Ofqual Board

Paper 27/17

Date:
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Title:
Strategy, Risk and Research Update

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Paper for discussion/information

Open paper, with some paragraphs and all annexes closed.

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Strategic Policy and Risk Team

Strategy and Corporate Planning

1. We have begun work to refresh our overarching regulatory strategy. The goal of this work is to identify how to maximise our impact at the lowest burden and cost. In light of the Growth Duty, we are also mindful of the expectation of regulators to support compliance through effective advice and guidance.

2. The refresh includes reviewing the optimal use of our tools – including the balance of advice and guidance with enforcement; and the proper use of audit and technical evaluation along with other levers such as communication and engagement with those we regulate.

3. We will also consider how Ofqual is perceived and positioned in relation to key stakeholders, particularly employers and industry in light of our growing vocational and technical qualifications role. Importantly, we will review if our resources are well targeted to our approach.

4. We will seek the Board's views on the refresh at the October Board strategy day.

Strategic Risk

5. The Strategic Risk Register is shown in Annex A. _{This section has been redacted, as its publication would be}

Risk and Markets

6. The first release of the new Single View of Risk is due to go live in beta form in mid-July. The tool is designed to bring together risk data and intelligence related to each of the entities we regulate. We are working closely with the primary users to refine and improve the tool, and preparing the second release with additional functionality.

7. We will be able to demonstrate the tool at the September Board meeting. Further, we will return to Audit and Risk Assurance Committee in autumn with an update on the work and a review of implementation.

8. We have initiated the annual refresh of our systemic risk register. A sample of Board members are contributing to risk identification, and all Board members will be invited to take part in the risk assessment process. We will report the findings to the Board at the October strategy day, and use them to inform strategy development for 2018/19.

Regulation Development and Impact Team

Business Impact Target (BIT)

9. In May we reported to the Board our progress on meeting the requirements of the BIT reporting period for 2015-17. We explained that of the six BIT assessments we had submitted to the Regulatory Policy Committee (RPC), three had been approved and three returned to us with Initial Review Notices.

10. The notices required us to provide clarification on certain aspects within the assessments. We made revisions to address the RPC's comments and resubmitted these assessments on 9 May. The changes made were to the narrative only, with the exception of adding to one assessment the estimated cost of awarding organisations complying with the new Total Qualification Time requirement. Our original version had proposed that this could be absorbed into the business as usual review of qualifications over a two-year period. Our revised assessments were approved by the RPC on 17 June.

11. BEIS had advised regulators to publish approved assessments by 9 June. In view Purdah, we published our first three approved assessments and summary of non-qualifying regulatory provisions on 14 June. The three further approved assessments were added to the set of published documents on 20 June. Beyond the Federation of Awarding Bodies reporting the publication in their newsletter, we are not aware of any reaction within the regulated community.

The Legal Team

12. The team continues to work on all strands of VTQ reform. In particular, in assessing the scope of change needed to our regulatory framework for apprenticeships, detailed work on up front evaluation and recognition, and development of thinking on our approach to partnerships with other EQA providers.

13. A priority focus over the last two months has been in relation to the management of delivery issues (including security breaches, exam paper errors and malpractice cases) that have arisen over the summer. We also continue to undertake work related to VTQ and GQ casework and wider VTQ and GQ strategic activity including in relation to Direct Claim Status and reviews of marking, moderation and appeals.

14. There continues to be a range of enforcement and pre-enforcement activity. This includes three active financial penalty cases, one of which has an associated significant investigation. We have also imposed two special conditions, one in relation to an issue that arose this summer and one in relation to the use of the Ofqual logo. We are in the process of agreeing two undertakings in relation to two VTQ AOs, are managing one potential pre-adjudication case and a further pre-enforcement case related to item functioning in a VTQ.

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

16. We are managing three internal reviews, two are complex complaints reviews and one relates to an FOI response. We have also closed an internal review in relation to a rejected recognition application and an internal review of complaints. We have managed our response to 19 FOIA requests during May and June.

Standards and Comparability and Research Teams

Summer 2017

17. In June, we published provisional entry statistics[1] and a blog[2] to draw attention to some of the changes in entries that might mean results in August look different. These include:
    - a 52% increase in entries (701,000) for GCSE English language, now that IGCSEs no longer count for performance tables;
    - the likely impact on results of a 48% increase in entries (551,050) for GCSE English literature, with much of the increase likely to be from weaker students than in previous years;
    - a shift in the proportion of students entered for higher/foundation tier in mathematics. This year 53% of provisional entries are for higher tier. We didn't collect data at the same time last year, but we believe the higher tier entry to have been around 70% in previous years;
    - a continued fall in AS entries – down 14% in 2016 and a further 42% this year. Entries for most of the reformed AS are less than half those seen before reform.

    There was general stability in the A level entries.

18. In June we also published the data exchange procedure for summer 2017[3]. This section has been redacted, as its publication would be prejudicial to the effective conduct of public affairs.

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[1] https://www.gov.uk/government/statistics/summer-2017-exam-entries-gcses-level-1-2-certificates-as-and-a-levels-in-england

[2] https://ofqual.blog.gov.uk/2017/06/15/2017-entry-data-things-to-look-out-for/

[3] https://www.gov.uk/government/publications/data-exchange-procedures-for-a-level-gcse-level-1-and-2-certificates

20. The data exchange sets out details of the small adjustment we have agreed to make to take account of the research[4] into the impact of native speakers in A level French, German and Spanish. In each subject the boards will adjust their predictions at grade A by +1% (so a board that had an original prediction of 35.6% would adjust that to 36.6%). We have not made any similar adjustment at A*, as we expect that an increase at A will also trigger an increase at A*. However, we have also instructed exam boards to have 'no decrease' relative to predictions at A*.

21. This year we have attended most of the 9-1 GCSE marker standardisation meetings, plus a handful of other meetings for A level and new Applied Generals. It has been helpful to see how exam boards are preparing their examiners to mark new GCSEs, and, in general, we have not seen anything that causes us concern. Later this month, we will also be observing awarding meetings for new GCSEs and A levels, and a small number of new Applied Generals. We will target our observations to those awards that are likely to be the most challenging, for example, where there have security issues, so that we can look closely at any remedial actions necessary.

22. We are preparing for results days in August. As in previous years, we will consider what additional information may be helpful to contextualise the results. In particular, we are aiming to publish interactive graphs alongside standard 'static' reports. The following are interactive graphs are planned:
    a. Centre variability. In recent years, we have published 'static' reports on centre variability on results days. These have been an important aspect in understanding the extent of centre variability in different subjects and how this compares to previous years.
    b. The number of candidates with particular grade profiles across the three new GCSE 9 to 1 qualifications. We think the particular focus will be on the number/proportion of candidates who have received grade 9 in all three GCSEs. But this graph will also show, for example, the distribution of grades in GCSE English Literature and GCSE English Language for those who achieved a grade 8 or above in GCSE maths.

23. A screenshot of the pilot centre variability interactive graph is shown below, along with annotated features.

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[4] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/610147/Native_speakers_in_A_level_modern_foreign_languages.pdf
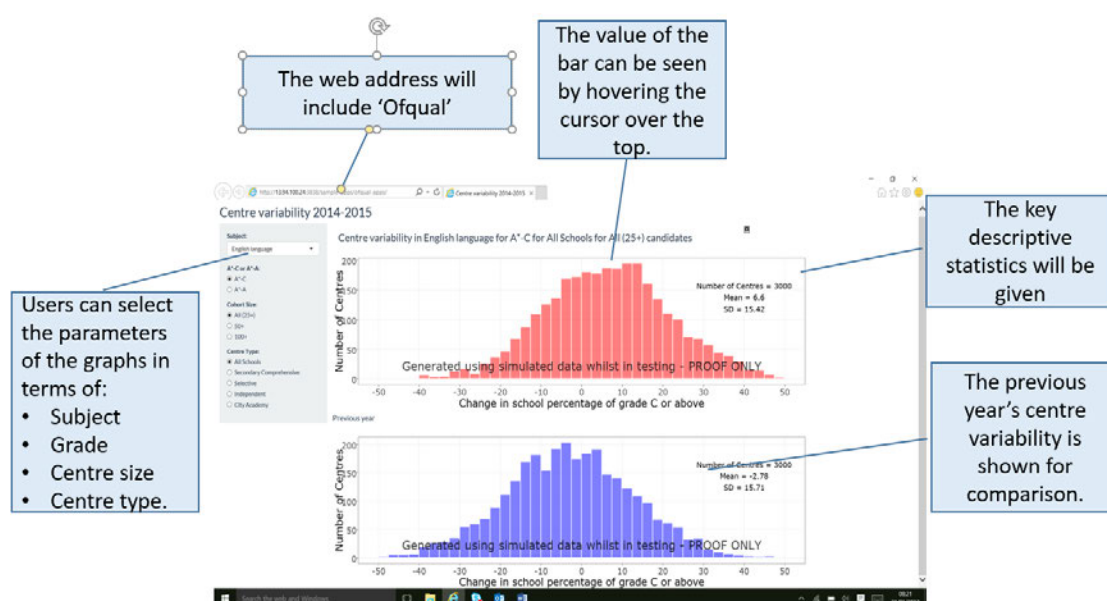
New Applied General Qualifications (AGQs)

24. We have written to all awarding organisations offering new AGQs to provide advice about the evidence they should consider when setting standards in new, externally-assessed units. We have also committed to a workshop in the autumn in the larger volume subjects offered by more than one AO, to review student work. So that we have visibility of the likely impact of the introduction of external assessment, we are working with those AOs with larger entries for them to send us unit and qualification-level data ahead of results being issued.

National Reference Test

25. Following the first test this year, we have carried out analysis of the 'no-show' students – those who were selected as part of the sample but did not sit the test. This analysis shows that, in general, they tend to be weaker students. We will monitor the impact of no shows over time so that we can be confident in our interpretation of changes in test outcomes.

26. We have also started to analyse the data from the student survey, which asked about levels of preparation for hew GCSEs and the NRT, as well as their motivation in the subject. We intend to continue to run this survey in future years, to see if there are any changes in preparation and motivation levels.

Mathematics requirements in AS

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Evaluation of Reviews of Marking and Moderation (ROMM)

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37. We are in the process of talking to boards about the findings of this work.

**National Assessments
Summer monitoring**

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42. On 4 July, Key Stage 2 results were returned to schools and headline national outcomes were published. 2017 was the second year of a new suite of tests, which are based on the new primary curriculum and are set at a more demanding standard than in previous years. Test results have gone up by 4-5 percentage points between 2016 and 2017; this increase is broadly in line with what we might expect to see in the second year of this new test, as pupils and teachers become more familiar with the test style and pupils have been taught more years of the new primary curriculum introduced in 2014.

43. Reaction to both the tests and the national headline outcomes has been broadly in line with expectations. Sector press have focused on the fact that more pupils have reached the expected standard than last year; national press have tended to focus on the proportion of pupils not meeting the combined maths, reading and writing standard. There is also continued criticism of the concept of national testing in primary stages, particular curriculum areas being tested and the use of test data to hold schools to account. Whilst some social media commentators struggle with the concept that cut scores can change year-on-year to maintain standards, others have been able to explain the process. At the time of

writing this update, there have not been significant concerns for Ofqual raised about either national or school-level results.

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Content validation research

47. We are finalising the report of our content validation study of the new KS2 maths and reading tests introduced last year. [CLOSED: Overall, our findings provide general support for the robustness of STA's approach to test development and in particular that the new 2016 tests sampled relevantly and representatively from both the content and cognitive domain. The degree of consistency between STA item ratings and those of our independent experts is particularly notable as both the maths and reading domain strands were introduced specifically for the new tests.]

48. [CLOSED: We also found that the *Test Framework* documents appeared to translate national curriculum teaching requirements into plausible blueprints for testing, although our subject experts suggested some areas for potential improvement. This included our reading group noting an apparent overlap between certain domain strands and our maths group identifying an area where it may be appropriate to separate on cognitive domain strand.

49. Experts in both groups also identified a number of other types of demands that did not feature in the *Test Framework* documents. For reading, these included time pressure and how engaging the reading texts were. For maths, these included demands on working memory, language demands, and the degree of contextual knowledge required. None of these observations presents a major challenge to STA's cognitive domain modelling; although they do underline the importance of treating the cognitive domain as 'work in progress' and of continuing to research and develop it.]

50. Our draft research report is being reviewed by the Standards Advisory Group in June and we will consider what further review or analysis we may need to complete prior to publication. [CLOSED: We are planning to publish an additional analysis on the accessibility of the 2016 reading test. We met with SEND experts in June to review findings from the main study and consider what light that could shed about the accessibility of the test, and we will be meeting with subject experts to consider this further. We had intended to publish the main report in July, but due to the nature of our findings, it would be more appropriate to publish both reports together in September.]

Primary Assessment consultation

51. On 22 June we published our response to the government's consultation on the future of primary assessment[5]. The consultation proposed a new reception baseline assessment to replace KS1 assessments as a progress measure; to remove statutory teacher assessment of reading and maths at KS2 and move from a 'secure-fit' to a 'best-fit' model for writing teacher assessment. It also proposed that STA should explore alternative approaches to moderation and to the assessment of English writing, and considered when a new multiplication tables check should be taken.

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Regulatory Framework Review

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Paper to be published	YES with the exception of closed paragraphs and annexes
Publication date (if relevant)	After the meeting
If it is proposed not to publish the paper or to not publish in full please outline the reasons why with reference to the exemptions available under the Freedom of Information Act (FOIA), please include references to specific paragraphs	*See guidance on exemptions below*

ANNEXES LIST:-

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