

[REDACTED]

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**From:** [REDACTED] *Ofqual official*  
**Sent:** 11 September 2012 14:19  
**To:** [REDACTED] *DfE official*  
**Cc:** Jeremy Benson  
**Subject:** FW: edexcel letters  
**Attachments:** Ofqual letter to Edexcel - 07.08.12.pdf; Ofqual letter to Edexcel - 09.08.12.pdf;  
Ofqual letter to Edexcel - 10.08.12.pdf; Edexcel letter to Ofqual - 10.08.12.pdf;  
Edexcel letter to Ofqual - 08.08.12.pdf; Email\_trail\_edexcel\_-ofqual\_09.08.2012.pdf

[REDACTED]

Please find attached exchanges of correspondence with Edexcel this summer about the award of GCSE English

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** Fiona Pethick [Fiona.Pethick@Ofqual.Gov.Uk]  
**Sent:** 09 August 2012 19:21  
**To:** Hughes, Karen  
**Cc:** Clare Gilligan; Glenys Stacey; Bristow, Rod; Liaquat, Ziggy; Cath Jadhav;  
Dennis Opposs  
**Subject:** RE: GCSE English

Dear Karen

Thank you for this email. We spoke on the phone before and after receipt of this email.

I can confirm that in the light of this email I will not proceed with our proposed notice of intention to direct tonight.

Please can you confirm in writing to me, by 10am tomorrow, the action you are going to take.

Thank you

Fiona

**Fiona Pethick**  
Director of Regulation, Ofqual

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**From:** Hughes, Karen [mailto:Karen.Hughes@pearson.com]  
**Sent:** 09 August 2012 19:05  
**To:** Fiona Pethick  
**Subject:** GCSE english

Dear Fiona

Following our various correspondence and conversations today I would like to advise you that we intend to review our grade C eng unit 3 boundary by +10 marks. The effects of this change were detailed in the letter I sent to Dennis yesterday

Best wishes

Karen

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9 August 2012

Karen Hughes  
Head of Recognition and Standards  
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Dear Karen

## Edexcel summer 2012 GCSE English award

Thank you for your letter of 8 August in response to my letter of 7 August. As you note, we have previously agreed that exam boards should aim to be within 1% of the overall prediction for English and English language, allowing up to 3% tolerance on each specification.

You say that you will make changes if we ask you to. I need to remind you of a regulatory requirement, part of the regulation framework that exam boards are all signed up to. Like other exam boards, Edexcel is obliged to make sure that its results are consistent with those of other boards. I am enclosing the actual Condition, for you to see. You declared Edexcel's compliance with this, earlier this year. And so it is not that we must ask, but that you must make sure that the grades are comparable.

It is our expectation, therefore, that Edexcel will produce outcomes for English and English language that are within 1% of the overall prediction, as is the case for AQA and OCR. It is for you to decide how that is achieved.

From the information you have provided about the possible grade C boundary marks on unit 3, it is clear that the mark of 62 (+7) does not produce an outcome within the 3% tolerance. It is also clear that the mark of 65 (+10) which the committee reviewed produces outcomes which are also out of tolerance, but in the opposite direction. There does seem to be scope within those two marks for an outcome that is within the 3% tolerance on the specification and within the 1% overall tolerance.

Please let me have your response by 10am on Friday 10 August.

Yours sincerely



**Dennis Opposs**  
Director of Standards and Research

## Annex

General Condition H4.1 states:

Where –

- (a) *an awarding organisation makes available a qualification,*
- (b) *at least one other awarding organisation makes available a qualification which is viewed by the generality of Users of qualifications as being a direct equivalent to that qualification,*
- (c) *each awarding organisation sets the specified level or levels of attainment for the equivalent qualification that they respectively make available,*
- (d) *Ofqual considers that a specified level of attainment set by an awarding organisation prevents the equivalent qualifications from indicating a consistent level of attainment (including, where Ofqual considers appropriate, over time), and*
- (e) *Ofqual specifies to an awarding organisation, in writing, requirements in relation to a specified level of attainment for the qualification which it makes available (either for a particular assessment cycle or during a particular time period),*

*any awarding organisation to which Ofqual has specified such requirements must ensure that, before the qualification is awarded for that assessment cycle or during that time period, the specified level of attainment for the qualification complies with those requirements.*





7 August 2012

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Dear Karen

**Edexcel summer 2012 GCSE English award**

At our meeting yesterday to review the emerging GCSE results picture, we questioned the outcomes at grade C in the Edexcel GCSE English specification, when compared to the predictions. We know that the awards in the new English suite have proved to be challenging and I am grateful to you and your colleagues for all your efforts, which have resulted in GCSE English language outcomes which are close to the predictions.

It is important to make sure that these first awards allow us to carry forward an appropriate national grade standard and that there is alignment between the examination boards. In order to achieve that aim, the examination boards have previously agreed to use predictions based on prior attainment at key stage 2.

The data that we reviewed yesterday showed that the Edexcel English specification is 8% above the prediction at grade C. As you know, the agreed tolerance was  $\pm 1\%$  on the predictions and the Edexcel award is still significantly above this. I note that the figure you quoted in yesterday's meeting (41.5%) is closer to the prediction but it is still some way from 34.7%, and we have not received any evidence to support those outcomes as being appropriate. We discussed yesterday some possible reasons why it might be difficult to meet the prediction. One possibility was that the Edexcel legacy specifications could have been lenient. That would mean that aligning with a grade standard based on national outcomes would represent a change in grade standard for Edexcel. We have now reviewed the 2011 screening data and it does appear that this may be part of the explanation. In the 2011 screening, Edexcel English A (1203) and Edexcel English (2731) were both flagged as generous at C (3.49 and 11.45 respectively).

I am therefore writing to you to ask you to review the English award at grade C in order to produce outcomes that are much closer to the predictions and so in line with national standards. This may require you to move grade boundary marks further than might normally be required.

I am conscious of the need to do this quickly, and I am therefore asking for a response by close of play on Wednesday 8 August.

If, having received your response, we consider it necessary to send you a notice of intention to issue a direction on this matter, we will do this as soon as practical and we will allow one clear working day for any representations. We will then consider these representations before deciding whether it is appropriate to issue a direction.

Yours sincerely



**Dennis Opposs**  
Director of Standards and Research



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10<sup>th</sup> August 2012

Dear Fiona

### **GCSE English Summer 2012**

I am writing to confirm that following our various correspondence and conversations between 7<sup>th</sup> and 9<sup>th</sup> August that we intend to review the Grade C boundary for unit 3 for GCSE English.

At award the committee reviewed a boundary mark of 65 (+10 on the January boundary) for unit 3 which at the time of award based on >85% marks gave an award within  $\pm 3\%$ \* for English and  $\pm 1\%$  overall. Now that all marks are in the system this would now give an award +3.44% against prediction for English and +2% for the combined English and English Language.

Whilst I appreciate this change still leaves us out of tolerance I can confirm we have tried to model an "in tolerance award" but this would require changes in the order of 12 on this unit and 3s and 4s on other units some of which are common to English Language. It would also have a negative impact on the A boundary. I really feel that I couldn't defend changes of this magnitude.

Therefore, I can confirm that we will be moving the grade C boundary on unit 3 to 65 for GCSE English Language.

Best wishes



Karen Hughes

Head of Recognition and Standards



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8<sup>th</sup> August 2012

Dear Dennis

### **Edexcel summer 2012 GCSE English award**

I am writing in response to your letter of 7<sup>th</sup> August 2012.

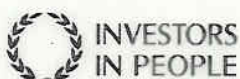
As you acknowledge, we have put considerable effort into producing what we consider to be a fair award for our GCSEs in English and English Language taking in to account all the available evidence and we have reviewed our GCSE English award at Grade C as you requested and we still feel that this is a fair award.

As you know this award was problematic for several reasons that were common to all awarding organisations including the change of structure required by the Ofqual subject criteria which would lead to higher outcomes and the existence of "banked" units and the fact that some controlled assessment tasks had been awarded in the previous series. The subject criteria also required the separation of GCSE English Language and GCSE English. This decision effectively created two new qualifications with different cohorts than existed in the legacy qualification. In addition to these Edexcel also had a 100% increase in its cohort. So whilst we appreciate that we agreed to use predictions based on KS2 prior attainment before the awarding took place we feel that given all these variables and the fact that these predictions can only be, at best, an indicator of performance we would be negligent not to take into account as much information as possible in making an award in these subjects. I provided you with some data we produced on common centre analysis at Monday's Maintenance of standards meeting to support our view that these outcome are appropriate. (I have attached this information to this response)

In your letter you suggest that the reason we have found this award difficult is because we were lenient on our legacy specifications. Your figure of +11.45% for 2731 is not relevant in considering this award as it relates to our English pilot specification which has now been withdrawn and was very different in structure to English and has previously been flagged as problematic. For this reason we have not included this in our analyses. However, we acknowledge that the 2011 screenings showed us to be +3.49% on 1203. The other relevant specification is 1204 which was screened at +1.92% in 2011. These combined would imply a potential leniency for English at grade C of approx 3% against 2011 screening.

Based on the proposed grade boundaries our common centre analysis based on 1203 and 1204, for centres over 20 candidates, shows that even taking in to account +3% from screening, outcomes at C will be -8.3%. When similar analysis was conducted for centres with an average entry of 100 and restricted to a  $\pm 3\%$  difference in entry across the 3 series, outcomes at C still show -4.3% taking in to account the +3% at screening.

The aggregate outcomes from all awarding organisations for 2012 show that the combined results for GCSE English Language and GCSE English at C is -0.9% on 2011 GCSE English results which would



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indicate that this is a severe award from all awarding organisations. This is despite all Awarding Organisations showing over their prediction against KS2 matched candidates. Given this I would ask you to confirm that you are confident that the evidence from KS2 predictions is sufficient to request awards with a  $\pm 1\%$  tolerance of match candidate predictions.

**We believe this to be compelling evidence that our award is a fair award and we do not believe a further revision of our grade boundaries is justified.**

I recognise your concern that Awarding Organisations are seen to be aligned, particularly at grade C. If you wish to pursue this aim despite my previous arguments having reviewed the awarding decisions I am able to inform you that at award the committee reviewed a boundary mark of 65 (+10 on the January boundary) for unit 3 which at the time of award based on  $>85\%$  marks gave an award within  $\pm 3\%*$  for English and  $\pm 1\%$  overall. (This mark was amended to +7 at Review of awards in light of the further evidence discussed above.) Now that all marks are in the system this would now give an award -3.44% against prediction for English and -2% for the combined English and English Language. If you wish us to take further action, we would be grateful for your response to the points raised.

Best wishes



Karen Hughes

Head of Recognition and Standards

\*I note your letter refers to an agreed tolerance of  $\pm 1\%$  and goes on to imply that this was the expectation for GCSE English. You will be aware that during one of our teleconferences we agreed that the tolerance on an individual specification could be  $\pm 3\%$  with an aim of  $\pm \%$  for GCSE English and English Language combined.



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10 August 2012

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Dear Karen

Thank you for your letter of 10 August confirming the actions you have taken on GCSE English for summer 2012. I note that this means that the English outcomes at grade C will be +3.44% against predictions and the combined outcomes for English and English language at grade C will be +2% against the combined prediction. I can confirm we will not be issuing a notice to direct on this matter.

Would you please let me have more detail on the impact of the changes, to include the following:

- outcomes at A\*, A, C and F for matched candidates against predictions, separately for English and for English language,
- outcomes at A\*, A, C and F for matched candidates for English and English language combined and
- outcomes at A\*, A, C and F for all candidates separately for English and for English language.

Please provide these details by noon on Monday 13 August. Perhaps when awarding is over we might reflect on the awarding season and the exchanges between us.

Yours sincerely

Fiona Pethick  
Director of Regulation

