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Chief Regulator

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The Rt Hon Michael Gove MP  
Secretary of State for Education  
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Dear Secretary of State

## English Baccalaureate Certificates

We have been working with your officials to develop arrangements for English Baccalaureate Certificates and Amanda and I met Elizabeth Truss last week as well.

As you know, we have expressed concerns about the timetable for change and I am now writing to set out briefly the three matters that are at the heart of our concerns. I do hope that we can meet soon to discuss them.

From our discussions with you and with the Minister, we welcome what we understand to be your policy aims: to replace GCSEs with qualifications that support the best possible teaching and learning for all students and that do not cap student aspirations. These ambitions are fully in line with the improvements we as regulator want to see to Key Stage 4 qualifications, given the problems we have found. As your consultation sets out, the proposed qualifications are to provide a good, internationally respected curriculum and assessment for the whole ability range to stretch the top end, engage those of lower ability, develop the skills and knowledge needed for employment and further study, encourage higher quality teaching, and provide a signal of achievement to employers, colleges and universities.

Our first concern is that the aims for EBCs may exceed what is realistically achievable through a single assessment. As we understand it, they are to meet the aims set out above, but also to be untiered, and – more effectively than GCSEs – to provide reliable data for accountability purposes, be immune to distortion from accountability pressures, enable standards to be maintained year on year, be deliverable safely and reliably to the whole cohort and be capable of being passed by a large majority of students. Our advice is that there are no precedents that show that a single assessment could successfully fulfil all of these purposes.

Our second concern is the proposal that EBCs sit at the centre of the secondary accountability system. There are both short and long term problems here.

In the short term (and following every subsequent EBC competition), the new qualifications will not provide a good basis for school accountability in the year they are introduced, because there will be unpredictable variability in outcomes at school level; some teachers will adapt and prepare better than others for the new qualifications. The GCSE English experience this year shows starkly how school acceptance of outcomes can be damaged when unexpected variations occur. We believe that parallel strands of accountability testing are needed, at least in English and mathematics, that can run across the transition period and provide evidence of changes in the underlying quality of teaching. These could be sample-based, like PISA tests, rather than full cohort tests.

In the longer term, while qualifications do have a central part to play in accountability, and no accountability system will be trouble free, we need to recognize that good qualifications are



not ideally suited to forming the sole basis of accountability measurement. As we wrote in our report on GCSE English earlier this month, if qualifications (and by implication curriculum and teaching) are limited only to those things that can securely form the basis of good accountability measures, the classroom experience is likely to be more limited than you would wish. But the current accountability framework assumes that GCSEs can be treated as totally reliable, objective and replicable measurements, and that precise judgements can be made about school performance based upon them, and on Grade C achievements in particular – which is clearly not the case, particularly in subjects such as English.

Furthermore, first class qualifications with the characteristics you are looking for in EBCs will be significantly less *reliable*, in the technical sense (ie the consistency or repeatability of results from one assessment to the next). Good marking of unstructured essay questions is quite subjective and can never be entirely captured in structured mark schemes. This variability will make EBCs less suitable for accountability measurement, which requires highly reliable tests with minimal susceptibility to marking challenge. We therefore advise that consideration be given to broadening the base of secondary school accountability measurement; we know that Ofsted is interested in more frequent progress testing as part of accountability measurement.

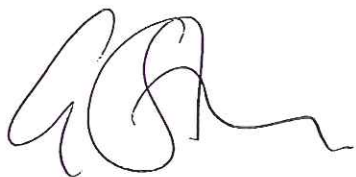
Our third concern, as previously stated, is about introducing completely new qualifications and removing provider competition at the same time. To give one example of the problems this will bring: exam board subject experts are currently spread around the different boards and around the country, and it is unlikely that many of those in boards that did not win the EBC in their subject could or would move to the winning provider. So the system would lose a large amount of subject expertise, which would not only damage the quality of EBCs but would also jeopardise the A level reforms – exam boards may be unable to provide A levels in subjects for which they had not secured the EBC. We have other more detailed concerns as well, which we will share with your officials, and which will need to be resolved before we could develop regulatory arrangements for EBCs.

Our assumption is that qualifications reform, and the safe delivery of both new and continuing qualifications (including A levels), are more important than removing provider competition, and our advice is that this qualification reform can be achieved most quickly and safely if it is not combined with significant market changes. When we met the Minister last week, we suggested that deferring market reform until EBCs are established could greatly increase the chances of EBCs meeting your policy aims. We will give this further thought and discuss options with your officials.

On all three of these matters we believe that there are choices and options which would increase the likelihood of successful introduction of EBCs. We hope that we can meet soon to discuss these options, and how we can play a constructive role in helping you to achieve your policy objectives.

I am copying this letter to Sir Michael Wilshaw.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Glenys Stacey', written in a cursive style.

**Glenys Stacey**  
Chief Regulator