



House of Commons
Education Committee

The administration of examinations for 15–19 year olds in England

First Report of Session 2012–13

Volume I



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Report, together with formal minutes

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The Education Committee

The Education Committee is appointed by the House of Commons to examine the expenditure, administration and policy of the Department for Education and its associated public bodies.

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Craig Whittaker MP (*Conservative, Calder Valley*)

Nic Dakin MP (*Labour, Scunthorpe*) and Tessa Munt MP (*Liberal Democrat, Wells*) were also members of the Committee during the inquiry.

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The Reports and evidence of the Committee are published by The Stationery Office by Order of the House. All publications of the Committee (including press notices) are on the Internet at www.parliament.uk/education-committee

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Summary

Exams have such an influence on people's lives and the choices that they can make that the running of them is a matter of permanent concern. Exams and exam boards exert huge influence over what young people study at school or college from 15 to 19. Confidence in GCSEs and A levels has been undermined by criticisms from universities and employers, by errors on question papers in summer 2011 and by years of grade inflation at GCSE and A level. There is also a perception that our system of multiple competing exam boards has led to downward competition on standards and that the market has been insufficiently regulated, with exam boards offering inappropriate support to teachers at training seminars and textbooks endorsed by exam boards encouraging a narrow approach to teaching and learning.

Changes to the exam system

We have serious concerns about incentives in the exam system which lead to downward competition on standards. While we are reassured that Ofqual is taking action that helps to mitigate competition on grading standards, we remain concerned about competition on syllabus content. Competition between the exam boards for market share, combined with the influence of the accountability system, leads to significant downward pressure and we recommend that the Government act immediately to change the incentives in the system.

We have considered several ways in which these incentives might be changed.

A single board offers a simpler system, with no risk of competition on standards between boards. However, we feel that the cost, heightened risk and disruption likely to be generated by a move to a single board outweigh the potential benefits. Evidence suggests that some key issues, such as standards over time and across subjects, would remain, while other problems, such as a lack of incentive to innovate, the risk of higher fees and of reduced quality of service may be generated.

Another alternative is franchising of subjects to exam boards, which would allow for a concentration of subject expertise and would remove competition on syllabus development between boards. However, franchising is a “one way street” with significant downsides and long-term implications for the exam system.

If multiple boards are to be retained, substantial improvements are needed to change the incentives in the system. We considered which exam board functions benefit most from competition, splitting these functions into three broad areas: syllabus development, the setting and marking of exams and associated administration and finally exam board support. We can see no benefit to competition on syllabus content. By contrast, properly regulated, we believe that competition on the other two functions generates incentives to drive up quality and offer value for money to schools and colleges.

We recommend the development of national syllabuses, accredited by Ofqual. National syllabuses would be developed by exam boards in conjunction with learned bodies and employer organisations and, at A level, higher education. They would be regarded as a

national resource that could be examined by any of the English exam boards. They would remove the incentive for exam boards to compete on content and the associated downward pressure on standards, but would retain the benefits of competition on quality and the incentive for exam boards to innovate. There could be more than one national syllabus in a subject, to provide some choice to schools. We believe that national syllabuses, coupled with a stronger Ofqual and the introduction of national subject committees, should help to maximise the benefits of having multiple exam boards while minimising the downsides and avoiding the cost, risk and disruption involved in major structural reform.

Ofqual

The role of the regulator, Ofqual, is pivotal in the examination system. It is clear that a stronger Ofqual is needed, however the system is organised. There are encouraging signs that Ofqual is becoming more rigorous in its regulation of standards, in particular of grading standards. The effect of this is twofold: first it helps to control grade inflation and second it provides reassurance that the exam boards are not competing on grading standards.

There is still, however, more to be done to improve Ofqual's strength and effectiveness as a regulator. Ofqual needs to ensure it has sufficient assessment expertise, including on its Board, and to demonstrate that the methodologies it uses to regulate standards and accredit qualifications are robust and that it draws on appropriate respected subject and assessment expertise. Ofqual also needs to monitor changes in market share between the exam boards more closely, in order to account for shifts at individual qualification level and to establish whether there is any link to standards.

The Government needs to give a clear direction to Ofqual about its priorities on standards in GCSEs and A levels, and whether this is to maintain standards over time, to benchmark against comparable qualifications in other countries or to “toughen” exams. Both the Government and Ofqual need to be explicit about any recalibration of exam standards and of the consequences for young people.

We welcome signs that Ofqual is becoming a more robust regulator. We believe that Ofqual should be given time to allow recent changes to settle, to make further improvements based on our recommendations and to demonstrate that it is prepared to bear its sharper teeth, taking vigorous action when needed.

National subject committees

We believe that national subject committees, convened by Ofqual, would offer a way to increase the involvement of subject communities as well as universities and employers in GCSEs and A levels. National subject committees should draw their membership from learned bodies, subject associations, higher education and employers. Their remit should include syllabus development and accreditation, starting with the forthcoming revised A levels, as well as on-going monitoring of question papers and mark schemes.

Other areas of competition between exam boards

We also considered a range of issues relating to competition between exam boards, including the role of examiners in training and textbooks and the links between exam boards and publishers. This is an area that has been under-regulated in the past and Ofqual’s “healthy markets” work is welcome, if overdue. Recent action by Ofqual to restrict exam board training is along the right lines. Ofqual needs to say publicly that it is satisfied that there is sufficient distance between publishing and examining across all boards and take action to address any aspects of exam board support that inhibit the availability of a wide range of high quality resources to schools and colleges.

Exams and school accountability

The Government should not underestimate the extent to which the accountability system incentivises schools to act in certain ways with regard to exams. We are concerned that the impact of national syllabuses and a strengthened Ofqual will be limited, if these are not accompanied by changes to the accountability system that drives much behaviour in schools. The Government needs to look afresh at current accountability measures, in order to reduce the dominance of the 5 GCSE A*–C or equivalent with English and maths measure, and to increase the credit given to schools for the progress made by all children across the ability range.

Part I: Introduction and key issues

1 Background to the inquiry

1. Examinations have such an influence on people's lives and the choices that they can make that the running of them is a matter of permanent concern. One journalist has observed that "England's children are now the most tested in the world [...] no other country puts its pupils through as many major government-or-exam-board-designed assessments as England".¹ Many 15 to 19 year olds in England take exams at regular intervals throughout their final four years of full-time education. By implication exams (and the bodies that set them) exert huge influence on what young people learn at this stage of their schooling. In addition, there is the familiar so-called "August frenzy" of media reports that accompany the issue of GCSE and A level results each summer and perennial questions about whether standards have gone up or down. In summer 2011, a series of errors in A level and GCSE exam papers prompted further concern, with the Secretary of State ordering an inquiry by the regulator.

2. It was in the light of this latest crisis that we launched our inquiry. We have considered whether the current system of multiple competing exam boards for GCSEs and A levels is the best way to ensure fair outcomes for young people and have reviewed the arguments for and against other organisational models. Our predecessor Committee considered a broad range of assessments and qualifications as part of its inquiry into Testing and Assessment.² We have concentrated on the so-called "high stakes" general qualifications, most commonly taken in schools. Our inquiry has also focused on the commercial activities of exam boards, such as training and textbooks, and how these impact on schools and young people.³

3. Since we began our inquiry, many of the issues we have been considering have become the subject of closer scrutiny by politicians and the media. These include: competition between exam boards and the so-called "race to the bottom" on standards, messages given to teachers at exam board training seminars and the question of whether fundamental reform of the exam system is required. Our inquiry has therefore proved timely.

The evidence base for our inquiry

4. Following the announcement of the inquiry on 12 September 2011, we received 73 written submissions, from a wide range of sources, including exam boards, teaching unions, learned bodies and subject associations, educational publishers and assessment researchers, as well as from individual examiners, teachers and university lecturers. We also received evidence from the regulator, Ofqual, and from the Department for Education.

1 Warwick Mansell, *Education By Numbers*, Politico's, 2007

2 *Testing and Assessment*, Third Report of the Children, Schools and Families Committee, Session 2007-08, HC169-I

3 The terms of reference for the inquiry can be found at: <http://www.parliament.uk/business/committees/committees-a-z/commons-select/education-committee/inquiries/parliament-2010/how-should-examinations-for-15-19-year-olds-in-england-be-run/>

5. We held a series of oral evidence sessions with a range of witnesses.⁴ These included: school and college leaders, representatives from higher education and employer organisations, examiners, assessment experts, representatives from learned bodies and from educational publishers, as well as senior officials from exam boards and from Ofqual. Finally, we heard evidence from the Minister of State for Schools, Nick Gibb MP. We also advertised, via the Times Educational Supplement and online, for practising examiners to attend a seminar at the House of Commons. We were very pleased to receive over 200 responses. Of these 17 were selected to attend the seminar, representing a range of subjects, qualifications, exam boards and examining roles. All other applicants were invited to complete a questionnaire and the 45 responses provided very useful additional information.⁵

6. During the inquiry we have considered a range of other evidence, including academic and research publications on assessment, exam board and Ofqual publications, media reports, surveys and reviews relating to the exam system and reports by our predecessor Committee, the Children, Schools and Families Committee. The House of Commons scrutiny unit also conducted an analysis of income data supplied by the exam boards, and statisticians in the House of Commons library prepared data on market share across the exam boards, based on the inter-board statistics published by the Joint Council for Qualifications.

7. Finally, six members of the Committee undertook a short visit to Singapore, where meetings took place with representatives from the Singapore Examinations and Assessment Board, as well as headteachers, academics, Government ministers, officials and members of the Government Parliamentary Committee on Education. A note of our visit is annexed to this report.

8. As always, the Committee has benefited hugely from the expertise of its standing adviser on education, Professor Alan Smithers, and of its specialist adviser for this inquiry, Professor Mike Cresswell. We were also helped in the early stages of the inquiry by our standing adviser Professor Geoff Whitty. All three have shared their knowledge and experience of the examination system with us and this has proved invaluable.⁶

Background on the exam system in England for 15-19 year olds

9. The scale of the examination system in England is vast: in 2011 exam boards issued over 4.6 million GCSE grades, over 1.3 million GCE AS and nearly 800,000 GCE A level grades.⁷

4 A list of witnesses and written evidence received can be found at the back of this report.

5 A note of views expressed at the seminar and a summary of the questionnaire responses can be found at annex 1 and 2 respectively. Examiners participated in the seminar and completed questionnaires on a non-attributable basis and comments quoted in the report are therefore not referenced to individuals.

6 Professor Whitty, Director Emeritus of the Institute of Education, University of London, and Professor of Public Policy and Management, University of Bath, declared interests as a Trustee of the IFS School of Finance and as a Board Member of Ofsted. Professor Smithers, Director of the Centre for Education and Employment Research, University of Buckingham, declared no interests. Professor Cresswell declared an interest as an occasional consultant for Doublestruck, part of AQA.

7 JCQ press notices on GCSE and A level results, summer 2011

This involved the marking of about 15.1 million scripts.⁸ GCSEs and A levels account for 85% of qualifications achieved in schools. Over the last five years vocational qualifications have grown in popularity in schools and now account for 15% of all qualification achievements in schools.⁹ The most commonly taken suites of vocational qualification in schools are BTECs (offered by Edexcel) and OCR Nationals (offered by OCR).

10. In 1980, 14.9% of school leavers in England gained 2 or more A level passes and 12.7% of the population went to university.¹⁰ By 2011, 35.5% of school leavers in England achieved 2 or more A level passes and 35.9% of the population went on to university.¹¹ In the last thirty years examinations have changed significantly and A levels and GCSEs, which replaced O levels and CSEs in 1988, have had to cater for increasing numbers of candidates across a broader ability range.

11. GCSEs and A levels are used for a variety of purposes: to certify achievement, to rank students, to provide feedback and diagnostic information to teachers, pupils and parents and to hold teachers, schools and government to account.¹² They are also used to prepare students for the next stage of learning or employment. It is clear that these multiple purposes place additional pressures on the exam system.

GCSE and A level exam boards

12. Exam boards design GCSE and A level specifications (formerly known as syllabuses)¹³ based on centrally agreed criteria, set and mark question papers and award grades. There are three English exam boards offering GCSE and A level qualifications: the Assessment and Qualifications Alliance (AQA), Edexcel and the Oxford, Cambridge and Royal Society of Arts examinations (OCR). Candidates in England may also enter for GCSEs and A levels offered by the Welsh Joint Education Committee (WJEC) and the Council for Curriculum Examinations and Assessment (CCEA), based in Wales and Northern Ireland respectively. AQA, Edexcel and OCR account for over 85% of GCSE and A level awards, with AQA alone accounting for over 45% of GCSE and 42% of A level awards.¹⁴

13. Of the three English providers, two are not-for-profit organisations, while the third is run on a for-profit basis. AQA is a registered charity; OCR is a company limited by guarantee and part of the Cambridge Assessment Group, which is a department of the University of Cambridge. Edexcel, formerly linked to the University of London, was purchased by publishing group Pearson in 2003 and is now part of Pearson plc.

8 Ev 171

9 Ev 164

10 Statistics of education. Statistics of school leavers CSE and GCE England 1982, DES and Higher education in Great Britain: Early figures for 1981/82, DES statistical bulletin 9/82

11 National Pupil Database—Key Stage 5 2011 (final), DfE, 2010-based population projections, ONS and Participation rates in higher education: academic years 2006/2007—2010/2011 (provisional), BIS

12 Four primary purposes of formal assessment identified by the 2010 Sir Richard Sykes review

13 In this report we use the term “syllabus”, with the plural “syllabuses” (see Collins and Oxford English Dictionaries)

14 Ev 164

14. The current system of three main providers of GCSEs and A levels in England has evolved from many exam boards, often with links to universities. According to the Mathematical Association, “exam boards were established by the universities in second half of the nineteenth century and the early years of the twentieth century. By the 1960s there was a huge number of exam boards for CSE, O level and A level and the trend since has been to consolidate, down to the three current bodies.”¹⁵

The regulator

15. Ofqual (the Office of Qualifications and Examinations Regulation) is the independent regulator of qualifications, examinations and assessments in England and of vocational qualifications in Northern Ireland.¹⁶ Ofqual was established on 1 April 2010 by the Apprenticeship, Skills, Children and Learning Act 2009 as a non-ministerial government department, reporting directly to Parliament.

16. Ofqual’s Chief Executive, Glenys Stacey, was appointed in March 2011 and, following a change of legislation in the Education Act 2011, took over from Ofqual’s Chair, Amanda Spielman, as Chief Regulator of Qualifications and Examinations on 1 April 2012.

17. Prior to the creation of Ofqual, the regulation of the exams system was undertaken by the Qualifications and Curriculum Authority (QCA), a non-departmental public body, reporting to the Secretary of State. The separation of QCA’s regulatory function and creation of an independent body was announced by the then Secretary of State for Children, Schools and Families, Ed Balls, in September 2007. From April 2008 until April 2010, Ofqual operated in interim form as an independent regulator but part of QCA.¹⁷

Policy background

18. In summer 2010 an A level A* grade was introduced, instigated by the previous Government. The aim of the new grade was to help distinguish the most able candidates against a backdrop of increasing numbers of candidates achieving a grade A and to assist universities with selecting the best candidates. The indications are that, after some initial resistance, the A* grade has been well received and is working as intended. In a presentation to the Ofqual standards summit in October 2011, for example, Richard Partington, Senior Tutor at Churchill College Cambridge, reported a positive correlation between candidates achieving A* at A level and their performance in first year exams at Cambridge.¹⁸

15 Ev w39, paragraph 19. For a comprehensive account of the history of the exam boards and a list of predecessor bodies, see chapter 2 of *Techniques for monitoring the comparability of examination standards*, QCA, 2007.

16 *Introducing Ofqual, 2010/11*, Ofqual, 2010

17 <http://www.official-documents.gov.uk/document/hc1012/hc11/1171/1171.pdf>, Ofqual Annual Report and Accounts, 2010-2011

18 <http://www.ofqual.gov.uk/news-and-announcements/137/755> and see also *Fit for purpose? The view of the higher education sector, teachers and employers on the suitability of A levels*, Ofqual, 2012

19. The Coalition Government set out its policy aims with regard to GCSE and A level qualifications in the 2010 White Paper, *The Importance of Teaching*.¹⁹ The main thrust of the proposals was to reduce the opportunities for re-sits, and at GCSE, a return to end-of-course exams (a move from modular to linear), along with improved assessment of spelling, punctuation and grammar in English literature, history, geography and religious studies. The proposed changes to GCSEs will take effect for courses starting in September 2012 and will apply from the summer 2014 examinations. A full reform of GCSEs is planned following the current review of the National Curriculum in England.²⁰ Ofqual has indicated in its Corporate Plan 2012-15 that new GCSEs are likely from 2015. It has said that it plans to review the GCSE grading structure (which presently stretches from A*–G) and the range of subjects appropriate to the “GCSE brand” as part of these changes.²¹

20. At A level the Government signalled that it wishes to increase the involvement of universities and learned bodies in the development of A levels and to explore whether synoptic learning can be reinforced within A levels.²² The White Paper stopped short of announcing full scale A level reform, promising instead that “we will consider with Ofqual in the light of evaluation evidence whether [reducing opportunities for re-sits] and other recent changes are sufficient to address concerns with A levels”.²³

21. On 30 March 2012 the Secretary of State wrote to Ofqual with more detail regarding the reform of A levels. He stated that he wished to see “new arrangements that allow Awarding Organisations to work with universities to develop qualifications in a way that is unconstrained—as far as possible—by centrally determined criteria”.²⁴ While there will need to be some core design rules, in particular to secure standards within a subject, the Government and Ofqual will largely “take a step back”, to allow universities to take a leading role. Mr Gove said he was keen that “universities should be able to determine subject content, and that they should endorse specifications, including details of how the subject should be assessed”. He indicated that he wished to see rapid progress on the reforms, with new A levels, particularly in Russell Group ‘facilitating subjects’, introduced for first teaching in September 2014.²⁵ In her reply Glenys Stacey, Chief Executive of Ofqual, was broadly supportive of the changes, but emphasized that the full commitment of and support from universities would be essential for the new arrangements to work.²⁶

19 *The Importance of Teaching—The Schools White Paper 2010*, Paragraphs 4.47-4.50

20 At the time of writing, the Department of Education has said that it expects “to announce in the near future the timescale for introducing new GCSEs in National Curriculum subjects, alongside decisions on the introduction of the new programmes of study”; taken from DfE General Article, *Changes to GCSEs from 2012*, updated 26 April 2012

21 GCSEs are currently offered in over 70 subjects, although schools usually offer only a small number of these (Ofqual Corporate Plan 2012-15).

22 Ofqual’s predecessor, the Qualifications and Curriculum Authority (QCA), defined synoptic assessment as “a form of assessment which tests candidates’ understanding of the connections between the different elements of a subject.” Arrangements for the statutory regulation of external qualifications in England, Wales and Northern Ireland, London, QCA, 2000.

23 *The Importance of Teaching*, 2010, paragraphs 4.47 and 4.48

24 Letter from Michael Gove to Glenys Stacey, 30 March 2012

25 A list of facilitating subjects can be found on page 27 of *Informed Choices: a Russell Group guide to making decisions about post-16 education*, 2012. They are: mathematics, English Literature, physics, biology, chemistry, geography, history and languages (modern and classical).

26 Letter from Glenys Stacey to Michael Gove, 3 April 2012

22. On 27 October 2011 the Government announced changes to the rules concerning which vocational qualifications could count in performance tables. The changes follow recommendations in the Wolf report on vocational qualifications. From 2014 “only valued vocational qualifications that meet strict new criteria will be recognised in the tables. GCSEs, established iGCSEs and AS levels will continue to be included. All these qualifications will count equally on a one-for-one basis”.²⁷ Qualifications will only count in performance tables if they offer pupils proven progression, are the size of a GCSE or bigger, have a substantial proportion of external assessment and are graded A*–G. They must also have good take-up levels among 14-16 year olds. In January 2012 the Department for Education published the full list of qualifications that will count in performance tables from 2014. The list heralded a reduction in the number of vocational qualifications that will count in the 5 A* to C GCSE accountability measure from 3175 to 70.²⁸

23. The Secretary of State for Education has recently suggested that “we are going to make exams tougher” and “there will be years where performance will dip”.²⁹ He has also raised the prospect of wider reform of the exam system. Responding to a Daily Telegraph investigation in December 2011, Mr Gove said that the current exam system is “discredited” and needs “fundamental reform”.³⁰

27 “All vocational qualifications to be judged against strict new rules”, Department for Education press release, 27 October 2011

28 “Only the highest quality qualifications to be included in Performance Tables”, Department for Education press release, 31 January 2012

29 Michael Gove speech to Ofqual standards summit, 13 October 2011 and “Michael Gove: Get set for new age of exam failures” *The Independent*, 22 February 2012

30 Statement issued in response to Daily Telegraph investigation, December 2011, <http://www.education.gov.uk/a00200596/michael-gove-responds-to-the-daily-telegraph-investigation>

2 Confidence and credibility: key issues with the current system

Perceptions of the current system

24. As noted in chapter one, the exam system features frequently in media reports, most often of a critical nature. From time to time, those more closely involved in the exam system have spoken out. For example, Tim Oates, Group Director of Assessment Research and Development at Cambridge Assessment, was reported to have had a “Ratner moment” in his criticism of exam standards in 2010, when seeking to prompt a debate about the reasons for grade inflation in recent years. Mr Oates suggested that changes instigated by policy-makers might have contributed to grade inflation and that exam boards should look critically at the techniques they used rather than following orders blindly.³¹ Mick Waters, former senior official at QCA, was widely quoted later the same year as saying that the exam system was “diseased” and “almost corrupt”.³² The independent schools sector has been publicly critical of the exam system on occasions.³³ Exam boards and more recently the regulator have attempted to stimulate public debate and facilitate understanding about the exam system and in particular the thorny issue of exam standards.³⁴

25. The Department for Education suggested to us that “confidence among universities and employers in the rigour of key qualifications has fallen”.³⁵ As end-users, employers and universities offer useful commentary and insight on how the exam system is working, as well as the wider education system. Ofqual has also looked more broadly at public perceptions of GCSEs and A levels, conducting annual research with teachers, students, parents and the general public, as well as on occasions with employers.

Employers’ views

26. Employer organisations have expressed ongoing concerns about the poor literacy and numeracy skills of school leavers, despite rising numbers of students achieving GCSE grades A*–C in English and maths. The 2011 Vorderman report into mathematics education noted that “employers say that even those who pass GCSE are not functional in mathematics, meaning that they cannot apply what they have learnt in the workplace”.³⁶ The confidence of employers and wider society is therefore being affected by concerns not

31 “Exam chief’s ‘Ratner moment’ over grade inflation”, *Times Educational Supplement*, 26 March 2010

32 “System of exam boards ‘corrupt and diseased’, says leading schools adviser”, *The Independent*, 17 September 2010

33 For example: “Exam system too commercial, says private schools body”, *BBC News*, 9 January 2012, “‘Tougher’ AS-level marking makes private schools cry foul”, *The Observer*, 4 October 2009

34 Cambridge Assessment hosted a series of debates culminating in its report: Exam Standards: the big debate in 2010, Ofqual hosted a standards summit on 13 October 2011 and in February 2012 Pearson launched a consultation “Leading on standards”.

35 Ev 170

36 A world class mathematics education for all our young people, 2011 p53

just about grading standards and what is represented by a GCSE grade C in English or Maths, but also about the content of assessment and what children have been taught.

27. The British Chambers of Commerce (BCC) told us that “businesses lack confidence in the English education and training system, and particularly in qualifications”.³⁷ Anne Tipple, National Skills Executive at the BCC, cited their most recent survey: “it was a large sample, 7,149 employers, or which just over 72% of the respondents said they did not feel confident in recruiting school leavers with A levels or equivalent”.³⁸ We were struck by the examples the BCC provided of two employers reporting recent declines in the pass-rates of in-house literacy and numeracy tests used over a period of time in their selection procedures.³⁹

28. The CBI conducts annual surveys of Education and Skills among employers. The findings are consistently critical of the literacy and numeracy skills of school leavers. A 2006 CBI report noted that “CBI surveys have repeatedly shown that many employers are dissatisfied with the level of skills among young people entering the workplace. In the 2005 Employment Trends Survey, for example, 42% of employers taking on school-leavers were not satisfied with their basic literacy and numeracy skills”.⁴⁰ The most recent CBI survey reported that “two thirds of employers (65%) [...] see a pressing need to raise standards of literacy and numeracy among 14–19 year olds”.⁴¹ Employers have also been critical of the level of “softer skills”, such as interpersonal skills and teamwork, communication skills and “work readiness” among young people.

29. We appreciate that the views of employers may need to be treated cautiously. As journalist Warwick Mansell has pointed out, “employers’ objections about poor basic skills among school leavers are far from new”.⁴² The following excerpt from an HM inspector’s report in 1876 suggests that employers’ criticisms have changed very little in the last 150 years:

it has been said, for instance, that accuracy in the manipulation of figures does not reach the standard which was reached 20 years ago. Some employers express surprise and concern at the inability of young persons to perform simple numerical operations involved in business.⁴³

In addition, getting beyond anecdotal evidence can be difficult on occasions, as Anne Tipple of the British Chambers of Commerce confirmed.⁴⁴

37 Ev 152

38 Q108, referring to Skills for Business: more to learn?, October 2011, British Chambers of Commerce

39 See Ev 153

40 Working on the Three Rs: Employers’ Priorities for Functional Skills in Maths and English, CBI, 2006

41 Building for Growth, CBI, 2011

42 Education By Numbers, Warwick Mansell, Politico’s, 2007, p138

43 See appendix 2, Exam Standards: the big debate, Cambridge Assessment, 2010

44 See Q109

30. Despite these caveats, we believe that employers are giving a clear and consistent message about GCSEs and A levels, which suggests that rising pass rates may not reflect true improvements in candidates' knowledge, skills and understanding or their ability to apply these in a work context. What is less clear, however, is the extent to which this issue is related to the administrative organisation of the examination system. Employers, as Anne Tipple told us, “do not see a tension between exam boards, because they are oblivious to the fact that schools and colleges can choose exam boards [...] they are oblivious to most of the architecture of the curriculum and examination system. They are interested in outcomes”.⁴⁵

Universities' views

31. Universities have been critical for some time of A levels both as a selection tool and as a preparation for undergraduate level study.⁴⁶ Research recently published by Ofqual found that although universities and employers were broadly satisfied that A levels did a good job, they felt that some key improvements were needed in order to “change the student experience of upper secondary education and go some way towards better preparing them for higher education and the world of work”.⁴⁷ Suggestions included “a move towards a more linear system of examination, changes to the re-sit system, better incorporation of synoptic learning and changes to methods of assessment”.⁴⁸ Ofqual's research echoes the initial findings of a study by Cambridge Assessment, which has called for reform of A levels to make them less predictable, contain more essay/open-ended-style questions and limit the number of re-sits. Cambridge Assessment found that universities want A levels “to include more advanced content for more able students; cover core subject areas in greater depth; and encourage critical thinking, independent study, experimentation, exploration and more extensive reading”.⁴⁹ The findings of both studies seem to be broadly in line with Government thinking on A levels, outlined in the White Paper and more recently in Michael Gove's letter of 30 March to Ofqual.

32. Evidence we heard from university representatives supports the research findings on the views of the higher education sector. Ana Gutierrez, Head of Student Administration at Bournemouth University, told us that students “do not have the intellectual capability for research and synthesis of information when they come to us” and that “we have to put things in place to help with that transition [from school to university]”.⁵⁰ Professor Nick Lieven, Pro-Vice Chancellor of Bristol University, identified two issues with A levels: first, how to “distinguish at the top end the people whom we want to recruit” and second that “modularisation has reduced the capacity of students to do synoptic learning, which draws together multiple strands to solve an often difficult[...] problem [...] we are finding that

45 Q118 Anne Tipple

46 For example, in focus groups carried out as part of the Nuffield review of 14-19 education, see Nuffield Review Higher Education Focus Groups Preliminary Report, Oxford: Nuffield Review of 14-19 Education, 2006

47 Fit for Purpose? The view of the higher education sector, teachers and employers on the suitability of A levels, Ofqual, 2012

48 *Ibid.*

49 http://www.cambridgeassessment.org.uk/ca/News_Room/Latest_News/News?id=139383

50 Q106 and Q132

students assemble the tools but cannot interrelate [...] The A level system, through modularisation, simply does not equip students to do that”.⁵¹ Professor Graham Hutchings, Pro Vice Chancellor of Cardiff University, told us that “we have changed the way in which we teach subjects at first year [...] we have a non-inquiring cohort of students being brought out from this education system”.⁵²

33. Reasonably clear messages seem to emerge from higher education about A levels, consistent with research findings and recent reviews of qualifications and assessment, such as the Sir Richard Sykes review and the Walport report.⁵³ First, changes to A levels are necessary to help ensure young people are well prepared for university study. Second, many of the problems (and therefore the solutions) lie in the structure and content of A levels and their assessment. We return to the proposed A level reforms in chapter six.

Ofqual research into perceptions of GCSEs and A levels

34. Ofqual conducted research in 2010 which touched upon the question of reform and explored confidence in the system. The survey found that of teachers, students and employers, teachers were the most optimistic about the system, followed by students who were less happy, and employers the least optimistic. 61% of teachers, 57% of students and 48% of employers thought that the exam system was doing a good job but did need improving, with 12% of teachers, 14% of students and 23% of employers thinking that the system was not doing a good job and should be reformed. Only 26% of teachers, 25% of students and 18% of employers were completely happy with the system and did not think it needed any change.⁵⁴

35. Since 2003 Ofqual (or its predecessor) has commissioned an annual survey of perceptions of A levels and GCSEs, canvassing the views of teachers, the general public, students and parents. The reports provide a useful insight into confidence in the exam system and into common concerns about A levels and GCSEs among teachers.

36. The Wave 9 survey, published in 2011, found that “perceptions of the A level system are largely positive among teachers, parents, students and the general public—an on-going trend since the survey began in 2003” and that “confidence in the GCSE system overall remains high”.⁵⁵ However, we were struck by the low confidence levels among the general public. In the most recent survey, just over a quarter (28%) of the general public was more confident in the GCSE system now than a few years ago. For A level the figure was 25%.⁵⁶ The survey found that the most common concern among teachers about A levels is the incorrect marking and grading of papers; at GCSE it is controlled assessment. There was

51 Q111 and Q116

52 Q427 Professor Hutchings

53 The Sykes review suggested that “since universities are the major users of A levels, they should have considerable input into their content and their structure” and the Walport report recommended that the design and delivery of science and mathematics qualifications should be reconnected with HE and other stakeholders.

54 Public Perceptions of Unreliability in Examination Results in England: A New Perspective, Ofqual, 2010

55 Perceptions of A levels and GCSEs, Wave 9, Ofqual, 2011

56 Perceptions of A levels, GCSEs and other qualifications, Wave 10, Ofqual 2012

also a negative shift in the opinion of teachers about the reliability of GCSE grading between 2010 and 2011. This is discussed further in chapter nine.

Key issues affecting confidence

37. The Mathematical Association suggested to us that “with regard to the maintenance of standards and confidence in standards, perception is at least as important as substance”.⁵⁷ We would suggest that this observation could be extended to confidence in the exam system as a whole. The cumulative impression we have gathered is of relatively low public confidence in the exam system, alongside serious concerns about particular aspects of the system among various groups, including employers, universities and teachers. In the long term, this risks compromising the credibility of the system and devaluing the qualifications achieved by young people.

38. Evidence to our inquiry, alongside recent debates generated by Ofqual and the exam boards, as well as recent media reports on the exam system, suggest the following concerns (whether real or perceived) are widespread and have contributed to a lack of overall confidence in the system:

- Impact of competition between exam boards and the so-called “race to the bottom”
- Grade inflation
- The role of Ofqual and the effectiveness of its regulation
- The cost of exams to schools and colleges
- Problems with training and textbooks and conflicts of interest in the system
- Narrowing of teaching and learning, “teaching to the test” and the impact of the accountability system
- Question paper errors in summer 2011
- Reliability of marking
- The number of exams taken by young people
- Reduced involvement of universities in A levels

39. We believe that changes are needed in order to increase confidence in the system and maintain its credibility. The key question is whether improvements are best achieved through fundamental administrative reform or by improving the current system. In chapter three we consider the benefits and drawbacks of fundamental reform and whether, in the light of the evidence we have received, we think that reform to a single board, as advocated by some observers, is required. In chapters four to ten, we explore the concerns listed above. We also consider to what extent the concerns are linked to having multiple

exam boards and how effectively it would be addressed by organisational reform, although we are clear that some issues are features of the system that would need to be managed, whatever organisational model is adopted.

Part II: Changes to the system

3 Fundamental reform of the exam system

40. As stated in chapter one, the Secretary of State has said that the current exam system is “discredited” and needs “fundamental reform”.⁵⁸ He was reported to be planning a reform of the exam system “in the new year”, to believe that a single board was “the most compelling answer at the moment” and to favour “having one exam board for each subject to stop the ‘race to the bottom’ for GCSE and A level tests”.⁵⁹ The Minister of State for Schools, Nick Gibb MP, told us that “we are not ruling anything out or in [...] we are considering all [...] options and discussing them within the Department at the moment”.⁶⁰

41. The question of whether there should be multiple boards, a single board or a franchised system is not new. The system has evolved from many examination boards.⁶¹ The current structure of three English exam boards dates back to 1997, when the new Labour Government, acting upon the recommendations of the Dearing review of Qualifications for 16-19 year olds, announced “we believe that there should be three awarding bodies—each offering GCE A levels, GCSE and GNVQs”.⁶² The question has persisted, as concern about exam boards competing on standards has sharpened against a backdrop of grade inflation and increasing pressures on teachers from the accountability system. In 2010 the Walport report recommended that, instead of a move to a single exam board, “the planned stronger regulation by Ofqual, the new regulator, is given a chance” but warned that “if stronger regulation by Ofqual does not work as a means of strengthening the quality of examinations, we would recommend that there is a closer examination of whether it is appropriate to continue with competing awarding bodies”.⁶³ In the same year the Sykes review of qualifications and assessments, when considering the merits of a national examination in English and maths at GCSE, administered from the centre, concluded that “any government would be tempted to use that examination to justify its own performance, and confidence in its reliability would suffer as a result. We believe a contract with a particular awarding body, awarded every three years, could be an alternative”.⁶⁴

58 Statement issued in response to Daily Telegraph investigation, December 2011, <http://www.education.gov.uk/a00200596/michael-gove-responds-to-the-daily-telegraph-investigation>

59 “Exam reforms may see one board per subject, says Gove”, *Daily Telegraph*, 10 December 2011

60 Q647

61 See appendix 1 to Chapter 2 of Techniques for monitoring the comparability of examination standards, QCA, 2007

62 Press release from June 1997, quoted in Techniques for monitoring the comparability of examination standards, QCA, 2007, chapter 2, p79

63 Science and Mathematics Secondary Education for the 21st century. Report of the Science and Learning Expert Group, 2010

64 The Sir Richard Sykes review, 2010, pp23-24

Balance of evidence

42. As the reports cited above show, there are three models which are most commonly discussed for the administration of the exam system. These are: multiple competing exam boards (the structure currently operating in England), a single board (a national body responsible for setting, administering and grading examinations) and franchising by subject, whereby individual exam boards are contracted to run examinations in a particular subject, so, for example, AQA might run GCSE English, while OCR could be contracted to run A level Mathematics. Evidence to our inquiry has been split on which system would be best. In written evidence, most support was expressed for retaining a system of multiple boards (over 40%), with just under 20% of submissions favouring a single board and notably little support for a franchised system (under 5%), although this may be because a franchised system is not widely understood. Over a third of submissions did not express a preference for any particular system. However, there are other options for reform which emerged during our inquiry. These include changes to distinguish the setting of the syllabus from the running of exams.

43. Table 1 shows a summary of the arguments made for and against different models in written and oral evidence to the inquiry.

Table 1: Advantages and disadvantages of different administrative models

	Advantages	Disadvantages
Multiple exam boards	<p>Choice of syllabus for teachers (but not individual pupils)</p> <p>Competition encourages innovation which has led to improvements in marking and logistics</p> <p>Incentive for exam boards to raise the quality of service and support for schools</p> <p>Risk of system failure is diffused</p> <p>Schools can express dissatisfaction by moving to a different exam board</p> <p>Exam fees may be more competitive</p> <p>Independence from Government so reduced risk of political interference</p> <p>Cross-subsidisation of small entry subjects</p> <p>System can handle large numbers of exams with high entries</p>	<p>Risk of exam boards competing on content and grading standards</p> <p>Commercial interests may be put before educational ones</p> <p>Issue of lack of comparability of standards between exam boards</p> <p>No incentive for exam boards to collaborate on syllabus development</p> <p>Dilution of examiner expertise (issue especially for shortage subjects with high entries, e.g. maths and science)</p> <p>Inefficiencies and duplication, with similar syllabuses offered by several boards in some subjects</p> <p>Difficult for HE/learned bodies/employers to engage with several exam boards</p> <p>Increased bureaucracy for schools to administer exams from different boards</p>
Single exam board	<p>Simpler system</p> <p>Eliminates risk of competition on content and grading standards between exam boards</p> <p>Could still offer choice of syllabuses</p> <p>System failure would affect all, so no-one more disadvantaged</p> <p>Economies of scale (although some</p>	<p>Cost, disruption and risks incurred by moving to new system</p> <p>Heightened risk of high impact system failure</p> <p>Higher risk of political interference</p> <p>Lack of diversity of provision</p> <p>Lack of incentive to maintain</p>

	<p>point out that consolidation of exam boards in 1990s did not bring this)</p> <p>Easier for HE/learned bodies/employers to engage with single board</p> <p>Concentration of examiner expertise</p> <p>Avoids duplication of very similar syllabuses offered by different exam boards</p> <p>Many jurisdictions operate single exam board model successfully</p> <p>Reduced bureaucracy for schools administering exams</p>	<p>quality and innovate</p> <p>Increased likelihood of errors as damage to reputation would no longer result in loss of market share</p> <p>Likelihood of higher fees over time in absence of downward competitive pressure</p> <p>Issue of comparability of standards over time and between subjects remains</p> <p>Schools no longer able to express dissatisfaction by moving to another exam board</p>
<p>Franchised system (one exam board per subject)</p>	<p>Many of advantages of single board, with risk spread</p> <p>Eliminates issues of comparability between exam boards within a subject</p> <p>Concentration of examiner expertise</p> <p>Avoids duplication of very similar syllabuses offered by different exam boards</p> <p>Would allow three main GCSE and A level exam boards in England to continue</p> <p>Easier for HE/learned bodies/employers to engage</p>	<p>Cost, disruption and risks incurred by moving to new system</p> <p>Choice of exam board is made by Government not schools</p> <p>Threat to provision of small entry subjects unless formally agreed.</p> <p>Potential problems with continuity after lifetime of contract</p> <p>Incentive to maintain quality and innovate would need to be built into terms of contract</p> <p>Issue of comparability of standards over time remains</p> <p>Issue of comparability between subjects (and exam boards) remains</p> <p>Examiner expertise would be concentrated in one place and</p>

		<p>lost elsewhere, potentially problematic when franchise is up for renewal and if contracts change</p> <p>Heightened risks when contracts change , as illustrated by difficulties with National Curriculum tests</p> <p>Significant investment needed from Government/Ofqual to get contract right</p> <p>Bidding process would be significant resource burden for exam boards</p> <p>Costs may increase for schools as exam boards would build in risk premium to cope with policy changes over lifetime of a contract</p> <p>Could be financially challenging for exam boards if lose profitable, large entry subjects.</p>
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44. Views among witnesses to our inquiry varied. Perhaps unsurprisingly, the exam board chief executives expressed reservations about change, although they did acknowledge that change (possibly significant rather than minimal) is needed to improve the system. Rod Bristow, President of Pearson UK, told us that “no suggestions that can be made to improve the system should be off the table”.⁶⁵ Pearson has made six suggestions for improving the exam system in its consultation “Leading on standards”. AQA and OCR expressed reservations about both alternative models. Andrew Hall, AQA’s Chief Executive Officer, acknowledged that a single board model would “tackle in some ways the public perception that we three compete on standards” but cautioned that “it would bring very real system risk”.⁶⁶ In common with others, Mr Hall pointed to delivery failures with National Curriculum Tests, as a warning of problems that can ensue with franchising.⁶⁷

65 Q250

66 Q537

67 See also Ev 144 Cambridge Assessment, which points to problems experienced with national curriculum tests in 1997, 2004 and 2008, paragraphs 2, 19-21, Ev w3 Andrew Hall, Q366 Tim Oates

OCR’s Chief Executive Mark Dawe stated that “it would be a false confidence for the public if we said that we would create just one board”.⁶⁸

45. Assessment researchers we spoke to favoured a more robust approach to regulation over administrative reform. They supported the argument put to us by Cambridge Assessment:

creating a single awarding body does not of itself secure standards. There remains the issue of the need to ensure standards over time and standards between syllabuses in the same subject [...] A single board therefore does not eliminate the demanding task of managing comparability between syllabuses in the same subject, at the same level [...] the system needs a robust approach to comparability, not administrative re-organisation.⁶⁹

The exam board chief executives agreed that strong regulation, with a focus on standards, is vital. Mark Dawe of OCR told the Committee that “changing the exam boards is not solving the problem. Standards are the vital thing; we have to define what standards we want”.⁷⁰

46. Other witnesses were less cohesive in their views. Examiners were divided over which model should be adopted, with views split between retaining the current system and moving to a single board. Representatives from universities and employers expressed a greater interest in outcomes than how the system is organised. The views of learned bodies varied, both in oral and written evidence. Professor Graham Hutchings told us that the Science Community Representing Education (SCORE) favoured a franchised system.⁷¹ The British Academy view was that “there are some merits in plurality [...] perhaps it is that we need to find some kind of middle way, which may be with greater regulation and the role of subject committees, balanced against some degree of choice”.⁷² The Wellcome Trust suggested that “if we were establishing the exam system from scratch, a single awarding body would be most favourable. However, in the interest of stability the current model should probably be retained, but only with substantial improvements”.⁷³

47. The school leaders we spoke to were in favour of a single board, albeit with some reservations about its size and powers and how schools would express dissatisfaction.⁷⁴ Headteacher Martin Collier suggested that a single national board “could act as the custodian of examining standards as well as the academic integrity of qualifications” and would help to counteract the “erosion in examining standards”.⁷⁵ Teresa Kelly, principal of Abingdon and Witney College, told us that “a single board would make sense for GCSE

68 Q250

69 Ev 145, paragraphs 6 & 7

70 Q501

71 SCORE comprises the Association for Science Education, the Institute of Physics, the Royal Society, the Royal Society of Chemistry and the Society of Biology.

72 Q460

73 Ev 128

74 See Q61 and Ev 175

75 Ev 112

and AS/A2” but “would not cater for the needs of the majority of young people 16-19 who are taking vocational examinations”.⁷⁶ Her view that a single board would not work for vocational qualifications is consistent with the findings of the Wolf review of vocational education which warned against “central attempts to impose a neat, uniform and ‘logical’ structure”, arguing that “the great strength of the English system of independent awarding bodies is that it allows for multiple direct links between qualification development, the labour market and higher education”.⁷⁷

The international perspective

48. We considered the arrangements for exams in other countries by way of comparison. It would appear that many jurisdictions operate a single exam board system successfully. Jo-Anne Baird, Jannette Elwood and Tina Isaacs told us that “some countries appear to have a reasonably simple system of exam administration, with a single organisation, typically the Ministry, responsible for examinations”.⁷⁸ Among the examples they cited were Denmark, France, the Netherlands, Hungary, Italy, Kenya and Uganda. Other countries, such as Australia, Canada and China, have regional exam boards for each state or province. A further variation is that exam board functions may be handled differently, so that several organisations may be involved in setting, administering and certifying exams.⁷⁹ The arrangements in England would appear to be unusual, if not unique. This makes international comparison difficult, as both high and low performing jurisdictions may offer a similar contrast in the way they administer exams. The Wellcome Trust told us that it has “yet to identify a country other than England, that operates a model of multiple competing awarding bodies”.⁸⁰ Given the Secretary of State’s enthusiasm for looking at “the rest and the best”,⁸¹ we were interested in the DfE’s view that:

England is unusual internationally in having a regulated qualifications market with a number of commercial and not-for-profit providers of pre-19 qualifications. However, the fact that we are unusual is not a reason to think we are wrong.⁸²

49. Some issues, such as standards setting and maintaining public confidence, are common to all systems, regardless of how they are organised. Furthermore, evidence from other countries operating different models suggests that problems such as grade inflation, would not necessarily disappear. Tim Oates, Group Director of Assessment, Research and Development at Cambridge Assessment, told us that “if you are concerned about particular technical problems with measurement and particular problems with public confidence, you will find those problems emergent in all other systems, too, in different forms”.⁸³ This

76 Ev 175

77 Review of Vocational Education—The Wolf Report, Department for Education, March 2011, p57-58

78 Ev 178

79 Ev 179 paragraph 3.1

80 Ev 131 paragraph 13

81 Michael Gove speech to Ofqual standards summit, 13 October 2011

82 Ev 172 paragraph 11

83 Q337

was echoed by Dr Michelle Meadows of AQA’s Centre for Research and Education Policy (CERP), who warned that “if one looks at one awarding body countries, such as Scotland, and how their outcomes have gone up over time in their equivalent qualifications, they almost match identically what has happened in England. So, one awarding body does not solve that”.⁸⁴ Similarly, researchers pointed out that Sweden, which operates a type of franchised system, has experienced problems with grade inflation.⁸⁵

Implications and risks of change

50. Fundamental reform of the exam system would clearly constitute intervention on a large scale. We have heard several warnings of the disruption that would be caused by organisational reform. The Association of School and College Leaders (ASCL) cautioned that “there would have to be considerable evidence in favour of a change in order to balance the turbulence it would bring to the system”.⁸⁶ According to Cambridge Assessment:

constant reform, re-structuring and re-organisation of the qualifications system is a major threat to standards [...]democratic governments have an entirely legitimate interest in control of education and training systems—but ill-founded serial intervention in examinations does nothing to enhance the quality of provision.⁸⁷

Tim Oates of Cambridge Assessment told us that “maintaining standards in times of change is one of the most significant challenges to any assessment system”.⁸⁸

51. There is also the question of legislation and associated timescales. According to Glenys Stacey, Chief Executive of Ofqual, reform of the exam system would be likely to require legislation.⁸⁹ The Minister for Schools, Nick Gibb MP, told us that “we are actively considering a number of options. We are of the opinion that some of those options would not require primary legislation”.⁹⁰ He would not elaborate, but it is self-evident that changes requiring legislation could not be introduced quickly and there would be a period of uncertainty while the legislation was being developed and passed.

Conclusion on fundamental reform

52. We accept that there are advantages and disadvantages in all of the three systems we have examined and acknowledge the truth of Ofqual’s observation that “no delivery model is risk-free and there are many factors that could influence the pros and cons of each”.⁹¹

84 Q362

85 Q369 Michelle Meadows and Tim Oates

86 Ev w8 paragraph 2

87 Ev 145

88 Q367

89 Q590

90 Ev 201

91 Ev 160 Ofqual, paragraph 4

We are also clear that any change would be disruptive, potentially very expensive and would bring added risks. As the Minister for Schools suggested to us, this risk increases in the context of multiple reform:

if you are reforming the curriculum, putting in changes to modularisation,[...] and an increased emphasis on spelling, punctuation and grammar at the same time as a major restructuring of the awarding organisations, that presents risks.⁹²

Several submissions to us were critical of the involvement of Government and its associated bodies in exams in recent years.⁹³ “Forget competition between awarding bodies,” wrote Professor Jo-Anne Baird in 2010, “the biggest driver of change in this industry is Government policy”.⁹⁴

53. We appreciate that there are some strong arguments in favour of a single exam board. It is a simpler system, with no risk of competition on standards (although other issues regarding the comparability of standards over time and across subjects would remain). Examiner and assessment expertise would be concentrated and it would be easier for learned bodies, higher education and employers to engage with a single national body. However, certain benefits of the current system, such as schools being able to express dissatisfaction by changing boards, would be lost. Moving to a single board would involve the creation of a new body, at arm’s-length from Government, with substantial cost implications for resourcing such a new provider (and we note the limited appetite of the current Secretary of State for creating arm’s length bodies). We believe that such a change would require primary legislation. Alternatively it might involve the expansion of one of the current providers. This would involve significant scaling up and we doubt that the not-for-profit providers would be in a position to do this. The prospect of a single, for-profit, provider of GCSEs and A levels may be of limited appeal, given that many have already expressed misgivings about exams being run on a for-profit basis.⁹⁵

54. We also note that the creation of a single board for GCSE examinations in England would not, in itself, prevent schools using other examinations, such as GCSEs offered by WJEC and CCEA and the iGCSEs offered by some of the existing exam boards. Similarly, BTECs and OCR Nationals would, presumably, continue to be available and in competition with the national GCSEs. Many of the issues of credibility and comparability of standards would therefore remain unless schools were compelled to use only the examinations of the national board and that board offered vocationally-orientated examinations accepted as equivalent to GCSEs as well as GCSEs themselves. At A-level, similar issues would arise and similar compulsion might be required to head off the risk of creating a new market in qualifications claimed to be equivalent to A-levels.

92 Q652

93 For list of recent Government initiatives, see Ev 136 OCR paragraph 26, also see for example, Ev w35 Roger Porkess, Ev 153

94 Baird, J-A, *The problem at the root of our education system*, Government Gazette, p16, 2010

95 See for example, Ev 106, Ev 76, Ev w84, Ev w110, Ev w112, Ev 176

55. Overall, we conclude that the costs, heightened risk and disruption likely to be generated by moving to a single board outweigh the potential benefits. Furthermore, evidence suggests that some key issues identified with the current system, such as comparability of standards over time and across subjects and the role of examiners in training and textbooks, would remain. New problems, such as a lack of incentive to innovate, the risk of higher fees and a reduced quality of service to schools, may be generated. There may also be the potential for increased political interference, as well as the issue of whether to limit schools' choice of exams to those offered by the single board.

56. Moving to a franchised system would be potentially less disruptive, as the three main providers could remain. Costs would be borne largely by exam boards rather than by Government. Franchising by subject would, however, still involve fundamental change, with significant resource commitments on the part of Ofqual and the exam boards.

57. The question of whether there should be multiple organisations, or just one, involved in examinations is generally discussed in terms of the system as a whole. But we consider that exam boards in England currently have three interrelated, but distinct, functions:

1. Creation of the syllabus
2. Management and administration: collecting exam entries, setting and marking of exams and associated administration, issuing exam results, handling queries from schools
3. Provision of textbooks and teaching materials and training for teachers.

For each of these the effects—and desirability—of competition differs.

58. The potential benefits of competition in areas (2) and (3) seem clear: in a well-regulated and quality-assured system, competition around management and administration should keep exam boards on their toes and mitigate the risk of system-wide failure, and can help keep prices down; the regulator should be able to ensure consistency in the stringency of marking. A diverse market in teaching aids should help to make the subject material engaging and interesting to more students, and there is the incentive for innovation.

59. In area (1), however, the benefits of competition do not seem clear at all. We can absolutely see the benefit of having some choice in syllabus for certain subjects, for example in historical periods or English Literature texts. But we have not heard any compelling reasons to want to have exam boards competing over syllabuses. It is implicit in a number of the pieces of evidence we have received that such competition is one of the contributory factors to the grade inflation that is widely acknowledged.⁹⁶ Put simply, in a world where schools are under pressure to achieve ever-better exam grades, and exam boards measure their own performance by market share, there is an obvious inbuilt incentive for competing exam boards to provide syllabuses which make lesser demands of students.

96 See for example Ev 153, SCORE

60. If the system of multiple exam boards is retained, substantial improvements are needed in order to increase confidence in the system and maintain its credibility. We have serious concerns about the incentives in the current system for exam boards to compete on standards, in particular on content standards. We think that significant changes are needed to alter these incentives. We discuss these changes, including the option of franchising, in chapter four.

4 The way forward

Introduction

61. A recurring criticism of the current system of multiple exam boards is that they compete by lowering their standards, in order to increase market share, in the so-called “race to the bottom”. While this may not be overt, many have expressed concern about the two-fold downward pressure on the system generated by competition between exam boards and the accountability system (of which more in chapter ten).

62. The concept of exam standards is complex, involving the content of the syllabus and the demand of question papers and tasks, as well as marking and grading.

Syllabus content

63. Exam boards develop syllabuses based on qualification and subject criteria that are set by Ofqual. These criteria provide parameters within which exam boards may develop distinctive courses. Ofqual approves or accredits new syllabuses against the qualification and subject criteria. GCSE subject criteria are based on the Programmes of Study laid down in the National Curriculum, where applicable.

64. In the current system exam boards compete intensively on syllabus features, offering a variety of syllabuses so that “teachers can select approaches tailored to the needs and interests of their students”.⁹⁷ Examiners, many of whom were also practising teachers, reported that exam boards conduct extensive market research to help them identify which aspects of subjects (for example, texts in English, periods of history) are preferred by teachers. The choice available to teachers within the current system is such that teachers can choose the most appropriate syllabus for their classes or school cohorts, rather than for individual pupils. The distinctiveness of syllabuses varies between subjects, with duplication of very similar syllabuses in some subjects.

65. Learned bodies were critical of a lack of innovation in syllabus development across the exam boards. SCORE told us that the “current model is not supportive of innovation [...] sharing best practice and collaborative working are not embraced”.⁹⁸ Professor John Holman of the Wellcome Trust put it more bluntly, telling us that “innovation is not engendered in the current system because people aren’t encouraged to talk to each other”.⁹⁹ We believe that it is unrealistic to expect significant collaboration between exam boards on syllabus development in the current system, as exam boards compete vigorously at this stage for market share on the basis of syllabus features.

66. The DfE has also expressed its concerns about content standards:

97 Ev 114 paragraph 2.6 (AQA)

98 Ev 153

99 Q445

Central to our concern is that the nature of competition seems to present significant risk of awarding bodies producing more ‘accessible’ specifications, with content that is less intrinsically challenging, in order to capture market share.¹⁰⁰

This concern was echoed by Jon Coles, former director general for education standards at the DfE, who told a recent Cambridge Assessment conference that exam boards should stop marketing qualifications as “accessible”. Mr Coles suggested that the tactic has promoted a “culture in which it is seen to be acceptable to say to schools, ‘do this [exam] because it is easier’ [...] even if you do not use those words, that is what schools are hearing”.¹⁰¹ Mr Coles also accused the exam boards of developing exams that “barely meet” Ofqual’s minimum requirements and called for the boards to have the “moral courage” to ensure their qualifications have the depth and quality to exceed Ofqual’s minimum requirements.¹⁰²

67. Beyond Jon Coles’ “moral courage”, no-one was able to help us identify incentives that exist in the current system for exam boards to exceed the minimum requirements. The evidence pointed instead to downward pressures in the system, with the Minister for Schools telling us that we have “a system that rewards awarding organisations with an incentive to provide the most accessible [...] examination in order to increase market share”.¹⁰³ SCORE argued that the commercial concerns of exam boards and their need to maintain or increase market share have taken precedence over educational ones, affecting syllabus content (chosen to be easily assessable) and the demand of question papers (with fewer questions requiring higher level skills of analysis, synthesis and evaluation).¹⁰⁴

68. Even if exam boards do not compete overtly on standards, we agree with a TES forum post that “there is every incentive for the exam boards to ensure their exams are no harder than anyone else’s”.¹⁰⁵ Strikingly, this issue was also raised as an area of concern by a senior exam board official: AQA’s Andrew Hall called for a “focus on how we develop content standards for examinations”, arguing that the “safest thing for delivering the most secure improvements for our students is to really tackle content standards”.¹⁰⁶

69. There were recurring calls in evidence for Ofqual to be more robust in its regulation of content standards, specifically to have more rigorous and transparent accreditation procedures, with appropriate use of subject experts.¹⁰⁷ Glenys Stacey, Chief Executive of Ofqual, described the accreditation process as “our people at Ofqual trying almost to second-guess the experts in awarding bodies”.¹⁰⁸ We suspect that this task may be made

100 Ev 170

101 Jon Coles, speaking at Cambridge Assessment event “Learning comes first: shifting the focus from examining to the curriculum”, 31 January 2012

102 *Ibid.*

103 Q646 Nick Gibb

104 Ev 155, paragraph 7 bullet 2

105 TES forum post, 27 October 2011

106 Q537, Andrew Hall,

107 See for example, Ev 128, Ev w78, Ev 153

108 Q603

more difficult by a lack of assessment expertise within Ofqual. As Professor Jo-Anne Baird has pointed out “few individuals in [...] Ofqual have training or even experience of designing and delivering educational assessments”.¹⁰⁹

70. We welcome the recent action taken by Ofqual on content standards, requiring the exam boards to “tighten” GCSEs in geography, English literature, history and mathematics. This is to ensure that all students have to study the subject in appropriate breadth and depth.¹¹⁰ However, the fact remains that the syllabuses that needed “tightening” had been approved by Ofqual’s accreditation procedures. We were concerned at Glenys Stacey’s analysis that “accreditation at the moment is a process that has its worth, but it is part of the way things were done”.¹¹¹ This seems to imply that Ofqual is moving away from its current approach to accreditation. We return to Ofqual’s regulation of content standards, in particular its accreditation procedures, in chapter five.

71. It is our view (and we have heard little to persuade us otherwise) that the incentives in the current system lead to downward competition on content standards. Strong incentives exist for exam boards to reduce content to a minimum or to offer “content-lite” routes through their syllabuses. The problem as we see it is that, as Glenys Stacey herself stated, “there are no incentives to go in a different direction”.¹¹² We agree with Rod Bristow, President of Pearson UK, that it is fair to ask “what incentives can be put into the system to raise standards”.¹¹³ We have therefore considered two options for change which would aim to provide such incentives: the first is national syllabuses and the second is franchising by subject.

National syllabuses

72. National syllabuses would be accredited by Ofqual and then regarded as a national resource that could be examined by any of the English exam boards. There could be one accredited national syllabus in each subject or more than one to provide some choice for schools. This would remove the incentive for exam boards to compete on syllabus content, while retaining current incentives for operational efficiency, innovation and quality of service to schools. Too often, competition on content adds little value and, in some subjects, creates duplication of effort for little genuine variation.

73. Such national GCSE and A level syllabuses could be designed by exam boards in conjunction with representatives from higher education, learned bodies and/or employers. Increasing the role of learned bodies (and universities and employers) in syllabus development would be one way to encourage collaboration and a focus on best practice. Under a system of national syllabuses, exam boards could be required to consult with a relevant learned body or, at A level, higher education representatives, as part of their

109 Baird, J-A. The problem at the root of our education system, *Government Gazette*, February 2010, pp16

110 These changes are in addition to those already announced by the Government, namely the move to end-of-course assessment and increased assessment of spelling, punctuation and grammar in some subjects.

111 Q603

112 Q615, Glenys Stacey

113 Q253

syllabus development process. The syllabus could be endorsed by the learned body or universities, as the Government envisages for A level. Exam boards would be required to have at least one syllabus accredited (in any subject) in order to offer question papers linked to the national syllabuses developed by another exam board. Ofqual would need to monitor question papers, but its grading standards work (see chapter five) would take account of, and adjust for, any differences in demand between question papers.

74. An alternative approach to the creation of national syllabuses, which would then be examined by the existing boards in competition, would be to commission the syllabuses directly. Successful bidders in this process should be required to be consortia of examining boards, learned bodies, higher education and/or employers.

Franchising of subjects to exam boards

75. The second option is franchising, which would involve rather more fundamental changes to the way the system is organised. In common with national syllabuses, it would offer a way of eliminating competition on content standards and allegations of a “race to the bottom”, while retaining multiple exam boards. Unlike national syllabuses, it would involve exam boards developing particular areas of subject expertise, as they would be contracted to offer only certain subjects at GCSE and A level. A franchised system would make it easier for learned bodies, higher education and employers to engage (they would only need to engage with one exam board per subject) and would also avoid the duplication of syllabuses and dilution of examiner expertise that exist in the current system.

76. There are some very significant issues relating to franchising that would need to be taken into account. Franchising would require substantial Government and regulatory input to draw up and award contracts to providers. Glenys Stacey of Ofqual told us that experience (of regulating National Curriculum assessments and in other sectors) would suggest that

you have to make a very real and significant investment in getting the detail of the specification, the contract, and the bidding and tendering processes right [...] my advice would be to concentrate very hard on getting the legislation right, and getting the mechanics and technicalities of it right. It would be a significant and complex matter.¹¹⁴

The burden would be on those who procure to specify correctly, as the success of the system would depend upon it. Exam boards would have to devote significant resource to the bidding process, which requires a different skill-set to that involved in running exams. The impact on unsuccessful bidders should also be considered.

77. Glenys Stacey also advised that the Government should “truly evaluate the risks and [...] recognise the trade-offs.” Pricing, in a franchised model, would need close monitoring: “one might expect that pricing would be a dark art, or would be lacking in transparency”

and “there is likely to be an increase in pricing”, in comparison to the current system.¹¹⁵ Exam boards would include a premium for risk and to cover the implications of changes in government policy (which, recent experience suggests, would be highly likely during the lifetime of a contract).

78. A particular concern would be how to encourage innovation, and the associated financial investment, such as improvements to question paper setting processes. Innovation is commonly cited as one of the benefits of multiple competing exam boards. As Cambridge Assessment observed, “whenever one board achieves an advance, the others compete vigorously to catch up and overtake”.¹¹⁶ Within a franchised system, innovation linked to service delivery would need to be built into the terms of a contract, as would the provision of small entry subjects.

79. As well as removing competition on syllabus development, one of the main benefits of franchising, acknowledged by many, would be the concentration and development of subject expertise within an exam board.¹¹⁷ This would encourage a focus on enhancing the quality of syllabuses and their associated materials, rather than “just meeting” the minimum regulatory requirements. The flip side is that, as Tim Oates argued, “over a period of time, the expertise becomes entirely concentrated in individual institutions [...] your choices then become profoundly limited”.¹¹⁸ Glenys Stacey described this as “a one-way street. When you get towards the end of a franchise period, it is much harder to attract true competition and real bidders”.¹¹⁹

80. Several witnesses pointed out to us that there are salutary experiences of how a franchised system can go wrong to be found in the history of National Curriculum tests.¹²⁰ Should the option of franchising be pursued, the Government needs to consider the legal implications of a franchised system very carefully, including the need to constrain schools’ choices of syllabuses to those provided by the franchisee and to prevent other exam boards from marketing alternative “equivalent” qualifications. Any major structural change to the exam system needs to be managed with extreme care in order to minimise the disruption caused, bearing in mind that the greatest threat to standards is at moments of change and that the bigger the change, the bigger the risk.

Conclusion on options for change

81. We believe that the current system incentivises downward competition on content standards and we recommend that the Government act immediately to change these incentives. We consider that national syllabuses would offer a way of addressing downward competition on content and provide reassurance on standards, without the

115 Q590

116 Ev 147, paragraph 30

117 See Ev 153, Q372 Jo-Anne Baird, Ev w78, Ev 128

118 Q372 Tim Oates

119 Q590

120 In particular delivery failure in 2008, detailed in the Sutherland inquiry: an independent inquiry into the delivery of National Curriculum tests in 2008 and in a report by our predecessor Committee: *Policy and delivery: the National Curriculum tests delivery failure in 2008*, Sixth Report of session 2008-09, HC 205.

risks, lost benefits and disruption involved in moving to a single board. The Government should begin by piloting a national syllabus in one large entry subject as part of the forthcoming A level reforms. Ofqual should review the effectiveness of the pilot, with a view to extending the approach across GCSE and A levels if appropriate. We believe that national syllabuses, coupled with a stronger Ofqual and greater involvement of subject communities in GCSEs and A levels, should help to maximise the benefits of having multiple competing exam boards while minimising the shortcomings.

82. While we can see that the second option we outline—franchising of subjects to exam boards—offers a way to address downward competition on content, we have concerns about the long-term impact and suggest that there may be serious downsides to such a change that need to be better understood before it can be recommended.

Grading standards and grade inflation

83. The Wellcome Trust told us that “it is important that the public, employers and universities understand and have confidence in the process by which grades are arrived at. Yet little is known publicly about how awarding bodies proceed from marked scripts to final grades”.¹²¹ The issue of grading standards is complex and the awarding of grades a technical process, involving a blend of the professional judgement of examiners with sophisticated statistical data. It is a difficult area, which quickly becomes impenetrable to non-specialists. Therein lies much of the challenge for the exam boards and Ofqual when seeking to provide reassurance about grading standards. Furthermore, as Glenys Stacey observed,¹²² the language used to discuss grading standards, including commonly used terms such as ‘grade inflation’, is emotive and loaded. Recently, Ms Stacey has been more outspoken, stating that there has been “persistent grade inflation” at GCSE and A level.¹²³ It is an area of long-standing debate and one that has strong influence over public confidence in the exam system.

84. When considering grading standards, we were concerned with several questions. First, whether increasing numbers of students achieving higher GCSE and A level grades reflect genuine improvements in standards of attainment; second, how the system of competing multiple exam boards has contributed to the year-on-year increases in results. Third, how the system should balance the requirement to maintain standards over time with the need to adapt to ensure that GCSEs and A levels remain fit for purpose.

Increasing numbers achieving higher grades

85. Rising GCSE and A level pass rates and increases in the numbers of candidates achieving good grades are well-documented and have prompted ongoing debates about grade standards. Figures 1 and 2 below show the trends in A level and GCSE pass rates

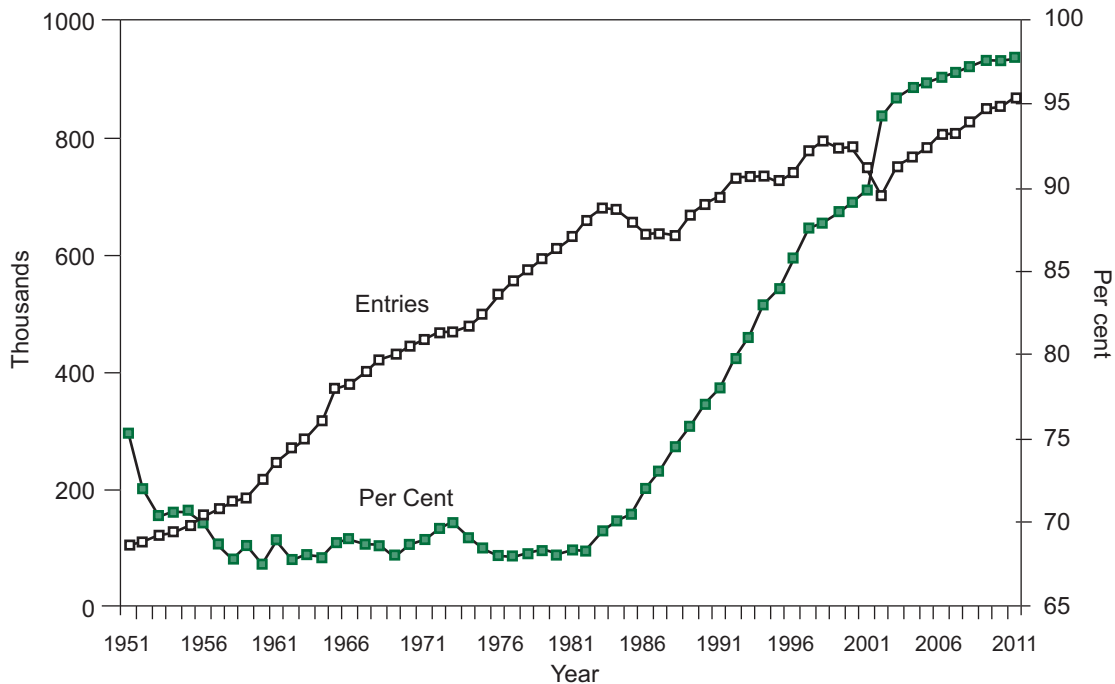
121 Ev 128

122 A new look at standards, Glenys Stacey, Ofqual standards summit, 13 October 2012

123 “A level overhaul to halt ‘rampant grade inflation’”, Daily Telegraph, 28 April 2012

since their introduction in 1951 and 1988 respectively.¹²⁴ Professor Alan Smithers observes that in the past 30 years, the A level pass rate has increased from 68.2 per cent in 1982 to 97.8 per cent in 2011. He notes that since norm-referencing was superseded by criterion-referencing in 1987, the proportion of candidates achieving a grade A has increased from under 10 per cent to 27 per cent in 2010.¹²⁵ Professor Smithers comments that the GCSE has seen “almost continuous grade improvement in the twenty-four years of its existence”.¹²⁶

Figure 1: Trends in A-Level Entries and Passes



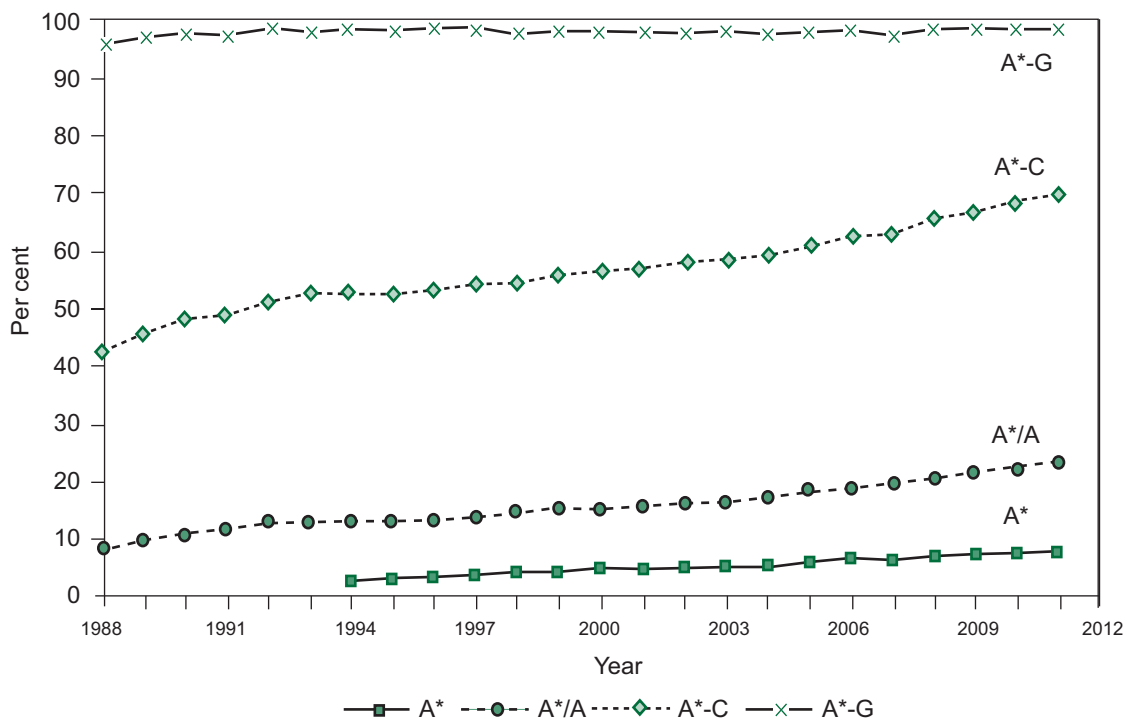
Source: *A levels 2011*, Alan Smithers, Centre for Education and Employment Research, University of Buckingham, 2011

124 *A levels 2011 and GCSEs 2011*, Alan Smithers, Centre for Education and Employment Research, University of Buckingham, 2011

125 Between 1963 and 1987 the A level grading system was norm-referenced; that is, a fixed percentage of candidates achieved each grade in any given year, regardless of the standard achieved. In 1987, criterion-referencing was introduced, whereby grades awarded were on the basis of examiners' judgement of the quality of work and were associated with a particular standard achieved (as in the driving test). Grade awarding these days is a blend of criterion-referencing with statistical analysis, including cohort-referencing (comparing individual performance against that of the overall cohort).

126 *A levels 2011 and GCSEs 2011*, Alan Smithers, Centre for Education and Employment Research, University of Buckingham, 2011

Figure 2: Trends in GCSE Passes



Source: GCSEs 2011, Alan Smithers, Centre for Education and Employment Research, University of Buckingham, 2011

86. The National Association of Schoolmasters/Union of Women Teachers (NASUWT) told us that “there is no evidence that standards in the qualifications used most regularly in the 14–19 sectors have fallen over time”.¹²⁷ However, few other stakeholders, including assessment specialists, appeared so confident. Doubt is cast by the critical comments from universities and employers (see chapter two) and by the contrasting static performance of English pupils on international surveys such as PISA. Tim Oates of Cambridge Assessment stated in a debate on exam standards in 2010 that there is “sufficient evidence from diverse sources to generate concern” about grade drift.¹²⁸

87. The DfE pointed to the findings of research by Robert Coe and Peter Tymms at Durham University, which, it told us, “raise important questions about grading”.¹²⁹ The research found that between 1996 and 2007 the average grade achieved by GCSE candidates of the same “general ability” rose by almost two-thirds of a grade; for A level candidates the increase between 1988 and 2007 was over two grades.¹³⁰ The Secretary of State warned last October and again recently that “there will be years, because we are going

127 Ev w70

128 Exam Standards: the big debate, Cambridge Assessment, 29 April 2010

129 Ev 170

130 Coe, R & Tymms P, “Summary of research on changes in educational standards in the UK” in Harris M (ed), Education Briefing Book, Institute of Directors, London 2008, p97.

to make exams tougher, when the number of people passing will fall”.¹³¹ This has led to discussion in the media of the prospect of “grade deflation”.¹³²

88. AQA’s Centre for Education Research and Policy (CERP) argued that grade awarding procedures and checks, along with associated research exercises, are “robust, efficient and effective” and that, given the rigour of the current grading system, “confidence in standards in general, and in inter-year and inter-AB [awarding body] comparability in particular, should be high”.¹³³ Exam boards explained to us how they share data with each other and the regulator at key stages prior to the publication of results. While exam board chief executives defended their awarding procedures as robust, they acknowledged that “whilst actual grades have been going up, our performance on international league tables has not” and that “there has been a creep in grading standards”.¹³⁴

89. AQA suggested to us that

the progressively high-stakes nature of general qualifications partly explains the year-on-year increases in results, which amount to a handful of extra students in each school exceeding the grade boundary each year. Teachers focus intensively on supporting borderline students, aided by the increased availability of mark schemes, past papers, information and support, and transparency as to the skills and knowledge required and how to demonstrate them [...] as education becomes increasingly centred on passing examinations, outcomes go up.¹³⁵

90. Glenys Stacey was recently reported as saying that “the grade inflation we have seen [at GCSE and A level] is virtually impossible to justify”.¹³⁶ We explored with assessment experts the elements that have most contributed to increasing numbers achieving higher grades. Several factors were cited. These seemed to us to fall into four broad categories: genuine improvements (for example, more efficient teaching, better quality teachers, harder-working pupils and pupils with better support from home), changes in the structure and design of qualifications (for example, modularisation, re-sits), factors linked to underlying drivers such as the accountability system (a culture of increasing results and expectation of increased performance, schools focusing heavily on GCSEs, teaching to the test) and finally factors linked to exam board procedures (greater transparency, improved reliability, examiners giving students the “benefit of the doubt”, tolerance of small increases year-on-year). We note the point made by Tim Oates, that there is a lack of evidence identifying which of these factors lead to actual improvements in underlying attainment (as well as improved grades).¹³⁷

131 Michael Gove to Ofqual Standards Summit, 13 October 2011 and “Michael Gove: Get set for new age of exam failures”; *the Independent*, 22 February 2012

132 Glenys Stacey interview on Today programme, *BBC Radio 4*, 24 February 2012 and “Michael Gove wants universities to create new A levels”, *BBC News*, 3 April 2012

133 Ev 193, paragraph 3.4

134 Q502 Rod Bristow and Q494 Andrew Hall

135 Ev 117, 7.6

136 “A level overhaul to halt ‘rampant grade inflation’”, *Daily Telegraph*, 28 April 2012

137 Exam Standards: the big debate, Cambridge Assessment, 29 April 2010

91. Increasing numbers of students achieving higher grades in GCSEs and A levels is an undisputed trend. What is less clear is whether this is matched by improvements in knowledge, skills and understanding among students. While we appreciate that this is a technically complex area, we agree with SCORE that “the impression that standards are either slipping or becoming incomparable between year groups cannot be ignored”.¹³⁸ More young people may be doing well because they are better prepared to pass their GCSE and A level exams. However, we feel that there is sufficient evidence from a variety of sources, such as universities, employers, England’s flat PISA profile and research by Durham University cited above, to cast doubt over whether GCSEs and A levels indicate improved preparation of young people for further education and employment and whether higher grades reflect genuine improvements in their underlying knowledge, skills and understanding. The findings of Ofqual’s most recent set of GCSE and A level standards reviews cast further doubt in this respect. Ofqual reported that many of the reviews “raise concerns about the maintenance of standards” and that in several cases changes to the way content was assessed had reduced the demands made by exams.¹³⁹ This doubt devalues qualifications and young people’s achievements and undermines public confidence in the system. **Ofqual should continue to investigate grading issues as part of its programme of standards reviews and to engage publicly with debate on exam standards. Ofqual needs to be able to account for what AQA’s Andrew Hall described as the “creep in grading standards”, particularly in the commercially significant large entry subjects at GCSE, which are key to schools’ performance in league tables and also in large entry A level subjects, commonly used for university entrance.**

92. We can see that the requirement on Ofqual and the exam boards to maintain standards over time may present challenges when trying to ensure that GCSEs and A levels adapt and remain fit for purpose. A levels, for example, cater for a broader ability range, with larger numbers going on to university, than they did thirty years ago. As Professor Nick Lieven of Bristol University told us, “the median area that you are trying to focus the qualification on has shifted: it has to, in order to be fair”.¹⁴⁰ We suggest that occasional explicit recalibration of grading standards may be required and is preferable to slow creep downwards or upwards. Slow drift or creep in grading standards, such as that seen over recent years, is difficult to interpret and leads to the system courting controversy, with obvious consequential risks to public confidence. We return to this in chapter five.

Competition on grading standards

93. There is clearly a public perception that exam boards compete on grading standards. The Wellcome Trust told us that “it seems likely that grade [boundaries] have reduced in part because the awarding bodies are competing for custom and teachers are likely to choose those qualifications that will yield the best performance for their schools and for

138 Ev 153

139 Standards reviews: a summary, Ofqual, 1 May 2012. Ofqual published reports on reviews in GCSE Biology, GCSE Chemistry, GCSE Mathematics, A level Biology, A level Chemistry, A level Critical Thinking and A level Geography.

140 Q111

their students.” The Trust cites evidence of one exam board marketing their syllabus as “proven to help improve grades”.¹⁴¹

94. According to the Wellcome Trust, “Mark Walport, chair of the Science and Learning Expert Group, observed that when giving evidence [to his inquiry], awarding bodies openly admitted that they struggle to avoid competing with each other on grade standards”.¹⁴² This was not our experience. Exam board chief executives were emphatic that they do not compete on grading standards, telling us that “there is no scope for competing on standards” and that “it is the standards agenda that brings us into a collective, but we compete on everything else”.¹⁴³ A key factor in this appears to be recent action taken by Ofqual to control grade inflation. Since summer 2010 Ofqual has monitored the interim outcomes from summer awards to secure comparability between exam boards and minimise any grade inflation. As Tim Oates explained, “the regulator has increasingly said, ‘if you’re erring, err in this direction, not that direction’”.¹⁴⁴ The approach seems to have been broadly welcomed by assessment experts and the exam boards. AQA’s Andrew Hall told us “we share data—we share it with the regulator—and we have made a great leap forward now”.¹⁴⁵ Ofqual has said that it is “committed to containing grade inflation, whilst making sure that awards reflect accurately students’ achievements”¹⁴⁶ and that it plans to adopt the same approach to the award of GCSEs in summer 2012.

95. We welcome Ofqual’s recent action to regulate grading standards and recommend that it continue with this approach for A level and, from summer 2012, for GCSE. The effect of this action is twofold: first it helps to control grade inflation and second it provides reassurance that the exam boards are not competing on grading standards. We recognise that the effect will take time to filter through the system and to help increase public confidence.

141 OCR 21st century science syllabus suite, see <http://www.twentyfirstcenturyscience.org/?q=content/faqs#seven>

142 Ev 129, paragraph 4

143 Q252 Andrew Hall and Q253 Gareth Pierce

144 Q389 Tim Oates

145 Q252 Andrew Hall

146 Ev 161 paragraph 9

5 The role of Ofqual

Introduction

96. Ofqual is pivotal in the current examination system. The Secretary of State has said that Ofqual needs to move from being an organisation that provides reassurance to one that provides challenge to politicians and exam boards.¹⁴⁷ There were recurring calls in both oral and written evidence for a stronger Ofqual, whatever organisational model is adopted. SCORE told us that “whatever system is in place, there is a need for some form of external regulation or scrutiny”. It criticised Ofqual for being “a crash scene investigator rather than an air traffic controller”.¹⁴⁸ Professor Nick Lieven of Bristol University told us that “Ofqual needs more teeth. Whether you have one examination board or 10, it is the checks and balances you have in the system that are important”.¹⁴⁹

97. The Secretary of State has also said that if Ofqual is to be an effective watchdog, it needs “sharper teeth”.¹⁵⁰ To this end, the Government has legislated to increase Ofqual’s regulatory powers, most notably giving it the power to fine exam boards up to 10% of their turnover. It also made an amendment to Ofqual’s qualifications standards objective in the Education Act 2011, requiring it to ensure that attainment in English qualifications is consistent with that required by comparable qualifications in other countries, as well as over time in England. From May 2012 Ofqual will be moving to tighter regulatory requirements and, as Chief Executive Glenys Stacey repeatedly told us, it will be “crawling all over” the exam boards.¹⁵¹ Regarding its powers, Ms Stacey reported to us that Ofqual is “shortly to be awash with them”.¹⁵²

98. In this chapter we consider Ofqual’s regulation of grading and content standards and whether this is sufficiently robust. We also examine Ofqual’s use of assessment and subject expertise and its relationship with the Joint Council for Qualifications (JCQ).

Ofqual’s regulation of standards

99. Assessment experts and exam board chief executives have recommended that Ofqual should focus on its standards objective, building in-house assessment expertise and improving the robustness of its comparability work.¹⁵³ This, they argue, would serve its public confidence objective, by improving confidence in the system. Mark Dawe, Chief Executive of OCR, told us:

147 Michael Gove speech to Ofqual standards summit, 13 October 2011

148 Ev 153

149 Q136

150 Michael Gove speech to Ofqual standards summit, 13 October 2011

151 Q591, Q630 and Q636

152 Q591

153 See Ev 144, Q391 & Q392 Michelle Meadows, Q399 and Q401 Alison Wolf

Ofqual’s core role should be around [...] standards and comparability. That should be their focus. If they do that properly, it gives us all the approval, in a sense, that our qualifications are appropriate, and it gives the public the confidence they are looking for.¹⁵⁴

100. Assessment researchers have suggested that Ofqual needs to build its in-house assessment expertise, in order to regulate standards more effectively. They acknowledged that Ofqual has taken steps to improve the methodology of its comparability work although, as Dr Michelle Meadows of AQA’s Centre for Research, Education and Policy (CERP) told us, there is “still a way to go before you see the robustness of design that we would like, but it is a journey that we are on”.¹⁵⁵ Professor Alison Wolf told the Committee that Ofqual would benefit from “some decent in-house statistical help, looking at comparability and technical issues and not wasting time looking at prices”.¹⁵⁶

101. There are signs, as the DfE suggested to us, that Ofqual “has begun to show a real willingness to tackle awarding bodies on the key issues of standards”.¹⁵⁷ Since summer 2010, Ofqual has taken action to contain grade inflation at A level. This has proved effective, and it plans to do the same at GCSE from summer 2012. In October 2011, Ofqual hosted a standards summit to stimulate and inform public debate on exam standards. It has also recently set up a standards advisory group of assessment specialists to “consider and advise it on qualification and assessment standards issues”.¹⁵⁸ Amanda Spielman, Chair of Ofqual, told us that “without a shadow of a doubt, we need more assessment expertise in the oversight of Ofqual” and that they are also considering how to bring in such expertise at board level.¹⁵⁹

102. We agree with assessment experts that Ofqual should focus more tightly on its qualification standards objective, taking steps to improve the methodology of its comparability work and building its in-house expertise. We appreciate the point made by Glenys Stacey that “assessment expertise is quite a rare thing”,¹⁶⁰ residing mainly in the exam boards and some universities. We were therefore disappointed to note the absence of an assessment expert in Ofqual’s recent announcement of new appointments to its Board.¹⁶¹ **We recommend that Ofqual seek to build its assessment expertise and finds the resources to do so. We further recommend that Ofqual appoint an assessment expert to its board as soon as possible.**

154 Q532

155 Q392

156 Q399

157 Ev 170

158 <http://www.ofqual.gov.uk/news-and-announcements/83-news-and-announcements-news/869-standards-advisory-group>

159 Q593

160 Q316

161 <http://www.ofqual.gov.uk/news-and-announcements/83-news-and-announcements-news/879-appointments-to-ofquals-board>

Ofqual's international standards objective

103. The recent amendment to Ofqual's qualifications standards objective in the Education Act 2011 with its international dimension presents significant challenges to Ofqual in its regulation of standards. Ofqual must ensure that attainment in English qualifications is consistent with that required by comparable qualifications in other countries, as well as over time in England. Glenys Stacey has acknowledged that this could lead to a potential conflict, should standards in England be found to be out of line with those in other countries, telling us that "there is a tension, but I think it is a healthy one".¹⁶² When we asked Ofqual how it would deal with this tension, whether it would prioritise standards over time or internationally, Ms Stacey responded that "the answer is that we want the best [...] we are going to pick up these things, learn, play them out for people, discuss them and then take a view".¹⁶³

104. We recognise that it is important to take account of best practice in assessment in other countries and welcome the work that Ofqual has done in this area so far. **We are concerned that the amendment to Ofqual's qualification standards objective could over a period of time pull it simultaneously in different directions and recommend that the Government give a clear indication to Ofqual about which should be the priority: the comparability of standards over time in England or benchmarking against the standards of qualifications in other countries.**

Government policy changes

105. Similar difficulties may emerge with the Secretary of State's suggestion that "we are going to make exams tougher" and that there may be years "where GCSE and A level results dip".¹⁶⁴ Ofqual's current approach is to maintain standards from year to year. For many years this has been the overriding concern at times of change in the exam system, in order to be fair to students from one year to the next. As journalist Warwick Mansell has questioned, "if Mr Gove does introduce changes which do make it "tougher" to get a good grade at GCSE or A-level one year than it was the previous year, how can this be justified to individual students?"¹⁶⁵ As stated in chapter four, occasional explicit recalibration of grading standards may be required. **We recommend that the Government make its priorities clear to Ofqual, whether these are the maintenance of standards over time or making exams tougher, and that both the Government and Ofqual be open about the consequences of these policies for young people.**

106. The Secretary of State's recent letter on A level reform would suggest that the Government is prepared to see more diversity in the examination system. Professor Jo-Anne Baird et al noted in evidence to us "there is a tension between the regulator upholding content standards and allowing variation in the syllabus and examination

162 *Chief Regulator of Qualifications and Examinations*, Eighth Report of Session 2010-12, HC 1764-i, Q34

163 Q323

164 Michael Gove speech to Ofqual standards summit, 13 October 2011 and "Michael Gove: Get set for new age of exam failures", *The Independent*, 22 February 2012

165 <http://www.naht.org.uk/welcome/comment/blogs/warwick-mansells-blog/?blogpost=534>

offer”.¹⁶⁶ She went on to say that “Ofqual needs to be empowered to foster more diversity in the examinations system, whilst ensuring that evidence is collated to reassure stakeholders that standards have been upheld”.¹⁶⁷ **If A levels are going to become more varied in structure, Ofqual needs to ensure that its collection of evidence and monitoring of standards are sufficiently robust to provide convincing reassurance that content standards are being maintained.**

GCSE changes and devolution

107. The Government has announced that GCSEs in England will be changing from modular to linear courses (a return to end-of-course exams), taking effect for courses starting in September 2012. These changes will not apply in Wales or Northern Ireland, where schools will be able to choose between linear and modular GCSE courses.¹⁶⁸ It will be the responsibility of Ofqual, in conjunction with the regulators in Wales and Northern Ireland, to ensure that GCSEs awarded in each nation are of a comparable standard. According to Cambridge Assessment, “the interrelationship of England’s qualifications system with those of Wales, Scotland and Northern Ireland has never been seriously addressed”.¹⁶⁹ We can see that increasing diversity between qualifications across the UK could present greater challenges to Ofqual in ensuring comparability of standards. Cambridge Assessment suggests that “it may no longer be tenable for the English regulator to accept by proxy decisions made by the other UK regulators and vice versa”.¹⁷⁰ **We recommend that Ofqual review its arrangements for ensuring comparability of standards between England, Wales and Northern Ireland, and that it continue to monitor standards in GCSE and A level examinations offered by WJEC and CCEA, as well as the English providers as part of its ongoing regulation of standards. We also believe that a debate is needed on the importance of standards comparability between the home nations, with a Ministerial conference to decide whether and what action is necessary.**

Accreditation

108. While Ofqual has been proactive in regulating grading standards, it has been less obviously so in respect of content standards until very recently. As noted in chapter four, several learned bodies have been critical of Ofqual’s accreditation procedures. Professor Jo-Anne Baird et al told us that “the process by which content standards of qualifications are judged by Ofqual could be more robust and transparent. A review of methodologies and publication of the process generated by this work is warranted”.¹⁷¹

166 Ev 179, paragraph 5.1

167 *Ibid.*

168 Education Minister says no to “linear only” GCSEs and yes to choice, CCEA press release, 12 March 2012 and Changes to GCSEs in England, Wales and Northern Ireland, WJEC, <http://www.wjec.co.uk/index.php?nav=14&news=206>

169 Ev 148

170 *Ibid.*

171 Ev 181, paragraph 6.8

109. With reform of A levels imminent and a further full reform of GCSE anticipated following the National Curriculum review, Ofqual’s regulation of content standards within subjects, through its accreditation procedures, is likely to feature prominently. Glenys Stacey suggested to us that “there is every incentive for an awarding body to want to get to the point where it does not have to come to us for accreditation [...] there is a real incentive in it getting an endorsement from the regulator on an annual basis that its products pass muster across the spectrum”.¹⁷² She also suggested that “the real control over standards should not, in the long term, be through an accreditation process. It should be by us placing requirements on awarding bodies that they must demonstrate they meet time after time in [...] close and continuous monitoring”.¹⁷³

110. We have serious concerns about this approach for GCSEs and A levels. We are convinced that the regulator has an important role in ensuring that content standards are appropriate and comparable across the exam boards, at the point of syllabus development through an accreditation process as well as through its ongoing regulation. **We recommend that individual accreditation of all new syllabuses, including our recommended national syllabuses, remain a part of Ofqual’s continuing regulation of GCSEs and A-levels and, indeed, of any qualifications that are deemed equivalent to GCSEs and A-levels. With this in mind, Ofqual needs to demonstrate that its accreditation procedures are rigorous and transparent, and that it draws on appropriate respected subject and assessment expertise when reviewing draft syllabuses and their associated materials. We recommend that Ofqual review and strengthen its regulation of content standards, including accreditation procedures, seeking and acting upon advice from its standards advisory group as appropriate.**

Ofqual and subject expertise

111. We received recurring criticisms of Ofqual’s lack of in-house subject expertise and of a lack of transparency in its use of external subject experts.¹⁷⁴ The Advisory Committee on Mathematics Education (ACME) stated that “there is a no transparency in Ofqual’s operation in terms of the choice of external subject experts consulted. This results in a lack of confidence in Ofqual’s ability to regulate key national examinations effectively”.¹⁷⁵ According to SCORE, syllabuses are required to have “official support from their subject community before they are accredited”¹⁷⁶ but the Wellcome Trust told us that “critically, although lip-service is paid to consultation [by Ofqual], it often amounts to inviting subject experts to rubber-stamp near-final proposals”.¹⁷⁷ Ofqual told us “we choose not to invest heavily in subject expertise on our staff at Ofqual [...] we prefer to buy it in [...] we choose

172 Q617

173 Q603

174 See for example Ev w35, Ev w45, Ev w59, Ev w78 and Ev 153

175 Ev w78

176 Ev 153

177 Ev 131

to broker that in a way that we think is in the best interests of qualifications and standards”.¹⁷⁸

112. Action is clearly needed to define the role of subject communities within the exam system. As SCORE told us, “this lack of engagement with subject communities results in a lack of confidence from users of the system, including HEIs and employers”.¹⁷⁹ **While we accept Ofqual’s rationale for its lack of in-house subject expertise, criticisms from the subject communities lead us to conclude that Ofqual needs to be more transparent about its consultation with and use of external subject experts.**

National subject committees

113. Several organisations, such as SCORE, ACME and the Wellcome Trust, argued strongly for the establishment of national subject committees, comprising representatives from higher education, employers and subject communities. It was suggested that the remit of such committees should include syllabus development and accreditation, as well as on-going monitoring, to help oversee standards across exam boards. As Professor Sir John Holman of the Wellcome Trust proposed to us, “the national subject committee does not just say what they want to have in the specification; it looks at the individual boards’ interpretations of that list and says whether it is good or not. It looks at the sample question papers. It looks at live question papers. It never stops working. It is always watching and monitoring”.¹⁸⁰

114. On the matter of question papers, several learned bodies expressed concern about the type of questions set and what they assess. SCORE, along with several mathematics subject associations and specialists, suggested to us that question papers often do not test important aspects of a subject, although these are in the syllabus.¹⁸¹ This was a feature of SCORE’s recent research on mathematics content in A level science examinations. Dr Ian Jones of the University of Birmingham told us that exams “fail to gather evidence of the very conceptual knowledge and higher order thinking skills that our country values and needs”.¹⁸² These issues also emerged in Ofqual’s most recent set of standards reviews.¹⁸³ Ofqual has indicated that it will use the findings from these reviews to inform the development of regulations for revised A levels and GCSEs. National subject committees would provide a way for subject communities to be involved formally in scrutinising question papers and mark schemes. They would also be a mechanism for Ofqual to gather regular feedback on the type of concerns described above.

115. We consider that national subject committees, convened by Ofqual, would offer a way to formalise Ofqual’s engagement with subject communities, as well as improving the

178 Q600

179 Ev 155

180 Q433

181 Ev 153-6, paragraph 2, 7 and 10, Ev w116 paragraph 6, Ev w40, paragraph 32, Ev w36, paragraph 20,

182 Ev w37 paragraph 1

183 *Standards reviews: a summary*, Ofqual, 1 May 2012 with links to reports on individual reviews see: <http://www.ofqual.gov.uk/news-and-announcements/130/888>

involvement of higher education and potentially employers with GCSEs and A levels. National subject committees would help Ofqual to counter criticisms about its lack of in-house subject expertise and to be more transparent in its use of external subject experts. We are aware that “the strength and representation of professional bodies/learned societies vary across different subjects” and this means that national subject committees may work better in some subjects than others.¹⁸⁴ Nonetheless, we consider that there is merit in the idea and **we recommend that Ofqual convene national subject committees in large entry GCSE and A level subjects, drawing their membership from learned societies, subject associations, higher education and employers. Such committees should include in their remit syllabus development and accreditation, as well as on-going monitoring of question papers and mark schemes, and oversight of comparable qualifications offered in the devolved nations.**

Ofqual and the Joint Council for Qualifications

116. The Joint Council for Qualifications (JCQ) is a membership body, consisting of AQA, City and Guilds, CCEA, Edexcel, OCR, SQA and WJEC. It was formed in 2004 and describes itself as “the single voice for member bodies”.¹⁸⁵ The JCQ is not regulated by Ofqual, but its member bodies are. The JCQ collates and publishes results for GCSEs, GCEs and other national qualifications. It issues guidance to schools and colleges on administrative matters common across exam boards, such as access and special consideration, entries, timetabling, instructions for conducting exams and post-results services.

117. Glenys Stacey told us that there is “a grey area between us and JCQ”.¹⁸⁶ She explained that “there are some areas where we have a joint interest, where we need to discuss our approach and also whether the prime responsibility is with JCQ or with us. A good example of that is the proper controls over requests for special consideration or extra time, where we have a joint interest but we are the regulator”.¹⁸⁷ We agree that a discussion about responsibilities in this “grey area” is needed. **Ofqual should instigate discussions with the JCQ to clarify roles and responsibilities in areas where there is a joint interest and publish information about this to schools and colleges as appropriate.**

Conclusion

118. Overall the evidence we received suggests that the exam system needs a stronger regulator, whatever organisational model is adopted. Glenys Stacey told us that “historically, the sector has been under-regulated or not firmly regulated” and that she has regarded her work as “turning a ship”.¹⁸⁸ We recognise that this is not just about increasing Ofqual’s powers and tightening its regulatory requirements, but may also involve a change

184 Ev 153

185 <http://www.jcq.org.uk/about-us/index.cfm>

186 Q612

187 Q612

188 Q580

in the focus and resourcing of Ofqual as an organisation. Although the exam system has been regulated for some time, we appreciate that Ofqual is a relatively new independent regulator (it was established officially on 1 April 2010) and its chief executive and chair have been in post since March 2011 and July 2011 respectively.

119. We believe that Glenys Stacey’s decision to concentrate initially on improving Ofqual’s regulation of standards was the right one.¹⁸⁹ We are particularly encouraged by evidence that Ofqual is taking more robust action in its regulation of grading standards and we welcome the steps it has taken to engage publicly with the “standards debate”. **It is clear from the issues raised with us that further improvements are needed if Ofqual is to be a stronger, more challenging and more effective regulator. As AQA’s Andrew Hall put it “Ofqual is, in fairness, on a journey”.**¹⁹⁰ We believe that there is a strong argument in favour of allowing time for a strengthened Ofqual to take effect, as the changes it is making will take time to settle and bear fruit. But Ofqual must demonstrate that it is collecting the right sort of qualitative and quantitative evidence and using robust methodology to regulate effectively. Details of the evidence used by Ofqual in the regulation of standards, and any specific findings and regulatory action on standards, should be set out clearly in annexes to Ofqual’s annual report to Parliament. Ofqual must continue to show that it is prepared to take vigorous action when needed, in order to help increase public confidence in the exam system.

189 See Q624

190 Q544

6 Forthcoming A level reform

Involvement of universities in A levels

120. The Government has announced that universities should have a “leading role” in the design of A levels. The Secretary of State envisages that “universities should be able to determine subject content, and that they should endorse specifications, including details of how the subject should be assessed”.¹⁹¹ These changes will take effect for courses starting in September 2014.

121. Historically universities were involved in the development and content of A levels and the “ancestors of the current awarding bodies were linked to universities”.¹⁹² These days, as examiner Andrew Hunt noted, “the links to universities are now very much reduced”.¹⁹³ Rather telling was the observation by Edexcel examiner Graham George that “as far as I know, none of the current Principal Examiners in Physics works in a university, compared with a significant majority 25 years ago”.¹⁹⁴

122. Cambridge Assessment has suggested that “the State’s greater role in defining the content of syllabuses and the way in which they are examined has led to a kind of divorce between the users and producers of qualifications”.¹⁹⁵ Researchers acknowledge that “occasional consultation [with HE] exists through exam boards and Ofqual—it is not working”.¹⁹⁶ Ana Gutierrez of Bournemouth University told us that “it is a pity that [...] we do not have any opportunity to be part of the design of qualifications”.¹⁹⁷ Recent studies by Ofqual and Cambridge Assessment both suggested that universities should have greater input into the design and content of A levels.¹⁹⁸

123. The fact that a high proportion of those studying A levels go on to higher education lends further weight to the argument that universities should have a greater influence over what young people study at A level. Research suggests that 84% of young people achieving 2 or more A levels go on to higher education before the age of 20.¹⁹⁹ The proportion of high achieving A level students (obtaining grade profiles of AAB or above) who go on to higher education is even higher, at over 90%.²⁰⁰

191 Letter from Michael Gove to Glenys Stacey, 30 March 2012

192 Ev 113

193 Ev w3

194 Ev w196, paragraph 3.7

195 A better approach to Higher Education/Exam Board interaction for post-16 qualifications, A policy paper, Cambridge Assessment, June 2011

196 *Ibid.*

197 Q120

198 Fit for Purpose? The view of the higher education sector, teachers and employers on the suitability of A levels, Ofqual, 2012 and http://www.cambridgeassessment.org.uk/ca/News_Room/Latest_News/News?id=139383

199 Phil Vickers and Bahram Bekhradnia, *Vocational A levels and university entry Is there Parity of Esteem?*, Higher Education Policy Institute,

200 Teaching funding and student number controls, Consultation on changes to be implemented in 2012-13, Higher Education Funding Council for England, 2011

124. There is plenty of evidence to support the Government in seeking to increase the involvement of universities in the design and content of A levels. However, as Glenys Stacey pointed out to us, “the practicalities of that are all in the detail” and “there is a danger in listening to a small cadre of voices in higher education; we need to look at it in the round”.²⁰¹ Ofqual has also emphasized that the full commitment of and support from universities is essential for the new arrangements to work. Indeed the success of the proposals depends upon the capacity and willingness of universities to play a major role. Universities UK has said “this involvement would have clear implications for universities in terms of resources and admissions”.²⁰² We were struck by the finding of Ofqual’s research that:

many HEI interviewees said that they would not have the time to set aside for such activities on top of their academic roles. On several occasions these interviewees suggested that Learned Bodies were best placed to provide the higher education sector view because they knew more about A levels than individual academics.²⁰³

125. Witnesses from higher education expressed concerns to us about securing consensus from universities, given the diversity of views across the sector. Professor Graham Hutchings, Chair of SCORE and Pro-Vice Chancellor at Cardiff University told us “there are at least four groupings. They all have their separate secretariats. Do they speak with one view? No, they do not. Whom you would go to is very difficult”.²⁰⁴ Professor Sir John Holman of the University of York and Senior Fellow for Education at the Wellcome Trust warned that “any kind of system where you try to have a collection of university heads of departments sitting down together and working out A levels would not work, but if you take a body like the Institute of Physics, for example, it has strong links to universities and employers and very good education expertise”.²⁰⁵

126. It was also pointed out to us that performance measures operating in higher education do not incentivise involvement with A levels. Professor Jo-Anne Baird et al cautioned that “systems of accountability in higher education are now a disincentive to academics being involved with examining at secondary level, as this would not contribute to the indicators upon which individuals and institutions are measured in HE”.²⁰⁶

127. Press coverage would suggest that some in higher education have concerns about the Government’s proposals, the speed of their introduction and the prospect of two-tier A levels, as well as a lack of consultation so far. There is a perception that the proposals are

201 Q310

202 Universities UK response to proposals to give universities a larger role in the development of A levels, 3 April 2012

203 Fit for Purpose? The view of the higher education sector, teachers and employers on the suitability of A levels, Ofqual, 2012, p12

204 Q433

205 Q433

206 Ev 181, paragraph 7.5

overly focused on Russell Group universities.²⁰⁷ We can see that it is important to take into account views across the university sector, as universities' requirements of A levels may vary. We think that there is a strong case for increasing the involvement of learned bodies in the design of A levels, as suggested by Ofqual's research, and that this may offer a solution to the limited resource available within higher education. These learned bodies have strong links to universities and employers, as well as very good education expertise. We note, however, that syllabus development requires a blend of subject and assessment expertise, with the latter residing mostly in exam boards. It is therefore essential that exam boards retain ultimate control of question paper and examination design, working with universities and learned bodies on matters of content, and subject to rigorous accreditation by Ofqual.

128. We recommend that the Government and Ofqual seek to increase the involvement of learned bodies as well as universities in the content of A levels, while allowing exam boards to retain control of question papers and examination design to ensure best assessment practice. The Government and Ofqual must also ensure that the *whole* of the university sector is consulted on the proposed A level reforms, as well as schools, colleges, learned bodies and employers.

National subject committees

129. Part of the role envisaged by the Government for higher education in A level reform could well be undertaken by the national subject committees we recommended in chapter five. National subject committees may also help address the issue of limited capacity in higher education to devote to A level changes, as raised in Ofqual's recent report. Ofqual's research suggested that:

the optimal outcome might be for Ofqual (and other regulators) to convene and coordinate the involvement of a representative group of HEIs and other stakeholders in offering substantive input at the criteria stage, and then involve these same people at the review and accreditation stage when it receives specifications from Awarding Organisations. Then the Awarding Organisations would be free to involve other HEIs and stakeholders, not involved in these representative groups, in their own specification designs.²⁰⁸

130. This fits very well with the role we envisage for national subject committees, convened by Ofqual, in terms of their role in syllabus development and accreditation. We recommend that Ofqual involve national subject committees in the development of criteria for and accreditation of new A levels.

207 Interview with Pam Tatlow of Million+ on BBC News, 3 April 2012, "Exam regulator's research backs case for A level reform", *The Independent*, 4 April 2012, "All A levels are equal – but some will be more equal", *The Times Educational Supplement*, 6 April 2012

208 Fit for purpose? The view of the higher education sector, teachers and employers on the suitability of A levels, Ofqual, 2012, p12

Part III: Competition between exam boards

7 Market share and price

131. Rod Bristow, President of Pearson UK, told us that the factors schools take into account when choosing an exam board are “price, service and support [...] typically service and support are what they care most about—the service and support they get in teaching and learning”.²⁰⁹ Later in this chapter we look at the charges paid by schools to exam boards and the competition between exam boards on price. In subsequent chapters we consider how exam boards compete on support, in particular training and textbooks, and finally, certain aspects of service. By competing in these three areas, exam boards seek to maximise their market share. In the first part of this chapter, we therefore examine changes in market share and the reasons for these.

Changes in market share

132. Figures supplied by Ofqual show that overall market share for GCSE and A level has remained relatively stable in recent years.²¹⁰ Glenys Stacey told us that “year on year, you do not see a lot of movement at the highest level, but what is interesting is the churn underneath. We suspect that the movement underneath might be telling us something possibly about standards”.²¹¹

133. Analysis of the inter-board statistics published by the Joint Council for Qualifications (JCQ) confirms the point made to us by exam board chief executives and Ofqual that sharp shifts in market share tend to occur at moments of syllabus revision. We looked at the figures for a sample of large entry A level and GCSE subjects between 2000 and 2010. Interestingly, these indicated that WJEC had increased its market share in GCSE English (from 8% to 22%) and in GCSE Religious Studies short course (from 9% to 18%) over a period without significant syllabus revision. Across all GCSE syllabuses, Edexcel and WJEC increased their market share between 2000 and 2010, broadly at the expense of AQA, which saw its share decrease from 56% to 47%. At A level the changes were less marked, although WJEC doubled its overall market share from 4% to 8% and its A level French gained steadily in popularity from 7% in 2000 to 18% in 2010, with new syllabuses in 2002 and 2010.

134. We found it difficult to get beyond anecdotal explanations of reasons for such changes and to identify whether the changes do say something about standards. The National Association of Headteachers (NAHT) suggested to us that schools do not tend to change syllabuses on a frequent basis, but noted that to the best of its knowledge “there is not a body of evidence that seeks to explain how schools arrive at the judgement that a particular

209 Q234 Rod Bristow

210 See Ev 165-6, figures 2 and 3

211 Q284

specification is right for a particular cohort of pupils”.²¹² The Examination Officers’ Association suggested that “teachers are mostly concerned with what is likely to be the best outcome for students by using a particular awarding body—‘my students will get a better deal if I use X, their marking seems to be much fairer than Y’”.²¹³ The NAHT stated that “the tipping point comes when a perception emerges that the quality issues are compromising the integrity and quality of assessment”.²¹⁴ School leaders and exam board chief executives put it more bluntly, saying that schools switch when they have “had a rotten summer” and are dissatisfied with the marking/grades and the response from the exam board.²¹⁵ AQA’s Andrew Hall acknowledged that the quality of service varied across his organisation and suggested that it was the same for the other boards.²¹⁶

135. Our limited analysis suggests to us that the changes in market share at individual qualification level warrant further regulatory scrutiny, particularly given the absence of independent published research. Ofqual needs to be able to respond publicly and convincingly to questions about changes in market share between exam boards and to confirm whether the changes do say something about standards. This is particularly the case for large entry, commercially significant subjects, such as GCSEs in English, mathematics and the sciences. To do this, Ofqual needs a sound evidence base on which to draw and to monitor changes more closely, investigating why they occur. Ofqual has told us that “a lot of data are provided to us by awarding bodies on switching, for example. We need to be on top of those data and interrogate them, and then talk with schools and understand, in a timely manner, what they are telling us”.²¹⁷ **We are pleased that Ofqual has recognised the need for closer monitoring of changes in market share between exam boards and recommend that it prioritise this work, in order to establish the reasons for changes at individual qualification level and whether there is any link to standards.**

Examination fees

136. Figures from the DfE show large increases in spending on exams by schools in recent years. Expenditure on exam fees increased from £154 million in 2002/3 to over £302 million in 2009/10. This means that spend per maintained secondary school on exam fees increased from £44k to £85k between 2002/3 and 2008/9 and from £47 per pupil to £89 per pupil over the same period.²¹⁸ Ofqual suggests several factors may account for this increase:

- an increase in the number of qualifications taken,
- students moving to qualifications with higher fees,

212 Ev w48, paragraph x

213 Ev w43, paragraph 1.2.9

214 Ev w48 paragraph ix

215 See Q58 Martin Collier and Robert Pritchard, Q509 Mark Dawe and Q514 Andrew Hall

216 Q524 Andrew Hall

217 Q632

218 HC Deb, 10 January 2012, col 83W

- an increase in the number of additional fees such as late fees,
- an increase in the number of re-sits,
- an increase in the level of fees.²¹⁹

Ofqual’s 2012 annual market report shows that increases in average GCSE and A level fees over the last six and four years respectively have been roughly in line with inflation.²²⁰

137. Entry fees for GCSEs and A levels are broadly comparable across the exam boards. This seems to be due largely to the nature of the exams market. Professor Jo-Anne Baird et al explained that rather than an open market the exam boards “operate in a regulated oligopoly, which produces different characteristics. In an oligopoly, firms compete less aggressively on price and the more so the fewer operators in the marketplace”.²²¹

138. Ofqual told us that “one of the things that boards compete on now [...] is price: not only the list price but the deal”.²²² The exam boards provided information in confidence on a range of approaches towards discounting. Ofqual told us that “although fee discounting does take place, such practice is not widespread in schools and colleges”.²²³

139. Teaching unions in particular expressed concern to us about the large amount of public money spent on exams and a lack of transparency about how this is spent. The Association of Teachers and Lecturers (ATL) told us:

the transparency of awarding body operations and their profits is patchy and a weakness in what must be a publicly accountable system—we have found it difficult to find a very clear picture of the big organisations, their subsidiaries, parent organisations, which are limited companies and which are charitable bodies, and the money made across these complex structures.²²⁴

140. In its written submission Ofqual told us that “the current data available do not allow us to make a robust overall judgement on the efficiency of awarding organisations’ costs or cost structures”.²²⁵ It acknowledged, however, that “we need to be able to make this judgement”.²²⁶ In November 2011 Ofqual announced that it will be investigating pricing principles and structures and undertaking work to understand better what is driving costs in the sector and the scope for efficiency as part of its “healthy markets” work.²²⁷ Ministers have indicated that they need reassurance that fees are set at an appropriate level and that the Government would support moves to reduce school expenditure on exams.²²⁸

219 Ofqual annual market report, Ofqual, 2011

220 Ofqual annual market report, Ofqual, 2012

221 Ev 179

222 Q626 Glenys Stacey

223 Ev 197

224 Ev w 112

225 Ev 162

226 *Ibid.*

227 Letter from Glenys Stacey to Nick Gibb, 28 November 2011

228 Letter from Nick Gibb and John Hayes to Glenys Stacey, 29 November 2011 and HC Deb, 10 January 2012, col 83W

Forthcoming changes to GCSEs (the move from modular to linear courses) and tighter restrictions on the number of re-sits should help to reduce costs to schools. Indeed OCR has said that it “is budgeting for a loss over the next few years”.²²⁹

141. There is an undoubted increasing financial burden on schools linked to exam costs and certainly the perception (though not necessarily the evidence) that exam boards are making excessive profits from GCSEs and A levels. The current system of multiple exam boards may not have generated the downward pressure on fees that might be desired. As discussed in chapter three, we heard repeated concerns that organisational reform of the exam system could bring the risk of increased fees, with Ofqual warning that “there is likely to be an increase in pricing” under a franchised system.²³⁰ **The area of pricing is complex and Ofqual studies so far in this area have been limited. This hinders Ofqual from making a robust public critique of the high costs to schools. We agree with the Government that reassurance is needed that fees are set at an appropriate level. Ofqual also needs to demonstrate that overall the charges made to the public purse by the exam system are fair and appropriate. We also stress that any changes to the system, in particular a move to franchising, will need close attention to pricing by Ofqual.**

229 Ev 136, paragraph 29

230 Q590 Glenys Stacey, see also Ev w18 and Ev w112

8 Support: training and textbooks

142. Professor Stephen Ball of the British Academy told us that “the market in examining is part of a much larger market in educational services”.²³¹ Teacher support is a key area of competition between the exam boards and a growth area in terms of their activity (though not necessarily revenue). In this chapter we focus on two key areas of support: training and endorsed textbooks.

Training

143. In December 2011 the Daily Telegraph conducted an investigation that raised questions about the nature of training offered to teachers by exam boards, in particular whether examiners were giving too much information to teachers on likely question areas or topics that might compromise the security and standards of exams. Similar concerns featured in evidence to our inquiry. ACME told us that training sessions “risk being focused on coaching participants on how to pass the examination” and Dr Tony Gardner of the University of Birmingham warned that training “can too easily slip into explaining to teachers how to train students to maximise marks”.²³² Others were more cautious. Professor Sir John of the Wellcome Trust told us that “I don’t think we should say blanket-fashion that dialogue between examiners and teachers is wrong because, at its best, it can be constructive”.²³³ However, he acknowledged that “there is an enormous amount of sailing close to the wind in the way that those with inside information about the examinations use that knowledge, which, frankly, is in an unprofessional way”.²³⁴

144. In its initial report into the Daily Telegraph allegations, Ofqual concluded that “teacher seminars have their place”, but acknowledged that “there is a fine line” and that exam boards “need to make sure that in their seminars, lines are not crossed”.²³⁵ In its final report, Ofqual reached a rather different conclusion: that “there is a real risk that inappropriate information about the future content of secure exams is disclosed. And there is a risk of narrowing the curriculum through sessions on how to teach the specification.” Ofqual concluded that “it is not possible to reduce the risks to an acceptable level, and so seminars relating to particular qualifications should stop”.²³⁶ This decision will take effect from August 2013. Ofqual’s report suggests that information needed by teachers about the structure of a qualification and its assessment should be made readily available to all schools and colleges via the internet.

145. All three exam boards have stated, both in evidence to us and more widely, their commitment to supporting schools in preparing students for examinations. Exam board

231 Q460

232 Ev w83, paragraph 41 and Ev w47 paragraph C8

233 Q415

234 Q414

235 Awarding Organisation Seminars for Teachers, Ofqual, December 2011

236 Exam Board Seminars: Final Report, Ofqual, 2012

chief executives emphasized to us that almost all the information given at training sessions is freely available on their websites, but that some schools prefer “face-to-face” interaction. OCR described Ofqual’s action to end face-to-face seminars as “a rushed decision” and expressed disappointment that Ofqual had not consulted more widely with teachers.²³⁷ AQA and Pearson emphasized that much of their training is already offered as web-based support and that they will expand this approach in future.²³⁸

146. It is important that schools have access to high quality information about qualifications that enables them to prepare their students for assessments. We agree with Ofqual that there are “fairer and safer ways in which information can be shared with teachers”.²³⁹ Indeed, it was pointed out to us that “we have one of the most transparent systems in the world in terms of what we publish”²⁴⁰ and a great deal of information about GCSEs and A levels is already disseminated through examiners’ reports, question papers, mark schemes, syllabuses and associated guidance materials.

147. We had particular concerns about exam boards offering enhanced or tailored support to individual schools or groups of schools in exchange for loyalty to a particular qualification over a specified period of time. We consider that such bespoke training could easily lead to “lines being crossed” and inappropriate information being given to schools. We were pleased to note Ofqual’s finding that “there are particularly high risks where bespoke qualifications training seminars are offered to individual schools”.²⁴¹ Ofqual’s decision to end qualification-specific training rightly extends to these events for individual schools.

148. There is a common perception that, as exam boards often charge for attendance at seminars (between £100 and £200 per delegate according to Ofqual),²⁴² they make a profit on training offered to schools.²⁴³ Income data provided by the exam boards confirmed what senior exam board officials had told us: that exam boards make a loss on training. It is, however, very much part of the package of support used to market qualifications to schools. Clearly, some aspects of this support will need to change in the light of Ofqual’s decision to end exam board seminars relating to specific qualifications.

149. We believe that the exam system has placed examiners involved in training in a difficult position, with fine lines to navigate. While some were able to do this appropriately and successfully, others were not, and neither the exam boards nor Ofqual were monitoring closely enough. **We welcome Ofqual’s decision to end exam board training on specific qualifications. Ofqual needs to monitor the impact of its decision and the**

237 OCR responds to Ofqual announcement on changes to teacher seminars, http://www.ocr.org.uk/news/2012/item_025.aspx

238 AQA responds to Ofqual’s announcement on changes to teacher seminars <http://web.aqa.org.uk/media-centre/news-270412.php> and Pearson’s response to the Ofqual report on exam board seminars <http://www.edexcel.com/Aboutus/press-room/press-releases/Pages/ViewItem.aspx?filter=2582#>

239 Exam Board Seminars: Final Report, Ofqual, 2012

240 Q230 Mark Dawe

241 Exam Board Seminars: Final Report, Ofqual, 2012

242 Exam Boards Seminars: Final Report, Ofqual, 2012

243 See for example, “Head attacks ‘aggressive commercialisation’ of exams”, *Daily Telegraph*, 9 January 2012

activities and materials produced by exam boards to replace their seminars. We also recommend that Ofqual monitor other training offered by exam boards, such as marketing events to promote new syllabuses, and more general training, for example on improving results, taking further action if needed. Ofqual must ensure that a school's loyalty to a particular exam board cannot be rewarded with access to information not available to others.

Textbooks

150. Many of the concerns about training also exist with regard to exam board endorsed textbooks, frequently written by senior examiners. Textbooks emerged as an area of particular contention in our inquiry. The Government has said that it has “serious concerns” about the links between exam boards and textbooks.²⁴⁴ The DfE itself identified the key issues raised in submissions to us. These are:

- examiner authorship
- the impact on competition in the publishing market (exclusive endorsements and the close alignment of exams and publishing at Pearson)
- the branding and marketing of endorsed textbooks
- the variable quality of endorsed textbooks and their narrowing impact on teaching and learning

151. As with training, income data provided by the exam boards show that exam boards make very little money from endorsed textbooks, but such books are used to help market qualifications to schools. Pearson told us that “we publish teaching resources as part of an integrated support package which is closely linked to our GCSE and GCE specification from Edexcel”.²⁴⁵ AQA stated that “endorsement acts as a kite-mark; quality assurance ensures the text accurately interprets the specification and assessment arrangements” and OCR aims for “a strong and varied range of support materials” for all its qualifications.²⁴⁶ According to AQA, having endorsed resources “helps restrain the most misleading market provision”.²⁴⁷

Examiner authorship

152. The predominant pattern in recent years has been for exam board endorsed textbooks to be written by senior examiners. AQA told us that “examiners are leading subject experts and usually practising teachers, so are well-placed to act as authors”.²⁴⁸ On the other hand, others argued that “the skills involved in being an effective examiner are not the same as

244 Letter from Nick Gibb and John Hayes to Glenys Stacey, 29 November 2011

245 Ev 122

246 Ev 113 and Ev 133

247 Ev 118

248 Ev 118, paragraph 8.4

those needed to devise good curriculum materials”.²⁴⁹ Many have also suggested that examiner authorship leads to a potential or actual conflict of interest for examiners when writing textbooks in a subject where they are responsible for setting and maintaining national standards in exams. One examiner told the Committee that “a conflict of interest is not inevitable, but if the boundaries are ignored, then it would be”.²⁵⁰ Others have taken a stronger line, describing examiner authorship as “insider dealing”²⁵¹ and have suggested that examiners “should not be compromised by gaining financially from endorsing textbooks”.²⁵²

153. All three exam boards place contractual restrictions on their examiners, which prohibit them from disclosing their exam board affiliation when writing textbooks. In 2011 Pearson introduced a new code of conduct for examiners, preventing them from being the main author of textbooks linked to syllabuses for which they set question papers. Rod Bristow told us that Pearson had introduced the change because the situation “was putting examiners in quite a difficult position”.²⁵³ For the same reason, Edexcel examiners are no longer allowed to be directly involved in the training of students (but may still train teachers). Pearson is also “piloting approaches to prevent examiners from having any involvement in writing any resources for courses they examine”.²⁵⁴ Mark Dawe of OCR told us that if trust in examiners and in the system as a whole is evaporating then

it may be that we are reaching the point where anyone who has seen a question relating to the future cannot be involved in seminars or books, because they have that question in their head [...] but if the sacrifice we have to make is to put some of those things in place to regain the public’s trust, that is what we are going to do.²⁵⁵

154. While we can see that there are strong arguments for senior examiners being well placed to write textbooks, **we are concerned that there is a potential conflict of interest for examiners involved in question paper setting also writing textbooks that are linked closely to the same syllabus. We welcome indications that exam boards may place tighter restrictions on the role of examiners in textbook authorship. We recommend that Ofqual make clear the expected future role of examiners in textbook authorship, in order to ensure a consistent industry-wide approach.**

Endorsement arrangements and their impact on competition

155. Links between publishers and the three English exam boards take several forms. Textbooks linked to Edexcel exams are either published by Pearson (the *Edexcel Own* range) or are produced by other publishers, such as Oxford University Press (OUP) or

249 Ev w3, see also Ev 184 and Ev w35 Roger Porkess

250 Questionnaire completed by examiner

251 Mick Waters, quoted in “System of exam boards ‘corrupt and diseased’”, *The Independent*, 17 September 2010

252 Ev w61

253 Q554

254 Ev 126

255 Q564

Hodder Education, and then endorsed by Edexcel. AQA had until recently an exclusive partnership with Nelson Thornes, and OCR has formal partnerships with three publishers as well as endorsing books by other publishers.

156. Two of these arrangements were brought to our attention in particular, by representatives in both education and publishing, with the suggestion that they had a negative impact on competition in the publishing market and may ultimately risk reducing the range of resources available to schools. One was the exclusive endorsement arrangement between AQA and Nelson Thornes; the other was the close alignment of publishing and exams at Pearson. AQA’s arrangement with Nelson Thornes has now ended.²⁵⁶ Although we appreciate that there were sound reasons for AQA’s exclusive endorsement arrangement with Nelson Thornes when it was agreed (securing resources to support a wide range of syllabuses), we agree that exclusive endorsement arrangements risk limiting the range of resources available to schools. **We recommend that Ofqual consider restricting exclusive endorsement arrangements between exam boards and publishers in future.**

157. Kate Harris, Managing Director of the Education and Children’s Division at OUP was critical of the close alignment of publishing and exams at Pearson and called for “guaranteed actual or perceived independence between those setting and marking exams and defining specification, and those who are publishing resources for them”.²⁵⁷ Pearson told us that “we have very strict firewalls between the people involved in textbooks and in the actual examinations” and that “there is no chance of anything that is going on in any publishing activity leaking back or influencing what is in the question papers”.²⁵⁸ However, OUP pointed out that “in terms of the spec development, there are very close links [...] the specification development bit is very integrated with the publishing”.²⁵⁹ Glenys Stacey of Ofqual told us that “for the moment, awarding bodies are required to have conflict-of-interest procedures in place. They need to confirm with us by May 2012 that they have those [...] we will be crawling all over them.” However, she acknowledged that “there is more work for us to do to get to the detail of this”.²⁶⁰ **Ofqual needs to be satisfied that Pearson has sufficient firewalls in place to ensure that its publishing and examining activities are separate, including syllabus development, and to say so publicly.**

Branding and marketing of endorsed textbooks

158. Exam boards and publishers supplied us with a sample of endorsed textbooks, as well as further examples of textbook covers. We supplemented this with a further sample of textbook covers drawn from our own research. We are concerned that describing a book as “all you need for your course” or saying that a textbook ensures students study topics “to the appropriate level of depth required by the specification” and helps students “to obtain

256 See Ev 119

257 Q469

258 Q481 Jacob Pienaar and Q554 Rod Bristow

259 Q483 Kate Harris

260 Q636

the best grade they can” may encourage a narrow approach to teaching and learning.²⁶¹ We saw examples of all these practices and they serve to reinforce the point made to us by the Wellcome Trust that “textbooks have increasingly become ‘examination guides’ instead of providing broad and deep knowledge. The endorsement of textbooks by awarding bodies exacerbates this problem by promoting teaching to the test”.²⁶² **We have serious misgivings about the language used to market some endorsed textbooks and would urge exam boards and publishers to move away from marketing textbooks in this way.**

159. We were shown and also found examples of very similar branding of Edexcel syllabuses and *Edexcel Own* textbooks published by Pearson, with the same logos and cover designs. Competitors in the publishing industry suggested that this gives the impression of “official” resources.²⁶³ Pearson told us that it works “very hard to ensure a choice of books for teachers”, through endorsing textbooks from other publishers.²⁶⁴ Kate Harris of OUP also suggested to us that Pearson is not even-handed in the presentation of its own and other endorsed resources on the Edexcel website.²⁶⁵ We found that the links to resources from the GCSE and A level qualification pages lead to *Edexcel Own* resources only. We were able to locate information about endorsed resources from other publishers using a different route, but *not* from the qualification pages where teachers will tend to look to find information about the syllabus they are using.²⁶⁶ **We welcome Pearson’s statement that it is moving away from a shared design between Edexcel syllabus materials and Pearson textbooks, as we agree that this can unhelpfully overstate the link between the two. Pearson should give even-handed treatment to *Edexcel Own* and endorsed resources from other publishers on the Edexcel website.**

Quality of endorsed textbooks and their impact on teaching and learning

160. Many submissions suggested that the quality of endorsed textbooks is variable and that they lead to a narrowing of teaching and learning by focusing on the exam syllabus. One examiner told us “as general texts these books are woeful: as guides to passing the exam they are very useful”.²⁶⁷ Headteacher Martin Collier (himself a textbook author) observed that textbooks “are rushed into production and can be of indifferent quality,” while university lecturer Dr Tony Gardner stated that endorsed textbooks “give students little incentive or opportunity to engage with broader and richer material, and fail to foster an appreciation of the subject’s subtleties”.²⁶⁸ Examiner authors told us of pressure from publishers to limit coverage to what is in the syllabus.²⁶⁹

261 GCSE Geography, Edexcel B, OUP, Edexcel Business for GCSE Building a Business, Hodder Education and Edexcel Government and Politics for A2 Ideologies, Hodder Education

262 Ev 132

263 Ev 188 and Q465 Kate Harris

264 Ev 169

265 Supplementary evidence submitted by OUP [not printed]

266 For example, GCSE Business, <http://www.edexcel.com/quals/gcse/gcse09/Business/Business/Pages/default.aspx>, or A level Geography, <http://www.edexcel.com/quals/gce/gce08/geography/Pages/default.aspx> accessed on 16 May 2012

267 Questionnaire completed by examiner

268 Ev 112, paragraph 8 and Ev w47, paragraph C2

269 Seminar held with examiners on 14 December 2011, see annex 1

161. The issues relating to textbooks have led some, such as the Wellcome Trust and several mathematics subject associations, to call for an end to exam board endorsement arrangements, as recommended in the 2010 Walport report.²⁷⁰ School and college leaders also recommended to us a separation of textbooks from the examining function.²⁷¹ Evidence from examiners (many of whom were practising teachers) was more mixed, with some arguing that endorsed textbooks are a useful resource and that endorsement acts as a quality kite-mark.

162. By contrast, Pearson and Cambridge Assessment's Tim Oates drew attention to international research, which demonstrates that systems which have radically improved their performance use high quality resources (often approved textbooks) which are closely aligned to the curriculum and to assessments. Tim Oates warned that in the light of this evidence, "it would be a terrible error, in England, to diminish the linkage between textbooks, curriculum and assessment without ensuring that the form of the linkage is optimized".²⁷² He acknowledged that "we currently have the wrong sort of linkage between textbooks and examinations" but concludes that this "does not mean that there should no link".²⁷³ In common with other submissions, Tim Oates pointed to School Mathematics Project (SMP) and Nuffield Science curriculum projects, which "were predicated on a very close link between learning materials and examinations", but crucially the linked materials "did not encourage restrictive teaching".²⁷⁴ ACME told us that the "high quality is due to the books growing out of a vision of a course which is itself the result of a deeply considered curriculum and qualifications development programme".²⁷⁵

163. Tim Oates suggested that evidence presented to us highlights "the extent to which narrow instrumentalism has pervaded the whole education system—textbooks and exams have not been immune to this insidious tendency".²⁷⁶ Mr Oates believes that the "linkage which we now have between textbooks and examinations is most likely a symptom of a deeper structural trend in the system." He argues that "publishers are highly sensitive to market demands. The narrow 'guide to the examination' is produced by them because this is precisely what an accountability-trammelled profession asks for".²⁷⁷

164. We agree with Tim Oates and others²⁷⁸ that the criticisms of endorsed textbooks must be seen in the context of the accountability system and the pressures on teachers and schools to focus on exam preparation, in order to achieve the best possible results in exams. Clearly the situation will vary: some endorsed textbooks will provide enrichment and extension beyond the related syllabus and confident teachers with secure subject

270 See Ev 128, Ev w78, Ev w18, Ev w61, Ev w58, Ev w15 and Science and Mathematics Secondary Education for the 21st Century, Science and Learning Expert Group, 2010

271 Q101 and Q102, Teresa Kelly, Robert Pritchard and David Burton

272 Ev 148

273 *Ibid.*

274 See also Ev w20, Ev w35, Ev w61, Ev w78

275 Ev w83, paragraph 40

276 Ev 149

277 Ev 150

278 See Ev w8, Ev 184, Warwick Mansell, Education By Numbers, Politico's, 2007

knowledge will not over-rely on a textbook, endorsed or otherwise. We believe that exam board endorsement is not necessarily the major factor driving the production of narrow text books.

Conclusion

165. Overall the evidence suggests that the current system of exam board endorsed textbooks written by senior examiners is not leading to high quality textbooks that enhance teaching and learning. We suspect that this situation results from a complex interaction between endorsement arrangements, examiner authorship and competition between the exam boards, laced heavily with pressures exerted by the accountability system—a heady cocktail indeed. As a member of the Society of Authors put it:

the specification is written, the textbook written by the examiners meets only the specification, and the teaching is restricted to the textbook. It is a circle that is difficult to break and destroys innovation, creativity and good teaching and learning.²⁷⁹

166. We feel that this circle does need to be broken. It is vital that schools are provided with a choice of high quality textbooks, which are not merely “examination guides”, and that the system should work to provide this. Few would disagree with Tim Oates that “textbooks should help the delivery of a high quality curriculum.” The link to the curriculum is, we believe, crucial. The examples cited by Tim Oates and some learned bodies were of textbooks linked to curriculum as well as assessment. The evidence presented to us suggests that problems have occurred because endorsed textbooks have been linked too heavily to assessment, becoming ‘examination guides’, instead of extending and enriching young people’s curriculum experience: a classic case of the assessment tail wagging the curriculum dog. Amanda Spielman, Chair of Ofqual, described the “symbiotic relationship” between curriculum and assessment.²⁸⁰ We would suggest that in the case of endorsed textbooks the relationship is no longer symbiotic as these textbooks are working to the advantage of assessment but to the detriment of curriculum.

167. We have considered whether to recommend a restriction on exam board endorsement of textbooks. We believe, however, that such action would not solve the problem, as it is related to a wider issue, namely the pervasive impact of the accountability system on teaching and learning. Under pressure to achieve results, teachers will continue to want textbooks closely linked to assessment in order to prepare their students as effectively as possible for their exams. Publishers will continue to respond to demand and produce such textbooks, with or without exam board endorsements. **In order to strengthen the links between textbooks and the curriculum, as well as assessment, we recommend that in future A level textbooks be endorsed by the universities involved in developing a particular syllabus rather than by the exam board. At GCSE much will depend on the outcomes of the National Curriculum review and the ensuing reforms to**

279 Ev 185

280 Q595

GCSE, but a possible way forward might involve learned bodies endorsing textbooks instead of exam boards.

Ofqual’s regulation of exam board support

168. Our system of multiple exam boards competing for market share may have made the issues concerning textbooks and training more acute. That said, many of the issues would remain, however the exam system were organised. Pressures from the accountability system would continue to exert an influence over the type of training and textbooks that teachers feel they need to prepare their students to succeed. Decisions would still need to be taken on the role examiners should play in training and how much they should be involved in writing textbooks.; and on whether and how exam boards should endorse textbooks and how such books should be marketed to schools. We believe that the answer to much of this lies in robust regulation. It is an area where a stronger Ofqual could and should make a significant impact.

169. Ofqual announced a focus on training and textbooks in late 2011 as part of its work on healthy markets. It has acknowledged that “in the past the market has not been regulated tightly enough”.²⁸¹ **We agree with Ofqual that the market has not been regulated tightly enough with regard to training and textbooks and we believe that this has allowed conflicts of interest to arise. Ofqual’s healthy markets work is welcome, if overdue, as it is clear that many of the issues raised with us have gone unchecked for some time. We welcome Ofqual’s recent report on exam board seminars and look forward to its publication of an action plan relating to textbooks and study aids in September 2012. Proper regulatory control and scrutiny of these issues will help to increase public confidence in the exam system.**

170. There is an underlying assumption behind much of the support offered by exam boards to teachers that they have a role to play in helping schools to improve their performance and to raise standards. Pearson described in its written evidence how it helps teachers to “use data to enhance attainment” through its free ResultsPlus service, thereby “driving systematic improvements to teaching and learning”.²⁸² The Welsh exam board, WJEC, has said that its training “is designed to provide feedback on previous exams and advice to teachers on best practice, with the aim of raising teaching standards and allowing all students to achieve their full potential”.²⁸³ We believe that there is a legitimate question about the appropriate role of exam boards and how much this should extend beyond the impartial assessment of attainment. **We recommend that Ofqual, as part of its healthy markets work, take a clear view on the broader question about how much exam boards should be involved in helping to improve results as well as in the impartial assessment of attainment.**

281 Ev 168

282 Ev 120

283 <http://www.wjec.co.uk/index.php?nav=14&news=189>

9 Service: question papers and marking

171. The quality of service offered by exam boards is a broad area, extending to logistical elements of service delivery and the administration of exams in schools. We have focused on three areas of service that featured most prominently in evidence to us: question paper errors, marking reliability and online standardisation.

Question paper errors in summer 2011

172. Public confidence in the exam system was shaken by 12 errors on GCSE and A level question papers in summer 2011. Ofqual’s investigation into the errors exposed issues relating to exam boards’ question paper setting procedures and checks—an area of the system largely untouched by recent innovation. Examiners told us of how the system relies very heavily on a few key people. This was confirmed by the Ofqual report, which concluded that, unlike marking, question paper setting procedures have “remained virtually unchanged for years, if not decades” and recommended that exam boards “look afresh at the process”.²⁸⁴ Ofqual’s report made no suggestion that exam boards were cutting corners as a result of competition or that having multiple exam boards contributed to the errors in summer 2011. Indeed, the impact of the errors was reduced by having multiple exam boards, as fewer candidates were affected by each error. **We welcome the findings of Ofqual’s investigation into the errors in summer 2011. It is vital that Ofqual acts swiftly and robustly (including, where appropriate, using its power to fine) in the event of errors in order to protect the integrity of the system and the interests of young people.**

Reliability of marking

173. Exam boards told us that the quality and reliability of marking have improved in recent years. Online marking is generally credited with improving the reliability of marking and there is research evidence to support this.²⁸⁵ It has also helped to improve examiner standardisation and monitoring and quality assurance procedures associated with the marking process.

174. Yet, as the exam boards and assessment researchers acknowledge, concerns persist among teachers and the general public about the reliability of marking.²⁸⁶ Ofqual’s most recent public perceptions survey found a negative shift in the opinion of teachers towards the reliability of GCSE grading, with fewer teachers reporting that their students achieved the right grade (77% compared to 86% the previous year) and more teachers saying that about a quarter of their pupils got the wrong grade (20% up from 11%). The most commonly reported concern among teachers about the A level system was incorrect

284 Inquiry into examination errors summer 2011 final report, Ofqual, 2011

285 Ev 193, paragraph 3.3 and Ev 116, paragraph 6.5 cite the following research: Fowles, D.(2005). Literature review on effects on assessment of e-marking. AQA Internal Report. Pinot de Moira, A. (2009). Marking reliability & mark tolerances: Deriving business rules for the CMI+ marking of long answer questions, AQA report. Taylor, R. (2007). The impact of e-marking on enquiries after results. AQA Internal Report. Whitehouse, C.(2010). Reliability of on-screen marking of essays. AQA report.

286 Ev 116, paragraph 6.1, Ev 193, paragraph 3.2

marking and grading.²⁸⁷ Barnaby Lenon, Chairman of the Independent Schools Council (ISC) and recently appointed to the Board of Ofqual, voiced his concerns publicly earlier this year, saying that independent schools are “anxious that there should be greater consistency between and within boards in relation to marking and grading.”²⁸⁸

175. Enquiries about results and the number of resulting grade changes have increased in recent years.²⁸⁹ In 2011, enquiries about results were up 38% on the previous year and the number of grade changes increased by 11%. Grade changes represented 0.45% of the total GCSE awards made and 0.48% of the total A level awards. This was a “statistically significant” increase in the number of grade changes at GCSE on the previous year.²⁹⁰ The increase may be linked to the introduction of new GCSEs in summer 2011—an illustration of the destabilising impact of change on the system. According to Ofqual’s latest perceptions survey, 42 per cent of teachers said that they had to rely on challenging initial results (enquiries about results services) to get accurate results for their students.²⁹¹ On the other hand, researchers at AQA’s CERP suggest that “the trend of increased enquiries about results reflects not a reduction in marking reliability, but an increase in the high-stakes nature of general qualifications”.²⁹²

176. Ofqual has acknowledged that marking is an area that is “significantly undermining confidence”.²⁹³ It has recently announced a programme of work to review current arrangements for the marking of GCSEs and A levels.²⁹⁴ Glenys Stacey suggested to us that there may be issues not so much with marking processes but with the way schools are treated by exam boards when questioning marking or grades. AQA’s Andrew Hall acknowledged this, saying “ideally I would love the quality of service to be the same between each of our subjects [...] hand on heart we are better in some parts of our organisation than others [...] I think others would be the same”.²⁹⁵ School leaders also complained about this aspect of the process, with headteacher Robert Pritchard telling us that “the response is slow and the machine is so big”.²⁹⁶ Ofqual has said that it “will be working with awarding bodies to agree a common approach to the service that anyone would expect when they raise a concern about marking. We wish to promote a much greater consistency and transparency about that”.²⁹⁷

177. Public confidence in the exam system is undermined significantly by recurring crises, such as the summer 2011 errors, and by allegations of improper conduct by exam boards in

287 Perceptions of A levels , GCSEs and other qualifications: Wave 10, Ofqual 2012

288 “Top private schools head support multiple choice tests, insisting they are harder than short written questions”, *Daily Mail*, 2 January 2012

289 Statistical Bulletin, Enquiries About Results for GCSE and GCE: Summer 2011 Examination Series, Ofqual, 2011

290 *Ibid.*

291 Perceptions of A levels , GCSEs and other qualifications: Wave 10, Ofqual 2012

292 Ev 193, paragraph 3.2

293 Q300 and Q305 Glenys Stacey

294 Ofqual Corporate Plan 2012–15, p9 and p15

295 Q524

296 Q61 Robert Pritchard

297 Q305

relation to marking and grading. A recent example is the allegation that one exam board failed to investigate the full extent of errors in the calculation of candidates' marks in the summer 2011 exams, potentially leading to candidates' being awarded the wrong grades.²⁹⁸ Society places considerable trust in the ability of exam boards to ensure that results achieved by young people are an accurate and fair reflection of their attainment. **Ofqual must investigate allegations of improper conduct by exam boards thoroughly, taking vigorous action if necessary, to ensure that candidates are awarded the grades they deserve and to protect the integrity of the exam system.**

178. We recognise that some gap between exam boards' view of the reliability of marking and the public perception is inevitable and we accept Andrew Hall's point that examinations have become increasingly high stakes and so there is more challenge.²⁹⁹ We also note the point made to us by Dr Tony Gardner that "examining is a craft rather than a science: examination results are never wholly reliable".³⁰⁰ OCR stated that "there is a philosophical point about how far we seek to design papers which elicit absolute reliability from examiners [...] mechanistic assessment may be accurate but it does not encourage deep learning".³⁰¹ Assessment researchers point out that absolute marking reliability would only be achievable using multiple choice tests, but this would limit the assessment of the full range of knowledge and skills required at GCSE and A level (for example, essay writing skills).³⁰² A degree of marking unreliability is therefore the price to be paid, although this is not necessarily politically or publicly very palatable. **We welcome Ofqual's work to agree a common approach across exam boards to deal with concerns about marking and to ensure students are treated fairly across the system.**

Online standardisation

179. The most consistent message that emerged from our consultation with examiners was a dislike of online standardisation, whereby examiners' marking is standardised at the beginning of the marking process via an online session rather than a face-to-face meeting.³⁰³ The objection seemed particularly strong in essay-based subjects, where there is more room for interpretation of the mark scheme and examiners felt that the opportunity for face-to-face discussion was especially valuable. The issue was also raised by examiners who submitted formal written evidence, with examiner Richard Nixon telling us "having done all three types available to examiners in the last 18 months the former two (chatroom/online and online only) saves Edexcel lots of money in teacher release fees, travel costs and hotel bookings but not sure that it is the best way to prepare examiners for marking papers".³⁰⁴

298 <http://www.channel4.com/news/exams-whistleblower-thousands-of-papers-could-be-wrong> (Sunday 20 May 2012) and <http://www.channel4.com/news/whistleblower-suspended-for-revealing-exam-mark-mistakes> (Thursday 17 May 2012); see also Ev w51 (David Leitch)

299 Q549

300 Ev w47, see also Ev w38, paragraph 8 and Ev w59, paragraph 6

301 Ev 134, paragraph 12

302 Ev 194, paragraph 4.1

303 See annexes 1 and 2

304 Ev w119, see also Ev w84, Ev w116, paragraph 10

180. AQA’s Andrew Hall defended online standardisation, saying that “the research evidence is absolutely clear that this makes for better quality of marking [...] and the students getting the right results”.³⁰⁵ We looked at the research cited by the exam boards, which involved GCSE History examiners.³⁰⁶ The study that found “online standardisation was as effective as face-to-face standardisation” with examiners demonstrating “a similar level of accuracy and consistency in their marking post-training”.³⁰⁷ The researchers commented that “gaining the acceptance of the users of new systems can be the most challenging aspect of innovation” and that “some examiners were concerned about a potential loss of their community of practice”.³⁰⁸

181. We accept that there is some research evidence to show that online standardisation is as effective as (but, if our reading of the research is correct, not necessarily *more* effective than) face-to-face standardisation. We can also see that it brings other benefits, such as reduced costs, an accelerated marking process and real-time monitoring of marking. We believe, however, that exam boards should continue to monitor the effectiveness of online standardisation and should consider offering opportunities for face-to-face discussion between examiners.

305 Q548

306 Chamberlain, S and Taylor, R. Online or face-to-face? An experimental study of examiner training in *British Journal of Educational Technology*, volume 42 no4 2011, pp665-675

307 *Ibid.*

308 *Ibid.*

Part IV: Wider issues

10 Exams and school accountability

182. Glenys Stacey said in a recent speech that “we ask a lot of final examinations” and that “some of society’s demands on qualifications are contradictory and some can, we know, create a backwash [...] effect”.³⁰⁹ Many of the problems identified with the exam system are very closely linked to the pressures generated by the accountability system. The pervasive impact of the accountability system can be felt in endorsed textbooks, exam board training and arguments around the reasons for grade inflation. The Association of Teachers and Lecturers (ATL) stressed that, when considering the exam system, it is important to take account of the broader educational picture, arguing that

the pressures of a high-stakes accountability atmosphere, coupled with the overly-commercial behaviour of awarding bodies lead to perverse but perfectly rational decision-making by teachers which threatens to undermine the quality of education offered to young people.³¹⁰

183. The Daily Telegraph suggested in December 2011 that exam boards are conniving in a “gaming” of the system, by offering training and support to teachers that may encourage teaching to the test. Schools thereby improve their results and performance against government accountability measures, while exam boards retain their market share. As SCORE put it, “the current system, in which a school’s performance is measured mainly by the raw grades of its students, encourages them [schools] to connive in a broken market”.³¹¹ Warwick Mansell observed that

because all the actors in this complex system are accountable, directly or indirectly, for raising numbers, they also have a vested interest in this happening. And no-one has an interest in looking seriously at any side-effects of a decision which could help raise the scores.³¹²

184. In this chapter we consider the interaction between the exam system and accountability measures, in particular the issue of early and multiple entries to GCSEs and the wider question of whether exam results are the best way to measure national standards of attainment as well the performance of individual students and schools.

The burden of assessment

185. The Association of School and College Leaders (ASCL) told us that “the main problem facing our examination system is one of overload. Young people in England in

309 A new look at standards, Glenys Stacey to Ofqual standards summit, 13 October 2011

310 Ev w112

311 Ev 155, paragraph 7

312 Warwick Mansell, *Education by Numbers*, Politico’s, 2007, p181

this age group take more external assessments than in any other country.” This means that “young people are losing valuable learning time [...] by being faced with so many examinations”.³¹³ We can see that, however well-intended, modularisation of GCSEs and A levels and increased opportunities for re-sits have increased the burden of assessment on young people. The Government is introducing changes that will reduce the number of exams, returning to end-of-course assessment at GCSE and limiting re-sit opportunities and we welcome these moves. **We have seen no evidence to suggest that having competing exam boards has contributed to the burden of assessment. The number of exams taken by young people is linked to Government policy and to decisions made by schools responding to pressures from the accountability system.** We doubt that changes to the way the system is administered will impact greatly on this area.

Early and multiple entries to GCSE examinations

186. Early and multiple entry to GCSE examinations, particularly in mathematics and English, provide an illustration of the interaction between the exam system and the accountability system and how this may not always be in the best interests of young people. Early entry is when a student is entered for a GCSE at the end of year 10 or part way through year 11. Multiple entry is when a student is entered for the same GCSE with more than one exam board, with the aim of maximising his or her grade.

187. A DfE report on early entry to GCSE examinations found that “whilst there has been a long history of this practice for the highest achieving pupils, the trend is increasing for pupils of all abilities. For many, this can be detrimental to their overall performance”.³¹⁴ According to ACME, early entry to GCSE Mathematics is particularly common in National Challenge schools. These schools are often under the most pressure to improve their results. ACME concluded in a report last year that:

the practice of early entry has a negative effect on most students’ mathematical education, hindering their progression to a wide range of subjects post-16 and in Higher Education. It is an unfortunate example of how league tables and National Challenge status can encourage school leaders to put the interests of the school above those of the students themselves.³¹⁵

The Secretary of State for Education has written recently to Sir Michael Wilshaw, Her Majesty’s Chief Inspector, seeking advice on “what more Ofsted and the Department [of Education] can do to ensure that early entry does not impact negatively on pupils achieving their full potential”.³¹⁶

188. We suggest that a focus on multiple entry is also necessary. Multiple entry illustrates how the accountability system encourages schools to use the exam system to improve their league table performance, in a way that may benefit schools and exam boards

313 Ev w9, paragraph 3

314 Early Entry to GCSE examinations, DfE, 2011

315 Early and Multiple Entry to GCSE Mathematics, ACME, 2011

316 Letter from Michael Gove to Sir Michael Wilshaw, 5 March 2012

commercially, but may not necessarily be in the best interests of young people. As ACME noted, “artificial improvement of GCSE pass rates through multiple entry is a poor use of public money and does nothing to improve the true educational standards of any school”.³¹⁷ Ofqual does not currently collect data on multiple entries, as it says there are significant logistical difficulties involved in doing this. Ofqual told us, however, that they “suspect the cost and practical issues mean that the number is tiny”.³¹⁸ **We recommend that the Government ask Ofqual to gather data from the exam boards to enable it to identify the extent of multiple entry and then offer advice on whether, and what, action is needed to limit the practice.**

Wider changes

189. Changes to early and multiple entries would, however, only deal with side-effects of the accountability system. There is a need to address the core problem. As a teacher in a National Challenge schools suggested, “banning multiple entry wouldn’t tackle the cause of the problem here, which is the focus on arbitrary performance targets that don’t take account of value added”.³¹⁹ We believe that there is a genuine question as to what extent reform of the exam system and strengthened regulation would solve the problems identified in our report, without significant changes to the accountability system that drives much behaviour in schools. This is linked to the multiple purposes served by A levels and in particular GCSEs, namely certifying achievement, ranking students and holding teachers, schools and government to account, as well as preparing young people for the next stage of education or employment. The 2010 Sir Richard Sykes review was critical of the “implicit and damaging assumption [...] that all examinations and tests can and should be used for all these purposes”.³²⁰ Ministers are explicit about these multiple purposes and, on occasions, about the unintended consequences and “gaming” of the system. Michael Gove referred in a recent speech to GCSEs and A levels having a sorting function, a preparation function and an accountability function.³²¹ The Schools Minister told us that “the secondary purpose—but an important purpose—[of GCSEs and A levels] is as an accountability measure for the schools where those qualifications are taken”.³²² While Mr Gibb indicated that Ministers “are definitely open” to issues concerning the accountability system, he made it clear that the Government is committed to having “rigorous external accountability measures”.³²³

190. Warwick Mansell has argued that “the exams system cannot perform the function that politicians demand of it”,³²⁴ namely, to provide a reliable indicator of whether standards

317 Early and Multiple Entry to GCSE Mathematics, ACME, 2011

318 Ev 170

319 Ev w84

320 The Sir Richard Sykes review, March 2010

321 Michael Gove speech to Ofqual standards summit, 13 October 2011

322 Q642; the primary purpose identified by Mr Gibb was certification of achievement

323 Q642 and Q643

324 Warwick Mansell, *Education By Numbers*, Politico’s, 2011, p178

are improving at national level as well as being used to judge the performance of individual schools. He suggested to us that:

if you wanted national accountability in terms of actually finding out what is going on with education, you would not do it through the current system. You might have a system more akin to PISA, where children are set tests that do not change particularly over the years. There is nothing high stakes about the system, so you can retain question between years. You could do it in a broader, more in-depth way than PISA by looking at a much broader range of subjects and getting much better information than you get from the system at the moment.³²⁵

Crucially, schools would not be held accountable against such a measure, thereby breaking the link between the test and accountability.

191. Our predecessor Committee, in a report on Testing and Assessment, recommended that school accountability should be separated from the system of pupil testing and that the purpose of national monitoring of the education system would be best served by sample testing.³²⁶ While the intricacies of sample testing are beyond the scope of this inquiry, we can see merit in the idea of sample testing as a way of gauging information on standards, where neither individual pupils nor schools are being judged on the outcome. Similarly the assessment of school performance should be less dependent upon raw GCSE results. Professor Stephen Ball of the British Academy told us that “the amount of ingenuity, effort, resources, time and energy that are being put into getting more students across the C/D boundary is stunning [...] there is a systematic effect of concentrating attention on some students”.³²⁷

192. Young people’s educational experience from age 14 onwards is dominated by the qualifications they study. Altain Education, an educational consultancy, suggested to us that “examinations and exam boards have perhaps unwittingly come to occupy too much of the centre stage”.³²⁸ We are concerned that the exam system is struggling to bear the weight of pressures exerted by the accountability system. Glenys Stacey of Ofqual has told us that Ofqual is keen to discuss with Government the “ways in which we can mitigate those pressures.” She added that “it is not so much an issue between Ofqual and the awarding bodies as between Ofqual, Government and those other players in a wider system”.³²⁹ As Warwick Mansell told us, by judging teachers and schools on GCSE results, as well as students, the “reaction to that is that they seek to take more control over that process; they guide closely towards exams, particular exams and content of exams. They are strategic about who they enter for exams”.³³⁰ **The Government should not underestimate the extent to which the accountability system incentivises schools to act**

325 Q422

326 *Testing and Assessment*, Third Report from the Children, Schools and Families Committee, Session 2007-08, HC 169-I, paragraphs 185 and 186

327 Q412

328 Ev w128

329 Q581

330 Q437 Warwick Mansell

in certain ways with regard to exams. Sometimes these may be in students' interests; sometimes, however, they are not. We recommend that the Government look afresh at current accountability measures, with a view to reducing the dominant influence of the measure of 5 GCSE A*–C or equivalent including English and mathematics and to increasing the credit given to schools for the progress made by all children across the ability range.

Part V: Conclusion and recommendations

11 Conclusion

193. From our detailed study of the examination system in England, we have come to the conclusion that competition between the exam boards for market share, combined with the influence of the accountability system, leads to significant downward pressure on standards. Ofqual is taking action to address competition on grading standards and grade inflation. But current incentives in the system encourage the exam boards to compete for schools' business by having the most "accessible" syllabus. Schools buy into the syllabus that will help them achieve the best results. This perpetuates a "race to the bottom" on content. It is essential that the Government takes action to change these damaging incentives.

194. There are several ways of addressing this situation, all of which we have examined carefully. A single exam board is the obvious option, but this has significant downsides. Franchising subjects to exam boards is another alternative, but this too has significant downsides. We therefore support piloting a change to national syllabuses, which would remove the incentive for exam boards to compete on content and the associated downward pressure on standards, while retaining the benefits of competition on quality of service and the incentive to innovate. We stress that this is not an argument against multiple syllabuses in a subject: there could be more than one national syllabus in a subject, to provide choice to schools.

195. National syllabuses, coupled with a strengthened Ofqual and the introduction of national subject committees, should help to maximise the benefits of multiple exam boards while minimising the downsides and avoiding the cost, risk and disruption involved in major structural reform. However, as with all options for reform of exam administration, they can have only limited impact while the school accountability system continues to drive behaviour in the classroom. Only when issues with the accountability system, such as the dominance of the C/D borderline, are directly addressed, can we hope to see an end to "teaching to the test" and appropriate attention given to the progress of every child. We therefore call upon the Government to re-examine the school accountability system as a matter of utmost urgency.

Conclusions and recommendations

Fundamental reform of the exam system

1. Overall, we conclude that the costs, heightened risk and disruption likely to be generated by moving to a single board outweigh the potential benefits. Furthermore, evidence suggests that some key issues identified with the current system, such as comparability of standards over time and across subjects and the role of examiners in training and textbooks, would remain. New problems, such as a lack of incentive to innovate, the risk of higher fees and a reduced quality of service to schools, may be generated. There may also be the potential for increased political interference, as well as the issue of whether to limit schools' choice of exams to those offered by the single board. (Paragraph 55)
2. If the system of multiple exam boards is retained, substantial improvements are needed in order to increase confidence in the system and maintain its credibility. We have serious concerns about the incentives in the current system for exam boards to compete on standards, in particular on content standards. We think that significant changes are needed to alter these incentives. (Paragraph 60)

The way forward

Syllabus content

3. We believe that the current system incentivises downward competition on content standards and we recommend that the Government act immediately to change these incentives. We consider that national syllabuses would offer a way of addressing downward competition on content and provide reassurance on standards, without the risks, lost benefits and disruption involved in moving to a single board. The Government should begin by piloting a national syllabus in one large entry subject as part of the forthcoming A level reforms. Ofqual should review the effectiveness of the pilot, with a view to extending the approach across GCSE and A levels if appropriate. We believe that national syllabuses, coupled with a stronger Ofqual and greater involvement of subject communities in GCSEs and A levels, should help to maximise the benefits of having multiple competing exam boards while minimising the shortcomings. (Paragraph 81)
4. While we can see that the second option we outline—franchising of subjects to exam boards—offers a way to address downward competition on content, we have concerns about the long-term impact and suggest that there may be serious downsides to such a change that need to be better understood before it can be recommended. (Paragraph 82)

Grading standards and grade inflation

5. Ofqual should continue to investigate grading issues as part of its programme of standards reviews and to engage publicly with debate on exam standards. Ofqual needs to be able to account for what AQA's Andrew Hall described as the “creep in grading standards”, particularly in the commercially significant large entry subjects

at GCSE, which are key to schools' performance in league tables and also in large entry A level subjects, commonly used for university entrance. (Paragraph 91)

6. We welcome Ofqual's recent action to regulate grading standards and recommend that it continue with this approach for A level and, from summer 2012, for GCSE. The effect of this action is twofold: first it helps to control grade inflation and second it provides reassurance that the exam boards are not competing on grading standards. We recognise that the effect will take time to filter through the system and to help increase public confidence. (Paragraph 95)

The role of Ofqual

Ofqual's regulation of standards

7. We recommend that Ofqual seek to build its assessment expertise and finds the resources to do so. We further recommend that Ofqual appoint an assessment expert to its board as soon as possible. (Paragraph 102)

Ofqual's international standards objective

8. We are concerned that the amendment to Ofqual's qualification standards objective could over a period of time pull it simultaneously in different directions and recommend that the Government give a clear indication to Ofqual about which should be the priority: the comparability of standards over time in England or benchmarking against the standards of qualifications in other countries. (Paragraph 104)

Government policy changes

9. We recommend that the Government make its priorities clear to Ofqual, whether these are the maintenance of standards over time or making exams tougher, and that both the Government and Ofqual be open about the consequences of these policies for young people. (Paragraph 105)
10. If A levels are going to become more varied in structure, Ofqual needs to ensure that its collection of evidence and monitoring of standards are sufficiently robust to provide convincing reassurance that content standards are being maintained. (Paragraph 106)

GCSE changes and devolution

11. We recommend that Ofqual review its arrangements for ensuring comparability of standards between England, Wales and Northern Ireland, and that it continue to monitor standards in GCSE and A level examinations offered by WJEC and CCEA, as well as the English providers as part of its ongoing regulation of standards. We also believe that a debate is needed on the importance of standards comparability between the home nations, with a Ministerial conference to decide whether and what action is necessary. (Paragraph 107)

Accreditation

12. We recommend that individual accreditation of all new syllabuses, including our recommended national syllabuses, remain a part of Ofqual’s continuing regulation of GCSEs and A-levels and, indeed, of any qualifications that are deemed equivalent to GCSEs and A-levels. With this in mind, Ofqual needs to demonstrate that its accreditation procedures are rigorous and transparent, and that it draws on appropriate respected subject and assessment expertise when reviewing draft syllabuses and their associated materials. We recommend that Ofqual review and strengthen its regulation of content standards, including accreditation procedures, seeking and acting upon advice from its standards advisory group as appropriate. (Paragraph 110)

Ofqual and subject expertise

13. While we accept Ofqual’s rationale for its lack of in-house subject expertise, criticisms from the subject communities lead us to conclude that Ofqual needs to be more transparent about its consultation with and use of external subject experts. (Paragraph 112)

National subject committees

14. We recommend that Ofqual convene national subject committees in large entry GCSE and A level subjects, drawing their membership from learned societies, subject associations, higher education and employers. Such committees should include in their remit syllabus development and accreditation, as well as on-going monitoring of question papers and mark schemes, and oversight of comparable qualifications offered in the devolved nations. (Paragraph 115)

Ofqual and the Joint Council for Qualifications

15. Ofqual should instigate discussions with the JCQ to clarify roles and responsibilities in areas where there is a joint interest and publish information about this to schools and colleges as appropriate. (Paragraph 117)

Conclusion

16. It is clear from the issues raised with us that further improvements are needed if Ofqual is to be a stronger, more challenging and more effective regulator. As AQA’s Andrew Hall put it “Ofqual is, in fairness, on a journey”. We believe that there is a strong argument in favour of allowing time for a strengthened Ofqual to take effect, as the changes it is making will take time to settle and bear fruit. But Ofqual must demonstrate that it is collecting the right sort of qualitative and quantitative evidence and using robust methodology to regulate effectively. Details of the evidence used by Ofqual in the regulation of standards, and any specific findings and regulatory action on standards, should be set out clearly in annexes to Ofqual’s annual report to Parliament. Ofqual must continue to show that it is prepared to take vigorous action when needed, in order to help increase public confidence in the exam system. (Paragraph 119)

Forthcoming A level reform

17. We recommend that the Government and Ofqual seek to increase the involvement of learned bodies as well as universities in the content of A levels, while allowing exam boards to retain control of question papers and examination design to ensure best assessment practice. The Government and Ofqual must also ensure that the *whole* of the university sector is consulted on the proposed A level reforms, as well as schools, colleges, learned bodies and employers. (Paragraph 128)
18. We recommend that Ofqual involve national subject committees in the development of criteria for and accreditation of new A levels. (Paragraph 130)

Market share and price

Changes in market share

19. We are pleased that Ofqual has recognised the need for closer monitoring of changes in market share between exam boards and recommend that it prioritise this work, in order to establish the reasons for changes at individual qualification level and whether there is any link to standards. (Paragraph 135)

Examination fees

20. The area of pricing is complex and Ofqual studies so far in this area have been limited. This hinders Ofqual from making a robust public critique of the high costs to schools. We agree with the Government that reassurance is needed that fees are set at an appropriate level. Ofqual also needs to demonstrate that overall the charges made to the public purse by the exam system are fair and appropriate. We also stress that any changes to the system, in particular a move to franchising, will need close attention to pricing by Ofqual. (Paragraph 141)

Support: training and textbooks

Training

21. We welcome Ofqual's decision to end exam board training on specific qualifications. Ofqual needs to monitor the impact of its decision and the activities and materials produced by exam boards to replace their seminars. We also recommend that Ofqual monitor other training offered by exam boards, such as marketing events to promote new syllabuses, and more general training, for example on improving results, taking further action if needed. Ofqual must ensure that a school's loyalty to a particular exam board cannot be rewarded with access to information not available to others. (Paragraph 149)

Textbooks

22. We are concerned that there is a potential conflict of interest for examiners involved in question paper setting also writing textbooks that are linked closely to the same syllabus. We welcome indications that exam boards may place tighter restrictions on the role of examiners in textbook authorship. We recommend that Ofqual make clear the expected future role of examiners in textbook authorship, in order to ensure a consistent industry-wide approach. (Paragraph 154)

23. We recommend that Ofqual consider restricting exclusive endorsement arrangements between exam boards and publishers in future. (Paragraph 156)
24. Ofqual needs to be satisfied that Pearson has sufficient firewalls in place to ensure that its publishing and examining activities are separate, including syllabus development, and to say so publicly. (Paragraph 157)
25. We have serious misgivings about the language used to market some endorsed textbooks and would urge exam boards and publishers to move away from marketing textbooks in this way. (Paragraph 158)
26. We welcome Pearson's statement that it is moving away from a shared design between Edexcel syllabus materials and Pearson textbooks, as we agree that this can unhelpfully overstate the link between the two. Pearson should give even-handed treatment to *Edexcel Own* and endorsed resources from other publishers on the Edexcel website. (Paragraph 159)
27. In order to strengthen the links between textbooks and the curriculum, as well as assessment, we recommend that in future A level textbooks be endorsed by the universities involved in developing a particular syllabus rather than by the exam board. At GCSE much will depend on the outcomes of the National Curriculum review and the ensuing reforms to GCSE, but a possible way forward might involve learned bodies endorsing textbooks instead of exam boards. (Paragraph 167)

Ofqual's regulation of exam board support

28. We agree with Ofqual that the market has not been regulated tightly enough with regard to training and textbooks and we believe that this has allowed conflicts of interest to arise. Ofqual's healthy markets work is welcome, if overdue, as it is clear that many of the issues raised with us have gone unchecked for some time. We welcome Ofqual's recent report on exam board seminars and look forward to its publication of an action plan relating to textbooks and study aids in September 2012. Proper regulatory control and scrutiny of these issues will help to increase public confidence in the exam system. (Paragraph 169)
29. We recommend that Ofqual, as part of its healthy markets work, take a clear view on the broader question about how much exam boards should be involved in helping to improve results as well as in the impartial assessment of attainment. (Paragraph 170)

Service: question papers and marking

Question paper errors in summer 2011

30. We welcome the findings of Ofqual’s investigation into the errors in summer 2011. It is vital that Ofqual acts swiftly and robustly (including, where appropriate, using its power to fine) in the event of errors in order to protect the integrity of the system and the interests of young people. (Paragraph 172)
31. Ofqual must investigate allegations of improper conduct by exam boards thoroughly, taking vigorous action if necessary, to ensure that candidates are awarded the grades they deserve and to protect the integrity of the exam system. (Paragraph 177)

Reliability of marking

32. We welcome Ofqual’s work to agree a common approach across exam boards to deal with concerns about marking and to ensure students are treated fairly across the system. (Paragraph 178)

Online standardisation

33. We accept that there is some research evidence to show that online standardisation is as effective as (but, if our reading of the research is correct, not necessarily more effective than) face-to-face standardisation. We can also see that it brings other benefits, such as reduced costs, an accelerated marking process and real-time monitoring of marking. We believe, however, that exam boards should continue to monitor the effectiveness of online standardisation and should consider offering opportunities for face-to-face discussion between examiners. (Paragraph 181)

Exams and school accountability

The burden of assessment

34. We have seen no evidence to suggest that having competing exam boards has contributed to the burden of assessment. The number of exams taken by young people is linked to Government policy and to decisions made by schools responding to pressures from the accountability system. (Paragraph 185)

Early and multiple entries to GCSE examinations

35. We recommend that the Government ask Ofqual to gather data from the exam boards to enable it to identify the extent of multiple entry and then offer advice on whether, and what, action is needed to limit the practice (Paragraph 188)

Wider changes

36. The Government should not underestimate the extent to which the accountability system incentivises schools to act in certain ways with regard to exams. Sometimes these may be in students’ interests; sometimes, however, they are not. We recommend that the Government look afresh at current accountability measures, with a view to reducing the dominant influence of the measure of 5 GCSE A*–C or equivalent including English and mathematics and to increasing the credit given to

schools for the progress made by all children across the ability range. (Paragraph 192)

Annex 1: Note of the Committee’s seminar with examiners, 14 December 2011

These notes are a general account of the opinions expressed by a group of examiners, who met with the Committee for an informal discussion. Examiners represented all three exam boards, a range of subjects and a variety of examiner roles.

The examiners were sifted from over two hundred applications received by the Committee in response to an advertisement in the Times Educational Supplement and online. All examiners not selected to attend were invited to complete a short questionnaire covering similar areas to those discussed at the seminar.

Comments in double inverted commas indicate a direct verbatim quotation, although these are not attributed.

Examiner recruitment

There was general agreement that “lots of assessment requires lots of examiners” and that this has led to shortages in some subjects.

Some examiners felt that recruitment requirements have become less stringent in recent years. Previously, teachers needed at least 3 years’ teaching experience before they could become an examiner. Some examiners reported that they were recruited in their first year of teaching or even during postgraduate training. Others argued that recruitment requirements are stringent enough as it is “easy to get rid of” poor examiners. However, one senior examiner expressed doubt as to whether all weak examiners are dismissed in shortage subjects, due to difficulties in recruiting sufficient numbers.

Some concern was expressed that too many examiners are retired rather than practising teachers. There was general consensus that it is important to have a balance between practising teachers and retirees. However, the main obstacle for practising teachers is time. The summer exam series coincides with a busy period in school for many teachers and examining (at least at more junior levels) is not sufficiently well paid to make it worth their while. Some suggested that being an examiner should be a recognised part of teachers’ continuing professional development.

Senior examiners recounted from experience that it is very difficult to combine senior examining roles with leadership roles in schools or full-time teaching. This means that many question paper setters are no longer teaching. This was felt to be a shame as it is important that examiners are sensitive to the impact in the classroom of the examinations they are setting.

Question paper setting

Examiners generally agreed that the question paper setting process is rigorous. It was pointed out that some of the errors in 2011 papers were introduced in the later stages of question paper setting (eg changes to graphs with accompanying text not updated).

Online standardisation

Examiners were unanimously of the view that the loss of face-to-face standardisation meetings was “a big mistake”. There was consensus that face-to-face standardisation meetings helped examiners to explore questions about the mark scheme in depth and get a feel for how the Principal Examiner was interpreting the mark scheme. Senior examiners felt that face-to-face standardisations meetings were useful for “talent spotting” as they helped them to identify potentially very good new examiners.

Controlled assessment

Examiners were generally negative about controlled assessment, although one senior examiner felt that controlled assessment had worked well in his subject (Drama). Many examiners were critical of inconsistencies between the exam boards in the rules for controlled assessment. Several complained that controlled assessment was hard to manage, dominating much of the school year for pupils in years 10 and 11 and also that it was impossible to be sure that a piece of work was a child’s own. Generally, examiners felt that controlled assessment had failed to address the problems with its predecessor, coursework, and that, in some respects, it had generated problems of its own.

Grade awarding

Senior examiners felt that there were many public misconceptions about how grades are awarded and that few people understood how data are used. There was some variation in examiners’ views on the importance attached to statistical information and examiners’ judgement of candidates’ work in awarding. Some examiners felt that it was right that awarding was data-led and that statistical information on the previous attainment of candidates and school predictions should be more significant than the judgement of a small group of examiners on candidates’ work. Others were concerned that candidates should be judged primarily on the standard of work achieved.

Commercial activities of exam boards

Several examiners (also practising teachers) suggested that exam boards spend a lot on marketing to schools, often very aggressively, in order to win market share. Some reported that market researchers from exam boards tried to determine which elements of a subject were the most popular (e.g. which period of history, novel in English) and incorporate these into their syllabuses.

Textbooks

There was general agreement that endorsed textbooks are problematic, although views varied on whether they should be allowed to continue. Some examiners felt that exam board/publisher partnerships, such as AQA/Nelson Thornes, were wrong and that exam boards should not make money from publishing agreements. Examiners suggested that the Committee could usefully explore how much money exam boards make from textbooks, compared to the core business of running exams.

Many examiners held the view that exam boards should not endorse particular textbooks and that publishers should not market books as “written in line with” a particular syllabus. Some felt that it was very misleading for exam boards to suggest that their endorsed or, in one case, own textbooks were all that schools needed, as well as potentially damaging to teaching and learning (by encouraging teaching to the test/book).

Some participants were also textbook authors. Several reported pressure from publishers to write to a particular examination, although they recognised the pressure on publishers and exam boards to supply what teachers wanted. There was disagreement about whether examiner authorship represented a conflict of interest, with examiners having insider knowledge. Some agreed with this, others argued that as senior examiners deal with so many exam questions across different exam series, insider knowledge is not an issue.

One examiner author said that he hoped his textbook gave an insight into the subject which would apply to all syllabuses. It was suggested that endorsed textbooks are more of an issue in some subjects than others. For example, English syllabuses are broadly similar across all exam boards, whereas in science there is more variation between exam boards, with textbooks linked to specific syllabuses and chapters for each module.

Some participants questioned the quality of some endorsed textbooks, pointing out that good examiners do not necessarily make good writers and that “children deserve good textbooks”. Others noted that it was difficult in some subjects for teachers to find a textbook **not** linked to a particular exam board. There was also concern about the cost of textbooks and the problem that “if you change syllabus, you need new textbooks”.

Training

Examiners stated that they now have more contact with teachers than they did 20 years ago. Exam boards run more feedback meetings and there is greater transparency about the system with more materials available.

It was pointed out that many senior examiners are self-employed and may use textbooks and training to supplement their income from examining.

There were reports of some senior examiners (not participants) using their position to promote training to schools offered by private training providers, with courses entitled

“changing your Ds to Cs” and “getting an A* grade” or intensive A level preparation courses. It was generally felt that this was inappropriate. By contrast, delivering general training on GCSE which covered all exam boards, was felt to be acceptable. Some pointed out that OCR contracts prohibit examiners from using their status as examiners to promote training and that Pearson is making changes to its examiner contracts from April 2012. However, it was pointed out that is difficult for examiners **not** to divulge their position as many teachers will know the names of senior examiners for their syllabus.

Competition between exam boards

It was suggested that commercial companies will always market aggressively and find a way of playing the system.

Examiners expressed concern about the comparability of standards between exam boards in some areas, suggesting that there are “pockets where the differences are significant”. Several agreed that “Ofqual has a case to answer” in terms of exam boards competing on standards.

Reform of the examination system

There was no agreement between examiners on whether the exam system should be reformed or how. Some were in favour of a single state-run exam board (with regulation), others favoured retaining the multiple exam board system. One examiner expressed a preference for franchising by subject.

Several examiners felt that teachers wanted a choice of syllabuses and being able to switch exam boards was a helpful tool at teachers’ disposal. Innovation and development were also cited as arguments in favour of a multiple board system. However, some examiners felt that the multiple board system carried the risk of competition on grade standards and that in this respect “Ofqual has a case to answer”.

Examiners suggested that other countries where exams were run by a single state provider (e.g. Scotland, South Africa) might prove useful comparators, although others cautioned that systems which work well for countries with much smaller populations may not translate well into the English context and that our experience of a top-down national system with national curriculum tests has, on occasions, been “catastrophic”.

Examiners observed that a franchised system would lose the elements of choice currently available to teachers and that system failure would affect larger numbers of candidates. However, some suggested that it could prove helpful to children moving schools as the same syllabus would be taught in all schools.

There was general agreement that better regulatory oversight by Ofqual was vital to the success of any model, whether a single board, franchising by subject or multiple board system.

Impact of the accountability system

Examiners acknowledged that schools are under immense pressure to improve their performance against accountability measures and that this drives behaviour in schools. Several observed that teachers do their best to optimise the performance of their students at the C/D boundary, often at the expense of weaker pupils. Some suggested that the system also encourages teachers to mark internally assessed work as generously as possible.

One examiner observed that with schools under pressure to improve performance in league tables and exam boards competing for business, everyone is happy with increasing numbers of high GCSE and A level grades “except the pupil when he tries to get a job” (and finds that employers no longer value his high grades).

Best features of the current exam system

Examiners were asked to identify what they felt was the best feature of the current exam system. The most commonly cited feature was choice provided by different exam boards offering a variety of syllabuses. Transparency of the current system was also noted as a strength. Some examiners commented positively on the use of professional expertise and rigorous question paper setting, delivery and awarding procedures that support standards. Online assessment and innovation and development were also cited as positive features.

Recommendations for change

Examiners were asked to identify one thing that they would change about the current system. There was unanimous agreement that face-to-face standardisation meetings should be reintroduced. Several examiners suggested that the most important issue for the exam system is ensuring comparability of standards and preventing competition on standards between exam boards, although opinions varied on how best to address this. Several felt that commercial competition and profit-making should be removed from the examination system altogether.

Some suggested that the current pace of change is too rapid and leads to instability. One examiner was critical that changes in exams have often failed to take account of evidence of the impact of previous changes. He also suggested that the benefits of change should be weighed up against the cost of disruption. Several examiners felt that pressures from the accountability measures distort the exam system. One examiner suggested that all schools should have some staff involved in examining and that examining should be made part of professional development for teachers.

Annex 2: Examiners' questionnaire responses

The Committee received over 200 expressions of interest in response to the advert in the Times Educational Supplement (TES) and online for the examiners' seminar held on 14 December 2011. A copy of the questionnaire was sent to all those who were not selected or who were unable to attend on 14 December.

The questionnaire covered areas similar to those discussed at the seminar. These were: examiner recruitment and performance, question papers, marking, grading and the commercial activities of the exam boards. In common with the seminar, examiners were asked to identify one thing which they would change about the current system.

The Committee received 45 completed questionnaires. It should be noted that this is a self-selecting sample with very small numbers, so the findings must be treated with caution. Some examiners did not respond to all questions or sub-questions. The responses capture a "flavour" of examiners' views about the system, in much the same way as the seminar. Some points raised in questionnaire responses echo those made by examiners at the seminar and this is noted below where applicable.

Just under half of examiners who responded (49%) were teachers in schools/colleges. 9% were teaching in higher education. 22% described themselves as self-employed and 20% said that they were retired.

Examiner recruitment

The most commonly cited requirement was appropriate subject expertise and 3 years' teaching experience. 40% of responses mentioned that they had to demonstrate 3 years or more teaching experience. 24% said that they were required to have less than 3 years' experience.

No respondents said that entry requirements had become more stringent. Over half didn't comment, but some (27%) thought that requirements had become less stringent, while others (20%) felt that there had been no change.

Examiner performance

Most examiners (82%) were positive about the way their performance was monitored by the exam boards. A few (11%) noted that feedback varied between exam boards and a minority (7%) were unhappy with the feedback given.

Question papers

Just over half of respondents (53%) felt that question paper setting and checking procedures were rigorous and several observed that there are remarkably few errors

given the number of papers produced each year. One examiner noted that the setting and checking system relies heavily on one or two people and that, “ironically, it’s the number of checks of a paper that can lead to an oversight, usually based on the assumption that you have seen it so many times before.”

Just over a third of respondents (36%) were critical of the question paper setting and checking process, citing the sheer number of exams, short timescales and pressure to meet deadlines, along with cost-cutting by exam boards as possible reasons for errors. The remaining 11% did not comment.

Marking

Over half of respondents (56%) expressed confidence overall in the reliability of marking, although as one examiner noted “there is no room in terms of time for any disasters. It would only take one senior examiner to go ill/have a family crisis in July and the reliability of the system would be suspect”. 22% were less confident in the reliability of marking. Reasons cited tended to be related to extended answers and the “benefit of the doubt” marking culture. 11% said that marking was variable and 11% did not comment in their response.

Just under half of respondents (47%) felt that online assessment had been a positive development overall, albeit with some reservations. However, 31% were negative about online marking. Most commonly cited objections related to the marking of extended essays. Several examiners did not like the fact that online marking means that they no longer see whole scripts and cannot go back over an answer. 22% did not comment on online assessment.

Just over half of respondents (51%) complained about online standardisation, echoing criticisms made at the examiners’ seminar. One examiner stated that “I found that online standardisation did not prepare me in the same way as the traditional meeting did. I did not feel as secure in the standard or implementation of the mark scheme”. Senior examiners expressed similar reservations and also complained that online standardisation “deprives senior examiners of a valuable opportunity to mentor junior examiners and point out potential team leaders of the future”.

Grading

Examiners’ views on standards over time varied. Most respondents thought either that standards had declined over time (38%) or felt that it was difficult to say with certainty if standards had changed (42%). As one examiner put it, “today’s candidates do not demonstrate a significantly higher level of ability and yet pass rates and higher grades are achieved by many more”. Both groups attributed this to a range of factors, relating to changes in the examination system, such as more accessible and predictable questions, changes in content, modular assessment and increased opportunities for re-sits. Many felt that students were better prepared, due to greater transparency about the system and the effect of performance measures. One history examiner noted that it is “very difficult

to quantify what has happened to standards. The average student is certainly achieving a higher standard than was the case in the past, but teachers have more help in achieving this.” A minority (7%) felt that examinations had got harder and the remaining 13% did not comment on standards over time.

Examiners varied in their views on comparability between exam boards. 28 mentioned this in their responses. Of these, 43% felt that standards were comparable between exam boards. One examiner suggested that this had improved in his subject as in the past “there was wild inconsistency and certainly no golden age”. In contrast, 57% felt that standards were not comparable between exam boards, which is why, as one examiner put it, schools “go board fishing”.

Three respondents pointed to issues of comparability between subjects, with one examiner noting that “at present, over 50% of entries in Latin obtain an A, over 40% in Mathematics, over 30% in Chemistry and under 20% in Psychology”. The examiner called for more research into why the % of grade As varies so much between subjects, as he is not “convinced that this difference is totally justified”.

Commercial activities

Just under half of respondents (49%) said that they had contributed to textbooks.

Examiners were divided in their views on endorsed textbooks. 56% expressed concern about endorsements, with several suggesting that it was a conflict of interest between two functions of exam boards. Many felt that endorsed textbooks had a negative impact on teaching and learning, by encouraging teaching to the exam/book. As one examiner stated “as general texts these books are woeful; as guides to passing the exam they are very useful”.

44% of respondents were positive about endorsed textbooks, suggesting that they were a useful resource for teachers. As one examiner stated “I am not sure why this should be deemed a conflict of interests. We want our students to do well, therefore having insight into what the exam board are going to give them, is helpful”. One examiner expressed concern that if textbooks moved away from exam boards, then this would increase the risk of others “producing inaccurate material, charging the earth and confusing the heck out of teachers”.

Just over a fifth of respondents (22%) suggested that Ofqual should do more to regulate in this area, although a few examiners (7%) felt that Ofqual should not regulate “as other less scrupulous groups could move in”.

One “thing to change”

Responses varied considerably. The change called for most often (by 18% of respondents) was to replace online standardisation with face-to-face meetings, echoing the message from the examiners’ seminar. 16% of respondents called for various

changes to improve examiners' terms and conditions, such as a longer marking period or improved pay. One examiner called for a "jury service" for markers to improve marking reliability.

A third of respondents called for a change linked to organisation of the system. However, suggested changes varied from a single exam board (9%), limiting competition between exam boards (4%) and less Government interference (4%) to keeping multiple exam boards (9%) keeping publishing separate from examining (2%) and controlling the commercial activities of exam boards (2%). One examiner called for franchising by subject.

Annex 3: Note of the Committee's meeting with the Singapore Examinations and Assessment Board, 8 February 2012

This note offers a record of the Committee's meeting with representatives from the Singapore Examinations and Assessment Board during their visit to Singapore in February 2012. A full note of the visit can be found in Annex 4 of the Committee's report: *Great teachers: attracting, training and retaining the best*.³³¹

Members in attendance: Graham Stuart MP (Chair), Alex Cunningham MP, Pat Glass MP, Ian Mearns MP, Lisa Nandy MP, Craig Whittaker MP.

Singapore Examinations and Assessment Board

Ms Tan Lay Choo, Chief Executive *and other officials*

Background

The Singapore Examinations and Assessment Board (SEAB) was established on 1st April 2004 as a statutory board. SEAB, formerly the Examinations Division of the Ministry of Education (MoE), was formed to develop and conduct national examinations in Singapore and to provide other examination and assessment services, locally as well as overseas. SEAB collaborates with MOE on all national examinations. It also positions itself to become a regional centre for testing and assessment services, and to contribute to Singapore's development as an Education Hub.

Primary school examinations

PSLE

The Primary School Leaving Examination (PSLE) is a national examination, which a pupil sits at the end of primary education to assess their suitability for secondary education and also to place them on appropriate secondary school courses, which match their learning pace, ability and inclination. Based on their results, candidates are streamed into three different courses: Express, Normal (Academic) and Normal (Technical).

³³¹ Education Committee, *Great teachers: attracting, training and retaining the best*, Ninth Report of Session 2010-12, HC 1515-I

iPSLE

The iPSLE examination is offered to Singaporeans studying abroad and whose school has adopted a curriculum similar to that offered in Singapore. Like the PSLE, students take the exam after six years of primary education. The examination format is similar to that of the PSLE. The iPSLE is also used by some schools abroad as a benchmarking tool to assess their standard of education compared with Singapore.

Secondary school examinations***GCE N-Level***

The GCE N-Level examinations, otherwise known as the N-Levels, are conducted annually in Singapore. They are taken after four years in the normal academic or normal technical stream (secondary education). For subjects examined in English, foreign languages and Non-Tamil Indian Languages, the examining authority is the University of Cambridge Local Examinations Syndicate. For subjects such as ‘mother tongue’ languages, most commonly Chinese, the examining authority is the Ministry of Education, Singapore (under ‘mother tongue’ ethnic Chinese students must learn Mandarin Chinese, ethnic Malay students must learn Malay and ethnic Tamil Indians students will learn Tamil).

GCE O-Level

The GCE O-Level examinations, or more commonly known as O-Levels, are conducted annually in Singapore. Like the N-Levels, they are taken after four years of express or five years of normal academic secondary education and are under the same examining authority. However, the B-syllabus for mother tongue subjects will not be counted towards the total aggregate score.

Examinations for tertiary education***Singapore-Cambridge GCE A-Level***

The Singapore-Cambridge GCE Advanced Level examination, like the other examinations, is conducted annually. It is taken before the completion of 2 years of Junior College. Like the GCE O-Levels, the B-syllabus subjects are not counted towards the total aggregate score.

The GCE A-Level examinations require students to read a compulsory H1 General Paper subject or alternative-H2 Knowledge and Inquiry (KI) alongside with 3 Higher-2 and 1 Higher-1 subjects (minimum of 10 Academic Units (A.U)). One out of the 4 content-based subjects must be of a cross-disciplinary nature.

Discussion

- The Singapore Examinations and Assessment Board (SEAB) was established in 2004. Previously it had been part of the MoE. It was now a statutory body, reporting to the Ministry.
- There were four main exams, at three points in the education system: the PSLE at the end of Grade 6, GCE N-level and O-level aged 16 and GCE A-level aged 18.
- Singapore had no experience of multiple examinations boards, but because it was so small it did not require more than one.
- Some 60 subjects were offered to students at O-level, including a spread of humanities and sciences. Most students took 7-8 subjects, but the most able took 9-10.
- At A-level it was a condition of the curriculum that students take one subject of a different type to their main choices; for instance, a science student would have to take one humanity.
- Some 50,000 students were examined each year for the PSLE. After that stage, students took different tracks so the numbers taking each exam at aged 16 and 18 varied.
- SEAB was accountable to the MoE but had no other formal external scrutiny.
- The Curriculum Development Committee delivered exam papers and aligned exams with the curriculum. It was chaired by the Director General of Education at the MoE, and had members from different departments in the Ministry. SEAB made recommendations on grade boundaries to a Grading Committee which drew members from different departments and agencies. Its recommendations were usually accepted by the Committee.
- If a change in results was noticed, the SEAB would first question whether it could be explained by the profile of that year's cohort. This could be done by checking the results against candidates' past performance and schools' previous results. If the characteristics of the cohort did not provide an explanation, SEAB would normalize the results.
- SEAB did not produce textbooks. The Curriculum Development Commission in the MoE issues the syllabus, then independent publishers could bid for tender and develop their own textbooks, which were authorised and approved by the MoE.
- Students were required to pass exams in English and their mother tongue. In addition, their best six subject results were counted for their points score.
- On the basis of PSLE results, some students clearly fell into the 'academic' stream and others clearly into the 'normal/technical' stream. A further group fell in between streams and their parents selected the most appropriate track for them.
- Students on the 'normal/technical' stream studied many of the same subjects as those on the 'academic' stream, but were taught in smaller classes with different learning outcomes. The system recognized that children learnt at different paces, and the 'normal/technical' stream took a year longer to complete than its 'academic' counterpart. Asked whether there was a societal stigma in taking longer to complete the 'normal/technical' course, SEAB considered not. This was helped by the fact that

there was movement between the streams; for instance, a student on the 'normal/technical' stream might go to ITE and then on to polytechnic/university.

- SEAB ran seminars for examiners when there was a change in syllabus, to brief them on the curriculum changes and give them specimen papers, share learning objectives and the rationale behind changes. Private tuition centres did not have access to such training.
- Private tuition was a kind of 'parental insurance policy'. Parents were desperately competitive that their children should not lose out and this drove the significant use of out-of-school tuition.
- Current teachers and head teachers were engaged to mark exams to a common mark scheme. For the PSLE, all schools were closed for four days to allow the teachers to mark. There were no professional markers.
- Evidence showed that those students who performed well at O-level went on to perform well at A-level. SEAB concluded from this that the exams system accurately selected and identified the most able students.
- New subjects were proposed by the MOE, through its Syllabus Review Committee on which sat representatives from industry and higher education. SEAB would develop and offer any new subjects agreed in this way. The Board did not act as a block on innovation or the development of new subjects.
- SEAB officials considered that the public (including the international community) had strong confidence in the exams system, and that it offered an accurate assessment not just of ability but of potential as well.

Formal Minutes

Tuesday 12 June 2012

Members present:

Mr Graham Stuart, in the Chair

Neil Carmichael
Alex Cunningham
Pat Glass
Damian Hinds

Ian Mearns
David Ward
Craig Whittaker

Draft Report (*The administration of examinations for 15-19 year olds in England*), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 195 read and agreed to.

Annexes 1 to 3 agreed to.

Summary agreed to.

Resolved, That the Report be the First Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Written evidence was ordered to be reported to the House for publication on the Internet.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[Adjourned till Wednesday 13 June at 9.15 am

Witnesses

Tuesday 29 November 2011

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Martin Collier, Headmaster, St John's School, Leatherhead, Surrey, **David Burton**, Deputy Headteacher, St Michael's CofE High School, Crosby, Liverpool, **Rob Pritchard**, Headteacher, St Mary's Catholic High School, Menston, Ilkley, West Yorkshire, and **Teresa Kelly**, Principal of Abingdon and Witney College, Member of Principals' Professional Council/Association of School and College Leaders Ev 1

Professor Nick Lieven, Pro Vice-Chancellor, University of Bristol, **Anna Gutiérrez**, Head of Student Administration, University of Bournemouth, and **Anne Tipple**, National Skills Executive, British Chambers of Commerce Ev 14

Thursday 15 December 2011

Paul Barnes, **Paul Evans** and **Steph Warren**, senior examiners Ev 20

Andrew Hall, Chief Executive Officer, AQA, **Mark Dawe**, Chief Executive, OCR, **Rod Bristow**, President, Pearson UK (on behalf of Edexcel) and **Gareth Pierce**, Chief Executive, WJEC Ev 27

Glenys Stacey, Chief Executive, Ofqual, and **Dennis Opposs**, Director of Standards, Ofqual Ev 39

Wednesday 18 January 2012

Professor Jo-Anne Baird, Pearson Professor and Director of the Oxford University Centre for Educational Assessment, **Dr Michelle Meadows**, Director of Centre for Education Research and Policy, AQA, **Tim Oates**, Group Director, Assessment Research and Development, Cambridge Assessment, and **Professor Alison Wolf**, Sir Roy Griffith Professor of Public Sector Management, King's College, London Ev 48

Professor Stephen J Ball, FBA, AcSS, British Academy, **Professor Sir John Holman**, Senior Fellow for Education, Wellcome Trust, **Professor Graham Hutchings**, FRS, SCORE Chair, and **Warwick Mansell**, freelance journalist Ev 59

Tuesday 21 February 2012

John Butterworth, Educational Writer and Chief Examiner, on behalf of the Society of Authors, **Paul Howarth**, UK and International Managing Director, Nelson Thornes, **Jacob Pienaar**, Managing Director of Schools and Colleges, Pearson UK, and **Kate Harris**, Managing Director, Education and Children's Division, Oxford University Press Ev 69

Rod Bristow, President, Pearson UK, on behalf of Edexcel, **Mark Dawe**, Chief Executive, OCR, and **Andrew Hall**, Chief Executive Officer, AQA Ev 75

Wednesday 21 March 2012

Amanda Spielman, Chair, and Chief Regulator of Qualifications and Examinations, Ofqual, and **Glenys Stacey**, Chief Executive, Ofqual Ev 92

Nick Gibb MP, Minister of State for Schools, Department for Education Ev 102

List of printed written evidence

1	Martin Collier, Headmaster, St John's School, Leatherhead	Ev 112
2	Assessment and Qualifications Alliance (AQA)	Ev 113
3	Pearson	Ev 120
4	The Wellcome Trust	Ev 128
5	Oxford Cambridge and RSA Examination Board (OCR)	Ev 133
6	Cambridge Assessment	Ev 144
7	British Chambers of Commerce	Ev 152
8	SCORE (Science Community Representing Education)	Ev 153
9	Ofqual	Ev 160, E197
10	Department for Education	Ev 170, Ev 201
11	David Burton, Deputy Headteacher CofE High School Crosby, Liverpool	Ev 174
12	Robert Pritchard, Headteacher, St Mary's Catholic High School, Ilkley, West Yorkshire	Ev 175
13	Teresa Kelly, Abingdon and Witney College	Ev 175
14	British Academy	Ev 176
15	Jo-Anne Baird, Jannette Elwood and Tina Isaacs, Oxford University, Centre for Educational Assessment, Queen's University, Belfast & the Institute of Education	Ev 178
16	WJEC	Ev 182
17	Society of Authors	Ev 184
18	Oxford University Press	Ev 188
19	AQA Centre for Education Research and Policy (CERP)	Ev 192

List of additional written evidence

(published in Volume III on the Committee's website www.parliament.uk/educom)

1	National Union of Teachers	Ev w1
2	Andrew Hunt	Ev w3
3	Mark Hobson	Ev w7
4	Association of School and College Leaders (ASCL)	Ev w8
5	Council for Awards in Care, Health and Education (CACHE)	Ev w10
6	GL Assessment	Ev w14
7	Institute of Mathematics and its Applications	Ev w15
8	Association of Teachers of Mathematics (ATM)	Ev w18
9	EMTA Awards Limited (EAL)	Ev w19
10	The Royal Statistical Society	Ev w20
11	Joint Council for Qualifications (JCQ)	Ev w22
12	DRS (Data Services Limited)	Ev w26
13	Chartered Institute of Educational Assessors (CIEA)	Ev w30
14	Federation of Awarding Bodies	Ev w31
15	Vicky McCarthy	Ev w34
16	Roger Porkess	Ev w35
17	Dr Ian Jones, Mathematics Education Centre, Loughborough University	Ev w37
18	The Mathematical Association	Ev w38
19	Examination Officers' Association (EOA)	Ev w41
20	Dr Tony Gardner, University Birmingham	Ev w45
21	National Association of Headteachers (NAHT)	Ev w48
22	Fiona Nicholson, independent home education consultant, Sheffield	Ev w49
23	Sector Skills Council for Science, Engineering and Manufacturing Technologies (SEMTA)	Ev w49
24	David Leitch	Ev w51
25	E-Skills UK	Ev w52
26	University of Cambridge International Examinations	Ev w55
27	London Mathematical Society	Ev w58
28	Girls' Day School Trust (GDST)	Ev w60
29	Mathematics in Education and Industry (MEI)	Ev w61
30	Centre for Market Reform in Education	Ev w63
31	NISAI Group	Ev w65
32	Association of Colleges (AoC)	Ev w67
33	NASUWT, The Teachers' Union	Ev w70
34	The Royal Grammar School, Guildford	Ev w75
35	National Union of Students (NUS)	Ev w76
36	Helen James	Ev w77
37	Advisory Committee on Mathematics Education (ACME)	Ev w78

38	Neil McNaughton	Ev w84
39	International Society for Design and Development in Education	Ev w86
40	Janine Clatworthy	Ev w100
41	Graham George	Ev w106
42	Ian Thow	Ev w109
43	Mark McKelvie, Senior Assistant Headteacher, Weatherby High School	Ev w110
44	Association of Teachers and Lecturers (ATL)	Ev w112
45	National Association for the Teaching of English (NATE)	Ev w115
46	William Godsoe Rigby	Ev w117
47	Prit Prat	Ev w118
48	Richard J Nixon	Ev w119
49	Dan Bottom	Ev w119
50	Dr Ian White	Ev w123
51	Dr Roger Taylor	Ev w125
52	Rodger Williams	Ev w125
53	Geoff Hurst, Altain Education	Ev w128

List of unprinted evidence

The following written evidence has been reported to the House, but to save printing costs has not been printed and copies have been placed in the House of Commons Library, where they may be inspected by Members. Other copies are in the Parliamentary Archives (www.parliament.uk/archives), and are available to the public for inspection. Requests for inspection should be addressed to The Parliamentary Archives, Houses of Parliament, London SW1A 0PW (tel. 020 7219 3074; email archives@parliament.uk). Opening hours are from 9.30 am to 5.00 pm on Mondays to Fridays.

Supplementary evidence from Oxford University Press

List of Reports from the Committee during the last Parliament

The reference number of the Government's response to each Report is printed in brackets after the HC printing number.

Session 2010-12

First Special Report	Young people not in education, employment or training: Government Response to the Children, Schools and Families Committee's Eighth Report of Session 2009-10	HC 416
Second Special Report	The Early Years Single Funding Formula: Government Response to the Seventh Report from the Children, Schools and Families Committee, Session 2009-10	HC 524
Third Special Report	Transforming Education Outside the Classroom: Responses from the Government and Ofsted to the Sixth Report of the Children, Schools and Families Committee, Session 2009-10	HC 525
Fourth Special Report	Sure Start Children's Centres: Government Response to the Fifth Report from the Children, Schools and Families Committee, Session 2009-10	HC 768
First Report	Behaviour and Discipline in Schools	HC 516-I and -II (HC 1316)
Second Report	The role and performance of Ofsted	HC 570-I and -II (HC 1317)
Fifth Special Report	Looked-after Children: Further Government Response to the Third Report from the Children, Schools and Families Committee, Session 2008-9	HC 924
Third Report	Services for young people	HC 744-I and -II
Fourth Report	Participation by 16-19 year olds in education and training	HC 850-I and -II
Fifth Report	The English Baccalaureate	HC 851
Sixth Report	Services for young people: Government response to the Committee's Third Report of Session 2010–12	HC 1501
Eighth Special Report	Participation by 16–19 year olds in education and training: Government Response to the Committee's Fourth Report	HC 1572
Ninth Special Report	The English Baccalaureate: Government Response to the Committee's Fifth Report	HC 1577
Seventh Report	Appointment of HM Chief Inspector, Ofsted	HC 1607-I
Tenth Special Report	Services for Young People: the Government response: Government response to the Committee's Sixth Report of Session 2010–12	HC 1736
Eighth Report	Chief Regulator of Qualifications and Examinations	HC 1764-I and -II
Ninth Report	Great teachers: attracting, training and retaining the best	HC 1515-I and -II