

Ofqual Board

Paper 69/17a

Date:

31 January 2018

Title:

Strategy, Risk and Research Directorate Update

Report by:

Michelle Meadows

Responsible Director:

Michelle Meadows

Paper for discussion/information

Open paper, with some paragraphs and all annexes closed.



Issue

1. This report provides an update on the work of the Strategy, Risk and Research Directorate since the last Board meeting. It includes updates from the Strategic Policy and Risk Team (paras 4-20), the Regulation Development and Impact Team (para 21), the Legal Team (paras 22-25), the Standards and Comparability Team (paras 26-33), the Research Team (paras 34-36) and on National Assessments (paras 37-48).

Recommendation

2. To note the issues raised in the report and the progress made.
3. To provide initial comment on the proposed goals and priorities for 2018/19 as presented in Annex A for internal consumption, and subsequently presented in the published Corporate Plan to be reviewed at the February Strategy Day.

Strategic Policy and Risk Team

Strategy and Corporate Planning

OFFICIAL – SENSITIVE

4. Following discussions at the October Board Strategy Day of both systemic risks and our regulatory strategy, we have begun the process of developing our plans for 2018/19. These will culminate in our published Corporate Plan that will be reviewed and discussed by the Board at the February Strategy Day in draft and then brought to the March Board meeting for sign off. We will publish the plan at the end of March.
5. To underpin the development of the Corporate Plan, the Executive have discussed and agreed proposed goals, and then projects and programmes to deliver against those goals in 2018/19. These are included in Annex A for your reference and initial comment.
6. These goals as presented here are primarily for internal use. However, our intention is to update the published Corporate Plan to reflect this approach.
7. At the heart of the plan are six newly defined strategic goals. We envisage that the structure of the six goals, and what we seek to achieve, should endure for more than one year – though we will review with the Board as part of the 2019 strategy development process.
8. Board members will note that our intention for each of the six goals is different – with the words chosen carefully to reflect stakeholder expectations, our varying risk appetite and, ultimately, the choices we make in how to use our resources.
9. Largely the goals as articulated reflect a codification and clarification of our existing approach, rather than any radical shift.

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

11. Per the Board's steer at the October Strategy Day, across the goals we see the opportunity to demonstrate thought leadership, and proactively identify risks and opportunities to shape positively the future of qualifications. This takes us beyond responding to Government led policy initiatives.
12. In light of that steer, we are proposing a range of proactive work including:
 - a. Initiating a long-term strategic research programme into performance assessment (i.e. non-examined proficiencies);
 - b. A broader centre controls project to develop and expand the work we initiated this year to look at Direct Claims Status;
 - c. Using the year to develop and set out publicly our position on qualifications reform – when, how, how frequently, why it should be undertaken – to inform future reform programmes;
 - d. A stronger focus on making effective use of our data, including continuing to innovate how we present and make accessible our data; and ensuring we have in place MOUs with key organisations

OFFICIAL – SENSITIVE

- to make sure that data moves effectively through the wider system;
and
- e. Consulting on changes to our rules about publishing pricing information to bring greater transparency to the market.
13. These strands come in addition to the existing proactive systemic work we are already committed to including:
- a. Research into modular and linear qualification structures;
 - b. Research to underpin future improvements in awarding;
 - c. A new malpractice campaign; and
 - d. Our newly established approach to National Assessment regulation with a review of assessment of writing planned for 2018/19.
14. Each of the strands set out in paras 12 and 13 above reflect our identification of systemic risks and priorities informed by:
- a. Feedback from stakeholders;
 - b. The failings and compliance issues we see arising in Awarding Organisations;
 - c. Long term planning to evaluate and continually improve high stakes qualifications;
 - d. Research and analysis we have undertaken;
 - e. Gaps in our existing knowledge that we wish to address to inform future long-term programmes of work; and
 - f. A recognition of our unique role and position in the qualifications and education system – enabling us to authoritatively provide data and resources to equip others to bring about systemic improvement.
15. We welcome initial comments on this internal document now, to inform development of the published Corporate Plan – which we will consider in detail at the February Strategy Day.

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

Regulation Development and Impact Team

Business Impact Target

16. We reported to the Board in September that BEIS intended to issue a Call for Evidence to inform new BIT policy. This will no longer be the case as decisions on BIT will now be taken by ministers. In December BEIS confirmed that a £5m ‘de minimis’ threshold will apply to BIT in the new parliament commencing June 2017 (i.e. backdated). This means that regulatory activities with an annual impact on business of <£5m will not require a full BIT assessment and will be subject to separate reporting requirements. This will significantly reduce the number of assessments we undertake. However, we will still be required to conduct cost–benefit analysis on these activities, as the independent verification body will select cases for sampling to ensure they do not exceed the de minimis threshold. All other decisions on BIT policy in this parliament have yet to be confirmed, including the overall savings target and what is in and out of

scope. We expect to report to BEIS in line with the new requirements by June 2018.

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

Standards and Comparability Team

November 2017 series

17. In November there were 32,407 entries in GCSE English language and 34,908 in GCSE maths across all boards. Entries for some boards were relatively small, which made the use of predictions more challenging. Additionally, OCR offered a final re-sit for the legacy GCSE science suite in November (other boards chose to make this available in January 2018 instead). Entry numbers were very small and awarding relied heavily on senior examiners' judgements to maintain standards. We reviewed the outcomes of all awards at the end of December and were content with them.
18. There was some critical commentary from stakeholders regarding the position of the grade 4 boundary on the higher tier GCSE Maths papers. Grade 4 boundaries were around 15% of the maximum mark. Some stakeholders expressed concern that candidates can achieve a grade 4 by "getting 85% of the questions wrong". Comments were made by journalists and politicians rather than by the maths community.
19. The higher tier is not primarily intended for grade 4 candidates who ought to be entered for the foundation tier. Rather the presence of the grade 4 on the higher tier is intended for candidates who were expected to achieve a higher grade but who, for whatever reason, failed to perform as expected on the day. This is reflected in the targeting of questions to grades and hence the position of the boundaries. In the higher tier papers, half of the marks should be targeted at grades 9, 8 and 7 and the other half of the marks should be targeted at grades 6, 5 and 4.
20. Evidence suggests that candidates are generally appropriately entered for the tiers. Last summer the proportion of candidates entered into the higher tier and not achieving a grade was less than half a percent which was even lower than in the legacy qualification. Further, there was no evidence of candidates' grades being capped by inappropriate entry to the foundation tier.
21. It would be possible to raise the higher tier grade 4 boundary by targeting the higher tier question paper differently. For example, by including more questions intended for candidates of this level of ability and making the papers longer. This would, however, run the risk of compressing boundaries and of encouraging more candidates to be inappropriately entered for this tier.
22. Previous research into grading reliability found that the legacy GCSE Maths qualifications classified students highly accurately. This is a

reflection of the unidimensional nature of the mathematical construct¹ which means that lengthy tests are unnecessary to achieve a reliable measure of ability. We are considering whether repeating such research is worthwhile as it would most likely show that the reliability of grading is high which might reassure stakeholders. If it were to reveal lower than expected levels of reliability then there might be a case for considering a change to current practice.

Preparations for Summer 2018

23. We have already started to discuss technical questions with the exam boards, ahead of agreeing the detailed regulatory requirements. Issues include:

- The first awards of the new A level maths qualifications. Unlike other subjects, we allowed this to be offered after only a year's teaching, because of the previous practice of schools entering students for maths at the end of year 12 and further maths at the end of year 13;
- First awards in the new GCSE science suite with the new double award in combined science being reported on a 17-point grade scale, from 9-9, 9-8 through to 1-1;
- First awards in the new GCSE in food preparation and nutrition, a new subject which has links with previous qualifications in food technology, home economics and catering;
- Likely further decline in AS entries and the implications for maintaining standards.

24. We will collect and publish provisional entry figures for GCSE, AS and A level as usual in May/June. We are also collecting data from the twenty or so awarding organisations offering qualifications which are approved as Level 3 Applied General and Technical level qualifications for performance table purposes. This includes provisional entry data for externally assessed units to be sat in January, as well as plans to collect similar for May/June units.

Research and Analysis Team

Official Statistics

25. The end of the year is always busy for official statistics publications² – and this year has had some additional challenges. There have been some teething problems with some new data formats required from boards for some of the publication (at more granular level to allow greater analysis), and this has meant that some data returns from boards needed resubmitting. This was the reason for the delay of the Malpractice report from December 14th 2017 to January 5th 2018.

¹ Student performance on different elements of mathematics is strongly correlated – a student who does well on, say, geometry is very likely to also do well on, say, algebra – in this sense it is a unidimensional construct.

² Reviews of Marking and Moderation, Entries and Late Entries, Vocational Quarterly, Special Consideration, Access Arrangements, November GCSE Entries, Malpractice.

OFFICIAL – SENSITIVE

26. Despite these difficulties the other reports were, however, all published on time. Further, this was the first time each publication used the new style report template – which has greater visual impact and less text in the main report than in the previous version. The Government Statistical Service has been very positive about the concision and usability of these new reports.

Publications

27. Publishing in peer reviewed journals is part of the strategy to maintain the academic credentials of our research and to retain and develop staff. A list of recent submissions can be found in Annex C.

National Assessments

Annual report

28. On 14 December we published our first stand-alone National Assessments annual report since 2011 (found [here](#)). It sets out key elements of the work we have done throughout 2017 to regulate National Assessments. An important objective for this report is to provide greater transparency and visibility of our work.

29. The report provides assurance in the following areas:

- That the Standards and Testing Agency (STA) took an appropriate approach to maintaining standards of 2017 key stage tests;
- There was a very high level of marking consistency of the tests, suggesting that marking quality assurance processes are effective.

30. We also commented on the ‘semicolon’ item in the KS2 grammar, punctuation and spelling test. We explained that the item did not function as intended and set out the commitments that STA has since made in light of lessons learned. We also provided assurance that there was no evidence that this item had any impact on the overall functioning of the test.

31. The report sets out the commitments STA has made to further investigation of the questions raised by our KS2 test research, in particular our review of evidence concerning the accessibility of the 2016 reading test. It also references improvements STA are making to moderator training and communications in light of our feedback from our KS2 writing moderation research.

32. The report was welcomed by stakeholders. It received limited media interest, with a single article in the TES referencing our views on the semicolon item.

Future assessments

33. Following the government’s response to its primary assessment consultation earlier this year, planned changes are now moving into the development phase. In particular:

OFFICIAL – SENSITIVE

- An advisory panel has been constituted to advise DfE on implementation of proposed changes to the Early Years Foundation Stage profile, assessment of which is carried out at the end of the Reception Year. We are an observer on this panel and are providing advice designed to help secure an assessment approach that is valid and fit-for-purpose.
- We are keeping under review STA’s plans to develop a new reception baseline, due to be introduced in autumn 2020. We **[CLOSED: have reviewed and provided advice on the technical specification and]** will also be part of an advisory group that STA is establishing to support the baseline’s development.

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

35. During this autumn and winter, we have been observing a sample of test development meetings relating to 2018 and 2019 tests. This should enable us to provide an insight into this process for our 2018 annual report.

Response to Select Committee Primary Assessment report

36. On 16 October, we submitted a memorandum to the Select Committee in response to its report on primary assessment, and on 18 December it was published [here](#). We welcomed the committee’s scrutiny of primary assessment and committed to improving the transparency and visibility of our National Assessments regulation and role, including through stakeholder engagement and our regulatory framework consultation. Our memorandum was submitted shortly after the government’s official response, which is available [here](#). The government response stated that there would not be a review of our National Assessments role and also pointed to our regulatory framework consultation.

Regulatory framework consultation

37. The consultation on our regulatory framework closed on Wednesday 20 December. Paper 56/17b summarises the responses we have received and outlines proposed next steps for approval.

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	<i>See guidance on exemptions below</i>

OFFICIAL – SENSITIVE

under the Freedom of Information Act (FOIA), please include references to specific paragraphs	
---	--

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