



Consultation on GCSE Reform

IoD response to Ofqual consultation

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Dear Sir,

Thank you for giving the Institute of Directors (IoD) the opportunity to respond to *Consultation on GCSE Reform*, published by the Office of Qualifications and Examinations Regulation (Ofqual) in September 2011. Policy relating to education, skills and training is of the highest interest to the IoD and its members. The IoD has previously conducted research both on business perceptions of education performance generally, and on perceptions of the quality of GCSEs in particular, and we are pleased to participate in the current consultation. This paper presents our response to the questions posed.

Our submission stresses the high degree of importance that business leaders attach to improving education performance and making public examinations more rigorous. One contributing factor here is the sheer prevalence of basic skills weaknesses in the workforce and the effect they have on employers. Unfortunately, weak spelling, poor punctuation and ignorance of the rules of grammar are not limited to a small proportion of the population with below average education attainment. Indeed, errors are all too frequently made even by those with an impressive collection of educational qualifications, including undergraduate and postgraduate degrees. Simply to illustrate the point, it was disappointing to find an example of a misused apostrophe in the evidence that Ofqual itself provided to the Secretary of State on how GCSE mark schemes could take greater account of the importance of spelling, punctuation and grammar.¹ If Ofqual – the guardians of education standards – can't get it right, what hope everybody else?

About the IoD

The IoD was founded in 1903 and obtained a Royal Charter in 1906. It is an independent, non-party political organisation of approximately 40,000 individual members. Its aim is to serve, support, represent and set standards for directors to enable them to fulfil their leadership responsibilities in creating wealth for the benefit of business and society as a whole. The membership is drawn from right across the

¹ "Taking action in these two subjects [history and geography] will send out a strong signal about the importance we attach to young peoples' use of accurate spelling, punctuation and grammar..." See: Letter to Rt. Hon. Michael Gove MP, Secretary of State for Education, from Glenys Stacey, Chief Executive of Ofqual, 11 May 2011, available at: <http://www.ofqual.gov.uk/files/2011-06-27-ofqual-letter-to-michael-gove-SPaG.pdf>. [The apostrophe is erroneously placed if one assumes that Ofqual's focus is trained solely on the accuracy with which young people in *this* country use punctuation...]

business spectrum. 68% of FTSE 100 companies and 52% of FTSE 350 companies have IoD members on their boards, but the majority of members, some 70%, comprise directors of small and medium-sized enterprises (SMEs), ranging from long-established businesses to start-up companies.² IoD members' organisations are entrepreneurial and resolutely growth orientated. More than half of our members export goods and services internationally. They are at the forefront of flexible working practices and are fully committed to the skills agenda: 93% of members' organisations provide training for their employees and almost 70% provide training leading to qualifications.³

IoD response: summary

The IoD welcomes the thrust of the reforms set out in the consultation paper. A return to linear GCSEs would help to make the qualifications more rigorous. Allocating marks to good spelling, punctuation and the accurate use of grammar helps to emphasise the importance of written communication skills. From a business perspective, both of these interventions are sorely needed. Research carried out by the IoD among its membership has revealed genuine fears about the maintenance of education standards over time, worries about the rigour of public examinations, and particular concerns about the prevalence of basic skills weaknesses in the workforce:

- In a survey of over 1,300 IoD members conducted in July/August 2009, more directors believed that the quality of education provided by schools, colleges and universities had deteriorated over the course of the last ten years than believed it had improved. Based on direct experience of interviewing and employing young people, 19% of directors believed that the quality of education provided by schools had improved over the last decade, against 53% believing it had deteriorated. (The respective figures for further education colleges were 17% against 37%; for universities 14% against 46%.)
- A 2008 survey of IoD members found that the majority of directors polled had witnessed a decline in young people's proficiency in writing skills; reading skills; oral communication skills; mathematical skills; and analytical skills. The one skill to buck this trend was IT, where proficiency was seen to have improved considerably.⁴ With regard to GCSEs, the 2008 research found that only 26% of members had confidence in the GCSE system. Only 11% of the directors surveyed had more confidence in GCSEs than they did 10 years ago, and only 18% believed that GCSEs were as demanding as they were a decade ago.
- Directors participating in the July/August 2009 survey were asked what they believed, from an employer's perspective, should be the Government's priorities for improving the education system. 86% of directors nominated the improvement of standards of literacy and numeracy as a high priority – more than for any other issue. Given that 33% of directors in the same survey reported that some of their organisation's employees lacked basic skills, with 70% of the affected businesses saying that the deficiencies posed a significant problem, the priority attached by business leaders to increasing literacy and numeracy attainment in the education system can be easily understood.

In short, policy interventions to address perceived weaknesses in education performance have our strong support. However, there are aspects of the proposals put forward in the consultation that arguably do not go far enough. We explore these in our answers to the questions below, where we suggest possible ways of beefing up the requirements. In particular:

- **Performance in spelling, punctuation and grammar should be assessed in as many disciplines as possible, and not confined to a limited number of subjects.**

² Membership statistics correct as of 10 October 2011.

³ Source: IoD skills and training survey, August 2010.

⁴ See M. Harris, *Education Briefing Book 2008*, Institute of Directors, August 2008, p. 63.

- The performance descriptions contained in the *Guidance for Awarding Bodies* should be clarified, strengthened and supported by illustrative examples.
- Assessment of accurate spelling, punctuation and grammar usage should not be limited to subjects or examination papers featuring ‘extended writing’. It is a mistake, for example, to assume that literacy is not an important part of scientific subjects.
- Assessment of accurate spelling, punctuation and grammar usage should not be confined to particular questions, or specifically indicated to candidates.
- The total allocation of marks awarded for accurate spelling, punctuation and grammar usage should have a significant impact on the final grade awarded to a candidate. The allocation of marks should be sufficient to ensure the difference of a whole grade, and not merely affect those at grade boundaries.

Given the strength of feeling among employers on the continuing basic skills weaknesses of those leaving education, we feel that these suggestions on strengthening the proposals should be given very serious consideration. If they cannot be taken forward, and it is not possible to facilitate more rigorous assessment of proficiency in spelling, punctuation and grammar usage in existing qualifications, the Government should consider an alternative way of enabling young people to demonstrate their – for example a short, discrete, mandatory test of these skills to be taken alongside GCSEs.

Response to consultation questions

Question 1: *Do you agree that there is a need for a November re-take opportunity for English, English language and mathematics, as set out in paragraphs 18 to 20?*

Yes.

This seems reasonable.

Question 2: *Do you agree that we should permit controlled assessment results to be carried forward for students re-taking a qualification, as set out in paragraphs 21 to 23?*

Yes.

On balance, for reasons of practicality, this seems reasonable – although it might well be argued that not permitting controlled assessment results to be carried forward would create a greater disincentive effect on those considering re-takes.

Question 3: *Do you agree that students should be allowed to use unit results from a single GCSE to aggregate to a double award GCSE in the same subject, as identified in paragraphs 25 and 26?*

Yes.

On the basis of the evidence given in paragraphs 25 and 26, this seems a sensible approach.

Question 4: *Do you agree that students should not be allowed to carry forward units from a short course to a full course award, as set out in paragraph 27?*

Yes.

Question 5: *Do you agree that, subject to the considerations detailed in paragraph 28, pilots should be considered as exceptions?*

Don't know.

Sensibly managed, there is merit in this proposal, though the case for it is difficult to judge on the basis of the information provided. Clearly, some flexibility and discretion over the implementation of pilots is arguably useful and sensible, but wholesale exceptions would undermine policy integrity and the stance taken elsewhere.

Question 6: *What, if any, other exceptions should we consider to the proposal to make GCSEs linear, as set out in paragraphs 18 to 28?*

Don't know.

The only observation we would make here is that, whilst some limited exceptions may be necessary, for example to avoid penalising particular learners, the number should be kept to an absolute minimum to avoid undermining the integrity of the policy.

Question 7: *Do you have any comments on any potential equality impacts, as detailed in the Equality Analysis form, of the proposed move to linear assessment in all GCSE qualifications, as set out in paragraphs 18 to 28?*

No.

Question 8: *Do you have comments on any other aspects of the proposed move to linear assessment in all GCSE qualifications, as set out in paragraphs 18 to 28?*

Yes.

Contrary to the positive picture painted by official statistics, the research the IoD has conducted among its membership reveals that business leaders are generally sceptical about the degree of improvement in education performance. Based on their personal experience of interviewing, recruiting and employing young people, the majority of directors believe that young people have become less proficient in their writing skills; reading skills; oral communication skills; mathematical skills; and analytical skills. The one skill to buck this trend is in IT, where proficiency is seen to have improved considerably.⁵

With regard to the GCSEs in particular, IoD research in 2008 showed that only 26% of members had confidence in the GCSE system. Only 11% had more confidence in GCSEs than they did 10 years ago, and only 18% believed that GCSEs were as demanding as they were a decade ago. However, 44% of business leaders still took GCSE results into account when recruiting young people, on the basis of their being a guide to ability, and only a minority (24%) wanted to see them replaced by a new qualifications system. Rather, 59% favoured their retention as independent qualifications, but made more demanding.⁶

Such findings should make clear the degree of ground to make up to restore business confidence in GCSEs, and they provide the basis for the IoD's support for the move towards linear qualifications: it should help to restore some lost rigour and make GCSEs more demanding. That said, we are clear that such a move can only contribute to this process – much more depends on the nature of the qualification specifications themselves and on the outcome of the current National Curriculum Review. But it's a start.

⁵ See M. Harris, *Education Briefing Book 2008*, Institute of Directors, August 2008, p. 63.

⁶ See M. Harris, *Education Briefing Book 2008*, Institute of Directors, August 2008, pp. 65-70.

Question 9: *Do you agree that the Performance descriptions, as set out in paragraph 35, provide a sound basis for assessing candidates' abilities to spell, punctuate and use grammar accurately?*

No.

We have a number of concerns here:

1. Firstly, it is not clear that the performance descriptions adequately address poor performance. The existing categories of 'Threshold performance', 'Intermediate performance' and 'High performance' provide a framework for crediting spelling, punctuation and the use of grammar to 'reasonable accuracy', 'considerable accuracy' and 'consistent accuracy' respectively. It is to be assumed that candidates who spell, punctuate and use the rules of grammar with little, no or 'poor' accuracy, and who consequently fail to scale the barrier for 'Threshold performance', would not be awarded any marks at all. But this is not made explicit and, as the performance descriptors stand, the 'Threshold' level is the lowest category available. This would not be sufficiently ambitious.
2. Secondly, the descriptions are not detailed enough to convince that the changes will prompt meaningful improvements in standards of written English. Unless further guidance is given to examiners, assessing whether candidates spell, punctuate and use the rules of grammar with 'reasonable', 'considerable' or 'consistent' accuracy leaves a very great deal to subjective judgement. What exactly constitutes 'reasonable' accuracy, after all? What does 'consistent accuracy' mean, precisely? (Complete accuracy? Language use that is consistent but imperfect?) The given descriptors – in isolation – are insufficient and need to be tightened. They should be supported by examples illustrating expectations regarding candidates' knowledge about, for instance, when to start a new paragraph, how to use an apostrophe, or how to use a comma. They should also prompt examination of whether candidates' use of language type – formal/informal – is appropriate for the context for the question(s).
3. Paragraph 35 (ii) states that: "Marks for spelling, punctuation and the accurate use of grammar must be allocated to written and externally assessed units where there is a requirement for **sufficient extended writing** [author's emphasis] to enable the accurate application of the Performance descriptions."

On the one hand, this is an entirely understandable stance to take – it may not always be possible or appropriate to apply the Performance descriptions to particular subjects or in particular examination papers. In some mathematics papers, for example, there may be no writing expectation at all.

That said, it would be a mistake to assume that just because there is less expectation of, and opportunity for, extended writing in subjects such as science, there should be a form of blanket indemnity for poor writing in subjects outside the list prescribed in the consultation paper. If there are questions within a Biology examination, for example, that require or prompt written explanatory answer from candidates, it is reasonable to permit examiners to penalise poor language use – particularly when this obscures meaning. The reason for this is that, from an employer's perspective, distinctions between different contexts for language use are not always so easy to draw as in educational exams or courses – accuracy in language, punctuation and grammar use is as important in a short business email to a potential client, or in a brief promotional brochure or flier, as it is in a long strategy paper. Poor grammar, punctuation and spelling are just that, regardless of where they occur.

Thus, whilst in some subjects and examinations it may not be possible to apply an assessment according to the *full* Performance descriptions, it is nevertheless important to facilitate the deduction of marks for poor writing where it exists. This is vital in achieving a consistent message about the importance of good written communication skills and to ensure a coherent policy approach. Indeed, there is an argument for saying that if in some subjects or examination papers there isn't "sufficient

extended writing to enable the accurate application of the Performance descriptions”, then a different approach should be considered – for example a simple deduction of marks from the total score.

Question 10: *Do you think that question papers should indicate to candidates which questions will involve the assessment of accurate spelling, punctuation and use of grammar, as set out in paragraph 40?*

No.

We do not believe this to be the right approach at all. If the policy goal of the proposed changes is to encourage a genuine improvement in the standard of young people’s written English, flagging to candidates which questions will incorporate an assessment of accurate spelling, punctuation and use of grammar, is unlikely to help. Rather the reverse. Limiting such assessment to specific corners of examination papers, and communicating to candidates where assessment will actually occur, is likely to obscure candidates’ true level of performance. It would be entirely natural for candidates to devote more time, care and attention to exhibiting good spelling, punctuation and grammar in these questions than in others. Examiners would consequently face situations in which candidates displayed good spelling, punctuation and grammar in the ‘assessed’ questions, but made mistakes throughout the rest of the paper. Under the suggested approach, such a candidate would be rewarded with a ‘High performance’ grade – their other mistakes effectively being ignored.

This would be farcical. Guidance to awarding bodies must require the reward of consistently good written skills, not merely sporadically good skills. To construct guidance otherwise would simply not reflect the world beyond education. In the workplace, no such safety net will exist. Employers will simply not make allowance for poor spelling in one section of a business letter if there are no mistakes in a later section, just as they can’t be expected to exempt mistakes made in examples of concise writing compared with errors in extended writing. An assessment about a candidate’s ability to spell, punctuate and use grammar accurately must therefore be a holistic judgement on a whole paper, not on performance in specific questions. To do otherwise would be to undermine the credibility of the whole policy.

Question 11: *Do you agree that allocating 5 per cent of the total marks available for the qualification, as set out in paragraph 35, gives sufficient emphasis to the importance of accurate spelling, punctuation and use of grammar?*

No.

Allocating 5 per cent of the total marks for the qualification may not give sufficient emphasis to the importance of accurate spelling, punctuation and use of grammar. The GCSE Qualification Criteria should make tougher provisions here. For the policy initiative to be meaningful and give genuine weight to this, awarding bodies should be required to ensure that the total marks available for good spelling, punctuation and use of grammar could – in practice – make the difference between an entire grade, and not simply affect candidates at grade boundaries. In other words, candidates at the higher reaches of a ‘B’ grade should, if they display poor spelling, punctuation and grammar usage, be penalised with a ‘C’ grade, and not merely slip back into a low ‘B’.

Clearly, it is not just a question of the volume of marks available for good spelling, punctuation and grammar usage, but how rigorously and consistently the standards are applied. If the standards are not applied rigorously, the impact and influence of this initiative will inevitably be diluted and its value will be questionable.

Question 12: *Do you have any comments on any potential equality impacts, as detailed in the Equality Analysis form, of the proposal to assess spelling, punctuation and grammar separately?*

No.

Question 13: *Do you have any comments on any other aspects of the proposed assessment of spelling, punctuation and grammar?*

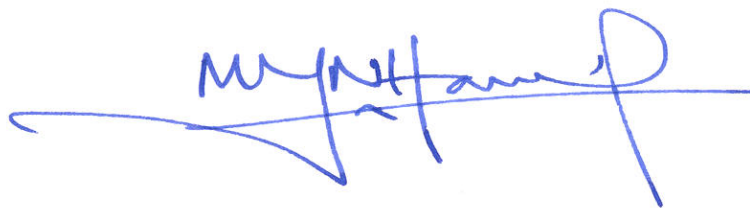
Yes.

Paragraph 41 specifies that: “The changes affect written and externally assessed units available from September 2012. They will **not** apply to controlled assessment tasks.” But it is not clear why controlled assessment tasks should be excluded from the provisions wholesale. Clearly, the nature of such assessment tasks will vary according to subject, but in some respects, there is even less excuse for spelling, punctuation and grammatical mistakes in – say – pieces of coursework, than there is in the white heat of a final exam when candidates are required to work quickly under considerable pressure. This stance should be revised.

Finally, it is difficult to read the consultation paper and its supporting evidence and avoid the conclusion that the need to insert greater assessment of spelling, punctuation and grammar into a range of examinations reflects badly both on the quality of early education generally, and also on the efficacy of GCSE English in assessing functional literacy.

Thank you once again for inviting the Institute of Directors to participate in this consultation. We hope you find our comments useful and look forward to seeing the consultation report and further engagement on ensuing policy changes. If we can provide further information on any of the issues discussed, please do not hesitate to contact me.

Yours faithfully,



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