



Helen Hayes MP  
House of Commons  
London  
SW1A 0AA

20 June 2019

Dear Ms Hayes,

**Parliamentary Question 257045: To ask the Secretary of State for Education, what plans his Department has to ensure that grades awarded for EBaccs are comparable across all subjects.**

The Rt Hon Nick Gibb MP has asked Ofqual to respond to you directly regarding your recent parliamentary question. A copy of this response will be placed in the Libraries of both Houses.

As the regulator of qualifications, examinations and assessments in England, Ofqual is responsible for maintaining the standards of regulated qualifications, including GCSEs.

There are three different aspects of comparability of grading standards that we consider in relation to GCSE qualifications: comparability of grades between different exam boards offering qualifications in the same subject, comparability of grades in a particular subject over time, and comparability of grades between different subjects.

In relation to comparability of grades between different exam boards and over time, for all GCSE subjects, including EBacc subjects, we require exam boards to use a combination of expert judgement and statistics to set grade boundaries. This approach enables us to make sure exam boards maintain comparable standards in each qualification over time and there is comparability of grade standards between the four exam boards that offer GCSEs in England when they each offer GCSEs in the same subject.

The statistics used for GCSEs are predictions based on the cohort's prior attainment at key stage 2. These allow the exam boards to predict likely achievement at the key grades which determine where all grade

boundaries are set. Exam boards' experts then check whether the boundaries that the statistics indicate are appropriate.

In relation to comparability of grades between subjects, in 2016 Ofqual took a [policy decision](#) not to seek to align grading standards across all GCSE and A level subjects according to statistical measures of subject difficulty. In particular, we took this decision in light of our concerns about:

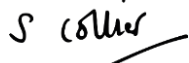
- the significant limitations of statistical measures of relative subject difficulty,
- our statutory objective to maintain qualification standards, and
- the negative impact on student choice and performance standards which has been seen in some of the educational jurisdictions which do try to align standards statistically in this manner.

However, we decided to consider specific cases where significant concerns had arisen that standards were misaligned between different subjects.

As part of this work, we are undertaking a [comprehensive review](#) of grading standards in relation to GCSEs in French, German and Spanish. We are looking at statistical evidence, contextual data including trends in numbers taking these subjects, and also considering the quality of students' work through looking at how performance at specific GCSE grades relates to the Common European Framework of Reference for Languages (CEFR). This will inform our decision on whether there is a compelling case for an adjustment to grading standards in these subjects. We have also consulted with stakeholders including subject associations, Higher Education and others. We are due to report on this work in the autumn.

I do hope this information is useful.

Yours sincerely,



**Sally Collier**  
Chief Regulator