

Removal of the code of practice for GCSE, A & AS level qualifications and new requirements for reviews of marking/moderation and appeals

Department for Education - Ofqual

RPC rating: validated

Description of proposal

The measure replaced the *GCSE, GCE, Principal Learning Project Code of Practice* for GCSE, A level and AS level qualifications with a new set of *Qualification Level Conditions and Requirements*. These regulations are related to post-results services (i.e. reviews of marking/moderation and appeals) provided by awarding organisations. The reform was intended to improve the quality, transparency and consistency of these services.

As a result of the changes, exam boards were required to:

- provide training to staff employed to conduct reviews of marking – the new rules specify that reviews of marking must be conducted by specially trained staff;
- monitor review outcomes – under the new requirements exam boards must track reviewers' decisions to ensure that changes are made when, and only when, there has been a marking error; and
- update their IT systems to permit them readily to provide information on reasons for upholding or revising a mark on review, publish key metrics for post-results services and make marked scripts available for GCSEs (previously, schools could only request return of AS or A level marked scripts before the deadline for review requests).

Impacts of proposal

The IA states that 4 exam boards are affected by the change.

Ofqual estimates the total one-off cost related to updating IT systems will be £400,000, based on consultation responses from two of the affected exam boards.

The IA states that training reviewers will cost exam boards £271,000 per year, on the basis that 5000 markers will each have to take part in a 2-hour annual training session and that their (suitably uplifted) average wage is £27.06 per hour. These

assumptions are derived from responses to a consultation undertaken by Ofqual in 2016.

Exam boards have two options for complying with new requirements on monitoring of review outcomes – either “seeding” (creating a set of scripts marked by an expert and then used as a “true mark”) or “back reading” (re-marking a proportion of each reviewer’s work). Based on ASHE data and earlier internal research on the time taken to implement monitoring systems, Ofqual estimates the total costs of these approaches at £208,000 and £164,000 respectively. The assessment takes the average of these two numbers to estimate the total cost of monitoring at £186,000.

As a result of the changes, Ofqual notes that the exam boards need to familiarise themselves with a total of 198 pages of new guidance. On the assumption that 50 employees need to read the guidance and that the (uplifted) wage of an average employee is £26 per hour, the regulator estimates the total one-off familiarisation cost at £103,000.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0.5 million. This will be a qualifying regulatory provision that will score under the Business Impact Target.

Quality of submission

The assessment is proportionate and provides an appropriate level of evidence in support of its estimates. Overall, the assessment provides a thorough analysis of the impacts of the policy.

The assessment would have benefited from a slightly clearer structure. For example, including a list of the new requirements in the background section of the IA would make it easier to judge the scale and nature of this policy.

Issues addressed following RPC’s initial review

When first submitted, the assessment failed to consider on-going costs related to the IT changes or potential burdens related to the requirement to publish key post-results metrics. In addition, some of the assumptions used in the original document were not properly justified. The revised assessment justifies clearly why the IT updates impose no additional on-going costs and provides a much more detailed explanation of the evidence underpinning the assumptions used to calculate the burden of the new monitoring system. Ofqual also discusses why the requirement to publish key metrics would not result in costs to business. In response to the RPC’s

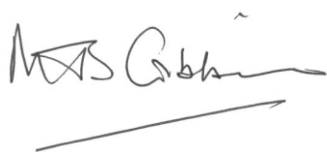
comments related to non-monetised costs, Ofqual also provides a more detailed narrative in the relevant section of the IA.

Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net direct cost to business (EANDCB)	£0.5 million
Business net present value	£-4.4 million

RPC assessment

Classification	Qualifying regulatory provision (IN)
EANDCB – RPC validated ¹	£0.5 million
Business Impact Target (BIT) Score ¹	£2.5 million



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000.