will continue to be used in unitised specifications that use a Uniform Mark Scale (UMS). We have decided to implement these requirements as consulted on.

- One respondent commented that the table set out in paragraph 11 of our requirements should be extended to take account of qualifications that comprise more than six units.

We agree with this comment and have decided to extend this table to reflect the version that existed in the Code.

⁷ <https://www.gov.uk/government/publications/criteria-for-gcse-qualifications-graded-a-to-g>

⁸ Whilst this was only raised by respondents in relation to legacy GCE qualifications, this process applies to any qualification which uses uniform marks (UMS)

⁹ The intention of this process is to ensure, in the interest of fairness to students, that raw marks have the same value, in terms of uniform marks, just above and just below the boundary for the highest available grade and the boundary for the lowest available grade. It means a student who has not quite achieved the maximum raw mark might sometimes be able to achieve the maximum uniform mark – if, for example, the highest grade boundary was set at a relatively low proportion of the raw mark total. This is an exam board process and exam boards publish information about it on their websites – see for example <http://store.aqa.org.uk/pdf/AQA-UMS-GUIDE.PDF>

Other than the changes we have set out above, we have decided to implement all other Conditions, requirements and guidance for legacy GCE AS and A level qualifications as consulted on.

Reformed GCE AS and A level Conditions, requirements and guidance

Respondents generally supported our proposals.

Respondents to these requirements commented on the process for calculating grade boundaries, specifically the A*/A grade boundary at A level. Respondents commented that for current (pre-reform) A levels, this process is based on a formula which awards an A* to those students who achieve a grade A on the A level overall and also achieve 90 per cent or more of the maximum uniform mark on their A2 units. Respondents commented that by not including this rule for reformed A levels, the process for setting this boundary would be less transparent. Respondents also commented that the requirements would require intermediate grades to be calculated arithmetically and would not allow for any other approach to these grades.

The current rule for the A*/A boundary is based on the A level qualification being in two parts – with AS units designed to be taken at the end of the first year and A2 units designed to be taken at the end of the whole course. For reformed qualifications, this is not the case, therefore it is not possible to apply such a formula. For the intermediate grades, our intention is that these should be calculated arithmetically; if this was to change in future, we would consult on any new approach. We have decided to implement our requirements as consulted on.

- One respondent commented that the requirements for reformed AS and A level qualifications did not include the sequence for setting grade boundaries which is included in the requirements for legacy AS and A level qualifications. They asked whether this was deliberate.

We have decided that this requirement is not necessary to secure standards. For legacy qualifications, we decided to replicate the existing requirements as closely as possible, therefore we retained the sequence set out in the Code. For reformed A level qualifications, where no requirements currently exist, we have not included this as we do not feel it is necessary. This would not however prevent an exam board that wanted to continue to adopt the existing sequence from doing so.

- One respondent commented that the reference to a 'moderated mark' in paragraph five of our requirements, relating to carrying forward non-exam assessment marks, was not accurate in instances where these assessments are marked by the exam board.

We have decided to change this reference to ‘mark/moderated mark’ to reflect the fact that some non-exam assessment is marked by the exam board, therefore moderation is not necessary.

- Respondents also noted an error in the draft requirements, which incorrectly referred to the grades for legacy GCSEs (A* to G) and not those for reformed AS/A levels (A to E/A* to E).

We will correct this error in the final versions.

Other than the changes set out above, we propose to implement all other Conditions, requirements and guidance for reformed GCE AS and A level qualifications as consulted on.

Next steps

We have decided to implement our Conditions, requirements and guidance for:

- pre-reform GCSE (A* to G) qualifications;
- pre-reform GCE AS and A level qualifications; and
- reformed GCE AS and A level qualifications

from 24 June 2016.

From this date, the following sections of the *GCSE, GCE, Principal Learning and Project Code of Practice* will no longer apply:

- Section 6 – Awarding, maintaining an archive and issuing results
- Appendix 2 – Grading for GCSEs that do not use uniform marks;
- Appendix 3 – Aggregation and grading for qualifications that use uniform marks

We have published the following new and revised documents which formally introduce our new rules and guidance:

- *GCE Qualification Level Conditions and Requirements*¹⁰ (revised)
- *GCE Qualification Level Guidance*¹¹ (revised)
- *Pre-reform GCE Qualification Level Conditions and Requirements*¹² (revised)

¹⁰ www.gov.uk/government/publications/gce-qualification-level-conditions-and-requirements

¹¹ www.gov.uk/government/publications/gce-qualification-level-guidance

¹² www.gov.uk/government/publications/gce-qualification-level-conditions-for-pre-reform-qualifications

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- *Pre-reform GCE Qualification Level Guidance*¹³ (new)
- *GCSE (A* to G) Qualification Level Conditions*¹⁴ (new)
- *GCSE (A* to G) Qualification Level Guidance*¹⁵ (new)

¹³ www.gov.uk/government/publications/pre-reform-gce-qualification-level-guidance

¹⁴ www.gov.uk/government/publications/gcse-a-to-g-qualification-level-conditions-and-requirements

¹⁵ www.gov.uk/government/publications/gcse-a-to-g-qualification-level-guidance