

consultation response

Ofqual - GCSE Reform Consultation

UCAS' mission is to help learners make informed higher education (HE) choices that best suit their aspirations and abilities and maximise their opportunity for success, and to benefit our members through the provision of shared services. UCAS provides information and advice; course information; entry requirements; and application services to around 650,000 UK applicants to over 360 UK higher education providers each year. These applicants make over 2 million applications to HE courses. Our services support applications for full-time HNCs, HNDs and foundation degrees as well as undergraduate and some postgraduate degrees.

The GCSE qualification is of importance throughout the UK and is one of the most well established progression pathways in secondary education. As we indicated in our response to the consultation on Key Stage 4 qualification reform, we believe that any reform of GCSEs needs to take place hand-in-hand with the reform of A levels. The risks associated with undertaking reform of A levels without alignment of reform at Key Stage 4 could be significant.

The use of GCSEs for entry to higher education

The consultation foreword states that GCSEs are “taken into account in admissions decisions for many university courses.” UCAS recognises that GCSEs are used as one of a number of data and information sources admissions departments use to distinguish between applicants. The UCAS Qualifications Information Review found that institutions value the information GCSEs provide regarding an applicant's breadth of study at Level 2, with particular value being placed on the core subjects of English, mathematics and the sciences¹.

GCSEs feature in the entry requirements for many courses. For the 2013 application cycle, 266 UCAS member institutions made reference to GCSEs in their course entry requirements. This accounted for 23,047 courses (45% of all courses). However, it is likely that the majority of institutions will make reference to GCSEs in their wider matriculation requirements. Some courses, such as initial teacher training courses, have a mandatory GCSE requirement.

Institutions are autonomous in their decision making and processes and practices will vary across the HE sector. The emphasis placed on GCSEs will vary and institutions will use GCSE results in different ways – for example some institutions will consider them at the time of application or as part of the holistic assessment of an application, whereas others may only view them when evaluating near miss candidates or when distinguishing between applicants with similar academic profiles.

¹ UCAS Qualifications Information Review: Findings and Recommendations.
<http://www.ucas.com/sites/default/files/qir-findings-and-recommendations.pdf>

Timeline for qualification reform

There is a significant amount of reform being undertaken in relation to qualifications throughout the UK, encompassing not just A levels, GCSEs, vocational qualifications and Apprenticeships in England, but also fundamental reforms in Scotland and Wales. Northern Ireland is also reviewing its secondary qualifications.

Based on the currently available public information, the timeline for reformed qualifications is as follows:

- **2013**
 - Graded Welsh Baccalaureate introduced (Wales).
 - First teaching of the new Scottish National 5 (Scotland).
 - Final January assessment for A levels in England.
- **2014**
 - A levels taught in England without January assessment.
 - First teaching of revised Apprenticeships in some areas (England).
 - First teaching of the revised Access to HE Diploma (England and Wales).
 - First teaching of vocational qualifications that meet the interim standard and count towards the 2016 and 2017 performance tables (England).
 - First teaching of the revised Scottish Higher (Scotland).
 - Technical Baccalaureate introduced. Reported in performance tables in January 2017 (England).
- **2015**
 - First teaching of revised Apprenticeships in remaining areas (England).
 - First teaching of revised A level qualifications in subjects that require minimal content change (England and Wales).
 - First teaching of revised GCSE qualifications in some subjects (England and Wales).
 - Revised Welsh Baccalaureate introduced (Wales).
 - First teaching of the revised Scottish Advanced Higher (Scotland).
- **2016**
 - First teaching of vocational qualifications that meet the full standard and count towards the 2018 performance tables (England).
 - First teaching of revised A level qualifications that require significant content change (England)

The Chief Regulator of Ofqual recently noted in a letter to the Department for Education in relation to A level reform that the “introduction of new GCSEs and A levels at the same time will place a considerable burden on schools².”

Universities and colleges will share this burden, and also the additional burden of the other qualification reform highlighted above. Institutions will need to research these revised qualifications, and if there is a significant change in these qualifications and their eventual outcomes, may need to review their entry requirements and offer making strategies.

² <http://www.ofqual.gov.uk/files/2013-03-22-letter-to-secretary-of-state-for-education-alevel-reform.pdf>

UCAS is currently looking at ways in which it can support the HE sector by providing high quality qualification information to our members through the New Qualification Information System (NQIS) project. This includes the development of a new, simpler points system to replace the current Tariff.

We also intend to publish information on our website regarding qualifications reform in September in order to ensure that applicants, advisers, parents and HEIs are aware of developments throughout the UK. We would be keen to work with Ofqual in the drafting of this content.

Phased introduction

The phased introduction of GCSE subjects will see learners undertaking a mixture of revised GCSE qualifications and existing GCSE qualifications. This mixed profile has the potential to cause confusion to the range of stakeholders that have an interest in GCSE qualifications, such as employers, applicants and HEIs.

We share this concern with the phased introduction of A levels.

UK divergence

There is increasing divergence between the UK nations in terms of qualifications. The current direction of travel for reform suggests that there is a possibility we could see fundamentally different GCSEs and A levels in England, Wales and Northern Ireland. For example, the proposals within this consultation are for GCSEs to be linear with a terminal exam following two years of study, and for tiering to be limited. In contrast, GCSEs in Wales will remain largely modular and tiered.

UCAS also notes the recent letter from Michael Gove to John O'Dowd and Leighton Andrews regarding the joint regulation of qualifications, stating that the three country regulation of qualifications should no longer be an objective that each country works towards.

This divergence raises a number of issues in relation to educational progression. Consistency in standards is important across all of the UK nations to ensure that individuals have similar opportunities to study and work anywhere in the UK and hold qualifications which are internationally recognised and understood. HEIs will need to understand the similarities and differences between these qualifications and how they relate to Level 3 study and higher education. HE institutions and other users will find it challenging if there are significant variations between qualifications with the same name.

Key design features: assessment arrangements

UCAS does not feel it appropriate to comment on the specific design features proposed within the consultation. However, we do have a number of general comments that we wish to express.

Tiering

Learners should be given the greatest opportunity to present an accurate reflection of their ability. The removal of tiering may open up progression routes to learners that may have previously not been available, therefore we support this proposal.

However, we are concerned that the removal of tiering in some subjects, and the assessment of the whole learner cohort through a single method, may have a disproportionate impact on some learners and that some learners may be more advantaged by the removal of tiering than others. This has the potential to increase the achievement gap between certain cohorts of learners and we would be keen to understand how Ofqual intends to identify and address any negative impact the reform may have.

Assessment arrangements

GCSE qualifications are taken by the vast majority of the learner cohort in England. The purpose of GCSEs is to provide access to a wide range of post-16 options, including employment, work based learning and progression to Level 3 study.

Due to the high stakes nature of the qualification and the wide range of progression pathways it opens, it is important that the assessment arrangements utilised test the full range of skills and abilities of the learner cohort. It is unlikely that a written examination in isolation would be able to achieve this. However, we do acknowledge that such an approach will only be used when appropriate.

For those subjects that are assessed through a written exam only (English literature, geography and history), this could potentially disproportionately impact on students from disadvantaged backgrounds who may be less likely to receive the support required to succeed in an exam environment. This could potentially impact on their future progression opportunities. UCAS would be keen to understand how Ofqual intends to monitor and manage this risk.

Key design features: reporting student performance

Grading

UCAS believes that if the revised GCSEs are “materially different” to existing GCSEs it is logical that the revised qualifications are easily distinguished from the existing version. This could be achieved through the use of a different title or grading scale. This will need to be communicated to a wide range of audiences to ensure that these changes are fully understood. UCAS would be happy to assist with this communication.

If the reforms to GCSEs result in English GCSEs having different standards and/or grading scales then this may have a number of impacts on admissions to HE. Institutions and professional bodies may need to re-calibrate entry requirements (and the alignment between English, Welsh and NI GCSEs), and to review which qualifications are deemed equivalent to English GCSE grade C for English language purposes. There is a risk that this could result in different entry requirements for students who have taken GCSEs in England versus Wales or NI. This will in turn need to be reflected in the provision of information and advice to prospective applicants.

It is not possible to comment in more detail about the potential impacts of any changes in advance of the consultation on setting standards.

Regulation

UCAS supports the improved regulation of GCSEs in order to ensure that the qualification is high quality, robust and fit for purpose to ensure that student's achievements are accurately represented.

We hope that our above comments have been of use to Ofqual and would happily elaborate on any points if required