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Corporate Plan 2013-16

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Contents

Ofqual
Reform
GCSEs
Modularisation5
Tiering6
Assessment6
Reporting results
Setting and maintaining standards
A and AS levels
A levels
Subject content
Modularisation
Assessment
Reporting results
Setting and maintaining standards
Vocational qualifications10
Standards
Content standards12
GCSEs, AS and A levels12
Other qualifications13
Assessment standards13
Performance standards14
GCSE performance standards 14

	Reformed GCSE performance standards	15
	A level performance standards	16
	Comparability between subjects	16
₹	egulation	18
	Three-country regulation	18
	Recognition	19
	Monitoring	19
	Sanctions	19
	Awarding	19
	Comparability of qualifications and services	. 20
	System risks	21
	National Assessments	21
	The cost of qualifications	21
	Transparency and engagement	22
	The regulatory framework	. 22
D	eveloping Ofqual	25
	Capacity and capability	. 25
	Resources	25
	Measures of achievement	26

Introduction by the Chair and the Chief Regulator

This is our second corporate plan. It covers the period to March 2016, a period of unprecedented qualifications development and reform.

Qualifications do not exist in isolation. Valid and reliable outcomes that will serve young people well for their futures result not from good qualifications in themselves, but from a good curriculum, and good teaching aimed at the best educational outcomes and recognised through credible qualifications. Increasingly, we find school leaders, heads of subject and teachers willing to discuss with us how qualifications can best be designed and regulated to promote good teaching and lead to the best educational outcomes in the real world of schools and colleges, and we are grateful: without this we would not be able to ensure qualifications fit for the future. We also talk to employers and others about how vocational qualifications can meet their needs and recognise the skills they need from apprentices and employees.

Our plans reflect Government decisions to reform GCSEs, AS and A levels in England, with the first of the new qualifications to be first examined in summer 2017. It is a great privilege to implement the proposed reforms, and to shape materially better general qualifications for the great majority of young people – qualifications that should prepare them as well as possible for the next stage of their lives.

Our work on these qualifications is significant, but it is not our only priority. Vocational qualifications are important to employers, students and adults in employment or looking for work. Our second challenge is to regulate for vocational qualifications in ways that ensure the right quality at the right price.

We have a third challenge: to make sure that standards are set and maintained so that young people and others relying on their grades can have confidence in them. For a variety of reasons, maintaining GCSE standards has become both complex and difficult and is likely to stay that way pending the reform of GCSEs. We will continue to maintain standards in established GCSEs, AS and A levels, and we will also determine how internationally comparable standards will be set for the new qualifications.

Glenys Stacey Chief Regulator Amanda Spielman Chair

Amanda Spielman

Ofqual

Government decides the curriculum to be taught in maintained schools, the qualifications that can be offered, and the accountability framework by which schools are evaluated. It also determines the vocational qualifications that can be taught in schools and colleges and used in apprenticeships.

Our job is to make sure that qualifications are of the right standard and that the qualification system works well so that those who take or rely on qualifications can have confidence in them. The UK Parliament has determined that we shall be independent, and has set us objectives that require us to maintain the currency and worth of regulated qualifications. Two of our three strategic objectives flow from our statutory objectives. We aim:

- to secure (and where necessary reset) the standards of qualifications and assessments, and promote confidence in them
- to secure a healthy, robust and efficient qualifications system

Our third strategic objective is to continue to build our capability and capacity.

Reform

The Westminster Government has set out its plans to reform and redevelop GCSE, AS and A level qualifications in England and it is developing plans for vocational qualifications and apprenticeships.

GCSEs

Government has decided that GCSEs in England should remain universal qualifications of about the same size as now and accessible to about the same proportion of students as now. However, Government has set out new purposes for GCSEs. Their primary purpose will be to certify individual student achievement. They will also need to prepare students well for further study, and they will continue to be a key feature in the accountability system for schools.

We plan to regulate for new GCSEs to be developed and introduced for first teaching in September 2015 in the following subjects: English language, English literature, mathematics, biology, chemistry, physics, combined science (double award), history and geography. Following consultation, the Government will set out the curriculum content for GCSEs in these subjects. Together they represent about two-thirds of all GCSE entries. Other subjects will follow in further tranches in subsequent years.

In parallel, we plan to reform the key design features of GCSEs that fall to us as regulator: modularisation, tiering, assessment and reporting results (grading). Our proposals and the reasoning and evidence behind them are set out fully in our June 2013 GCSE consultation papers² and are summarised below.

Modularisation

GCSEs presently taught in schools were mostly designed as modular qualifications. Students are taught individual units of study and were (until recently) assessed at the end of each unit of study. This has proved problematic for qualifications of this nature and size: students can spend disproportionate amounts of time preparing for, sitting and re-sitting assessments and learning is not always joined up. With many different unit options and then re-sit opportunities, modular GCSEs are difficult to award in ways that are fair to students overall. From September 2013, GCSEs will be examined at the end of the course rather than at the end of each unit, but the qualifications are still modular in their design. We propose that new GCSEs are each

Ofqual 2013 5

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www.ofqual.gov.uk/files/2013-02-07-letter-from-michael-gove-reform-of-ks4-qualifications.pdf

² GCSE Reform Consultation – June 2013 available at: http://comment.ofqual.gov.uk/gcse-reform-june-2013/

designed as one programme of study, with assessment at the end of the programme of study.

Tiering

In most of the popular GCSE subjects schools place students in sets based on their ability, for teaching purposes. Students in top sets are then taught and entered for GCSE higher-tier papers where there is no ceiling on the achievable grade, while students judged less able and in lower sets are entered for less challenging papers in which grade C is the highest achievable. The available research evidence shows that some students entered for lower-tier papers find it de-motivating and that it is difficult to align across tiers.

We propose to limit the use of tiering to those subjects where it is necessary because of the nature of the subject and/or the spread of candidate ability, and to review the detailed design of tiering so as to make it as fair as possible. Of the first tranche of new GCSEs, we propose that mathematics, biology, chemistry, physics and combined science (double award) will be tiered.

Assessment

GCSE assessment is based on the assumption that everything that should be taught should be assessed, and should contribute to the outcome – the grade each student achieves. This is sometimes problematic: some skills cannot be assessed by written exam and yet non-exam assessments (such as controlled assessment in GCSEs) are less reliable and resilient than written exams.

GCSEs will continue to be subject to school accountability pressures, so GCSE assessment needs to be reliable and as resilient as possible. In our recent review of controlled assessment³ we found that it does not discriminate between students sufficiently. What is more, we are aware increasingly of controlled assessment malpractice – such that we cannot assure the fairness of student outcomes overall. We intend to make changes.

For GCSEs, as well as AS and A levels, we will develop alternative approaches to the assessment of those skills that cannot be assessed by written exam, including approaches that do not involve formal, graded assessment.

Most immediately, we propose to retain non-exam assessment in those subjects where it is both necessary and practical, and to reduce significantly the proportion of

Ofqual 2013 6

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³ Review of Controlled Assessment in GCSEs available at: www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

non-exam assessment in some subjects and remove it altogether in others. We propose to increase the minimum requirement for written exam assessment.

In addition, we are developing approaches that do not assume that everything that should be taught should be assessed and contribute to the student's grade for the subject – in particular where it is not possible to design an assessment that is sufficiently robust for use for accountability purposes.

We have proposed that student results from non-exam assessment in speaking and listening skills for GCSEs in English and English language be reported separately from performance in the rest of the qualification. These important skills would be assessed just as now but the results would not contribute to the student's GCSE grade. The assessment of these skills would thus be removed from the pressures of school accountability. We will announce our final decision shortly following consultation on these proposals.

We will continue to develop alternative approaches that lead to the most valid assessment of skills that cannot be assessed by written exam.

Reporting results

We are consulting on alternative approaches for reporting results that could provide more effective performance discrimination and also make it easy to tell new from old GCSEs. We are also consulting on the extent to which any additional information about individual student performance should be reported alongside student outcomes.

Setting and maintaining standards

Reformed GCSEs in England will be materially different from those that they replace, and are likely to be different from GCSEs offered outside England. We will ensure that standards are set for reformed GCSEs that compare well internationally, and we explain later in this plan how we intend to do that. We will make sure that in England standards are set consistently across exam boards, and then maintained.

In 2013-14 we will:

- make and publish decisions on the key design features of new GCSEs and on speaking and listening arrangements in current GCSEs, by autumn 2013 and regulate to bring any agreed changes into effect;
- determine assessment types and weightings in each first-tranche subject;
- determine subjects to be included in the second tranche of GCSE reform.

In 2014-16 we will:

- accredit new GCSEs in first-tranche subjects (for release to schools in autumn 2014) and second-tranche subjects (for release in autumn 2015) and determine subjects to be included in any third or subsequent tranches of reform;
- determine assessment types and weightings in the second and any subsequent tranche subjects.

A and AS levels

A levels

The primary purposes of A levels are to prepare students for higher education and to enable students to be selected according to their ability and understanding.⁴ A levels are to remain about the same size as now, and accessible to the same proportion of students.

The Government has determined that in England the current AS qualification will be decoupled from the A level and will stand alone as a qualification in its own right. AS marks will not contribute to an A level grade. The new AS will be about the same size as now and may be co-taught with the A level, if the curriculum design allows.

Subjects *potentially* in the first tranche (for first teaching in September 2015) are:

- English (language, literature, and joint language and literature), biology, chemistry, physics, maths and further maths, history and geography (to match the first phase of GCSE reform);
- psychology, art and design, sociology, business studies, economics and computing.

Reformed A levels in other subjects will follow in subsequent years.

We are ensuring that subject content is reviewed and updated for the new A levels. In parallel (and following our earlier consultation) we are making changes to the assessment arrangements for A levels).

Subject content

Government does not determine A level content, but it is government policy to strengthen universities' stake in subject content in England. Exam boards (with representatives from universities and others) are reviewing the content of the

Ofqual 2013 8

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⁴ A level Reform Consultation available at: http://comment.ofqual.gov.uk/a-level-reform/

subjects set out above in a process that we have agreed and are overseeing. We will confirm *actual* first-tranche subjects in autumn 2013 when subject reviews in the subjects listed above are completed and we have considered the scale of change required in each subject.

We will consolidate these review arrangements and strengthen university involvement in the review of remaining subjects, working with ALCAB (the new organisation being established to review A level content on behalf of the Russell Group of universities) and others.

Modularisation

A levels are unitised, with assessment available in January and June each year. We have removed January assessment opportunities from September 2013 following favourable responses to our consultation on that proposal that last year.

We intend to introduce end of course assessments, as A and AS levels are decoupled.

Assessment

Achievement in A level is generally assessed by both written exam and non-exam assessment (coursework) in varying proportions depending on the subject. Similar considerations to those at GCSE apply, albeit non-exam assessment is less prevalent at A level and school accountability measures are less pressing. However there are occasional security breaches at student and sometimes school level.

As with GCSEs, we will consider (in all subjects) alternative approaches that enable schools and students to demonstrate the teaching and learning of those skills that cannot be assessed by written exam. And we will regulate to drive improvements in written exam assessment, taking into account our international research findings.

Reporting results

Our 2012 national A level research showed broad support for the current A level grading structure and at this stage we do not propose changing it.

Setting and maintaining standards

Standards for new A and AS levels will be set broadly as now: our research shows that standards compare well internationally and we do not propose a new or different standard from that set currently in England. We will work with exam boards to maintain the current standard as A and AS levels are re-structured, and keep A and AS standards under review.

In 2013-14 we will:

regulate to implement changes to A level structure;

- determine first-tranche subjects, and consolidate and develop arrangements for subject content review in other subjects;
- determine assessment types and weightings for first-tranche subjects;
- determine subjects to be included in the second and any subsequent tranche of A level reform.

In 2014-16 we will:

- accredit new A levels in first-tranche subjects (for release to schools in autumn 2014) and accredit second-tranche subjects (for release in autumn 2015);
- determine assessment types and weightings for second and any subsequent tranche subjects.

Vocational qualifications

We plan to improve the quality of key vocational qualifications.

We will develop new ways to ensure that key vocational qualifications are fit for purpose. We will focus on the arrangements for ensuring subject content quality, the quality of assessment and the ways in which performance standards are set.

Many vocational qualifications are included in the Qualifications and Credit Framework (QCF). There are known problems in the way that the QCF operates in practice. We will review the use and value of the QCF, and consider to what extent frameworks more generally should be a feature of the qualifications system in England.

There are many vocational qualifications, serving many different purposes – some niche, others more general. In some sectors, this makes it difficult for people to make choices between them. We will require awarding organisations to review qualifications (other than niche qualifications) on the qualifications register so that only qualifications that are current and in sufficient use remain. We will provide better information on those that remain, so that people can be better informed when they make choices.

In 2013-14 we will:

- regulate to drive improvement to the quality of key vocational qualifications;
- review fundamentally the Qualifications and Credit Framework;
- regulate to control qualifications remaining on the qualifications register.

In 2014-16 we will:

- develop and implement new arrangements for providing information on qualifications, to support choice;
- continue to regulate to drive improvement (where needed) to the quality of vocational qualifications.

Standards

At Ofqual, we think about the standards of qualifications in three ways: content standards (what the student is to learn); assessment standards (how assessments are designed and delivered); and performance standards (the standard of candidate achievement, or results). If these three dimensions are right, then any assessment is likely to be a valid assessment and a proper evaluation and recognition of the student's achievement in a worthwhile programme of study.

We review GCSEs, A levels and some other qualifications before they go live, to check that they meet specified standards requirements. Once they are live we sample them in a rolling programme, comparing them with each other and with the specified requirements for them to see the extent to which they still meet requirements. Where we find shortfalls we require exam boards to make changes. We have reviewed this approach, given that these qualifications are being reformed.

We plan to prioritise and to strengthen the way we specify requirements, and our checking that those requirements are met before qualifications go live. We will also require exam boards to provide evidence of the assessment standards of their qualifications and the validity and reliability of outcomes in practice, year by year.

We will focus our comparability work on inter-board comparability – the extent to which qualifications offered by several exam boards are sufficiently comparable and of the same standard.

Content standards

GCSEs, AS and A levels

The Government is introducing a new Key Stage 4 curriculum in England. For each subject we have evaluated the extent to which the proposed curriculum provides sufficient depth and breadth and a coherent programme of study, and the extent to which it can be assessed in valid and reliable ways. We will advise Government of any perceived difficulties, and ensure that they are resolved before accepting subject content proposals for first-tranche GCSEs.

Government does not wish to determine the content of GCSEs beyond the English Baccalaureate subjects, or decide what subjects exam boards can offer at GCSE. We will propose to Government and exam boards new arrangements for the review of non-national curriculum subject content.

A level subject content is being reviewed by exam boards in a collaborative process, as set out earlier. As each new A level is developed, individual exam boards will develop AS levels that may be co-teachable with A levels, depending on curriculum

design, subject by subject. Exam boards will retain responsibility for AS subject content.

We plan to consult on the range of subjects that can carry the GCSE and A level title, to ensure that the currency and value of the brands are maintained. There is no constraint on subject topics currently.

Other qualifications

We will specify requirements to ensure the quality of subject content in vocational qualifications, prioritising those vocational qualifications that are taught in schools (where employer feedback loops are not well established) and those qualifications that represent a licence to practise.

Assessment standards

We plan to drive improvement in assessment standards.

First, as GCSEs are reformed and new A levels are introduced, we will review and strengthen the assessment objectives we specify for each subject. Many assessment objectives are currently expressed in broad terms that are open to a wide range of interpretations by exam boards. We will set requirements that reduce the scope for narrowing curriculum and assessment.

Secondly we will require exam boards to set out their assessment strategies for new GCSEs, AS and A levels – the ways in which they will ensure that assessments compare well with international counterparts, and are designed to produce valid, reliable and comparable results. Exam boards will be required to demonstrate how assessment decisions – for example, the balance of short- and long-answer questions – ensure stretch and challenge, and sufficient discrimination.

We will apply these requirements over time to other qualifications (including key vocational qualifications), applying a risk-based approach.

Thirdly we will upgrade our pre-live checking process (known as accreditation) for GCSE and A levels. We will require new GCSE specifications and sample materials to be submitted in subject tranches by exam boards, to enable us to make comparisons in each subject across all exam boards. We will keep under review the extent to which qualifications other than GCSEs, AS and A levels should be submitted for accreditation.

Fourthly we will increase the minimum written exam assessment time for new GCSEs (to reflect the reduction in non-exam assessment) and develop the controls of non-exam assessment where necessary, to protect standards.

Fifthly, we will complete a review of the quality of marking in key qualifications and regulate to implement any recommendations arising from the review.

Lastly, we will develop and introduce a periodic review of A level and GCSE assessment standards, taking into account any available comparable data and information on individual assessments' validity and reliability, and the demand and predictability of assessments.

Performance standards

We oversee the setting of performance standards for key qualifications. We impose requirements on exam boards, designed to ensure comparability of performance standards between boards and over time. We welcome the Education Select Committee's recent recognition of our work in controlling grade inflation and ensuring that awarding organisations do not compete on grading standards in key qualifications,⁵ and the endorsement of both the Select Committee⁶ and the High Court⁷ of standard-setting in GCSE English qualifications in 2012.

GCSE performance standards

Increasingly, candidates are being entered early in key subjects (most particularly maths), entered for more than one exam board's GCSE in the same subject and for IGCSE rather than, or as well as, GCSE (most particularly in English and English language). These trends make standard-setting complex and difficult and increase the risk of unfairness for candidates overall. We have advised Government of changes needed to school accountability measures to reduce risks to standards, and we will strengthen our working arrangements with exam boards and others to identify and discourage school behaviours that distract from good educational outcomes and risk standards.

Our plans for setting GCSE performance standards for the future are set out below. Most immediately we are taking remedial action to ensure performance standards in specific subjects.

www.publications.parliament.uk/pa/cm201314/cmselect/cmeduc/204/204.pdf

⁵ Great Britain. Parliament. House of Commons (2012) *The administration of examinations for 15-19 year olds in England.* London: The Stationery Office. (HC 141ii) www.publications.parliament.uk/pa/cm201213/cmselect/cmeduc/141/141ii.pdf (assessed 5th August 2013)

⁶ Great Britain. Parliament. House of Commons (2012) *2012 GCSE English results.* London: The Stationery Office. (HC 204)

⁷ www.judiciary.gov.uk/media/judgments/2013/london-borough-lewisham-aqa-judgment-13022013

- Standards in biology, physics and chemistry have not been of sufficient demand. To address this we have required new performance standards to be set, with first awarding of the new standard in 2013. We will ensure comparability between exam boards as the new standards are implemented.
- We have required exam boards to produce better quality GCSEs in geography and history. We are ensuring specifications are of the right quality and we will ensure that appropriate performance standards are set.
- We have introduced particular controls for GCSE English qualifications to promote fair outcomes, and we will monitor their implementation and ensure comparability between exam boards as standards are set.

Reformed GCSE performance standards

Reformed GCSEs will be materially different from the qualifications they replace, and we do not assume that performance standards will be comparable between current and reformed GCSEs in England. We do not presume to carry existing performance standards forward to new qualifications using the established "comparable outcomes" approach.

Instead, performance standards that meet public expectations and that compare well with good international standards will need to be set. Using national and international evidence and comparisons we will develop our proposals on the extent to which performance standards should be recalibrated for reformed GCSEs.

We will ensure that we are transparent and open about how new performance standards will be set and maintained. We will also strengthen the arrangements for standard-setting and awarding in the following ways.

■ Introducing a reference test. International studies and test data⁸ suggest that national achievement changes slowly over periods of many years, rather than noticeably each year. Our current awarding system allows for incremental change each year, or over longer periods of time, but awarding judgements can be hampered by a lack of definitive evidence. In order to inform standard-setting initially and over time, we intend to develop and implement a reference test – a national test to be sat by a sufficient sample of GCSE students.

Ofqual 2013 15

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⁸ See for example the report for the ONS by CEM Centre.

Coe, R. (2007) Changes in standards at GCSE and A-Level: Evidence from ALIS and YELLIS. www.cem.org/attachments/ONS%20report%20on%20changes%20at%20GCSE%20and%20A-level.pdf%20 (accessed 5th August 2013).

Reviewing and developing the awarding process. So for example, we will agree with exam boards how reference test data is to be used alongside Key Stage 2 data and examiner judgement, and consider other ways in which awarding can be strengthened.

A level performance standards

We do not plan to recalibrate A level performance standards as new A levels are introduced. However, there are two features of performance standards at present that we plan to address.

First, relatively few A* grades are awarded in modern foreign languages when compared with other subjects with a high proportion of A grades. Secondly, there are variations in the proportion of A* to A grades awarded at A level each year in subjects. We plan to evaluate both of these features and to make improvements so that standards are as comparable and consistent as possible.

Comparability between subjects

There are differing opinions and known concerns about whether some subjects are harder or easier than others at both A level and GCSE. We will consider with experts the available data, information and evidence on comparability between subjects. We will determine whether any changes should be made to the qualifications themselves and if so, when, given other changes to these qualifications.

In 2013-14 we will:

- determine the acceptability of first-tranche A level and GCSE subject content and so determine first-tranche subjects;
- propose and agree with the Government new arrangements for GCSE subject content review in subjects for which Government is not setting curriculum requirements;
- consult and determine any change to the range of subjects that are permitted to carry the GCSE and A level titles;
- review and strengthen GCSE and A level assessment objectives and accreditation arrangements and require exam boards to present assessment strategies;
- report on the quality of marking and drive any necessary improvement;
- take remedial action to ensure performance standards in specific subjects;

- propose and consult on arrangements for performance standard-setting and awarding for new GCSEs, and specify and commence procurement of a national reference test to aid standard-setting;
- evaluate the A*/A relationship and also grading concerns in modern foreign languages and determine any action to be taken.

In 2014-16 we will:

- confirm standard-setting arrangements and expectations for reformed GCSEs;
- develop and implement arrangements for the periodic review of assessment standards in GCSE and A levels;
- oversee development and implementation of a national reference test to support the maintenance of GCSE standards;
- determine our strategies for evaluating and improving subject comparability;
- apply assessment strategy requirements to providers of other qualifications (including key vocational qualifications).

Regulation

We regulate awarding organisations (including exam boards) – those organisations that provide regulated qualifications in England and those providing vocational qualifications in Northern Ireland. Most awarding organisations offer qualifications in other countries, but our focus is on those qualifications in use in England and Northern Ireland.

Our regulatory approach differs from that of other regulators in other fields in two particular ways. We require key products (qualifications) to be individually accredited by us, and we oversee awarding (the setting of performance standards) in GCSE, AS and A levels. Otherwise we regulate much as other regulators do: we set out regulatory requirements for awarding organisations in a regulatory framework, provide guidance to show what is expected, monitor compliance and products (using risk-based approaches) and take action if we find that requirements are not being met.

Last year, the Select Committee for Education reported on the administration of examinations for 15–19 year olds in England. We welcomed the Committee's recognition of our work so far, and agreed with the Committee's view that we need to become a stronger and more challenging and effective regulator. We are changing our focus, as the Committee suggested.

Three-country regulation

The regulatory requirements for qualifications and awarding bodies are similar in England, Wales and Northern Ireland. Education policy is a devolved matter, and qualifications policy is diverging, most particularly between England and Wales. The differences in education policy and standard-setting are such that it is no longer possible to secure comparability of at least some key qualifications, and regulatory arrangements in England and in Wales need to change to reflect that. GCSEs and A levels are being reviewed in Northern Ireland, and we will liaise with the regulator in Northern Ireland to align regulatory arrangements with the review outcomes.

A and AS levels will be decoupled in England but not in Wales. GCSEs awarded in England and Wales will differ in structure, content, assessment and outcome reporting. We will ensure that GCSEs in England and Wales are clearly differentiated, so that it is easy to distinguish between them. Where standards differ across borders for existing or new qualifications we will ensure that this is made clear on qualification certificates for those qualifications that we regulate and are awarded in accordance with our requirements.

We will consider further steps as necessary to ensure clear and workable regulatory arrangements for awarding organisations and others.

Recognition

Organisations must apply to be recognised by us as awarding organisations. We will continue to set and maintain rigorous recognition standards for new entrants, and increase our scrutiny of those already recognised by us. The number of awarding organisations we regulate is likely to reduce over the life of this plan, as we accept surrender of or withdraw recognition from any awarding organisation that a) does not or cannot meet our requirements; b) has not recently awarded qualifications; or c) does not award any qualifications in practice.

We will require exam boards wishing to offer reformed GCSEs to obtain fresh recognition from us for that purpose. They will be required to demonstrate their competence and capacity to deliver.

Monitoring

Once recognised, awarding organisations self-report annually the extent to which they judge themselves compliant with our regulatory framework. We do not rely on self-reporting alone: we check compliance using risk-based approaches. Exam boards are already subject to a programme of close and continuous monitoring. We have increased our monitoring capability and plan to increase and intensify our monitoring of awarding organisations offering key vocational qualifications.

Sanctions

Like other regulators we impose sanctions for non-compliance, with potential sanctions ranging from a requirement to provide and abide by an undertaking, to formal regulatory directions, fines and (ultimately) de-recognition. We will review periodically our enforcement and sanction strategy and practice, to ensure they are effective.

Awarding

We set out on our website details of how performance standards are set for GCSE, AS and A levels. We have set out in the Reform section of this plan (see page 5) our intention to develop a reference test to assist GCSE awarding, and we set out here our other plans to regulate awarding.

We are responsible for ensuring comparability of performance standards, and we require exam boards to adopt a consistent approach each year. If necessary we intervene and take regulatory action to protect standards. We require exam boards to

Ofqual 2013 19

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⁹ www.ofqual.gov.uk/standards/summer-exams-2013/setting-standards/

apply a comparable outcomes approach to awarding and exam boards need to provide us with evidence to justify any unusual changes in cohort achievement.

We will continue to review and (if it is possible) improve our approach to performance standard setting. We will provide more information on our overall approach, and detail the specific requirements we set for exam boards and the interventions we make each year, so that the public can have confidence in our work and in the standards set.

It is important that exam boards use the best possible statistical data to guide awarding. Currently exam boards use prediction matrices of cohort Key Stage 2 results (from National Curriculum Tests taken at age 11) to guide GCSE awarding. Key Stage 2 test results are not a perfect baseline. A separate and more timely reference test (as outlined in the Standards section of this plan) has the potential to compensate for Key Stage 2 results' shortcomings to some extent, but nevertheless it is important that current prediction matrices contain good quality and sufficiently comprehensive data. We recently audited all exam board prediction matrices and found them fit for purpose but capable of improvement, and improvements are being made. We will continue to audit prediction matrices periodically and to require improvement where necessary.

To ensure public confidence in performance standards we will review arrangements for standard-setting in other key qualifications where we think it necessary, for example for large volume IGCSEs, most particularly in English.

Comparability of qualifications and services

Market and school accountability pressures can combine to drive down qualification standards in key qualifications, if left to their own devices. We are changing the way we regulate for standards, setting new and more onerous requirements to reduce the opportunities for lowering standards (see the Standards section of this plan on page 12).

In addition, to incentivise awarding organisations to deliver to the right standards we will publish data and information on how exam boards and other awarding organisations compare with each other. We plan to publish the following:

- cost comparisons data for popular qualifications;
- service-level data and information on key services, starting with exam paper production and security breaches, and the time taken to deal with appeals against marks and grades;
- details of enforcement actions and sanctions.

We will develop this approach over the life of this plan, for example as it becomes possible to produce reliable information on the quality of marking and the quality of assessments.

Certain qualifications compete directly with GCSEs and A levels – IGCSEs and BTECs, for example. We plan to regulate such qualifications more closely so that (so far as possible) qualifications considered to be broadly equivalent (and particularly those treated as broadly equivalent in school accountability tables) compete on a level playing field.

System risks

There are known and developing risks to standards in the qualifications system and the wider education system. We are developing our identification, tracking and management of the most significant system risks to standards. Most immediately we will focus on two matters: study aids provided by exam boards, and malpractice.

Well-designed study aids such as textbooks and other support materials are important for good teaching and learning. They are essential as new qualifications are brought in. However, standards are threatened if they are not well designed and controlled. We will introduce new regulatory requirements for study aids provided by exam boards to allow for their provision and at the same time protect standards.

We are aware increasingly of malpractice in the administration of qualifications and assessments. We will work with others to strengthen the arrangements for malpractice identification and management, to protect standards.

National Assessments

The Standards and Testing Agency is now established as an executive agency of Government, responsible for the development and delivery of National Assessments. Following the review of the National Curriculum, new standards are to be set in statutory tests and teacher assessments, and new ways of reporting attainment are planned for 2016. To add best value, we intend to focus on the setting and maintenance of standards and on the fairness and integrity of National Assessment arrangements.

The cost of qualifications

The price of vocational qualifications varies significantly, depending in part on the training and teaching elements sometimes included in the price. We are expanding our annual market report to include information on the comparative prices of key vocational qualifications. We will develop our knowledge and understanding of high-volume vocational qualifications so as to determine and report on the extent to which they represent value for money.

New GCSEs, AS and A levels will not necessarily be produced at the same cost as the qualifications they replace. We will identify (so far as is possible) the cost drivers for new qualifications, and expected profitability so as to be able to report on the risks associated with the new qualifications and their introduction.

If desirable, we will seek additional statutory powers and resources to enable us to regulate for the cost of both general and vocational qualifications.

Transparency and engagement

We plan to increase our engagement with those groups and individuals most interested in and affected by qualifications. We will run regular forum meetings for key groups (for example, heads, teachers and employers) while continuing to meet and talk to established representative groups.

We will continue to improve the design and content of our website. We will develop and implement a web-enabled data and information dissemination strategy, so that those interested in standards and qualifications can both see the overview and access the detail.

We will report annually to the UK Parliament and Northern Ireland Assembly on our work. We will publish the outcomes of our planned periodic reviews of the standards of assessment and produce regular data and information to enable people to contrast and compare awarding organisations and their qualifications and services.

We will publish relevant information about the steps we have taken to ensure performance standards for key qualifications each year.

The regulatory framework

We introduced our regulatory framework in 2010–11. We will continue to develop it to manage standards and the risks to standards. We will introduce new regulatory requirements where needed – for example, to ensure the reform of key qualifications, to strengthen assessment and to implement recommendations from our marking and appeals review. Conversely, some requirements in at least one element of the framework (the Code of Practice) are becoming outdated and we plan to remove them and to set out all regulatory requirements in future in our other regulatory documents, making the code redundant.

Exam boards must meet our requirements for dealing with appeals against provisional GCSE and A levels results as set out in the Code of Practice. The appeal process is cumbersome and lacking in transparency. We plan to review and simplify the process.

Some awarding organisations are members of the Joint Council for Qualifications (JCQ). JCQ takes responsibility for some systems that support key qualifications delivery – for example, scheduling assessments. With JCQ we plan to review our respective responsibilities, to ensure our arrangements are coherent and consistent so that the UK Parliament and others can be sure that we are regulating all that we should.

As Government develops its approach to ensuring that regulation is not an unnecessary barrier to economic growth we will ensure our compliance with stated requirements. Moreover, we will periodically review our regulatory framework, and evaluate the regulatory benefits, burden and effectiveness of our regulation.

In 2013-14 we will:

- review three-country regulatory arrangements;
- develop and implement all necessary regulatory requirements and processes for exam boards wishing to offer reformed GCSEs;
- review our enforcement strategy;
- review and strengthen the way we regulate qualifications competing directly with GCSE and A levels;
- regulate to control the risks to standards in study aids provided by exam boards and confirm the support that can be provided by exam boards to schools and teachers preparing for new GCSEs;
- strengthen arrangements for malpractice identification and management;
- consider and seek any additional statutory powers we need to regulate the cost of key qualifications;
- review and consolidate our regulatory framework, making the Code of Practice redundant;
- review and simplify the appeals process.

In 2014-16 we will:

- publish exam board service and cost comparison data and information;
- continue to develop our regulatory approach and our oversight of national assessments;
- continue to identify and manage system risks;

 if necessary (assuming essential statutory powers) regulate to control the price of key qualifications.

Developing Ofqual

Ofqual has existed for three years, and in that time the job we do has changed and grown considerably.

Capacity and capability

We will continue to develop our capacity and capability and ensure value for money for the taxpayer. By March 2014 we will employ around 200 people. We set high standards for our staff, and we are developing new ways of working in order to become a stronger, more challenging and more effective regulator. During the life of this plan we will focus particularly on developing capacity and capability in the following areas:

- Standards and assessment
- Research and evaluation
- Data and information collection and analysis
- Report-writing
- Programme and project management
- Strategic communications.

Resources

Our administration and programme resources provided by the 2012–15 Comprehensive Spending Review (CSR) were £17.1 million in 2012-13 and reduce to £16.4 million in 2013–14 and to £15.7 million in 2014–15. Resources for 2015–16, the third year of this corporate plan, will be determined by the 2015-16 CSR, the initial outcome of which was announced at the end of June. Our resources were determined before we were established and were set at a level which assumed we would regulate awarding organisations providing existing qualifications while delivering efficiencies over the CSR period in line with wider government policy and economic need. Our resources were also set before we could determine how we would deliver our objectives or what our costs would be. The GCSEs and A level reform programmes now require us to do significantly more than envisaged in our 2012-15 CSR settlement and our resources have been increased by up to £2.5 million in 2013-14, by up to £2.0 million in 2014-15 and, depending on the outcome of the 2015-16 CSR, by up to £1.5 million in 2015-16. Our work on vocational qualifications will also require us to do significantly more than initially envisaged and we will discuss with Government how this work will be funded as its scope and timing is determined. To match the increase in our work volume we will

continue to develop our business planning and financial management to ensure that what we do is demonstrably value for money.

We understand that there is no current intention to reduce our resources in 2015–16 as a result of the 2015–16 CSR recently undertaken, but should resources be reduced, we will have to reconsider the activities and commitments set out in this plan, taking into account our statutory objectives.

Measures of achievement

We will report to the UK Parliament and to the Northern Ireland Assembly on the extent to which we deliver our plans and achieve our statutory objectives.

We plan to develop Key Performance Indicators and to report against them in 2014 and beyond.

We wish to make our publications widely accessible. Please contact us if you have any specific accessibility requirements.

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