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## **A Better Accountability - Should Ofqual be allocated responsibility for performance (achievement and attainment) table ratings and equivalences?**

### **About Cambridge Assessment**

Cambridge Assessment is a department of the University of Cambridge, and a not-for-profit organisation. Established in 1858, we are experts in assessment and are Europe's largest assessment agency. Cambridge Assessment incorporates three exam boards - which develop and deliver qualifications and tests for learners of all ages across the full range of subjects - and the largest research capability of its kind in the world.

In the UK OCR (Oxford Cambridge and RSA) is one of the UK's leading and most respected regulated awarding bodies with over 13,000 schools, colleges, workplaces and other institutions using its qualifications.

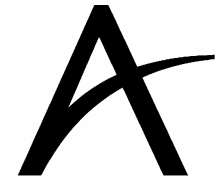
The qualifications offered by CIE (University of Cambridge International Examinations) are recognised by universities, education providers and employers in 150 countries. CIE qualifications are created with an international audience in mind, making them interesting, valuable and relevant for students around the world.

Cambridge ESOL (English for Speakers of Other Languages) exams are the world's leading certificates for English language learners. They are recognised and supported by universities, employers, government agencies, immigration authorities and professional bodies in many countries. Over 2 million people in 135 countries sit them every year.

### **The use of qualifications data for achievement attainment purposes**

Cambridge Assessment's awarding bodies design and award qualifications for the purposes of recognising the achievement of individual students. It does not believe that using the data provided for these purposes is very useful for the purposes of measuring schools, as performance tables do.

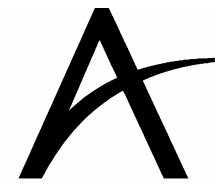
However, even an imperfect measure may be improved by bringing the calculations involved in its creation into the public domain. Proper publication of the criteria, with the opportunity for popular, academic and statistical debate, would shine a light on this very grey area with its huge impact on schools and colleges. Its removal from the DCSF to the new regulator would also remove yet another area of suspicion from public debate, thereby increasing public confidence.



## Accumulating evidence of serious issues

There is accumulating evidence of serious structural problems within current arrangements for compiling and managing performance tables – recently renamed achievement attainment tables:

- qualifications which are deemed to be equivalent but which clearly have different societal status and currency for progression.
- schools optimising performance table position by migrating to qualifications of lesser educational merit or currency for progression - in which students are likely to gain a higher grade than notionally equivalent qualifications of higher educational merit or currency for progression
- a divide opening up between the independent school sector and the state sector due to the independent schools' continuing adoption of qualifications not recognised in performance tables, but which are highly regarded for progression purposes.
- implicit suppression of qualifications which are 'different' from those already recognised in performance tables at specific levels, reducing the capacity of the education and training system to respond to the needs of learners – particularly those less engaged with learning – and to changing societal and economic requirements.
  - o An important example of this is the two-decade controversy over the failure to separate English Language and English Literature. Although it is vital for school children to engage with the study of English Literature, the combination of Language and Literature into a single examination has compromised adults' access to GCSE English. In the 1970s over 20,000 adults per annum accessed level 2 English Language through open centres – since they desired a vital labour market qualification which would also materially help them in their lives and work. The inclusion of Literature and the move to coursework impacted severely and adversely on this. This is a serious failing of the system - the needs of adults who wish to obtain Level 2 qualifications which are regarded as essential in the labour market have not been met. This has social and economic consequences as well as impact on individuals.
  - o Alongside this, the more recent divisive debate over IGCSE has led to undermining of public confidence and international confidence in the standing of UK qualifications. There has also been a tendency for vocational qualifications to be forced into alignment with academic qualifications, thus reducing their utility (and uptake) amongst the learners for which they were originally designed.
- anomalies in funding arrangements due to funding being linked to notional 'size' and 'level' (as determined by the rules for locating qualifications within performance tables, rather than the genuine, specific resource requirements of the awards and their related learning programmes
- extended, inefficient processes for approval of qualifications due to the complexities of meeting the increasingly detailed and complex requirements for locating new qualifications within the existing suites of recognised awards



### **Current arrangements for rating qualifications for inclusion in performance tables**

Since the late 1990s, a complex process has underpinned the rating of qualifications for performance tables – a process of which few are aware. It contains substantial elements of judgement; these are not subject to coherent regulation or scrutiny.

A team in DCSF compiles performance tables. These tables are based on a flow of data from schools. These data are conditioned by ratings for qualifications which are allocated by a very small team in QCA. The decisions of this team are crucial, since they determine which qualification is equivalent to another - the 'rating' of the qualification in the performance tables. They award this on the advice of officers in QCA and DCSF, on the basis of 'fit' and avoidance of anomalies. They do not undertake extensive empirical work on the consequences of ratings or institutional behaviour in the light of the performance tables – they are heavily driven by the 'internal logic' of previous decisions and allocations.

Significant judgements are made in regard of the equivalence of contrasting grade structures within different qualifications (e.g. one qualification being rated Pass Merit Distinction; another having eight grades A\*-G; another with five grades; etc). Such decisions are of great consequence in terms of the standing of different qualifications. The DCSF is wholly dependent on the work of this team. If their work is not completed to schedule, the performance tables cannot be compiled. This work currently done in QCA will pass to QCDA.

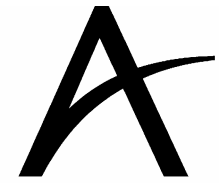
The concerns in respect of this are: the lack of transparency in the process; the fragility of arrangements and complex dependencies between DCSF and QCDA; the tendency for the process to be driven by internal logic rather than an understanding and analysis of its consequences for learners and schools.

### **Focussing on the appropriate 'unit of interest', in order to improve learner attainment**

Performance tables are driven by an assumption that to improve individual pupil learning, the school is the correct level at which to measure performance and to apply incentives and pressure for improvement. At a recent Cambridge/Nuffield/NFER seminar, the view of leading analysts was that classroom interaction – the level of the teacher rather than the school – is the critical level in the system on which to focus.

Performance tables impact principally on school-level behaviours, which include 'game playing' in terms of qualifications choice. It is not at all clear that performance tables have impacted beneficially on interaction in the classroom, indeed there is evidence that more superficial learning approaches have been adopted in a misguided attempt to maximise examination performance.

It is vital to note that the accountability process which once focussed principally on the quality of teaching – formal inspection – has now been deflected towards school-level performance as expressed through attainment of qualifications and through national assessment results. In particular, in order to focus on the quality of educational provision we would suggest that inspection needs to be re-oriented towards classroom level observation and review and to pupil-teacher interaction.



### **Unnecessary pressure on standards**

Awarding Bodies are acutely conscious of the full range of pressures which place upwards or downwards pressure on examination standards, and use a range of mechanisms for standards maintenance and monitoring. Performance tables exert a strong downwards pull on the system – schools actively ‘game play’ in order to find the easiest route to higher qualifications outcomes. It results in wasted time and resource, at all levels of the system, in respect of standards monitoring and maintenance.

The current approach to assuming that all subjects are – and should be – at the same level of demand compounds the problem (this is not an assumption which is made in Australia, where the HE admissions process weights different subjects differently). Reducing or removing the downward pressure that emanates from performance tables would be highly desirable, both from a technical point of view and in terms of general public confidence in examinations.

### **Control of the ratings and equivalences**

We suggest that the control of the ratings and equivalences processes (which lie at the heart of performance tables) be allocated to Ofqual. The impact of performance tables – in terms of the full range of artefacts and unintended consequences, as well as the desirable outcomes – require far more attention than it is given at present. Ofqual could undertake this work and, at the same time, institute more sensitive approaches to issues such as differences in demand between subjects.

Far greater sophistication and transparency is necessary in respect of performance tables, alongside recognition that focussing on school performance may be the correct approach (as we outline above).

Cambridge Assessment believes that when data is to be used in the public arena it should be done so in as transparent a way as possible.