

Roger Taylor  
Chair of Board  
Ofqual

6 June 2019

Dear Mr Taylor,

**Inter subject comparability and its effect on the take up of the sciences**

We are grateful to Ofqual for their commitment to investigating the question of grading standards in GCSEs and A level, with particular regard to A level sciences, in response to concerns raised and evidence provided by our societies. We acknowledge the range of evidence, including from original research, that has been considered.

However, we are concerned by the decision made by the Ofqual Board in November 2018 not to adjust grading standards for A levels in biology, chemistry and physics,<sup>1</sup> even though they acknowledge that there is incomparability in grades. This decision leaves A level grades openly unaligned meaning that students with similar prior performance are less likely to achieve an A grade in biology, chemistry or physics than in a more leniently graded subject.

There is evidence of damaging consequences from this lack of comparability between subjects. Most notably, that it deters students from taking subjects that are – and are known to be – more severely graded. It is also likely that students from under-represented groups are particularly affected. Therefore, the incomparability decreases both the uptake and diversity in these subjects.

The reduction in uptake is particularly worrying because the severely graded subjects map closely to those that the Government rightly regard as a priority. Therefore, to not address the incomparability will continue to undermine the Government's own aspirations to remediate the skills gap.

As well as being concerned about the decision, we question the undue weighting that was given to the final piece of work. This final – and decisive – investigation canvassed just one stakeholder group (of many) looking at scripts within their own subjects (rather than comparing across subjects). Given those facts and that stakeholder input comprised just one of four criteria given on page 6 of the Decision Document, we suggest that it should not outweigh all the previous data, analysis and evidence, which Ofqual has accepted as compelling. Also, it is not clear to us that this group of stakeholders should have so much influence – particularly given the question that was asked.

We accept that finding a solution is not straightforward. And we accept that implementing any solution will result in some difficult decisions for Ofqual. However, given that the overwhelming weight of evidence shows that the problem exists and causes damage, deciding not to act will leave us with a grading system that lacks credibility.

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We note that Ofqual intends to review the impact of its decision after the 2019 A levels. We ask that, unless there is evidence of an improvement (which seems unlikely), this review will be followed by action to remedy the problem as it exists – going beyond preventing it getting worse. This action is needed to prevent grading incomparability causing further damage to students' opportunities, Government aspirations, and the credibility of the exam system.

Yours sincerely,



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Cc Rt Hon Nick Gibb, Minister of State for School Standards