

INQUIRY INTO A LEVEL STANDARDS

Final Report

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December 2002

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INTO A LEVEL STANDARDS

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2 December 2002

A LEVEL INQUIRY: PHASE 2 REPORT

I am pleased to attach the final report on my inquiry into the conduct of the A level system. This phase 2 report makes proposals not only to secure the examining process in 2003, but also on how the system might be developed in the future.

I firmly believe the present operation can, and should, be improved. I hope you will find my recommendations helpful in this regard.

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SUMMARY OF CONCLUSIONS AND MAJOR RECOMMENDATIONS

1. This inquiry has sought to resolve the major concerns expressed this summer with the grading of A levels and propose arrangements which will secure the examinations in the future and provide assurances that the A level standard is being maintained year on year.
2. I remain convinced that my interim report and the subsequent review of grade boundaries dealt effectively with the major concerns and allegations about manipulation of the grading process. Some of the remaining concerns are not a consequence of grading but relate to subject syllabuses (technically known as “specifications”) or the marking and moderation of students’ work. These concerns are being dealt with separately by the QCA and the relevant awarding bodies.
3. Action by the QCA and the other regulatory bodies on my earlier recommendations, allied to further proposals made in this final report will, in my view, secure the standards and integrity of next year’s examinations. That has been, and remains, my priority. The action taken includes defining the standard and levels of demand to be associated with the AS and A2 examinations, supported by exemplification of performance at grades A and E. This will, I believe, deal with the major concern I had with implementation of the Curriculum 2000 reforms.
4. Changes to the Code of Practice will ensure in future that a more appropriate balance is struck than was always the case in the past between professional judgement and statistical data in setting mark grade boundaries, and that late changes to these boundaries will require either the agreement of Chairs of Examiners or a report to QCA and the governing body of the relevant awarding body. Through these and other measures in hand, I hope that teachers, students, parents and users of A levels will have their confidence restored. However, it is vital that all the changes are communicated effectively and speedily to all the relevant groups; if nothing else, this inquiry has revealed the need for far better communication of changes to our qualification system. In this context I fully endorse the

communications plans which the QCA is currently developing to improve professional and public understanding.

5. Once the above changes have been implemented over the coming months, a period of consolidation is necessary before further evolution of the AS and A2 system is undertaken. Any further changes must be carefully planned, piloted and introduced over a sensible period. My recommendations must be seen as evolutionary and should be considered in many cases within existing policy developments, including reduction of bureaucratic burdens on schools and colleges and the 14-19 proposals due to be published shortly.

6. The major recommendations cover:

Medium Term

- Systematic reform of the administrative requirements for the AS and A2 examinations to reduce the demands placed on schools and colleges by the awarding bodies' differing requirements and practices (paragraph 112).
- Professionalisation of examining. This should include high quality training for examiners and examination officers linked to career development (paragraphs 134-136).
- Clarifying and making more transparent the relationship between the QCA, the DfES and the awarding bodies, through a memorandum of understanding. In addition, there should be changes to the responsibilities of QCA (paragraphs 95-96).
- Arrangements to ensure, and reinforce confidence, that standards over time are being safeguarded (paragraph 29).
- Simplification to the rules governing re-sits and "cashing-in" of AS units (Paragraph 43.)
- Changes to the timetable for publication of A level results to give more time for marking and awarding (paragraph 58).

- Increasing the use of ICT in the administration and marking of public examinations and eventually in the examining process itself.
(Paragraph 163.)

Longer term

- De-coupling of AS and A2 to create two free-standing qualifications as part of the 14-19 policy developments. Consideration should be given at the same time to other changes in the design of A level assessment (paragraphs 42 and 53).
- Further work on the practicality of introducing a post-qualifications admission (PQA) system for entry to Higher Education (paragraph 59).

7. This inquiry arose out of concerns expressed by schools in England about the processes followed by Awarding Bodies based in England. However, a number of my recommendations have impact and relevance not just in England but also in Wales and Northern Ireland. It is vitally important that the QCA and its partner bodies, ACCAC in Wales and CCEA in Northern Ireland, continue to work closely together to ensure the smooth and consistent delivery of qualifications throughout the three countries.

8. Finally I believe it to be vital that there is greater public understanding of the examination process and that as a consequence there is an end to the annual argument about A level results. The standard has not been lowered if an increased proportion of students meet it as a consequence of improved teaching and hard work.

INTRODUCTION

9. This inquiry was set up following concerns expressed about the setting of A level standards in July 2002. The terms of reference for the inquiry are:

- *To investigate allegations about the setting of standards for A-level grades this year. In particular, to make sure that the conversion from marks to grades was determined according to proper standards and procedures. A first report on this will be provided to the Secretary of State by Friday 27 September.*
- *To investigate the arrangements at QCA and the awarding bodies for setting, maintaining and judging A level standards, which are challenging, and ensuring their consistency over time; and to make recommendations by November to the Secretary of State and Ken Boston, Chief Executive of the QCA, for action with the aim of securing the credibility and integrity of these exams.*

10. The first point was covered in my interim report published on 27 September. This led to the review of grades awarded to candidates for one or more units in 31 separate A level subjects. The outcomes of the review were that 9,800 candidate entries had unit grades improved and of these 1,945 candidates received higher overall AS and A level grades in at least one subject. Other recommendations in the interim report have been the subject of work by QCA, supported by a programme board. I have been encouraged by the progress made so far.

11. This final report deals primarily with point 2 of the remit though necessary reference has been made to the action proposed in relation to the recommendations made in my interim report. The priority of this final report has been to secure the examination process for 2003 so that there can be no repetition of the concerns expressed this year. In addition, proposals are made for the medium term once the standards and levels of demand of AS and A2 have been firmly established in the system and the revised arrangements in the Code of Practice have become fully operational. There should be no major upheavals of Curriculum 2000 before the above have been achieved.

12. The medium and longer term changes need to be considered as part of other significant policy developments such as the drive to reduce bureaucracy

and simplify demands on schools and colleges and the 14 -19 proposals due to be announced shortly. The latter provides an ideal basis for considering a number of my recommendations

13. I have been greatly helped in preparing this final report by the many written submissions from bodies and individuals (over 100) and by the three regional meetings I have held with teachers, head teachers, college principals, governors, pupils and students. A schedule of evidence presented to the inquiry is included as an annex. The views offered have always been constructive and insightful and I am grateful to each and everyone for their input, particularly given the pressures upon their time.

14. These meetings have also raised some continuing concerns with the 2002 examination process. A significant number of these relate to the quality of marking, coursework, promptness and extent of responses of the Awarding Bodies and to the effectiveness of the assessment requirements in some subjects. The latter are being revised for 2003 and some other concerns are covered in this final report.

15. Many of my recommendations will involve not only the Awarding Bodies in England but also those in Wales and Northern Ireland. I have appreciated the cooperation of colleagues from ACCAC in Wales and CCEA in Northern Ireland.

16. I also wish to record my sincere thanks to members of the reference group: Mike Cresswell, Sue Kirkham, Judith Norrington, David Raffe, Sue Singer and Leslie Wagner. Together they have provided a sounding board and have interrogated the evidence. This report is, however, mine. None of the views, nor any flaws, are attributable to the group. Finally I must thank the team who have supported my inquiry: Audrey Beckford, Marcus Chrysostomou, Darren Goff, Nancy McLean, Georgina Nolan, Peter O'Connor, Kate Taylor and Matthew White.

THE PURPOSE AND DESIGN OF GCE A LEVELS

What are A levels for?

17. Ever since their introduction, A levels have been associated with entry to higher education. This remains a valid and useful application. But over time they have also acquired a broader significance as a precursor to employment and as one strand in a qualifications framework which is designed to recognise the full range of advanced achievement of which young people are capable, ranging from the purely academic and theoretical learning through to the skills and knowledge associated with specific jobs. This trend is embodied in the Curriculum 2000 reforms which increased the flexibility of, and broadened the range of subjects and types of learning within, the A level strand, for instance by establishing A levels in vocational subjects.

18. During my inquiry, I have found broad commitment to this wider purpose of A levels as a means of recognising young people's achievement, and strong support for the principles of the Curriculum 2000 reforms. Students in particular value the possibility of studying a broad range of subjects in their first year of A levels and achieving a recognised AS qualification at that point for those subjects which they do not pursue to full A level.

19. There is also strong support for the existing A level design principle that the achievement required for an A level should remain the same from year to year and reflect predetermined standards of attainment, irrespective of how many students achieve the necessary standards. This is often thought of as "criterion referencing", although paragraphs 63 to 65 describe some of the difficulties of applying pure criterion referencing to A level examinations and assessment. I have encountered very little systematic support for a return to grading in which fixed quotas of grades would be awarded to students according to rank order rather than performance against a fixed standard of achievement (broadly, "norm referencing"). This conclusion is not incompatible with their traditional role as a filter for entry into higher education

or employment. But it nonetheless has significant implications for the design of the A level framework.

20. Even in relation to university entry, A levels must constitute more than a simple means of ranking students to help HE admissions authorities choose between applicants. They must also contain an assurance that students have acquired the specific skills and knowledge that they need in order to embark on their chosen degree course.

21. This role of accrediting specific levels of knowledge and skills is even more important if A levels are to act as a consistent and reliable indicator of students' achievements from one cohort to the next. In this wider context it is the accreditation of known standards of achievement which is important rather than the ranking of individual students against their peers. This reinforces the weight of argument in favour of judging students' performance against a fixed standard. If 100% of students reach the standard then 100% should pass, and that outcome should not be seen as a 'lowering of standards'.

22. The design implications arising from this have been significant in the recent developments of the A level system. Confident matching of students' performance to a fixed standard requires not just accurate and consistent marking but also the ability to define and maintain standards of grading from year to year and between subjects, and the means to judge the performance of individual candidates against that standard.

Standards over time

23. Ever since the 1996 Standards Over Time study undertaken by QCA's predecessor body, SCAA, and OFSTED, QCA has sought input from independent experts to its work and to verify its conclusions on the maintenance of standards over time. Such work has in the past been hampered by the absence of definitive evidence about students' performance over the past three decades. For more recent years, the systematic archiving of examination material will ensure that such evidence is available to inform future work.

24. Earlier this year, an independent report by a panel of three international experts, Chaired by Professor Eva Baker, commended QCA's work in monitoring A level standards, whilst also highlighting the difficulty of answering with certainty the question of whether standards have been maintained.

25. Whilst changes to qualification structure, syllabus content and assessment methods can make the task more difficult, I believe it is important that QCA should maintain efforts to investigate comparability from year to year and across the A level system, and should do so in a way that commands credibility with education professionals and the public. In doing so, QCA should build both on its existing rolling programme of five-yearly subject reviews and its use of external expertise and verification. The annual debate about A level standards undermines and devalues demonstrable improvements in teaching and learning over time, and the hard work and commitment of students. Action is needed to ensure that the evidence is available to rebut ill-founded claims both about the value of qualifications and about year-on-year comparisons. But, equally, it is vital that where legitimate concerns exist about standards, these must be looked into and appropriate remedial action identified and taken.

Setting and Maintaining the standard

26. The crucial first step is to establish a common understanding of what the standards should be. In my initial report, I highlighted the absence of a clear understanding of the standards or levels of demand for either AS or A2 assessment which lay at the heart of the concerns this year about the grading of A level performance.

27. QCA, the other regulators and the awarding bodies have been working to rectify this deficiency. By the January 2003 examinations there will be in place:

- a description in broad terms of the separate AS and A2 standards and levels of demand, and their relationship with the overall standard of the

former A level system. This makes it clear that the level of AS is equivalent to the first half of a two year traditional A level course, and that A2 covers the more demanding material found in the second half;

- descriptions of the performance that merits an E grade and A grade for both AS and A2 in the 27 A level subjects for which QCA has established subject criteria;
- exemplar material illustrating, through students' actual scripts and other material, the level of performance at A and E grades for both AS and A2 in the twelve most popular A level subjects, covering some 90% of the January entries.

28. By June 2003 the exemplar material will be extended to cover all A level subjects. In the longer term the material will be strengthened, refined and reviewed in the light of further experience.

29. **I now recommend that QCA should establish an independent committee whose role would be to review and, if necessary, advise QCA publicly on whether or not standards are being maintained – advising on a limited number of subjects each year - using all the available evidence including subject syllabuses, students' work, mark schemes and question papers. The group should also be able to review and verify other aspects of QCA's regulatory work, as requested by the QCA board. This committee will help provide reassurance that standards are being kept continuously under review and that, where necessary, action will be identified and taken to safeguard standards over time.**

30. I am satisfied that these measures will provide a secure foundation for the grading of A level entries; help ensure that individual candidates' performance can be consistently and reliably graded; and provide credible ongoing evidence that standards are being maintained.

31. In the longer term, however, I believe that there are some further steps which can reduce the complexity of the AS/A2 system and provide a more readily understood basis for grading.

Relationship between AS and A2

32. The annex to this report shows the key steps in the examining and grading process. Students' scripts and other work for AS and A2 units are marked and graded separately and then combined to determine the candidate's overall A level grade. The process to arrive at the final grade is complex.

33. First, a sample of students' work and other information is used to determine the mark which should define each grade boundary for each unit. Those grade boundaries are then translated into fixed points on a uniform mark scale (UMS). The range covered by this scale varies between units. For a 0-100 scale, the ranges of scores for each grade are: E=40-49, D=50-59, C=60-69, B=70-79, A=80-100. The scores for each grade boundary on scales which are less or greater than 100 will be proportionately lower or higher. From that, individual students' marks for each unit are translated into a UMS score for the unit. Marks which lie between two grade boundaries on the raw mark scale will translate into intermediate points between the same two boundaries on the UMS scale. The UMS scores for individual units are then added together to give an overall UMS score for the subject as a whole. The maximum total UMS score is always 600. The final A level grade is awarded based on where the overall score lies in relation to fixed points on this 600 point scale (ie E=240 to 299, D=300 to 359...).

34. This summer's experience, reinforced by much of the evidence submitted to my inquiry, demonstrates clearly the lack of clarity among teachers, students and parents about the way in which students' marks for individual units are converted into UMS scores for each unit and overall grades. In particular, there is no clear understanding of the relationship between marks awarded for individual units by markers and the UMS scores on which the final grade is based.

35. A further layer of complexity is added by the range of choice with which students are faced about the options for re-sitting units and “cashing-in” their AS units in exchange for an AS award part-way through their A level course. Broadly, after a student has completed the three AS units they may:

- exchange their unit UMS scores for an AS qualification in the relevant subject - an option known as “cashing-in”;
- elect to move straight on to A2 units without cashing in their AS units;
or
- re-sit some or all of the AS units in an attempt to improve either their AS grade before cashing-in or their overall A level grade.

36. Even after AS units have been cashed-in, the student may re-sit some or all of the same AS units in order to improve their overall A level grade.

37. These arrangements give students a great deal of flexibility. But the awarding bodies’ current guidance on the ‘entry, aggregation and certification’ of A levels acknowledges that: “For many centres and students the decision whether or not to cash in can be a difficult one.” That appraisal is certainly borne out by the remainder of the guidance, which, for instance, offers as a worked example a situation in which for a single subject the student sits 4 units (ie including 1 re-sit) to achieve their 3 unit AS award and a total of 11 (including 5 re-sits) to complete their full 6 unit A level course. One of the relevant AS units is repeated 3 times.

38. There are other potential complications. For example:

- if an AS award is cashed in at the end of the first year, the AS result must be declared on any UCAS application form. If they are not cashed in, the student may report the unit results to UCAS but does not have to;
- because a student may re-sit AS units after cashing-in, the AS unit results which comprise the original AS award may be different from the AS unit results which contribute to the overall A level grade.

39. None of this implies that the system is technically flawed. I am satisfied that operated in this way, and applying the correct AS and A2 standards, assessment will be robust, and that students will receive grades that are technically accurate and which reflect their overall performance. Action is needed over time to simplify the awarding arrangements and reduce the complexity and lack of transparency which affects perceptions about the system's reliability and fairness.

40. This might partly be rectified by more intensive efforts to provide accessible information about the grading process and the options open to students. But as it stands the system is unlikely ever to attract the levels of public and professional understanding which would prevent recurring confusion and dissatisfaction. In my view, the complexity of the current arrangements will continue to undermine the extent to which A level results are understood and trusted, even though the actual outcomes accurately reflect students' achievement.

41. Nor am I persuaded that the existing processes for sitting and re-sitting units and for combining AS and A2 scores are necessary to the effective accreditation of students' achievement. The rationale initially has been to provide a single overall grade which is directly comparable to those awarded for the former A level. As the new system becomes embedded and stands in its own right, the need to relate all current achievement to the previous A level outcomes will diminish. In effect the continuity of A level standards would be carried forward in the separate AS and A2 standards and levels of demand and the design of the qualifications rather than in direct comparability between students' past and present results.

42. I therefore recommend that in time, and as part of the 14-19 policy development process, the AS/A2 system should be simplified as follows:

- **AS and A2 should be assessed, graded and awarded separately. They should become distinct and separate qualifications;**

- **as now, AS should cover the first half of a two year A level programme; and A2 should cover the more demanding second half. No element of assessment of either should be at a level which would have been outside the scope of a traditional A level course;**
- **before any new arrangements are introduced, the separate standards for AS and A2 should be securely established and embedded within the existing A level framework; and time must also be allowed for the necessary design, development and testing of the new arrangements, and of any further changes along the lines illustrated in paragraph 46, below.**

43. As an interim measure, in the shorter term, I recommend that the QCA and Ministers should look urgently at the scope for simplifying the rules governing re-sits and the cashing-in of AS units, with a view to introducing changes for students embarking upon AS in September 2003 for examinations in 2004.

44. Separation of AS and A2 would build on the existing system. Examinations could continue to be set, taught, assessed and graded as now, using the established AS and A2 standards. It would also retain the consistency in the levels of demand inherited from the “legacy” A level which the current AS/A2 design is intended to secure, and it would retain the possibility of students receiving a qualification for the subjects which they drop after AS. At the same time, it would remove the complexities and scope for confusion within the process for re-sitting units, cashing-in, and combining AS and A2 unit results to give a single overall grade.

45. There are nonetheless some important policy and design issues which would need to be resolved, including:

- the extent to which completion of a relevant AS course should be a precondition of entry onto A2 courses;

- the extent to which A2 should include “synoptic” assessment – whether it should not only assess the material covered in the A2 units but also ensure that students can relate what they have learned across both the AS and A2;
- retaining flexibility for adults and other non-traditional learners;
- ensuring consistency with the structure and evolution of vocational A levels;
- maintaining the value and currency of the AS award in its own right.

46. Separating the two awards in this way would also provide an opportunity to review other aspects of the syllabus and assessment methods, for instance to reflect the nature of learning in specific subjects; to reduce burdens on the examination system by changing the weight of, and balance between, coursework and examinations; or to change the ways in which synoptic assessment is integrated into the course. The factors that would influence final decisions on these issues go well beyond the boundaries of my remit. I make no specific recommendations on them except that in following up the recommendation for separate AS and A2 awards, consideration should be given to these issues.

47. There is a range of potentially significant changes arising from this work. Reform should not be rushed. Implementation should take account of emerging timetables for wider 14-19 policy development. Equally crucially, sufficient time must be allowed for the necessary design, development and testing, and for schools and colleges to familiarise themselves with any changes. In my view it should be at least five years before significant changes are fully introduced, although the preparatory work could begin almost immediately.

Relevance for Northern Ireland and Wales

48. Maintenance of the national qualifications framework covering all three countries requires application of the A level standard and design changes on

a three country basis. The recommendations in this chapter should therefore be taken forward jointly.

REDUCING BURDENS ON THE SYSTEM

49. The evidence presented to me suggests that the public examinations system is operating at, or even beyond, capacity. Last year, the number of examination scripts and coursework assignments produced at GCSE, AS and A level totalled 24 million. In GCE advanced, the number of entries across the UK has increased 158% in the last 20 years; from 656,838 A level entries in 1982 to 1,696,784 A and AS entries in 2002. Full A level (ie not AS) accounted for about 700,000 of the 2002 entries. This increase is a result of the higher numbers staying on post-16, changes to the design of GCE advanced qualifications and of the popularity of AS. Candidates are now examined for AS at the end of Y12, often in more subjects than they would traditionally have taken at A level, and assessment across Y12 and Y13 is done on a modular, rather than a linear basis. There has been a corresponding increase in the complexity of the system and in the volume of decision-making at the awarding stage.

50. GCSEs and national tests also contribute very significantly to strains on students and on the examination system. In 2002 there were around 6 million GCSE entries and nearly 2 million children sat Key Stage tests, including over 600,000 at Key Stages 3. Students are externally assessed in at least four out of the five years from age 13 (ie year 9) to age 18 - to the detriment of some wider educational and developmental activity. The need to deliver the rising quantity of examination-related tasks stretches awarding bodies, schools, colleges and teachers

51. Some of the recommendations in this report will simplify the system, improve its efficiency and potentially reduce the burdens on schools, students and awarding bodies. Action to improve the supply of examiners will also help to increase the capacity of the system to deliver. However, I am convinced that the issue of burdens, particularly that which arises from external, examination-type, assessment can only be addressed effectively by looking more widely than A levels. Addressing this issue in the long-term implies a review of assessment at all levels, with a view to reducing the number of

external examinations and tests pupils must take. That breadth of activity is beyond my remit. Options relevant to A level include:

- reducing the number of assessment units; and/or
- making greater use of internal assessment and coursework.

52. Neither of these options is necessarily incompatible with the AS/A2 model recommended in paragraph 42. There is no *prima facie* reason why a modular curriculum requires separate assessment of each module and it may be that three curricular modules could be assessed in two assessment units. The burden of external examination could also be reduced by relying more on internal assessment and coursework, providing care is exercised to ensure that the total burden of internal assessment does not become excessive. There are issues that would first need resolving about coursework standards and how it is assessed, and about the training and professionalisation of examiners, some of which are explored in paragraphs 120 to 136. It has not, however, been possible in the time available for me to come to any firm conclusions about the amount and type of assessment appropriate to the curriculum and the maintenance of standards.

53. I recommend that, as part of the development of the 14-19 reforms, the Government and its partners examine carefully the scope for reducing the total burden of external assessment derived from GCSEs and A levels.

Relationship between the timetables for A level examinations and university admissions

54. The timetable for the marking and grading of A levels has been driven largely by the need to issue results in time to ensure that students may confirm their university places before the start of the academic year. Although there have been huge changes in the volume of A level entries, the time

available for marking, grading and issuing results has hardly changed in 50 years.

55. The availability of technology has removed much of the burden of administration and data processing, but time pressure remains a significant factor and can still have a notable impact on the quality of the marking and awarding processes. For example, post examination meetings to standardise marking and determine grade boundaries sometimes have to take place with only a limited amount students' work available on which to make judgements.

56. The timing issue has also adversely affected some of my own recommendations. In particular, it is my view that considerable benefits could be gained in the judging and maintaining of standards from the presence at awarding meetings of a Chair of Examiners from another board. As set out in paragraph 70, however, given current time constraints and capacity issues I do not believe that this is possible in the short-term.

57. It would in my view be beneficial to create additional space in the academic calendar for awarding to reinforce arrangements for guaranteeing standards and to enhance public confidence that important procedures are not being rushed. This needs, however, to be balanced against other demands, not least the time available for teaching. Consideration of these issues is well beyond the scope of my remit, though I do believe there are steps that can be taken which will bring about immediate improvements.

58. As an interim measure, I believe that delaying the publication of AS and A level results by 1-2 weeks is possible if consequential adjustments are made to the timing of GCSE results – perhaps with GCSE results coming out later in the same week as those for A levels. The impact on university admissions procedures, including clearing, should be manageable and offset by the potential benefits. I recommend that this is done to take effect as soon as can realistically be managed without risk to the effective administration of the systems for examinations and for entry to higher education.

59. For the longer term, I recommend that consideration be given to structural reforms to the timetables for A levels and university admissions to extend the time available for examining and awarding, without reducing the teaching time for A levels. This should, in my opinion, include looking at the possibility of reform of the school year and the university admissions timetable with a view to moving to a post-qualifications admission (PQA) system.

60. Though there are practical issues that need to be addressed, I have been persuaded in the course of my inquiry that PQA has much to commend it. The movement to PQA would increase accuracy in the admissions process as well as removing much of the burden of clearing. Students would be relieved of the stress of applying for universities during year 13 and have more time to focus on gaining good results. I think therefore it is worth considering how a PQA system might be established. This might include looking at:

- delaying the start of the first year of university. Moving the start of the first year of undergraduate study back to, say, the end of October might provide the additional space necessary for robust quality assurance and PQA. The impact on first year teaching might, if universities wished, be offset by a narrower break between the first and second years. This is a matter for universities to resolve, and they may want to consider how it would relate to other changes, such as the trend in many universities towards the adoption of a semester system, and the balance between the potential costs and the benefits of PQA in simplifying university admissions. I urge UUK to continue their work in this area;
- the LGA recommendation for a six term year. If this model were adopted on a national basis, examinations could perhaps be taken in term five, giving awarding bodies substantially more time to carry out the awarding process. The knock-on effect for earlier years would need careful evaluation, as an earlier start to the school year would be

necessary to ensure no reduction in the teaching time that teachers and students already feel is too compressed, especially for AS. The impact on the availability of markers and the present twice-yearly examination sessions would also need to be assessed.

Relevance to Northern Ireland and Wales

61. Action to tackle burdens of assessment may be a matter of national policy and need not necessarily be common to all three countries. Nevertheless, any reforms which affect the design of national qualifications must be developed on a three country basis. Equally, reform of the A level and school and university timetables would need to apply across all three countries. The impact on Scotland, especially of changes to the university year, would require appropriate involvement by Scottish institutions in consideration of any changes.

PROCESSES FOR GRADING STUDENTS' PERFORMANCE

62. The basis for any system of assessment intended to judge students' achievement using a fixed standard should in principle lie in a comparison of individual students' work against that standard. Many of the perceptions this year about the quality of the A level grading processes have been based on the perception that there can and should be a direct and fixed relationship between the marks for individual students' work and the grades they are awarded.

63. In practice, the system cannot be this simple. Neither the setting of standards, nor the judgement of individuals' work can be sufficiently precise to produce consistent and accurate grades directly from the marking of work. Most notably, the assessment process involves subjective judgements of individual examiners in the setting, marking and grading of students' work. Without intervention, variations in those judgements would lead to inconsistency of grading within and between subjects.

64. The awarding process needs to compensate for these inconsistencies. The awarding bodies have therefore developed sophisticated techniques for the use of historical and other comparative data to cross-check and modify judgements based on students' work. The purpose is not to substitute grading against a fixed standard with some form of norm-referencing but to produce consistency and accuracy of grading over time and between subjects: if 100% of students meet the standard then 100% should pass. Effective use of statistical information will provide results which are closer to those that would result from effective criterion-referencing than could be achieved by considering individual students' work in isolation from statistical and other comparative information.

65. I must stress that the use of statistical and other information in this way is a wholly legitimate and necessary part of the process of maintaining standards. But it is clear that part of the problem in 2002 was the perception that too much weight was accorded to statistical information in the grading process for some subjects, and particularly in modifications made in the latter

stages of the awarding process to the grade boundaries recommended to awarding body Accountable Officers by their Chairs of Examiners.

66. It is in my view essential to restore confidence in the grading process as a whole, and particularly the legitimate use of statistical information.

67. The regrading process following my initial report reviewed late changes by the Accountable Officers to mark grade boundaries which fell outside the scale which had been normal for such changes in the past. This review involved independent observers nominated by the organisations representing teachers, schools and colleges. I believe that it has helped restore confidence in the 2002 A level results.

68. But longer term action is needed to ensure that similar concerns do not arise in 2003 and subsequently. QCA, together with the other regulatory bodies, is currently revising the Code of Practice governing A level grading in time for the January 2003 examinations to: give greater emphasis to examiners' judgements about the quality of candidates' work and to clarify the role for statistical evidence in awarding; to ensure consultation between Accountable Officers and Chairs of Examiners before grade boundaries are finalised; and to ensure that QCA can monitor grade boundary decisions made by Accountable Officers. These are important steps towards improving the transparency and consistency of the awarding process.

69. **In addition, I now recommend that:**

- **as a short term measure, to help restore confidence in the system, for the January and summer 2003 examinations only, the QCA, in consultation with the Secretary of State, should appoint an appropriately qualified individual to observe and report publicly to the QCA board on the awarding process;**
- **permanent procedures should be put in place for QCA to scrutinise all stages of the awarding process, including Accountable Officers' and other consideration of the grade**

boundaries recommended by Chairs of Examiners;

- **as with the re-grading exercise, nominated representatives of teachers, schools and colleges should be invited, and given the necessary training, to observe and report each year in confidence to QCA on the application of the processes governing the setting of mark grade boundaries;**
- **QCA should take steps to ensure that Chairs of Examiners are, and are seen to be, impartial in giving their professional opinion during the awarding process.**

70. I have considered very carefully recommending that the awarding processes of each of the awarding bodies should involve examiners from another awarding body. I believe that this cross-referencing of standards strengthened the re-grading in October. In the longer term, too, it would help reinforce the mechanisms for maintaining consistent standards. However, on the basis of the evidence presented to me, I am forced to conclude that it is not a practical proposition whilst the existing time and resource pressures persist during the period when A levels are marked and graded. However, I believe this matter should be kept under review.

Other issues relating to this year's concerns

71. In the context of phase 2 of my inquiry, I have looked carefully at the circumstances that gave rise to some of the individual cases which have been highlighted as a cause for concern this year, such as the appearance of results for individual units which appeared to be out of line with the relevant students' pattern of results in other units ("the AAU problem").

72. Most of the concerns raised by those cases related to the overall standard setting and grading processes, which I have addressed in my two reports. However, there are other cases which highlight issues related to the

design and quality assurance of individual subject syllabuses and marking schemes; and the consistency and transparency of marking.

73. For instance in one coursework unit, the design of the syllabus and marking scheme made it inevitable that students' marks would be compressed into a very narrow range. The result was 9 marks (from a total of 50 available) separating the A and U grades. Where the grade boundaries are this close together it is difficult for the grading process to differentiate effectively between the performance of individual candidates. QCA and the awarding bodies are taking the necessary steps to correct such flaws for examinations in 2003.

74. Some continuing concerns have been expressed to me about the consistency of marking. Many of the case histories submitted to my inquiry, including some that have fuelled concern about "rogue" grades, appear to have affected only individual candidates or groups of students within a school. I am persuaded that such results cannot be the result of systematic manipulation of the grading process since that would downgrade all of the students taking the relevant units and in extreme cases would have led to up to 80% of them receiving a U grade. I have no evidence that this happened in any unit. I can therefore conclude that such cases are either a proper reflection of lower-than-expected performance by the candidate or inconsistent marking and/or coursework moderation. I have no clear evidence on which to judge a conclusion about the balance between these two explanations.

75. I am concerned also about the quality of communication and feedback to schools and colleges. For example, a number of case histories were submitted to me in which specific concerns about students' grades were based on significant misunderstanding of the A level marking and awarding process (e.g. about the translation from raw marks to UMS scores). Despite correspondence between the relevant school or college and the awarding body, these misunderstandings were often not corrected or explained, leaving teachers and students uncertain about whether their work has been treated fairly. It is essential that schools, colleges and students have access to high

quality feedback and clear explanations of the processes which have applied to their entries.

76. I am clear that all these problems are separate from the allegations which I investigated in my first report that the grading process was systematically manipulated. Similar issues can, and have, arisen in previous years. They have nevertheless added weight to the current concerns about the credibility of the system.

77. I do not believe that changes are needed at the level of system-wide procedures and practices to prevent such problems occurring again: they can and should be detected and tackled on a case-by-case basis as they arise. I am content that the existing regulatory framework, if properly applied, offers the correct mechanism to achieve this. Nevertheless, it is necessary for the regulators and the awarding bodies to keep their quality assurance and communication procedures under review in the light of experience. This year's events offer a good deal of experience on which to draw.

Relevance for Northern Ireland and Wales

78. The Code of Practice and other key regulatory processes are common to all three countries. Changes to this framework should therefore be taken forward jointly. Any other arrangements for scrutiny of the awarding process are a matter for individual countries to consider in the light of their own circumstances and current practices.

QCA AND ITS RELATIONSHIPS WITH MINISTERS AND THE AWARDING BODIES

79. The QCA, in close collaboration with the other regulators - ACCAC in Wales and CCEA in Northern Ireland - plays a pivotal role in the development and regulation of national qualifications. It:

- advises the Secretary of State for Education and Skills on the development and implementation of qualification policy;
- works with the awarding bodies to implement qualifications policy;
- regulates the operation of the qualifications system, including accrediting the awarding bodies' A level, GCSE and GNVQ courses and monitoring the standards of marking and grading of students' work.

80. The Quinquennial Review of QCA earlier this year reported in detail on QCA's work. I have not sought to reproduce the scope of this review. Moreover, I have not sought to investigate in detail the internal management and operation of QCA. I have every confidence that the new leadership at QCA will take whatever action is needed to ensure that the Authority can perform its functions effectively and credibly. In particular, they will need to ensure that the regulatory role is clearly delineated and that it functions separately from QCA's wider business.

81. In this inquiry I have focused on concerns highlighted by recent events about the role of QCA and its relationship with Ministers and the awarding bodies. This chapter examines those concerns and sets out my recommendations relating to the roles of, and relationships between, these key players in England.

Relationship between Ministers and the QCA

Developing and implementing qualifications policy

82. It is self-evident that Ministers should be responsible for the key decisions which shape the qualifications system and its relationship with wider

education and skills policy. In exercising that responsibility they should be able to look to the QCA for expert advice. I fully accept that the QCA should have a clear duty to respond to requests from Ministers for advice. In this context I note also that, whilst QCA is the Secretary of State's principal advisory body on qualifications, others have an interest in the development of qualifications policy and should be able to make their views known directly to Ministers if they so wish.

83. The normal mechanism for seeking QCA advice is a remit from the Secretary of State or other education Minister to the Chairman of QCA, asking for advice on specific aspects of qualifications policy, and setting out any parameters – such as timescale or wider policy constraints - which the QCA should take into account in preparing its advice. QCA officers will normally then prepare a response for approval by the QCA board, consulting other relevant interests, such as the awarding bodies or teachers. It is usual practice for QCA's advice to be published. There is no fixed timing for such publication, but the pattern is often for publication to take place alongside announcement of any decisions by Ministers resulting from the advice which QCA has offered. In general, QCA will have a responsibility to manage the implementation of those decisions in collaboration with the other regulators and the awarding bodies.

Regulating qualifications

84. The QCA's regulatory function is further removed from the Secretary of State's direct responsibilities than its role in advising Ministers on qualifications policy. In its regulatory role, QCA's responsibilities include:

- putting in place the framework of rules and processes to ensure that standards are maintained – for instance the Code of Practice governing A levels, GCSEs and GNVQs;
- monitoring the application of this framework by the awarding bodies;
- approving individual qualifications, including all A level courses, proposed by awarding bodies;

- reviewing, and taking whatever steps are necessary to maintain, standards over time between individual qualifications and across awarding bodies;
- monitoring and taking steps to maintain the overall health and effectiveness of the qualifications system.

85. Ongoing responsibility for maintaining and operating the regulatory system rests with QCA and the other regulatory bodies. From my inquiry it is clear that there is a wide consensus that Ministers have a legitimate interest in assuring themselves through contact with the QCA that these functions are being carried out effectively. Nevertheless, they should not intervene in the ongoing operation of the regulatory framework nor in the details of the QCA's relationship with the awarding bodies.

Does the relationship between Ministers and the QCA work?

86. I have received a range of views on the relationship between Ministers and the QCA. Many of these turn on whether QCA is, and is seen to be, sufficiently independent of Ministers. In particular, there is concern:

- that QCA's advice may be informally constrained in order to produce an outcome that is acceptable to Ministers;
- that lines of accountability are unclear. Even among some of those most closely involved in the delivery of qualifications, the decision-making processes can be unclear, and they are unsure where responsibility for some key decisions lies;
- that the DfES may become involved too closely in monitoring and influencing implementation and regulation activity which should properly be the responsibility of QCA.

87. The perception that the relationship might function in these ways damages the reputations both of Ministers and of QCA and affects the credibility of the decisions and actions which both take legitimately to maintain and develop the qualifications system.

QCA and the awarding bodies

88. Some similar issues arise in perceptions of the QCA's relationship with the awarding bodies. In particular there is a significant lack of clarity about the boundaries between QCA's role in overseeing and ensuring the health of the qualifications system and the awarding bodies' responsibility for operational management of that system and the qualifications outcomes to which it leads. In my earlier report, I highlighted a specific difference in perceptions between the Authority and the awarding bodies about the way in which QCA was carrying out its functions as regulator. That difference was indicative, at least in part, of a blurring of the boundaries between the respective roles of regulator and awarding bodies.

89. It is essential that the QCA acts as a regulator, and is rigorous and consistent in its actions. But it should not become involved in managing the detail of the awarding bodies' responsibilities in relation to the setting, marking and grading of A levels and other qualifications.

90. There is one aspect of the relationship between QCA and the awarding bodies which requires particular attention. QCA acts, in effect, as the awarding body for key skills qualifications and the national curriculum Key Stage tests in schools. Both of these activities fall outside my remit. Nonetheless, they involve a different relationship between QCA and the awarding bodies, because the delivery of significant parts of the key skills and key stage assessment process is carried out by the awarding bodies under contract to the QCA. The Quinquennial Review of the QCA published earlier this year expresses concern about this additional dimension to the relationship. Those concerns should be given significant weight. It appears to me that there is potentially a conflict of interest between the contractual and the regulatory relationships; QCA's management of contracts with the awarding bodies to deliver the tests is not compatible with the Authority's role in regulating those same awarding bodies' own qualifications.

Conclusions

91. Some have argued the case for giving QCA a greater measure of statutory independence. The QCA's status as a non-departmental public body gives greater formal powers for the Secretary of State to steer its work than would be the case if, for instance, the Authority were to become a non-ministerial government department like OFSTED. However, whilst a change of status might reduce some of the formal powers which Ministers have to influence and direct QCA's operations, I am not persuaded that it would address effectively the concerns which have been highlighted this year; and there is a risk that the necessary legislation and disruption arising from major institutional change would be a distraction from the immediate priority of managing the delivery and standards of A levels.

92. Nor am I persuaded that the relationship of necessarily close co-operation between the DfES and QCA across a wide range of curriculum and qualifications matters would be enhanced by a greater degree of separation.

93. I have also considered whether the QCA's regulatory functions should be separated from its other roles and accorded a separate independent status. I agree that there is a clear need to ensure that the regulatory function is effectively ring-fenced from QCA's wider activities. But the evidence presented to me suggests that the benefits of separating QCA's regulatory role would be largely presentational, and would not outweigh the risks inherent in organisational change, and in dividing the qualifications expertise currently available within QCA.

94. On this basis, I am persuaded that a change in the status of QCA or some of its component parts is not justified. There is nonetheless an early need to tackle the perceptions which appear to have grown up about the ways in which the DfES (Ministers and officials), QCA and the awarding bodies actually behave in practice. The key to this is to inject a greater degree of clarity and transparency into the roles and responsibilities of each, and into the ways in which they work together. I note that the Quinquennial Review recommended a *memorandum of understanding* setting out the guiding principles which should underpin the relationship. I support that approach.

95. I recommend that the DfES, QCA and the awarding bodies jointly draw up an agreement which describes their roles and relationship and establishes clear lines of responsibility and accountability. This agreement should also, wherever appropriate, set out ways of working to ensure that the relationship is transparent. In particular, the agreement should ensure that:

- requests to QCA from Ministers for fresh advice or new work should set out the matters which the advice should cover or the action required, who will have responsibility for subsequent decisions and follow up action, and which organisations or individuals should contribute to that work, including where appropriate DfES Ministers or officials;**
- such remits and QCA advice to Ministers should be published at or near the time when they are issued - unless there are strong reasons why they need to remain confidential;**
- implementation timetables for new policies and initiatives are established and published as early as possible in the development process, and fully reflect the need, amply illustrated by this year's experience, to allow realistic time for development and testing. In my view, major changes to the qualifications system should have a lead time of at least five years;**
- as clear a distinction as possible is maintained between (a) QCA's responsibility for monitoring and coordinating delivery, and for overseeing and guaranteeing standards and the general health of the qualifications system and (b) the awarding bodies' individual responsibility for managing effective delivery of their own qualifications to students, schools and colleges;**
- the awarding bodies and others with an interest can make representations directly to DfES on matters of qualifications**

policy;

- **that application of the agreement is monitored, and that mechanisms exist for resolving inconsistencies or uncertainty about its application in specific cases.**

96. I share the misgivings expressed in the Quinquennial Review about QCA's responsibilities for delivery of the key and basic skills qualifications and Key Stage tests, and recommend that these should be separated from QCA's other responsibilities and placed in the hands of a separate body. QCA should retain its regulatory oversight of these activities.

97. In making these recommendations, I am conscious of the extent to which these bodies work together formally and informally across a wide range of policy and delivery issues. This is a proper dimension to their relationship and plays a crucial part in helping to foster effective collaboration. A clearer delineation of roles and responsibilities should take care not to cut across the day-to-day working partnerships which are necessary to the smooth operation of the qualifications system.

Relevance for Northern Ireland and Wales

98. I have focused on the QCA and relationships within the English qualifications system. These recommendations apply only in that context. The institutions and their roles within the Wales and Northern Ireland systems are different. It is necessary that there should be a common understanding, and thus a joint approach across all three countries, about the regulators' roles and responsibilities in relation to those of the awarding bodies. My recommendations should be taken forward on that basis.

AWARDING BODIES AND THE ADMINISTRATION OF THE EXAMINATION SYSTEM

99. In 1997, the Government sought views on arrangements to underpin the new qualifications framework and to ensure that high and consistent standards were maintained across its qualifications. As part of the *Guaranteeing Standards* consultation, the case for rationalising the number of awarding bodies in England was examined with a view to ensuring comparability across qualifications. Rationalisation was intended to reduce variations between syllabuses, assessment, administration and customer service.

100. The consultation revealed broad support for the idea of rationalising the number of awarding bodies. There was also agreement that the development of qualifications provision should be underpinned by the principles of quality of content and assessment; consistent standards of awards; choice; cost effectiveness and accountability; and quality of service. Among these, choice and consistent standards of award were thought to be of prime importance. The decision was taken that three awarding bodies in England was an appropriate number to secure these and to tackle inconsistencies. Having three awarding bodies also limits the risk of system failure present where there is only one.

101. The evidence presented to me suggests that these arguments are still valid today. There is a wide range of support, including from schools and colleges, for the choice of syllabuses and potential for innovation provided by the current system. For instance, schools are able to select syllabuses which meet their preferences from the wide range of periods of history offered across the awarding bodies. Equally, alternative approaches to science and mathematics such as Nuffield, Salters, and MEI syllabuses offer a variety of approaches to the same subjects. Continued vigilance is needed by the regulators and the awarding bodies to ensure that the variety of assessment objectives is controlled and that a diversity of content in the same subjects from each of the awarding bodies does not become a diversity of standards. Overall, however, I see no strong reason to challenge present arrangements.

102. I have, on the other hand, been persuaded that differences between awarding bodies in their administrative practices contribute significantly to the administrative complexity and burden on schools and colleges, without offering significant counterbalancing benefits.

103. Centres' concerns about awarding bodies' different requirements are two-fold:

- Examination fee structures
- Administrative procedures.

Fee structures

104. Standard unit entry fees currently range from £9.20 to £10, while late entries are charged at the standard rate plus £4.60, £9.40 or £10, depending on the board. For very late entries the additional charge ranges from £9.20 to £20, meaning that costs range from £18.40 to £30. There is in schools' and colleges' view no obvious correlation between the charges made and the service they receive. Competition regulation outlaws the possibility of the awarding bodies collaborating to standardise the level of fees they charge. The prices charged are a matter for the awarding bodies, although I note that the QCA has some statutory powers to cap entry fee levels. More significantly, differences in the types of service for which the awarding bodies charge and the pricing structure for those services make direct price comparisons very difficult, and complicate the administration for schools and colleges. Consideration should be given to ensuring greater consistency and transparency in pricing structures.

Administration

105. Progress has been made by the awarding bodies since the Guaranteeing Standards consultation in improving the commonality of their systems, but significant differences remain, particularly in the administrative process through which they communicate with centres. These differences often appear to have no clear justification and seem to be the result of custom

and practice within the individual awarding bodies rather than of overriding operational need. I offer some examples of these below.

Entry procedures

106. The system for administering entries varies between boards. Advances have been made in recent years in standardising the terminology used, but there are still considerable differences in the codes used to identify candidates, series and syllabuses.

107. Not all of these differences are easily diminished, nor are they necessarily issues that the awarding bodies themselves can resolve. Some of the problems around the use of unique identification numbers for candidates, for example, arise from provision in the 1998 Data Protection Act, which also has a major bearing on the way educational data can be captured, stored, reported and exchanged. Efforts must continue to resolve these issues, though the process of doing so may not be quick.

108. Short-term progress does, however, seem possible in areas like the awarding bodies codes for units and examination sessions. It is unclear, for instance, why the GCE January 2003 examinations are given the code E IE03 by AQA, 1C by Edexcel and 1B by OCR. This complicates and extends the entry administration process. Similar inconsistencies are evident throughout, including in the format and provision of envelopes and labels and in the use of forms.

109. Over the longer term, important opportunities to simplify administration are presented by ICT. These are explored in paragraphs 145 to 164. The need is not to impose uniform systems on awarding bodies, but to simplify their interface with users. Standardising how centres input and amend their entry data would bring significant efficiency gains.

Issuing results

110. At present awarding bodies deliver results to centres in different formats. For example, one supplies results in alphabetical order, and another

in candidate number order. Centres must then spend time cross-referencing information in disparate formats to collate results for candidates. Certificates for students also differ in the supplementary information they show. One awarding body, for instance, issues grades at unit level, whilst others do not.

Appeals procedures

111. Although the processes for making inquiries upon results for individuals or groups of candidates are common between A level awarding bodies, the awarding bodies' own appeals processes, which may be followed where the school or college remains dissatisfied, appear to differ significantly in the demands they make on schools and colleges.

112. I recommend that the awarding bodies work together and with QCA to undertake a systematic review of such differences in administration and take urgent action to eliminate unjustified differences.

The Joint Council

113. The Joint Council for General Qualifications (JCGQ) could do much to enhance commonality between the awarding bodies. It has already produced a wide range of common documentation and identified common procedures and guidance covering many aspects of the examination process. I have already referred above to the need to carry this work further, to standardise any aspect of awarding bodies' work and requirements where there is no good reason for differences to be maintained.

114. JCGQ has the potential to act as a self-regulatory body, defining and encouraging minimum standards of service and defining the way in which award standards are to be set, judged and maintained. Mechanisms already exist for this, though so far groups like the Compliance Committee have limited their activity to sharing common practice. I believe that standards of both service and awards could be greatly enhanced if work was extended into actively seeking to define and enforce common standards, in areas such as

monitoring examiners, dealing with enquiries about results, reviewing awarding arrangements and, in consultation with QCA, placing strict limits on the late notification of changes to syllabus and assessment requirements. The latter is a particular problem for teachers and lecturers at present, adding significantly to the complications of delivering A level courses to students.

115. JCGQ might also provide a forum for enhanced co-operation between the awarding bodies - for instance in examiner training and the sharing of data more effectively during the awarding process - with potential benefits for the overall consistency and quality of the system.

116. I recommend that awarding bodies strengthen the self-regulatory role of JCGQ, and review the council's structure, to:

- **take forward the work recommended in paragraph 112 to improve commonality of administrative requirements between boards;**
- **identify and take forward further areas where it might usefully self-regulate, such as defining minimum service standards;**
- **enhance co-operation between the awarding bodies in the awarding process.**

117. Whilst I recommend that the JCGQ should be the vehicle for enhanced collaboration and commonality between the awarding bodies, I should make it clear that I consider that the work itself must be taken forward urgently. If the JCGQ cannot be strengthened in the way I envisage then its purpose must be seriously questioned. In these circumstances I recommend that the QCA and the other regulators should step in to progress this necessary work.

Implications for Wales and Northern Ireland

118. Students in Wales and Northern Ireland sit qualifications offered by English awarding bodies, while students in England and Northern Ireland take qualifications offered by WJEC. In 2002, for example, English awarding

bodies received over 30,000 A and AS subject entries from students at Welsh centres, while WJEC had around 27,500 subject entries from students at English centres. This cross-border traffic of qualifications means that it is important that any approach to standardisation across boards is common to all three countries. My recommendations should be taken forward jointly.

119. The JCGQ represents the awarding bodies in all three countries. Any development of its role would need to be taken forward on a three country basis.

PROFESSIONALISATION OF THE EXAMINATIONS SYSTEM

120. Any system is only as good as those operating it. During my inquiry I have looked closely at the supply and status of two key groups whose skills and professionalism are essential for the examination system to operate effectively.

- Examiners – those, mainly teachers, who mark examinations and coursework, and, at more senior levels, help ensure consistent standards and participate in the grade boundary-setting process.
- Examinations officers – the staff in schools and colleges who handle the administration of their students' examination entries and results.

The supply and training of examiners

121. Examiner shortages are not a new problem. But are a growing cause for concern, not least to the English awarding bodies. With the introduction of Curriculum 2000, the number of examination entries more than doubled, compounding an 8-fold increase in subject entries between 1951 and 2001. There was a 41% increase in GCE examiners (across the UK) between 1999 and 2002 and even that is thought to be insufficient to meet the demands of Curriculum 2000 with its modular structure and expectation that students will take more subjects.

122. Moreover, it is unclear what impact this year's problems with A levels will have on the supply of examiners in 2003. There are some concerns that the result will be a shortage owing to demoralisation and examiners' unwillingness to associate themselves with a system in which they have lost faith.

123. In the short term, it is necessary to guarantee examiner capacity for January and June 2003. The QCA-led Examinations Taskforce is currently considering a variety of measures to secure the supply of examiners for next year. These include extensive use of marking centres, release of teachers from their regular school or college duties (something some institutions

already allow voluntarily, supported by the existing teacher release scheme), engaging the teacher associations and reviewing examiner pay.

124. The Taskforce's work should also build on the findings of pilots conducted by Edexcel and OCR involving the use of graduates – particularly new PGCE graduates - as examiners. The Edexcel pilot used PGCE graduates to address a shortage in GCSE history examiners, while OCR relied on graduates with relevant subject expertise to redress a shortfall in ICT examiners.

125. Contrary to received wisdom that examiners should have lengthy classroom experience, the PGCE and graduate examiners were found to mark consistently and effectively. In the Edexcel pilot, the performance profile of the PGCE graduates was the same as for all examiners in 2002 – with 83% of A- or B-grade performance – and better than that for other new examiners. Factors contributing to this success were the extra training and regular monitoring the PGCE graduates were subject to; their deployment to specific papers; and the support they received from the senior examiner team. The initial allocation of papers they received was however about 25% lower than usual for new examiners to minimise pressure and risk, and the benefits need to be balanced against the cost and administrative implications.

126. At least one awarding body is already planning to make extensive use of PGCE graduates to address the examiner shortage for 2003.

127. In the OCR pilot, GCSE foundation scripts were marked by newly-graduated students in a supervised environment. The pilot met with great success, the level of accuracy being higher than for the teams of assistant examiners who marked at home in the normal manner. The reasons for this were considered to be:

- the ability to confer or seek guidance, which added significantly to the consistency of the marking;
- the controlled and supervised environment in which marking took place. This was seen to improve the quality of checking and

administrative compliance.

128. On the basis of the evidence presented to me, and subject to rigorous supervision and quality assurance procedures, I am confident in fully endorsing further development of this approach to the marking of public examinations.

The supply and training of examiners - longer-term action

129. In the longer term, I believe that the key to securing the supply of high quality examiners is to raise the professional status of what they do and to ensure that they, and the schools and colleges which provide them, are recognised for participation in the examinations system.

130. Professionalisation of marking and examining, including the marking of coursework, would have clear system-wide benefits. In my inquiry, I have found wide support for professionalisation, including from the awarding bodies and teachers' associations.

131. Professionalisation promises benefits for both institutions and individuals in the potentially greater recognition and rewards for both examiners and the institutions supplying them. Over the longer term, this could enable some centres or federations of centres to earn the right to take more control over assessment, enhancing perceptions of the reliability of internal assessment models, which would at the same time reduce the pressures on the public examination system.

132. The availability and take-up of good quality training is essential to professionalising the examining workforce. I am concerned by anecdotal reports received in conducting my inquiry about the quality of training and the attendance of staff from centres. I believe that additional resources are needed to tackle these issues, and that take-up of available training should be a necessary part of any schemes to enhance teachers' career prospects and status as a result of their participation in the examination system.

133. I am equally concerned by anecdotal reports about the variable quality of the training available. The QCA, working with the Joint Council and other relevant bodies, like the NCSL, should have a role in ensuring training provided is fit for purpose, timely and of a good standard. This should include making use of the exemplar material and other materials currently being gathered by QCA to define AS and A2 standards. Further efforts should also be made to offer common provision as far as possible, with bolt-on sessions offering training specific to awarding bodies as necessary.

134. I recommend that the use of graduates, and especially PGCE graduates, as markers in public examinations should be extended, subject to effective training, supervision, evaluation and public reporting.

135. I recommend a thorough professionalisation of the role of markers and examiners, including coursework markers. Implementation should be taken forward swiftly by the Secretary of State in collaboration with the regulatory and awarding bodies and the teaching profession, and should examine:

- **linking service and training as an examiner to professional recognition and career and reward structures, including through provision made by the National College for School Leadership (NCSL) and the proposed Post-16 Leadership College;**
- **improving the take-up of training, including by making available central government funding, distributed through the schools and FE Standards Funds or other appropriate funding mechanisms. Provision should also be made for examiners supplied by the independent sector;**
- **improving the quality of training, through rigorous accreditation procedures, drawing on work already underway within the awarding bodies to develop a qualification for examiners;**
- **working towards implementation of proposals, like those put**

forward by the Secondary Heads Associations for ‘Chartered Examiners’, which would establish a high status professional role for experienced examiners, and would give the schools and colleges in which they are based the right to take more control over examination assessment.

136. In addition, I also recommend that schools and colleges should be rewarded with “beacon” or similar status for significant contributions to the examination system, including examiner recruitment and administrative efficiency. As well as kudos derived from achieving a publicly recognised symbol of excellence, this could bring with it a lower level of scrutiny in relation to the administration and conduct of examinations, and possibly, financial or other rewards.

Examination officers

137. Examination officers have a critical role to play in the effective administration of the system. Perceptions of this role vary widely and it may be the responsibility of teaching or administrative staff. What has been clear in the evidence submitted to my inquiry is that the role of examination officer is time-consuming and cannot be done without training and mastery of the variety of systems used.

138. There is a need for common training across the awarding bodies where commonalities in systems and procedures already exist, and these should increase over time. All training should be to common standards and criteria specified by QCA, with required attendance supported by the availability of money from the Standards Fund. It should be accredited and recognised in career and development and reward structures. The difficulties most schools and colleges face if they lose their examination officer only underlines the invaluable nature of their contribution.

139. Raising standards of examination administration is significant to guaranteeing standards of awards, as well as to the smooth running of the

system, and in particular to combating problems arising from the huge number of late entries and entries made on the day of the examination (“pirate” entries).

140. This year AQA received 73,241 late, 48,674 very late and about 11,000 “pirate” (entries on the day using photocopied question papers and answer booklets) GCE and VCE entries. These amounted to nearly 4% of all entries. The corresponding figures for Edexcel GCE entries were 57,432 very late and 6,784 pirate entries, nearly 5% of the total, and OCR had 24,235 late entries, nearly 2% of the total. The awarding bodies are clear that they should not damage candidates’ life chances by refusing to accept these entries. Nevertheless, late and pirate entries place a significant additional strain on awarding bodies, which are already working in an extremely tight time window, including by hindering the planning of the numbers of markers and examiners.

141. More than this, however, late entries can hinder efforts to judge and maintain standards. This is particularly true of the late submission of coursework. Ideally an awarding body should have received 75% of coursework by the first deadline to inform standardisation meetings. It has been reported to me that this year by the first deadline one board had received only about 20% of coursework, and only about 40% by a second deadline 2-3 weeks later. This has impacts on the judgement of standards and on whether candidates receive the grade they deserve. Action must be taken to rectify the situation.

142. I recommend that by January 2004, the awarding bodies, in consultation with schools and colleges, the regulatory bodies and the Secretary of State, should develop and publish a strategy to:

- ensure good quality training for examination officers, who should gain professional recognition for their role;**
- promote and reward the efficiency of schools’ and colleges’ administration as part of the inspection process;**

- **encourage good practice. In my view that might include using the fee structure to provide incentives for timely examination entries.**

143. I further recommend that OFSTED and ALI should be asked to look at and report on the quality of schools' and colleges' examinations administration as part of the institutional inspection frameworks.

Implications for Wales and Northern Ireland

144. Examiner shortages are less acute in Northern Ireland and Wales. Indeed CCEA has successfully addressed an examiner supply problem in recent years. Nevertheless, the measures in this chapter would be of benefit more widely than just England, and the principles which underpin them could usefully be applied on a three country basis.

THE USE OF ICT IN QUALIFICATIONS

145. Consideration of how to improve the reliability, efficiency and quality of the qualifications system inevitably raised questions about the potential impact of ICT. I have looked at the potential for ICT in three aspects of the system:

- a. administration and data processing;
- b. to improve the quality and efficiency of the marking processes;
- c. as a medium for examining – ie ICT based examinations and assessment tasks.

Administration

146. Each of the awarding bodies uses computer systems to support their administration and data processing. Indeed, the current scale of the examinations task would not be manageable in any other way. From candidate entries at one end of the system through to the issuing of final results at the other, computing power is central to the vast majority of data processes needed to collect information about the performance of individual students, convert their raw marks into grades and issue their results and collate data across subjects, awarding bodies and the system as a whole.

147. All three of the English awarding bodies have recently made, or are just about to embark upon, major investment to update their administrative ICT systems. Nothing in the evidence put to me suggests that in relation to these administrative tasks the computer systems already operated or planned by the awarding bodies are fundamentally inadequate; nor that significant improvements in the quality or efficiency of qualifications administration could be achieved simply by additional investment in ICT beyond that already planned. It is certainly possible that the current position could be improved by continuing investment to extend the capacity of the systems to take on new tasks or manage existing tasks more efficiently. However, further work would be needed to establish the scope and business case for further investment of this kind.

148. Nevertheless, there is some evidence that additional investment elsewhere is needed to make best use of the current ICT capacity in the awarding bodies. This is particularly the case in relation to the commercially-operated Electronic Data Interchange (EDI) systems, which enable schools and colleges to make their examination entries on line and to exchange information with the awarding bodies about their candidates' entries and results.

149. Used to full potential, the EDI system would do much to eliminate differences in administrative procedures between awarding bodies. I gather that a significant obstacle to this is that some schools and colleges lack the necessary hardware and software packages to make full use of the EDI system. I have not had time to investigate this situation in detail, but if this understanding is correct it should be rectified as a matter of urgency.

ICT in marking

150. Based on the evidence presented to this inquiry, I am persuaded that ICT has the potential to bring about a step change in the efficiency and quality of the marking process. Students' scripts are currently distributed via the postal service to markers and the awarding bodies head offices. Typically they spend about five days in transit during the marking stage. The marking process is almost wholly manual. Markers work directly onto the written papers and collate their records manually.

151. The technology already exists to translate students' written performance into electronic form. Once digitised, scripts can be distributed and marked on-line, often in ways that would be difficult or impossible now. For instance, each script can be broken down into component answers and different answers can be distributed in different ways, for example by giving relatively straightforward short-answer questions to clerical or inexperienced markers. Questions which require more complex judgements can be sent to more experienced examiners. Marks awarded during the process can be collated and monitored continuously whilst marking is in progress. So, for instance, the performance of individual markers can be monitored during the

marking process and inconsistencies between them can be identified and corrected much more quickly and accurately than is possible currently. Estimates given to me suggest that a 10-20% increase in the efficiency of marking could be achieved, accompanied by a significant increase in the consistency and reliability of marking.

152. All of this would be of significant benefit. But it can not be a quick fix. The awarding bodies have piloted systems along these lines. Whilst some of the potential benefits were apparent in these projects, there are some problems still to be overcome. Significant among these is managing the natural human response of markers and examiners to what would amount to full-scale industrialisation of the marking process and the need to adapt their working practices to reflect this. I am confident that this and other issues, such as the adaptation of the currently available systems to the specific needs of the awarding bodies and their qualifications, can be overcome given time and investment.

153. I am not, however, persuaded of the benefits of using ICT to replace human markers. Whilst there are systems which can produce reasonable marking of multiple choice and short answer questions, I do not have evidence of the capability to machine mark answers which require complex judgement. There would be some efficiency gains to be had from more extensive use of machine marking of the simpler answers in existing examination scripts. But such systems would embed reliance on these question and answer formats, and could significantly constrain longer term innovation in the examination system. On this basis, significant investment in such systems would be misguided.

ICT as a medium for examining and assessment

154. The systems described above would not change significantly the nature of examinations as experienced by students themselves. If anything, the need for a common format for script and students' responses in order to ensure that they can be digitised accurately, for instance by scanning, could impose an additional constraint on the scope for innovation in the examinations process.

155. A more radical longer term solution would be the use of ICT as the means by which students take examinations and submit work for assessment. For instance, video, photographs, other images, and sound, could supplement traditional written work. Work could be submitted electronically and assessed over time to build up a portfolio of assessed work by the end of the course, rather than relying largely on one-off examinations. More flexible ways of assessing students' work could change radically the nature of the assessment process and the extent to which it promotes key attributes such as creativity and communication skills.

156. A further development of this approach would be to bring students' performance data – for instance, test and examination results, and higher education performance – and their work together in a single national database to provide a permanent and comprehensive record of their progress and achievements through school, college, training and higher education. This would be information which they could access themselves, for instance to support applications for university or employment - to supplement or replace paper certification of their results.

Investment

157. Any new ICT systems would carry a significant cost. It is not clear that any of the awarding bodies have the capacity for investment on the scale necessary. Indeed, even some of the limited piloting of new ICT systems has been curtailed simply on the grounds of costs.

158. Nor is it necessarily the case that awarding bodies should be expected to bear the whole cost. Many of the potential advantages of more extensive or consistent use of ICT would be for schools, colleges and students rather than producing efficiency savings or other benefits for the awarding bodies themselves. Indeed, for some of the possibilities outlined in this chapter it would be very difficult for the awarding bodies individually or collectively to justify the investment solely in terms of a cost-benefit analysis for their activities. The benefits are spread widely across the system and would contribute directly to wider policy objectives such as reducing administrative burdens on schools. For systems which use ICT as the medium through

which students undertake examination and assessment tasks, there would be a very substantial element of investment directly in schools and colleges to provide the necessary equipment and expertise to ensure students' access.

159. On this basis there is a strong case for suggesting that at least some of the costs should be met directly from public funds rather than specifically from the awarding bodies' own resources.

Conclusions

160. From the evidence presented to me, I am persuaded that ICT offers the prospect of significant improvements in the efficiency, quality and flexibility of the examinations system.

161. Although such a conclusion goes well beyond my remit, I am also persuaded that ICT offers in time the prospect of linking students' achievement information with examples of their work and other information to provide students with an individually accessible comprehensive portfolio which illustrates their learning much more broadly than simply examination results.

162. Most of the technology to achieve all these things is available now – albeit at a price. But there are still some important technical issues which need to be resolved. Most notably, in the context of work submitted on-line, it is essential that the identity of students and their responsibility for the work they are submitting can be verified. Equally, reliable security would be needed to ensure privacy of personal records and control individuals' access to personal portfolios and other personal data.

163. I recommend that:

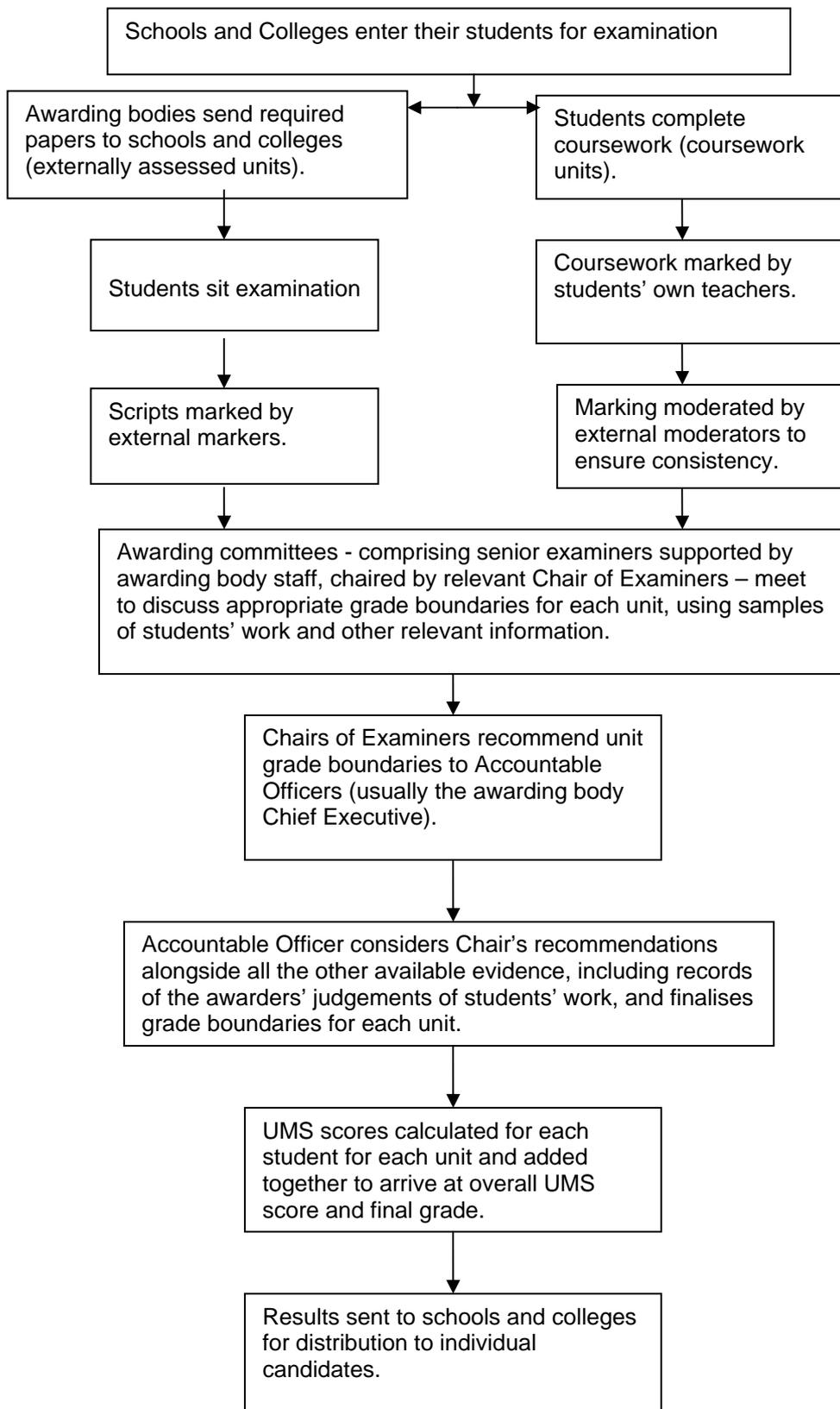
- **resources should be made available from public funds to the awarding bodies, schools and colleges to ensure that full use can be made of the existing EDI systems, and for other ICT developments to improve the commonality of administration and reduce the administrative burdens on schools;**
- **an expert working group should be established by the regulators and the awarding bodies to examine and develop the use of ICT to improve the efficiency and quality of administration and marking, whilst ensuring such developments do not constrain innovation by individual awarding bodies or the options for longer term changes in the nature and format of assessment;**
- **the Government should prepare a longer term strategy for developing the use of ICT as the medium by which students take examinations and submit material for assessment, taking account of wider developments of ICT in relation to the curriculum and teaching and learning;**
- **resources for developing, piloting and implementing new ICT-based systems in the qualifications framework should be provided directly from public funds to an extent which properly reflects the public benefits of such systems and the financial circumstances of the awarding bodies.**

Relevance for Northern Ireland and Wales

164. The issues of consistency between awarding bodies which I have set out in this chapter are equally relevant to Wales and Northern Ireland and to those schools and colleges which draw on qualifications from Welsh or Northern Irish awarding bodies alongside those from England. This work

should be taken forward on a three country basis. Longer term development of the potential of ICT is also potentially relevant to all three countries.

ANNEX: STEPS IN THE EXAMINING AND AWARDING PROCESS



SCHEDULE OF EVIDENCE PRESENTED TO THE INQUIRY

During the course of my inquiry I took oral submissions from:

Head Masters Conference (HMC)

Girls' Schools Association (GSA)

Secondary Heads Association SHA)

National Association of Head Teachers (NAHT)

National Union of Teachers (NUT)

National Association Schoolmasters/Union of Women Teachers
(NASUWT)

Professional Association of Teachers (PAT)

Association of Teachers and Lecturers (ATL)

National Association of Teachers in Further and Higher Education
(MATFHE)

Association of Colleges (AoC)

National Confederation of Parent Teacher Associations (NCPTA)

OFSTED

Universities and Colleges Admissions Services (UCAS)

Universities UK

Standing Conference of Principals (SCOP)

Qualifications Curriculum and Assessment Authority for Wales
(ACCAC)

Council for the Curriculum Examination and Assessment (CCEA)

International Baccalaureate Organisation

The Joint Council

CBI

The Chambers of Commerce

Institute of Directors

The Chief Executives of the three English Awarding Bodies: AQA,
Edexcel and OCR.

Ken Boston, Chief Executive of the QCA, Sir Alan Greener and QCA
officers

Nick Stuart

Roger Porkess
Professor Steve Heppell - Ultralab
NCS Pearson
Professor Carol Fitz-Gibbon
Professor David Melville
Dianne Francombe
Dr Brenda Cross
Damien Green MP
Phil Willis MP
Celia Johnson, DfES
Rob Hull, DfES

I have also received written evidence and submissions from:

SHA
HMC
GSA
NAHT
NUT
ATL
NATFHE
NASUWT
NCPTA
AoC
The General Teaching Council for England
Universities UK
UCAS
SCOP
QCA
OFSTED
AQA
Edexcel
OCR
Damien Green MP

Phil Willis MP

In addition, I have received helpful written submissions from a very wide range of individuals, schools, teachers, examiners and others.

I held three regional meetings with teachers, parents, governors and students and would like to thank all that took part and who helped in their organisation, particularly: Professor Robin Millar, York University; Kath James, York University; David Moores, Deputy Head, Fulford School; Roger Dancey, Chief Master, King Edward's School; Sarah Evans, Head, King Edward's High School; Alan Jenkins, Principal, Varndean College; and Dr Russell Strutt, Principal, Haywards Heath College.