

## RSS response to Ofqual consultation<sup>1</sup> on requirements on setting GCSE, AS and A level grade boundaries

### Your details

**Would you like us to treat your response as confidential?\***

No

**Is this a personal response or an official response on behalf of your organisation?\***

Official response

**Type of responding organisation\***

Other representative or interest group

**Type of representative group or interest group**

Subject association or learned society

**Nation\***

England

### Questions

**Question 1: Do you have any comments on our proposed Conditions and requirements for legacy GCSE (A\* to G) qualifications?**

No

**Question 2: Do you have any comments on our proposed guidance for legacy GCSE (A\* to G) qualifications?**

No

**Question 3: Do you have any comments on our proposed Conditions and requirements for legacy GCE AS and A level qualifications?**

Yes

### Please provide your comments

On page 22 of the consultation document: “1. Aggregate marks must be calculated on the basis of a uniform mark scale: (a) Uniform marks for each unit must be calculated in such a way as to maintain the Learners’ relative position between the raw grade boundaries.”

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<sup>1</sup> Ofqual (2016) ‘Requirements on setting GCSE, AS and A level grade boundaries’ [webpage], 26 May 2016. Available at: <https://www.gov.uk/government/consultations/requirements-on-setting-gcse-as-and-a-level-grade-boundaries>

On page 25: “7. A mark of zero on the raw mark scale must always be converted to zero on the uniform mark scale. The maximum raw mark for the unit is always converted to the maximum uniform mark for the unit.”

These two proposals taken together seem to remove provisions for a cap, which is present in the current rules. The cap was introduced specifically to deal with a known problem of non-uniformity when crossing a grade boundary.

Removal of the cap would encourage teachers and learners to concentrate their efforts on papers with frequently high grade boundaries.

It is very difficult to see why it should be changed now when legacy qualifications have such a short life left. We recommend that the present rules (which provide for a cap) are maintained for the remaining life of the legacy qualifications.

**Question 4: Do you have any comments on our proposed guidance for legacy GCE AS and A level qualifications?**

No

**Question 5: Do you have any comments on our proposed Conditions and requirements for reformed GCE AS and A level qualifications?**

Yes

**Please provide your comments**

On page 29 of the consultation document: “4. In respect of A level qualifications, an awarding organisation must set the A\*/A boundary using appropriate statistical and technical evidence.”

The changes as proposed remove the default criteria for the setting of the A\*/A boundary from public comment and scrutiny, thus reducing transparency.

Under the existing system statistical and technical evidence can be used to override the formula that generates the A\*/A boundary.

However, without properly scrutinised default criteria acting as an “anchor point”, the system of awarding A\* could drift, leading to inconsistency between awarding organisations.

Thus, for reasons of public scrutiny, transparency and consistency, we recommend that default criteria for the setting of the A\*/A boundary are included in the Conditions, and that the Conditions allow for statistical and technical evidence to be used to override this formula, if required.

**Question 6: Do you have any comments on our proposed guidance for reformed GCE AS and A level qualifications?**

No

*[Response ends]*

*Submitted by the Head of Education and Statistical Literacy, 8 June 2016*