



## GCSE English Language awards, 2012

A paper for the Children and Young People Committee of the National Assembly for Wales

### Background

The invitation for WJEC to attend a meeting of the Children and Young People Committee, as communicated by the Chair's letter of 28 September, is set in the context of the "re-grading of English Language GCSE results". The Committee has also indicated that it seeks "further information particularly about the discussions that took place between officials from the Welsh Government and WJEC and Ofqual staff during 2012 (and earlier if relevant) on the methodology for determining the grade boundaries for the June 2012 GCSE English Language examination".

In providing that information, this paper sets the re-grading in the context of the design of the qualification, its assessment over the first two years during which it has been taught, and the awarding for the summer 2012 series.

### 1. Design of the GCSE English Language qualification

There are four components to the new GCSE English Language qualification:

- a written exam (unit 1 – "Reading") which counts for 20% – *tiered*
- a written exam (unit 2 – "Writing") which counts for 20% – *tiered*
- Written (unit 3) – 30% – *untiered controlled assessment*
- Speaking and Listening (unit 4) – 30% (10% comprises "Spoken Language Study") – *untiered controlled assessment*.

The main changes from the "legacy" qualification are as follows:

- change in the weighting of elements, with "internally assessed" elements increasing from 40% (coursework) to 60% (controlled assessment)
- "internally assessed" elements becoming controlled assessment rather than coursework, with controls issued for task-setting, task-taking and task-marking
- shorter examination sessions for each written paper (1 hour each, compared with 2 hour written papers previously)
- time limitations for the completion of each controlled assessment assignment
- assessment objectives needing to be addressed via different assessment methods relative to legacy specifications, e.g. creative/imaginative writing now only assessed through controlled assessment rather than external assessment
- candidates not allowed to write draft responses to written controlled assessment tasks

- candidates allowed to take one A4 side of their own notes into the Reading controlled assessment , but these notes must not contain a plan or a draft essay
- it is not possible for students to be assessed orally for any of the controlled assessment assignments.

The origins of new specification derive from discussions between regulators (QCDA, Welsh Government, CCEA) and awarding organisations in 2008-09. One of the most vigorously debated aspects was the weighting to be allocated to the new controlled assessment elements. WJEC's view was that this should be approximately 25%, but this was a minority view and the outcome of these discussions was that the regulatory criteria would require a 60% controlled assessment for GCSE English Language qualifications for first teaching from September 2010.

The experience of operating the new specification for its first two-year cycle has not diminished WJEC's concerns about the potential impact of such a large controlled assessment element on the validity and reliability of the overall assessment. Hence, we are able to support any regulatory initiatives to reduce the weighting of the controlled assessment element, and hence are co-operating with the Welsh Government request that this be amended for the GCSE English Language assessments for 2014.

## **2. Assessment of the GCSE English Language qualification**

In the June 2011 and January 2012 series, it is the externally assessed units only (Units 1 and 2) that were made available by WJEC. The June 2012 series was therefore the first occasion on which the controlled assessment units were awarded, and hence WJEC has not yet encountered the potential difficulties associated with achieving stability in the grade boundaries for successive awards of these units.

Our retrospective analyses indicate that centres in England made considerably more use of the earlier assessment opportunities, relative to centres in Wales.

## **3. Awarding of the GCSE English Language qualification**

A key feature of the awarding process is the use of statistical information as a means of ensuring that results are comparable with standards in previous years and across awarding organisations. Whilst, in the past, a range of relevant statistical information would have been taken into account in a balanced way by our awarding committees, alongside evidence of the quality of candidates' work, the recent regulatory emphasis on predictor models has become very influential in the work of awarding committees for GCSE and GCE.

Awarding Organisations are required to report to regulators against agreed "predictors", and award outcomes are expected to be within a specified "tolerance" of the prediction (the margin of "tolerance" is dependent on the number of candidates for whom prediction data is available). The predictions are based on a statistical relationship between the prior attainment measure and the qualification outcome in a previous series. For the GCSE English Language awards in 2012, the predictions were based on the relationship between

the 2010 GCSE English outcomes and the prior attainment of those candidates at Key Stage 2 (in 2005). This relationship was then used to produce expected outcomes for the 2012 GCSE English Language candidature using their attainment at Key Stage 2 from 2007.

The Key Stage 2 measure used is the average attainment of a candidate over the three tests taken in England in Year 6. Predicted outcomes at GCSE are produced only for those candidates for whom attainment data at Key Stage 2 is available (hence, candidates in Wales are not included in this method of prediction). The predictions are taken into account by an awarding committee when setting grade boundaries: those grade boundaries are applied to all candidates, irrespective of whether they are included in the prediction model.

Immediately after our awards are completed, provisional outcomes are reported to regulators in order that any issues of comparability, over time or across awarding organisations, can be identified and reviewed. Following such a “monitoring standards” meeting held in Coventry on Monday 5<sup>th</sup> August, attended by regulators for both England and Wales, Ofqual wrote to WJEC on 8<sup>th</sup> August asking us “to review the English and English language awards at grade C in order to produce outcomes that are much closer to predictions” (see **Annexe 1**).

In responding on 9<sup>th</sup> August, WJEC sought to counter the two allegations made by Ofqual, that “WJEC awards at grade C appear to be out of line with the predictions, and overly generous”, and that “one possibility was that the WJEC legacy specifications could have been slightly lenient”. We also provided three options which brought the outcomes closer to the Key Stage 2 predictions, but in conclusion emphasised our belief that “the ‘at award’ outcomes are the fairest to our candidature overall and reflect the examiners’ judgement of quality of work viewed at the award.”

In the event, we received a further letter from Ofqual on 10<sup>th</sup> August stating that “we have discussed this with Welsh Government colleagues and have agreed that option 1 represents a fair approach for candidates in both England and Wales, and would bring WJEC grade standards closer to those of other exam boards. It also appears that the changes would be acceptable to the awarding committee. I am therefore writing on behalf of the three regulators to ask you to give serious consideration to adopting the changes set out as option 1.”

Our view is that, given the balance of evidence, it is extremely regrettable that regulators collectively decided not to uphold WJEC’s award. Although we were not party to the discussions, our understanding is that such a conclusion could be reached only by placing sole emphasis on the outcomes of the Key Stage 2 predictor model. We do not believe that such a conclusion would have been reached had there been a more balanced emphasis placed on other statistical evidence, taken in the context of the awarding committee’s views on the quality of candidates’ work.

Based on our knowledge of the power which regulators hold in relation to issuing directions, WJEC implemented “option 1”, which led to the much lower outcomes for candidates in Wales.

## **4. Re-grading of GCSE English Language under direction from Welsh Government**

### **4.1 Welsh Government request for an undertaking**

At the same time as it issued a report on “GCSE English Language 2012: an investigation into the outcomes for candidates in Wales” on the morning of 10<sup>th</sup> September, Welsh Government wrote to WJEC requesting an undertaking within 24 hours that we would “revise grade boundaries for GCSE English Language in accordance with the recommendation in the report, for candidates in Wales”. In the letter, Welsh Government acknowledged “the exceptional and difficult nature of this request and the challenges that it presents to WJEC in respect of its candidates outside Wales”.

WJEC replied on 11<sup>th</sup> September, within 24 hours of the Welsh Government communication, making the following points:

(i) that we were uncomfortable that the actions now proposed by Welsh Government would displace those actions which WJEC had previously taken in relation to our summer 2012 GCSE English Language awards, despite their letter confirming that those actions were “in accordance with the General Conditions of Recognition, with the Code of Practice for General Qualifications and with the explicit request of the regulators in Wales”.

(ii) that, in our view, given that the regulators had worked jointly on all matters to date relating to WJEC's GCSE English Language awards, it was essential that discussions (to which the Minister had referred) should take place between the Welsh Government, Ofqual and CCEA on a range of matters relating to the results of WJEC English Language candidates. We indicated that we would expect the scope of those discussions to include Welsh Government's “preferred outcome ..... for the regrading to be implemented in respect of candidates in England as well as in Wales” as well as “the challenges ..... to WJEC in respect of its candidates outside Wales”. WJEC's “candidates outside Wales” include those in England, Northern Ireland, the Channel Islands as well as those in other countries overseas, and we believe that there should have been collective discussions amongst regulators leading to a rational set of actions that would be implementable by WJEC.

(iii) that it was essential that the Welsh Government clarifies with Ofqual and CCEA the position on all matters that are currently implemented on a three-regulator basis (e.g. certification) and are relevant to the actions now proposed. We also indicated that there was a need to clarify the joint regulatory position in relation to the other awarding organisation which had candidates in 2012 for the GCSE English Language qualification in Wales

In conclusion, WJEC indicated that, should a regrading be proposed that was not supported by all regulators, our view was that changes to our awards would need to be implemented as a “direction” by the Welsh Government as regulator, rather than as an “undertaking” by WJEC. We indicated that such a direction would need to ensure that the actions and their implications are clear and rational, and are explicitly owned by the regulatory authority for Wales. Its scope would also need to be such as to allow the Welsh Government to provide a direction to WJEC on all those matters (e.g. certification) that are currently implemented on a three-country basis but for which there may need to be exceptional solutions in this instance.

We indicated that we looked forward to being able to discuss these matters with Welsh Government, and with the other regulators if appropriate, once we are advised that the necessary discussions between regulators have been completed.

#### **4.2 Welsh Government direction**

Within four hours of receiving WJEC's reply, Welsh Government replied on 11<sup>th</sup> September, indicating that:

- (i) they had "already had extensive discussions with Ofqual, some of these are detailed in the report and we had further discussion yesterday, shortly after they had received a draft of the report"
- (ii) they had considered our "request to work jointly with other regulators on this issue but firmly believe that at this stage it is unlikely that any agreement with Ofqual will be reached in a timely manner"
- (iii) as their "position is based on a fundamental principle of fairness to candidates in Wales we consider that we need to move swiftly to minimise the potential consequences for learners", and that on this basis they "feel it is necessary to issue a Direction to you in order to enforce the implementation of the regrading for candidates in Wales".

Although none of the issues raised in our response of 11<sup>th</sup> September had been addressed by Welsh Government, WJEC was put in a situation before the end of that day of having seven days in which to comply with a direction whose salient points were as follows:

- (a) determine revised unit grade boundaries at the C/D boundary for the summer 2012 award of GCSE English Language in relation to all Welsh candidates;
- (b) ensure that the unit grade boundaries .... bring the cumulative outcomes for the summer 2012 awards, at grade C, for the cohort of WJEC's Welsh candidates who were aged 16 at 31<sup>st</sup> August 2012, to within one percentage point of the results for the equivalent cohort in the summer 2011 awards;
- (c) apply the consequence of that adjustment to the arithmetically calculated grade boundaries, ensuring that no Welsh candidate receives a reduced grade as a result of these actions;
- (d) issue revised grade outcomes for all Welsh candidates affected by the action taken, with the exception of those candidates whose grades would otherwise be adjusted downwards.

#### **4.3 Implementing the re-grading**

In order to implement the requirements of the Welsh Government direction, WJEC convened a meeting of its Awarding Committee on Saturday 15<sup>th</sup> September, at which the following comments were made by the Chair and supported by the Committee:

- (i) that the initial award of 27<sup>th</sup> July went well and that the outcome was a just and fair award; however, it was found that the award had subsequently been changed (by the regulators jointly), which was an immediately uneasy situation; in conversation with the Chief Executive of Ofqual, the Chair had been advised that awarding organisations have powers to amend awards, but even if that is the

- case he felt considerable unease at the potential politicising of awards and that this was heading towards dangerous territory;
- (ii) it was noted that a Welsh Government observer had attended the awarding meeting of 27<sup>th</sup> July and that the subsequent Welsh Government report includes the following comments from the observer: “in both Foundation and Higher Tier examinations and also in the internally-assessed components, the level of demand was appropriately challenging for the full range of the candidature and offered scope for students to show what they knew, understood and could do”, “the levels of demand are appropriately differentiated”, and “the awarding meeting was fairly and appropriately conducted”;
  - (iii) the reference to the rigour of the examination and the fairness of the award would seem to imply an apparent clean bill of health, and the Chair indicated that he therefore found it regrettable in the extreme that the current situation should arise from that, placing the Awarding Committee in a very difficult situation in which it was being asked to recommend an action through which a student in Wales on the same mark as a student in England gets a different grade;
  - (iv) the Chair stated that in his view the situation was essentially untenable, and that the findings of the Welsh Government were matters which should have been discussed by all regulators with a view to reaching agreement;
  - (v) the Chair expressed his concern that the Awarding Committee was compromising its position; an award had been made in July to which both regulators had requested and agreed adjustments in August, i.e. they had endorsed the adjustments which they had jointly asked to be made; yet, now, the Welsh Government was saying that it did not wish to endorse that adjusted award to which it had previously agreed.

The objective of the awarding committee meeting was confirmed as being to identify the most appropriate grade boundary permutation to recommend for implementation. Such a recommendation would subsequently be communicated by WJEC to the Welsh Government, so that it could determine whether it wished to proceed with implementation, on the basis that the actions and their implications are then explicitly owned by the regulatory authority for Wales.

WJEC communicated the outcome of the awarding committee’s consideration of the matter to Welsh Government on 17<sup>th</sup> September, and Welsh Government confirmed on the same day that it wished the re-grading to be implemented on that basis. Re-graded results were issued to centres by 17:00 on 18<sup>th</sup> September.

## **5. Issues arising from the results of the GCSE English Language awards**

### **5.1 Variation in centre outcomes relative to 2011**

The most significant concern that has arisen from the GCSE English results for 2012, across all awarding organisations, is that a large number of centres have experienced unexpectedly large changes in the percentage of candidates gaining A\*-C relative to 2011 (some upwards, but in the main downwards in Wales).

Analysis undertaken by WJEC suggests that there is no single factor, nor any straightforward combination of factors, that explains these variations. To the extent that these variations are correct reflections of candidates' attainment, a contributory factor would be the different extents to which centres have adapted their teaching and learning strategies to the different demands of the new specification. To the extent to which there are doubts that these variations are correct reflections of candidates' attainment, a contributory factor may be the extent to which awarding organisations were able to externally moderate the controlled assessments, especially given that the standard convention of tolerance was applied.

## **5.2 Use of predictor models**

WJEC remains of the view that the over-deterministic use of predictor models is inappropriate: such models should be viewed as one piece of kit in the tool-box for monitoring and maintaining standards, with predictions being considered alongside other relevant statistical information and alongside information about the quality of candidates' work. The fundamental, largely untested, assumption which underpins any predictor model is that the "value-added" relationship that is used in the model is uniform across all sub-sets of the population to which that model is applied. Whilst such an assumption may be tenable for an awarding organisation that has a large candidature that is very representative of the cohort of candidates as a whole, there is no reason for supposing that the "average" value-added relationship is an equally good "fit" for subsets of the candidature that are demonstrably not representative of the candidature as a whole.

Whilst advocates of predictor models sometimes draw comfort from an NFER report which concluded that the use of GCSE-based predictor model for A Level awards is acceptable, that study was in fact based on an analysis of awarding outcomes which were themselves based on the use of that predictor model – so, in fact, the report did little more than confirm that if a predictor model is used in the awarding process, then the outcomes of that award are well aligned with the predictions. It is acknowledged by the strongest advocates of predictor models that some of the difficulties associated with their use are so substantial that some subsets of the candidature need to be excluded before a model is used.

In providing evidence to the House of Commons Education Committee (15 December 2011), WJEC expressed the view that "standards in any nation's education system need to be based on quality of achievement, the quality of candidates' work, so (we) would caution against being too comfortable when our standards debate is couched statistically, especially in an international context where we want to make sure that our young people have successful futures and can contribute to a successful economy."

## **5.3 Three-country regulation between now and the 2016 summer awards**

WJEC is of the view that the interests of all GCSE candidates (in England, Northern Ireland and Wales) are best served by ensuring that awarding standards remain based on a three-country regulatory approach for the four summer series from 2013 to 2016. With 2017 being scheduled as the first year for awarding the proposed English Baccalaureate Certificates in England, it may well be that each country will have quite separate awarding and certification arrangements from that year onwards, and that from that year onwards any work that is

undertaken in order to benchmark relative standards for Key Stage 4 qualifications may need to be on a completely different basis.

It is encouraging that, in announcing changes to the GCSE English Language criteria for Wales for summer 2014 awards, Welsh Government has indicated that it wishes to see awards that are “ensuring comparability of standards with GCSE qualifications in this same subject area in England and Northern Ireland”. WJEC’s view is that, if this is to happen, the three regulators will need to establish a protocol for working together by making a more balanced use of a range of appropriate statistical information.

WJEC believes that regulators should be able to find a way of working together in their collective role of monitoring and maintaining standards, but in order to do so it would seem to be increasingly clear that different elements of statistical evidence need to be taken into account by regulators in a balanced way.



Letter from Ofqual to WJEC, 8 August 2012

### **WJEC summer 2012 GCSE English and English language awards**

At our meeting on Monday afternoon to review the emerging GCSE results picture, we questioned the outcomes at grade C in the WJEC GCSE English and English language specifications, when compared to the predictions. We know that the awards in the new English suite have proved to be challenging but it is important to make sure that there is alignment across the examination boards in these first awards.

In order to achieve that aim, examination boards have previously agreed to use predictions for all GCSEs based on prior attainment at KS2. Because there are no KS2 test results for candidates in Wales, in summer 2011 WJEC (and CCEA) reported only against predictions based on common centres.

Ahead of the summer 2012 exams, we agreed with you that WJEC would report outcomes in the English suite against KS2 predictions, because the majority of the entry for the English suite was from centres in England, thus enabling them to be matched to their KS2 results. You will appreciate that one of our aims this summer is to align the grade standards across all examination boards, so that candidates in England are not unfairly advantaged or disadvantaged by their choice of examination board.

The data that we reviewed on Monday showed that for matched candidates in England, the WJEC English specification is 2.7% above prediction and the English language specification is 4.1% above the prediction at grade C. To date we have not received any evidence to support those outcomes as appropriate. Our concern is that according to the measure being used to evaluate the outcomes for candidates in England (prior attainment at KS2), the WJEC awards at grade C appear to be out of line with the predictions, and overly generous.

We discussed on Monday some possible reasons why it might be difficult to meet the predictions. One possibility was that the WJEC legacy specifications could have been slightly lenient. That would mean that aligning with a grade standard based on national outcomes would represent a change in grade standard for WJEC.

I am therefore writing to you to ask you to review the English and English language awards at grade C in order to produce outcomes that are much closer to predictions. I am conscious of the need to do this quickly, and therefore I am asking for a response to this letter by 9am on Thursday 9 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

Response from WJEC to Ofqual, 9 August 2012**WJEC Summer 2012 GCSE English Language and English Awards Issues to be addressed (from Ofqual letter of 8 August)**

Through a letter of 8 August, WJEC has been asked to review its GCSE awards in English and English Language: in doing so, we are attempting to address the following three themes in the letter.

- (i) “WJEC awards at grade C appear to be out of line with the predictions, and overly generous” (par 4)
- (ii) “one possibility was that the WJEC legacy specifications could have been slightly lenient” (par 5)
- (iii) “produce outcomes that are much closer to predictions” (par 6).

- (i) “WJEC awards at grade C appear to be out of line with the predictions, and overly generous”

WJEC, along with the other awarding organisations, shared their provisional 2012 award outcomes ahead of the “maintenance of standards” meeting on 6 August 2012, these being as follows:

**Table 1: WJEC All Candidates IPA outcomes**

	Entry	A% Outcome	C% Outcome	F% Outcome
<b>English</b>	38480	1.7	36.5	94
<b>English Language</b>	118012	16.6	72.8	98.4
<b>Combined</b>	156492	12.9	63.9	97.3

There has been much collective discussion about the basis for predictions for this summer’s awards and WJEC was asked, and agreed, to use KS2 predictions for these new GCSE awards.

Initially, the KS2 predictions for both GCSE English and GCSE English Language were based on the legacy English outcomes in 2010. However, it became apparent that all awarding organisations were having difficulty meeting the initial versions of these predictions.

In agreement with Ofqual, modifications were therefore made to the basis for prediction to be used by all awarding organisations: for English Language, outcomes were based on candidates in 2010 who had sat both English and English Literature; and for English, outcomes were based on candidates in 2010 who had sat only English and not English Literature. A final adjustment was then made to the prediction for English to ensure that the combined prediction matched the original combined prediction. At a further telephone conference, it was agreed that there would be a +/-3% tolerance for each specification and a +/-1% tolerance for the combined outcome.

Outcomes for WJEC, relative to these predictions are as follows for matched candidates:

**Table 2: KS2 Predictions for England and outcomes**

	Matched Entry	A%		C%		F%	
		Predicted	Actual	Predicted	Actual	Predicted	Actual
<b>English</b>	27517	1.2	1.7	36.1	38.8	96.7	96.3
<b>English Language</b>	65927	19	19.3	77.3	81.4	99.5	99.6
<b>Combined</b>	93444	13.8	14.1	65.2	68.9	98.7	98.6

Although much work has been done around these predictions, our understanding is that there is continuing unease across awarding organisations about these prediction outcomes.

One of the unexpected features of the predictor model is that award outcomes above tolerance seem to be associated with an overall reduction (relative to 2010 and 2011) in the outcomes for candidates (i.e. awards that appear “generous” relative to prediction deliver “severe” outcomes). This raises concerns about the calibration and robustness of the predictor model, even after the modifications made and agreed with Ofqual.

Our understanding is that actual A\*-C outcomes for England, taking GCSE English and GCSE English Language together, will be lower than for 2010 and 2011, and therefore two relevant questions are (a) whether the lower outcomes are justified, and (b) whether each awarding organisation is contributing in a proportionate manner to those lower outcomes.

In relation to (a), under the “comparable outcomes” approach the lower outcomes cannot be justified on the basis of centres being unfamiliar with the new specifications, as the “comparable outcomes” approach is intended to compensate for that; it has been suggested that a potential justification for lower outcomes would be the migration of substantial numbers of candidates to iGCSEs, but this possibility remains speculative until it can be shown that such migration is of candidates who are better than average in terms of A\*-C outcomes.

Lower outcomes are also difficult to justify for Wales, where the impact of “at award” outcomes is illustrated in Table 3.

**Table 3: Common Centre Predictions for Wales and outcomes**

	Matched Entry	A%		C%		F%	
		Predicted	Actual	Predicted	Actual	Predicted	Actual
<b>English Language</b>	30247	14.3	12.2	64.6	60.4	98.7	98

In relation to (b), WJEC’s “at award” outcomes do not make a contribution to lowering the overall outcomes for England, but can be considered to assist in making a modest counterbalancing contribution towards achieving “comparable outcomes” in terms of all-awarding body outcomes. The extent of overall improvement in WJEC outcomes for England, relative to 2010, can be deduced from tables 4 and 5, being of the order of 2.7 percentage points in the context of an increased entry of some 17,000 candidates.

**Table 4: WJEC 16 year old Candidates 2012 EPA outcomes**

	Entry	A% Outcome	C% Outcome	F% Outcome
<b>Wales Candidates</b>	30305	12.2	60.3	98
<b>England Candidates</b>	108416	14.3	68.1	98.4

**Table 5: WJEC 16 year old Candidates 2010 EPA outcomes**

	Entry	A% Outcome	C% Outcome	F% Outcome
<b>Wales Candidates</b>	30735	14.3	64.8	98.7
<b>England Candidates</b>	91453	14.5	65.4	98.3

With WJEC's candidature being approximately one-sixth of the England cohort, the net uplift contributed by WJEC to aggregate English and English Language outcomes taken together is about 0.4 percentage points.

(ii) “one possibility was that the WJEC legacy specifications could have been slightly lenient”

The inter Awarding Organisation screening carried out each autumn has shown that the 2010 and 2011 GCSE English results were in line with other Awarding Organisations and hence with the national outcomes. We have reason for believing that this screening exercise is robust, in the sense that it is based on a very substantial cohort of candidates, and the “basket” of GCSE subjects used in the comparison will be well distributed across the other awarding organisations.

Given that WJEC accounts for a very high proportion of English entries in Wales, the relative standing of outcomes for GCSE English relative to GCSE Mathematics and relative to all GCSEs provides another indication of the relative standards of WJEC's legacy English specification for grades A\*-C, as shown in Table 6:

Table 6: JCQ published results – cumulative percentages A\*-C (all candidates)

	2010			2011		
	English	Maths	All GCSEs	English	Maths	All GCSEs
England	64.8	58.5	69.0	65.5	58.8	69.8
net diff		+ 6.3	- 4.2		+ 6.7	- 4.3
Wales	61.6	55.4	66.4	61.3	56.4	66.5
net diff		+ 6.2	- 4.8		+ 4.9	- 5.2

If WJEC's legacy GCSE English specification was lenient, it might be expected that this would be apparent in the “net differences” in the above table being more favourable towards English in Wales than in England. What these net differences indicate, however, is that outcomes for GCSE English have been lower in Wales relative to all GCSEs than has been the case for England (e.g. 5.2 percentage points lower in Wales in 2011, compared with 4.3 percentage points lower in England). Net differences between GCSE English and GCSE Mathematics were very similar in both countries in 2010, but by 2011 the net difference in Wales had been reduced because of improved outcomes in GCSE Mathematics.

We do not believe that there is any evidence that points towards relative leniency of WJEC's legacy GCSE English specification.

(iii) produce outcomes that are much closer to predictions

WJEC has explored three options designed to produce outcomes which are closer to KS2 predictions, and these are illustrated below. In each case, there is a significant impact on

outcomes for Wales candidates, and therefore we would suggest that the implications of each of these options need to be considered carefully by regulators for both countries.

**Option 1:**

**KS2 Predictions and outcomes for England**

	Matched Entry	A%		C%		F%	
		Predicted	Actual	Predicted	Actual	Predicted	Actual
English	27517	1.2	1.7	36.1	35.3	96.7	96.2
English Language	65927	19	20	77.3	80.9	99.5	99.6
Combined	93444	13.8	14.6	65.2	67.5	98.7	98.6

**Common Centre Predictions and outcomes for Wales**

	Matched Entry	A%		C%		F%	
		Predicted	Actual	Predicted	Actual	Predicted	Actual
English Language	30247	14.3	12.8	64.6	59.7	98.7	98.3

In summary, the GCSE English is now within the 3% tolerance, the English Language is at 3.6%, (i.e. 0.6% outside of tolerance) and the combined outcomes are 2.2% above prediction at C (i.e. 1.2% outside tolerance). The effect on the Wales candidates is that they are now 6.3% below the common prediction and the 'headline' Wales C grade outcomes will be around 58%.

**Option 2:**

**KS2 Predictions and outcomes for England**

	Matched Entry	A%		C%		F%	
		Predicted	Actual	Predicted	Actual	Predicted	Actual
English	27517	1.2	1.7	36.1	35.3	96.7	96.2
English Language	65927	19	18.9	77.3	80.1	99.5	99.6
Combined	93444	13.8	13.8	65.2	66.9	98.7	98.6

**Common Centre Predictions and outcomes for Wales**

	Matched Entry	A%		C%		F%	
		Predicted	Actual	Predicted	Actual	Predicted	Actual
English Language	30247	14.3	11.9	64.6	58.6	98.7	98.3

In summary, the GCSE English and English Language are now within the 3% tolerance and the combined outcomes are 1.6% above prediction at C (i.e. 0.6% outside tolerance). The effect on the Wales candidates is that they are now 6% below the common prediction and the 'headline' Wales C grade outcomes will be around 57%.

**Option 3:**

**KS2 Predictions and outcomes for England**

	Matched Entry	A%		C%		F%	
		Predicted	Actual	Predicted	Actual	Predicted	Actual
English	27517	1.2	1.6	36.1	35.3	96.7	96.2
English Language	65927	19	18.9	77.3	79.3	99.5	99.6

<b>Combined</b>	93444	13.8	13.8	65.2	66.3	98.7	98.6
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### Common Centre Predictions and outcomes for Wales

	Matched Entry	A%		C%		F%	
		Predicted	Actual	Predicted	Actual	Predicted	Actual
<b>English Language</b>	30247	14.3	11.9	64.6	57.6	98.7	98.2

In summary, the GCSE English and English Language are now within the 3% tolerance and the combined outcomes are 1.1% above prediction at C (i.e. 0.1% outside tolerance). The effect on the Wales candidates is that they are now 7% below the common prediction and the 'headline' Wales C grade outcomes will be around 56%.

### Conclusion

WJEC is confident that its standards for the legacy GCSE English specification are well aligned with those for other awarding organisations, as indicated by the most recent statistical screening exercises carried out collectively by awarding organisation in the autumn of 2010 and 2011.

Therefore, our aims for the new qualifications were that we would maintain the standard of 2010 and 2011 by following the agreed "comparable outcomes" approach so as not to advantage nor disadvantage 2012 candidates.

However, in the work that we have done both pre-award and post-award, it has become apparent that there are serious issues arising from the prediction methodology used (not dissimilar to the problems reported by other awarding organisations), the change in weightings from the old to new qualifications and also the Wales England policy difference. It is difficult to quantify the effect of these on this year's outcomes, but at all times we have endeavoured to balance the regulatory requirements and the best interests of all candidates sitting a qualification whose outcome that will be very important for their progression intentions.

WJEC believes that the "at award" outcomes are the fairest to our candidature overall and reflect the examiners' judgement of quality of work viewed at the award. We would therefore wish to remain with the outcomes presented at 6 August Maintenance of Standards Meeting (i.e. Tables 2 and 3 of this document). This would mean that WJEC would be out of tolerance at both specification level and combined outcome level, but would give the Wales cohort outcomes that are only 4.2% below the common centre predictions and 2-3% below at all candidate outcomes.

However, if regulators' collective view is that an adjustment should be made, we would suggest that Option 1 is the one on which we would be able to reach agreement. Whichever outcome is preferred, the outcomes for Wales will need to be publicly explained as centres will be very disappointed with their GCSE English Language outcomes, and for the first time, Wales' GCSE Mathematics outcomes are likely to be above their GCSE English Language outcomes.

In attempting to explain these lower outcomes, we shall conduct further analyses to explore:

- (i) implications of regulatory policy differences, i.e. GCSE English being available in England only,

- (ii) possible differences in impact of changes to the GCSE English Language specification, including increased weighting for controlled assessment elements (on which Wales candidates seem to perform poorly in relative terms),
- (iii) possible impact of weak performance of under-16 and over-16 candidates in Wales (i.e. candidates outwith the Year 11 cohort).