



**Mr Robin Walker MP, Chair
Education Select Committee
House of Commons
London
SW1A 0AA**

20 March 2023

Dear Chair – Mr Walker,

I read with interest the transcript of evidence given to your Committee on 7 February about the Prime Minister's proposals for compulsory maths from ages 16 to 18. Several comments about the way standards are set for GCSEs were not correct. I am writing to clarify how standards are set for GCSEs in England.

GCSEs are not norm-referenced, and never have been. If they were, there would be fixed proportions of students awarded each grade for every specification, regardless of how well students performed. That is not the case.

GCSEs are not purely criterion referenced either – and never have been. Criterion-referencing means students must master every aspect of the content or skills to achieve a particular grade. GCSEs, A levels and many other qualifications used in schools and colleges, are compensatory. Better performance in one area can compensate for poorer performance in another, and grades are determined by the overall mark. Grades therefore reflect a student's general level of attainment, rather than mastery of all aspects of the curriculum. Grade descriptions illustrate an average level of performance at a grade, but students can achieve the same total mark in different ways. So, grade descriptions are not the same as detailed grading criteria used in mastery qualifications and cannot be used as the only source of evidence for setting grade boundaries.

There is no 'quota' or 'cap' on the number of students that can be awarded each grade. The assertion made during the hearing that a third of students taking GCSEs 'must fail' (that is, achieve below grade 4) is simply untrue. It is true that the profile of summer GCSE results before the pandemic was

stable over time, which could give the impression of a fixed percentage. That stability comes not from a fixed quota of grades, but from stability in the overall distribution of marks achieved by students, reflecting stability at a national level in the performance of students in their assessments. Every year, some students just do not score enough marks to be awarded a grade 4.

For every GCSE, AS and A level, a panel of expert examiners write the papers and lead the marking. After marking is complete, those examiners use a range of information to recommend where grade boundaries should be set. They review student work from the exams and assessments, supported by data showing how students taking the qualification compare with those in previous years and those taking it with other exams boards.

Exam boards also have evidence from the National Reference Test (NRT) in English and maths. The NRT is taken by a representative sample of year 11 students in England and the results provide an objective measure of how year 11 students are performing in these subjects compared with previous years. Evidence from the NRT since 2017 supports the stability seen in GCSE results.

During the discussion, one committee member referred to GCSE grades being “reliable to one grade either way”. As I made clear to the Committee in October 2022, the assertion that a significant proportion of exam grades are wrong is not borne out by the evidence and misrepresents Ofqual’s [research into marking consistency](#). That research focused on the likelihood of two expert examiners agreeing a precise mark to be awarded in a range of subjects, including for an essay question in English literature or history. The research literature on marking reliability, which goes back to the 1930s, is clear that two equally well-qualified examiners can legitimately disagree on the precise number of marks an essay is worth. In such cases, neither mark is wrong. Accordingly, it follows that any resulting grade is not ‘wrong’. Such misrepresentations of a body of research literature unnecessarily undermines public confidence in exam grades. There is also correspondence on this matter from my predecessors [Dame Glenys Stacey in December 2020](#) and [Simon Lebus in April 2021](#). As I said when I appeared before the committee, students, universities and employers can be confident in the grades awarded by exam boards.

A system where over six million GCSE, AS and A level grades awarded each summer can never be entirely free of mistakes. Ofqual has worked to ensure that there is transparency and recourse for students where mistakes do occur. Where a school or colleges believes there has been an error in the marking of a student’s work, they can see a student’s exam script before deciding whether to request a review of marking. There is also scope for a further appeal if a school or college believe errors in the marking remain uncorrected. This is an important safeguard, allowing any errors to be identified and corrected. In [2022](#), less than 1% of GCSE grades awarded were changed following a review.

As Chief Regulator of Ofqual it is my duty to secure qualification standards and to maintain public confidence in them. I want all students taking regulated qualifications to have confidence in the qualifications they are working so hard to achieve. That is why it is so important to address misconceptions about how these qualifications are awarded.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jo Saxton', with a long horizontal flourish extending to the right.

**Jo Saxton, PhD.,
Chief Regulator.**