

Consultation Response Form

Consultation closing date: 20 August 2013
Your comments must reach us by that date

**Reformed GCSE subject content
consultation**

Information page

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

Publication

Information you provide in your response to this consultation may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000.

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Please make it clear if you want all/any part of your response to be treated as confidential and explain why. If a request for disclosure of the information you have provided is received by DfE, your explanation will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

Please tick if you want us to keep your response confidential.	
Reason for confidentiality:	

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For the purposes of the Data Protection Act, DfE is the data controller for any personal data you supply in response to this consultation. DfE will process all personal data (such as your name, address and any other identifying information) in accordance with the Data Protection Act 1998. In most circumstances, this means that your personal data will not be disclosed to third parties.

Please do **not**:

- provide information in comments boxes that might identify you unless you are content for that information to be released into the public domain; or
- provide information in your response that might lead to the identification of other living individuals

Name: Rod Bristow	
Please tick if you are responding on behalf of your organisation.	✓
Name of Organisation (if applicable): Pearson Education Ltd	
Address: 190 High Holborn, London WC1V 7BH	

Information sharing

The Office of Qualifications and Examinations Regulation (Ofqual) is undertaking a parallel consultation on regulatory conditions for GCSEs. Please tell us if you or your organisation has responded or is intending to respond, to Ofqual's consultation:

Yes X	No	Don't know
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Please only respond to the next statement if you have ticked 'no' or 'don't know' above:

If you provide comments to us that are relevant to Ofqual's consultation, we intend to forward your responses to them so they can be considered by Ofqual. If you do not want us to do this then please opt-out by ticking the box below:

I do <u>not</u> want DfE to forward my response to this consultation to Ofqual	
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Please mark the box that best describes you as a respondent.

<input type="checkbox"/> Academy and/or Free School	<input type="checkbox"/> Comprehensive School	<input type="checkbox"/> State Selective School
<input type="checkbox"/> Independent School	<input type="checkbox"/> Special School	<input type="checkbox"/> Sixth Form Only
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Organisations representing teachers	<input type="checkbox"/> Parent
<input type="checkbox"/> Young Person	<input type="checkbox"/> Higher Education	<input type="checkbox"/> Further Education

<input type="checkbox"/>	Local Authority	<input type="checkbox"/>	Teacher	<input type="checkbox"/>	Governor
<input type="checkbox"/>	Employer/Business sector	<input checked="" type="checkbox"/>	Awarding Organisation		

Please Specify:

Questions 1-6 below ask you to give your views with reference to a specific subject suite:

1. *English,*
2. *Mathematics*
3. *Sciences*
4. *Geography*
5. *History*
6. *Modern and ancient languages.*

You do not need to give answers for all the subject suites - please answer only with respect to those subjects on which you have a particular view.

Please ensure that you answer questions 7-11 as well – we would like responses from everyone on those.

English, including English language and English literature

1a Do the proposed subject content and assessment objectives for English, which includes English language and English literature, cover the appropriate knowledge and understanding for GCSEs in these subjects?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No -insufficiently demanding	<input type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Pearson has an advisory panel for GCSE English which consists of representatives from higher education (from both Education and English departments), a national literacy charity, and FE and school teachers. The responses to this consultation have been drawn up following discussion with this panel.

Link between English Language and English Literature: All of our responses to this consultation have been based on the presumption that both English Language and English Literature will be taken by all students and that the link between the two subjects will remain. If the link is not maintained and English Literature becomes an optional subject, there are concerns that most students will focus on GCSE English Language and the uptake for GCSE English Literature will decrease. We are also concerned about the content of the GCSE English Language qualification if it has to include a number of Literature texts to cover the national curriculum requirements for Literature. It would mean that GCSE English Language becomes a hybrid subject and will not meet the reading and writing skills required by employers and FE. We recommend that the link between the subjects remain and that students are required to study both English Language and English Literature.

Loss of digital texts from the assessment: Our advisory panel felt very strongly that the omission of the assessment of digital texts would not equip students with the reading skills they needed for either the workplace or progression onto further education. Leading jurisdictions such as Hong Kong, Singapore, NSW and Ontario include these skills. We think that it was vital for 21st century students to be discerning and critical readers of digital media. We recommend that students should be permitted to study (and be assessed on) digital texts but would recommend that they are studied alongside more traditional print texts to allow students to understand the differences between the texts. We would also welcome greater specificity on the text types that would be permissible as digital texts to ensure there is consistency across all Awarding Bodies.

Assessment of writing: Our advisory panel and a wide selection of teachers have expressed concern about the over-assessment on the more 'functional' side of English and writing. Although it is vital that students are assessed on their ability to write using correct grammar and expression, there is a concern that this would hinder creative writing in English Language and creative expression and responses in English Literature. We recommend that creative writing be incorporated into the criteria for English Language and that the 30% writing requirement for English Literature be reduced, and refocused on the style of the writing and the SPaG requirements.

Spoken Language study: The proposed subject content for English Language makes no mention of the study or assessment of the spoken voice. In the current GCSE English Language specifications, students are required to analyse and write about the spoken word and how it is adapted and used for different situations. There is concern amongst employers, literacy experts and teachers that this vital skill will be lost if this element of the course is not assessed. There are also concerns that there would be a reduced progression route to GCE English Language if this element is not included in the GCSE course. We would like to see the study of spoken language included in the GCSE English Language criteria.

Choice of set texts for GCSE English Literature: Our research into the curricula leading jurisdictions such as Hong Kong and Singapore alongside our research with teachers and with our advisory panel has indicated that the proposal for the 'detailed study' for English Literature contains too many texts for students to cover in depth. In order to cover the set text requirement over a two year course, there is a risk that the whole text would not be sufficiently covered. Our panel, along with a number of teachers, have also commented that the study of 'representative Romantic Poetry at KS4' is not appropriate and would be more suited to GCE. We would recommend that the requirement to cover 'Poetry after 1850' be widened to incorporate Romantic poetry. This would lessen the number of texts in the 'detailed study' list as well as ensuring that students have some opportunity to study some Romantic Poetry.

1b Is the relative weighting of the assessment objectives right for English, which includes English literature and English language?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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The percentage weighting of 60% reading and 40% writing in English

Language has been questioned by a number of teachers. Although this balance does reflect the more content heavy nature of the reading required for the subject, we believe that writing skills are being devalued over reading skills. We recommend that the skills have a 50/50 split.

Our advisory panel recognised the importance of writing skills, but raised some concern around the emphasis on the more functional elements of the subject and that the assessment objectives (AOs) did not lend themselves to creativity. There was also a concern from teachers that the AOs did not appear to credit students for their analysis of presentational features and the importance of graphology in non-fiction texts. We would therefore like to see more emphasis on creativity within the AOs as well as more clarity around rewarding responses which focus on the presentational features of a text.

Wording of the AOs between English Language and English Literature

Our advisory panel argued that there is some confusion about the separation of reading into 'comprehension' and 'critical' as there is an overlap between the two skills. The skills were also placed in different areas in Language and Literature. 'Inference' appears as a 'critical' skill in Language but as a 'comprehension' skill in Literature which could lead to confusion for teachers. We recommend that the AOs are reviewed across English Language and English Literature to ensure that there is consistency across the two subjects.

AO of 30% in GCSE English Literature for writing: Concerns have been raised by our advisory panel about the separate AO of 30% in GCSE English Literature for writing. Whilst most would acknowledge that assessing the skill of articulating ideas and arguments is a relevant part of a literature qualification, it was felt that 30% was too high a weighting. There is also a concern that the requirement for students to 'use relevant quotation, detailed textual references and illustrative examples' would lead to a formulaic use of quotations, especially within a closed book assessment. We would recommend that the percentage for AO3 is re-evaluated and reduced.

Percentage weightings of AO1 and AO2 for GCSE English Literature: We feel that the allocation of 20% to 'Reading Comprehension' is flawed and does not allow for discrimination across the ability range. This is further complicated by allocating 30% of the qualification for the assessment of writing and 10% of AO2 to the assessment of

the unseen texts. This results in the assessment of students' ability to critically engage with five set texts being reduced to 40% of the qualification.

Spelling, Punctuation and Grammar allocation: Although we are supportive of the percentage of SPaG within both the Language and Literature qualifications, we would welcome more clarity within the assessment objectives. Although the percentage of SPaG is prescribed in AO3 for GCSE English Language, it is not clear in the current AOs exactly what students will be assessed on and what is included in the SPaG requirement. Likewise, for GCSE English Literature, the criteria state that SPaG must make up 5% of the overall qualification, but the requirements for this are not mentioned in AO3. We would recommend that the requirements for SPaG be more explicit in the AO requirements.

1c Has the right practical content for English language been identified to allow students to gain the skills to progress in the subject, beyond the content which can be examined externally and reliably included in the GCSE grade?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Our research with English stakeholders and teachers and our advisory panel confirm for us that the inclusion of Speaking and Listening is vital to the GCSE English Language course. This is supported by the curricula from leading jurisdictions, so we welcome the inclusion of Speaking and Listening within the criteria.

However, we feel that the content of the proposals for Spoken Language needs to be revised. The focus of the new content is on presentations and responding to spoken language. Whilst writing and presenting to peers is important, it is only one aspect of this area of study and not representative of the range of underpinning skills. We feel that the content should separate skills and contexts and describe the full range of skills students need to speak and listen within the range of contexts. These skills are assessed more widely in other jurisdictions and students are encouraged to incorporate speaking and listening skills across the English curriculum. We would therefore recommend that the criteria are widened to include these skills.

There is some concern from teachers and other stakeholders that if Speaking and Listening does not form part of the overall award, it will be devalued in schools and time will not be devoted to teaching this skill. In order to address these concerns and to ensure that this element of the course is taught, we would support the proposal that Speaking and Listening be reported separately on the certificate. Whilst we do not think Speaking and Listening should be a hurdle to achieving a grade in GCSE English, we do

think that assessment of Speaking and Listening should be compulsory for all students and that achievement should be recognised in a separately reported grade that differentiates student performance. This would encourage teachers and students to engage with the subject and ensure that employers and FE can be confident that this vital element of English Language has been covered and students have a certain level of oracy.

1d Do the proposed subject content and assessment objectives for English, which includes English literature and English language, provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
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Our advisory panel felt that the freedom in the curriculum at KS3 was lost in the prescriptive nature of the KS4 proposals and raised concerns that many schools may now use the KS3 'space' to prepare for KS4 examinations.

Our research with teachers highlighted the concern that the GCSE criteria would lead to a much narrower KS4 experience and would be much less rich than KS3.

The key areas of concern were around Speaking and Listening and if the skills learnt at KS3 would really be built upon in KS4. There was also a concern that the breadth of study in terms of text types at KS3 would be lost in KS4 with the loss of digital texts and a focus on literary heritage texts. We believe that progression will be clearer if our recommendations are taken forward.

1e Will the proposed qualifications in English, which includes English language and English literature, secure sound progression for the purposes of further academic and vocational study?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Our advisory panel and our research with teachers have raised a number of areas where the proposed qualifications in English do not secure sound progression for further academic and vocational study.

Content: the loss of the spoken language study and lack of engagement with digital texts at GCSE has taken away two content areas that stakeholders have highlighted as being important to progression to GCE English Language and GCE English Language and Literature. We would therefore recommend that these two aspects are included in the GCSE English Language criteria.

The number of texts and narrow range of texts for GCSE English Literature could mean that students do not study texts in depth or have the time to read more widely which is vital for GCE English Literature.

It is also important that Speaking and Listening focuses on a range of skills in a number of contexts to ensure that students are prepared for both vocational study and for the workplace. Whilst preparing for presentations and responding to feedback are important, there are a number of skills involved in working as a team and listening and responding to a variety of different situations which are vital tools for the workplace and for further vocational study.

Assessment: Whilst we accept that the GCSE qualifications can be 100% externally assessed, there is a risk that students will not be sufficiently prepared for the research and extended writing skills required in coursework at GCE level. It does also raise a concern in terms of progression to vocational study which also has internal research and project work.

Skills: In GCSE English Literature the 30% weighting for Writing may further restrict text exploration in the classroom, with the focus shifting to how things are written and essay-writing technique rather than analysis of the texts. This may have an impact on the critical reading skills of students going on to take English at GCE level as well as progression to other subjects, vocational subjects and the workplace. Students need to be able to read texts critically and respond in a number of ways in order to progress to any other qualification and it is vital that these skills are addressed. Our recommendation for AO3 is outlined in responses to question 1a) and 1b).

English Literature as an optional subject: If GCSE English Literature becomes an optional subject, then it is possible that far fewer students will progress onto GCE English Literature. Students who only study GCSE English Language will not have the knowledge to progress onto GCE English Literature at a higher level. This could also impact on the progression to other subjects and further academic and vocational qualifications. We would recommend that Literature is not an optional subject at GCSE to ensure that GCSE English Language remains primarily focussed on the study of English as a Language.

Mathematics

2a Do the proposed subject content and assessment objectives for mathematics cover the appropriate knowledge and understanding for GCSEs in this subject?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No -insufficiently demanding	<input checked="" type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Pearson has an advisory panel for GCSE mathematics which consists of representatives of higher education (from both mathematical disciplines and non-mathematical disciplines requiring proficiency in mathematics), employers, a national numeracy charity, and school teachers. The responses to this consultation have been drawn up following discussion with this panel. In addition, this response has been informed by a wide range of research with employers and HE, both directly by Pearson and by a range of external organisations. See Annex A (attached in Question 10) for further details.

It is not the insufficient or over demand that is the concern, as much as the balance of the proposed demand across the content and Assessment Objectives which leads to over-demand in some areas and under-demand in others. The proposals appear to suggest that the main purpose of GCSE mathematics is to prepare students for an A level mathematics course. While this is important and not to be ignored, the majority of students need a mathematics education that prepares them for broader progression – into other subjects, both academic and vocational, into HE and into employment. These proposals emphasise pure mathematics at the expense of the practical numeracy, the problem solving, the data handling and the application that employers and HE tell us they need, particularly in those who have not studied A level mathematics. This approach can – and should – be just as demanding as a pure approach. This view was very strongly put forward by the HE and employer representatives on the advisory panel. They are deeply concerned that this new GCSE will not prepare students in a

way that will best support their progression, and not provide HE and employers with recruits who are best prepared.

We strongly recommend that the weightings of the assessment objectives AO2 and AO3 are reviewed – please see the response to question 2(b).

A specific example of inappropriate demand is the list of mathematical formulae which need to be learned. It could be argued that requiring this adds 'demand' to the current GCSE, but HE and employer representatives were very clear that what they value is the ability to *apply* the formulae; there is little value in simply knowing the formulae but not when or how to use them. Mathematics assessment at A level and HE would allow the provision of formulae sheets. All members of the advisory panel felt that having to memorise the formulae list would be a waste of teaching and learning time that could be spent far more constructively on the core content, which would support deeper learning and understanding of mathematics.

Our strong recommendation, endorsed by our advisory panel, is that formulae sheets should be provided in GCSE assessments. Our advisory panel also had comments on the few formulae that are proposed; ironically the probability formulae are ones that a student *should* know, as they essentially give away the answer, rather than act as a tool to apply in order to find the answer. Provision of formulae, rather than rote learning of them, is supported by best practice internationally in a range of high performing jurisdictions.

2b Is the relative weighting of the assessment objectives right for mathematics?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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The proposed weighting of AO1 is appropriate as this will ensure that students of all abilities are able to access problem solving.

However, we do not agree with the reduction in weighting for AO3 since the initial drafts were shared with Awarding Organisations, as these are the aspects of Mathematics where problem solving and application are most explicit. These are the aspects of mathematics that are particularly valued by HE and employers, and we strongly recommend that the weighting is increased to the draft proposal weighting of 30-40%. This would mean AO2 being reduced to 20-30%, again in line with the initial draft proposals. The proposed weightings do not seem to meet the DfE's declared intentions for the revised subject content and assessment objectives for GCSE mathematics – page 7, para 5.4 of the DfE summary document 'Reformed GCSE

subject content consultation’.

This increase in weighting for AO3 is also supported by study of international high performing jurisdictions. They emphasise the importance of problem-solving in relevant, authentic real-world and mathematical contexts.

2c Has the right content for mathematics been identified for high achievers, including those going on to study A levels in science, technology, engineering and/or mathematics (STEM)?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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The content is not entirely right. There is plenty of useful and important content for students who are going on to further study of Mathematics at A level, but it is less appropriate for the majority of students who will follow a route where they will need to apply their mathematical learning in other contexts. This includes those high achievers intending to study science, technology and engineering subjects.

We are also concerned with the increased volume of content overall, and delivering the core content alone would be a challenge in the time available. With the bold content as well, we raise the issue that the content overall is much bigger than that of a single GCSE in mathematics. If teachers are to cover all content, they would have to tick off topics and move on and there would not be time for study in depth, or application of the knowledge gained. This is at odds with the stated aim of increasing the amount of problem solving in the new GCSE mathematics qualification - page 7, para 5.4 of the DfE summary document. We recommend the way to address this is to review the proposed GCSE content that overlaps with current A level content in order to reduce the amount of content in the GCSE. See Annex B (attached in Q10) for details of where content overlaps.

The emphasis on pure mathematics may not be essential, as the greatest need for HE and employers is for individuals who are able to *apply* their mathematical learning – in particular Number, and working with and analysing large sets of data.

The biggest concern is the relative weakness of the Statistics content, and our subject panel believe the integrity of the data handling cycle has been ‘destroyed’. This risks the study of statistics being reduced to contrived examples, whereas the emphasis should be on handling relevant, real and appropriate data – with a focus on working with and analysing data in order to solve relevant and authentic problems - as stated in the DfE’s declared intentions for the revised subject content and assessment objectives

for GCSE mathematics (page 7, para 5.4 of the Summary document).

We recommend that there should be more ambition for this section of content. Reversing the change in AO2 and AO3 weightings back to those that were put forward in the draft proposals would be an important step in achieving this. Without this change the revised qualifications will provide inadequate support for those students – arguably the significant majority – who need to develop and demonstrate their knowledge and understanding of Number and Statistics in order to be best prepared for the next stages of their education, training and employment.

An additional concern is the identification of content for higher achieving students. While this is helpful guidance, the risk is that this will become content reserved for the higher tier or the extension paper. Some of this content, for example ‘applying repeated percentage change’ should be expected of any student achieving the minimum pass standard through the core or ‘foundation’ tier route. Those students who achieve well on the ‘foundation tier’ or equivalent route may well wish to progress to level 3 study in STEM subjects; if they have not studied the content for higher achieving students they will not be adequately prepared, despite what their grade might suggest. Differentiating by content is a cap on aspiration in a way that a tiered assessment need not be.

We strongly recommend that while the assessment should be differentiated, the content should not be differentiated. Decisions about teaching the content are best made in schools and colleges by the teachers who know their students, and it is our view that it is preferable for teachers to make these decisions rather than for the decision to be imposed on them by differentiated content in the qualification.

2d Do the proposed subject content and assessment objectives for mathematics provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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We support the principle that the GCSE should not have too much repetition of content covered at KS3, but the wide range of abilities and prior achievement across the KS4 cohort should also not be overlooked. Many students coming through from KS3 will still need to cover and/or consolidate content that others have mastered already. This content would lend itself well to contextualisation and application, both to support those who need to consolidate their learning, and those who need to develop the skills of applying what they have already mastered.

The primary phase in England is only just starting to move towards a problem-solving approach to teaching and learning – and it will take time for this to work its way through the system. International best practice demonstrates that mathematics education systems designed as a whole lead to students developing the appropriate mathematical skills at an early age. Therefore these changes to GCSE mathematics are welcome but the first cohorts of students may find it harder to get the full benefit from them.

Statistics is a concern here as well – it does not develop significantly from KS2 and take students on to the levels needed to enable them to perform effectively in HE or the workplace. We strongly recommend that the Statistics content is reviewed so that the main focus is on statistical analysis rather than statistical processes and techniques, and with more focus on the integrity of the data handling cycle.

2e Will the proposed qualifications in mathematics secure sound progression for the purposes of further academic and vocational study?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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The emphasis on pure mathematics should support progression to A level mathematics. However A level mathematics is not the only academic progression route; many other academic subjects such as Geography, Economics, and the sciences including Psychology will require a greater degree of application for study at A level and beyond. This concern is even more marked when vocational progression is considered.

If there is to be a single GCSE in mathematics, then it must meet the progression needs of all students. This is no easy task, as there are so many conflicting needs in relation to prior learning and achievement and future progression routes. There is no simple way to resolve these issues. One approach could be to ensure that the new A level courses are designed to progress from a GCSE that best meets the needs of all KS4 students; alternatively, there is already a range of existing and proposed mathematics courses and qualifications that can support the transition, and we are committed to working with the Department to ensure that this provision is appropriate and clear in its purpose.

We strongly recommend that the design of the new GCSE should not prioritise preparation for A level at the expense of the needs of those for whom GCSE will continue to be a critical gate-keeping qualification to so many other progression routes, and that to address this, the weightings of AO2 and AO3 need to be reversed.

Science, including biology, chemistry, physics and combined science

3a Do the proposed subject content and assessment objectives for science, which includes biology, chemistry, physics and combined science, cover the appropriate knowledge and understanding for GCSEs in these subjects?

<input type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input checked="" type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Pearson has an advisory panel for GCSE science which consists of representatives of higher education (from the three sciences), employers and school teachers. The responses to this consultation have been drawn up following discussion with this panel.

There are several issues explained below. Due to the nature of the content, Pearson has provided detailed comments on the content in a separate document.

Demand

In many areas the content is sufficiently demanding. However, in other places it is overly demanding for GCSE. This is based on evidence from reviews of current GCSE and GCE science (including a review of progression) and international benchmarking of content.

Pearson has submitted detailed comments on content that is not appropriate.

Content distribution between Double Award and the separate sciences is not coherent leading to a cap on aspiration.

Using the GCE subject criteria as a basis, Pearson has a concern that students who complete double award science will not have covered sufficient content to progress to GCE. However the students completing the 3 separate sciences will have.

Pearson recommends that the Double Award must be designed to enable progression to A level (and this should be clearly stated in the subject aims), to ensure all students have the opportunity to progress. The additional content for separate sciences should provide additional useful exposure to ideas and opportunities to develop skills, but should not be the only route to further academic learning.

Assessment objectives

Assessment objectives are a concern due to the number of bullet points. All points will need to be assessed in each exam series for each qualification. This, combined with a high AO2 weighting, will make it difficult to properly sample the breadth of content over time and could lead to predictable assessments.

There are some specific bullets that we recommend should be removed:

- AO2 bullet 6 – sampling techniques. We recommend moving this to the content of the relevant subjects (this is only assessable in Biology).
- AO2 1st and 9th bullet point – remove the word verbal (this is not assessable in written examinations).
- AO3 3rd bullet point – change unreliability to repeatability
- AO4 – if this AO is retained, remove the last bullet point (this is not direct assessment of practical skills).

Verbs included in the content statements will define the demand of the qualification without proper scrutiny by assessment experts.

Pearson recommends that verbs should be removed.

A number of verbs have been included in the content statements, Some have well defined meanings in assessment and others do not. Verbs such as 'appreciate' and 'recognise' have no agreed meaning for assessment and so their inclusion will lead to a lack of comparability. The decision on whether and how to include verbs in an exam specification is a complex process that takes into account overall demand and opportunities to assess at a variety of levels of demand. It should be left to awarding organisations, working with Ofqual, to decide on the inclusion of verbs based on international evidence and best practice. The accreditation process is the appropriate place where assessment experts can ensure appropriate demand and comparability. Pearson has had initial discussions with DfE on this issue and looks forward to further engagement.

Subject specific comments

Biology

We believe that there is a missed opportunity in the biology to include basic statistics, particularly within the more ecological areas of biology. Central tendency and spread is not a difficult mathematical concept and gives a basic idea of sampling.

The structure of the content, especially in Biology, makes it difficult to plan teaching of double award and separate science. This is because there is often either slightly

different breadth or depth to the same content between the two routes. The impact of this is that students who are placed on the track towards double award in year 10 will not be able to transfer at a later date to separate sciences.

Pearson recommends that whole topic areas are specified as triple science only, rather than simply being an extension of existing topics. For example, the double/triple award split of the following sentence allows little scope to split content:

*explain the importance of auxins, **gibberellins and ethene** in the control and coordination of plant growth and development*

Chemistry

In comparison to the current GCSE, the content in chemistry is very heavy. Feedback from teachers indicates that from their experience of teaching the current qualifications, this new criteria will take up to 3 years to cover. The implication of this is either that GCSE content will be taught to many year 9 students, irrespective of whether they are ready for that level of complexity, or that teachers will sacrifice depth of understanding and development of skills to get through the content.

In response to the problem we see with excessive content, Pearson recommends that as the following are covered at A level they do not need to be covered at GCSE:

- show the simple connection between hydrogen ion concentration and pH
- recognise activation energy from a reaction profile as the total energy needed to break bonds in reactant molecules
- interpret an instrumental result given appropriate data in chart or tabular form, accompanied by a reference set in the same form
- understand and use the definitions of the Avogadro constant (in standard form) and of the mole
- determine the stoichiometry of an equation from the masses of reactants and products including the effect of a limiting quantity of a reactant
- putting bond energies in with ΔH . (There is sufficient maths without this.)
- weak and strong acids. (There is no reason for GCSE students to understand this).

We are in agreement with stakeholders, including the advisory panel, and our centres, who have noted some areas that either do not lead anywhere, e.g. ceramics, polymers and composites, or are not widely used, e.g. atom economy. We propose that these are

removed.

From stakeholders there is almost universal rejection of the addition of nanotechnology. Teachers indicate that it fails to engage students. Our own experience from the 2006 specification is that the topic is difficult to assess at all but the simplest level of demand at GCSE.

It is important that the double award prepares students for progression to A level, and so Pearson recommends that the following separate science content should move into double award to ensure coherent understanding:

- properties of transition metals
- tests for identification of ions and gases
- causes of corrosion.

Physics

We are pleased to see the inclusion of exponentials through radioactivity because this is a crucial transferable concept e.g. inflation, loan interest rates, etc.

While we are pleased to see a strong focus on long standing physics concepts, our view, confirmed by our advisory panel and centres, is that there are not enough opportunities for the inclusion of modern Physics. For example, health physics is an area that engages students in Physics. Engagement is a key concern in Physics to ensure uptake at A level.

As has been found in mathematics, our evidence indicates that formulae recall is not an appropriate use of teaching time when the time could be spent developing skills instead. Memorising is a low demand activity so memorising formulae takes time away from developing higher order problem solving skills. We recommend only a short list of key formulae should be required to memorise.

Sometimes there is a lack of logic over what is in double and what is in triple. We have made detailed comments in the accompanying document to ensure Double Award enables progression to A level.

3b Is the relative weighting of the assessment objectives right for sciences, which includes biology, chemistry, physics and combined science?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Weighting of the AOs is difficult to compare internationally, due to the lack of AOs in other jurisdictions. The weighting for AO2 seems unusually high and may lead to problems sampling breadth of knowledge over time.

Pearson recommends that the percentage for each AO should be amended to give a narrow range, as hitting a specific percentage for each exam series is not achievable. A small range would still ensure comparability between awarding bodies.

Pearson recommends that direct assessment of practical skills does not count towards the final GCSE grade. (see 3c).

The weightings we describe below would lead to an appropriate range of demand if the current descriptions of AOs are retained with minor changes outlined below.

Pearson recommends that the assessment weighting currently attributed to AO4 should be placed with AO3 and the distribution and definition of AO1 and AO2 be reviewed. Based on the current intention for AO1 and AO2, the following would be appropriate weightings:

AO1 37-43%

Recall and show understanding of:

- scientific phenomena, patterns, laws, theories and models
- how scientific theories develop over time and are tested
- scientific vocabulary, terminology, definitions, units and conventions
- uses of scientific instrumentation and apparatus
- scientific quantities
- everyday and technological applications of science

AO2 47-53%

Application, analysis, evaluation and problem solving

- extract data relevant to a particular context from information presented in diagrammatic, graphical, or numerical form
- evaluate qualitative and quantitative data, carry out calculations as appropriate, recognise patterns in such data, draw conclusions and formulate hypotheses
- explain familiar facts, observations and phenomena in terms of scientific laws, theories and models
- present reasoned scientific explanations of unfamiliar facts, phenomena and unexpected observations, and make decisions based on the evaluation of evidence and arguments
- apply scientific principles and formulae and justify methods to solve qualitative and quantitative problems
- communicate scientific observations, ideas, arguments and conclusions in diagrammatic, graphical, numerical and symbolic form
- evaluate the personal, social, economic and environmental implications and risks of applications of science.

AO3 7-12%

Experimental skills and methods

- Identify and explain the factors that lead to experimental measurements being accurate and valid
- process and evaluate quantitative and qualitative data acquired through practical work, evaluate the design of experiments and experimental observations, draw conclusions and suggest improvements where appropriate.

AO4 0%

Carry out part investigations to show competency in the following:

- follow instructions accurately
- use scientific instrumentation, apparatus and materials appropriately

- work with due regard for safety, managing risks
- observe, measure and record accurately and systematically

3c Has the right practical content for science been identified to allow students to gain the skills to progress in the subject?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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The AOs have been written in an attempt, it seems, to split what could be feasibly, and indirectly, assessed in an exam (AO3) and what should be directly assessed (AO4). This has been partly successful, but significant issues remain in AO4. Currently AO4 mixes a description of competence in the first bullet points with a catch-all final bullet point requiring investigations or part investigations. The investigation requirement is well covered in AO3, inclusion in AO4 would mean doubly assessing skills. The suggested content of AO3 is much more suited to a practical investigation where students can analyse and evaluate the results of practical work. The other bullets within AO4 all refer to competencies. As such, a large percentage of the cohort is likely to score full marks on this 10% meaning that differentiation, potentially across 8 grades, would need to be done using 90% of the marks. This may lead to narrow grade boundaries at key grades and awarding issues.

Pearson recommends that AO4 is 0% weighted and does not form part of the final grade. We also recommend that practical skills are separately reported on the student certificate. This position has been formulated in response to feedback from key stakeholders and our advisory panel. We recognise that there are challenges in the quality assurance of practical work but are confident that improvements can be made to assure the reporting.

The advantage of zero weighting is three-fold. First, it ensures that the GCSE itself is made up entirely of graded assessments that differentiate. Second, if students are unable to take part in practical work for accessibility reasons, they are not disadvantaged. Third, by not totally removing AO4, schools still have a requirement to carry out practical work.

We also propose that the requirement for full investigations within AO4 should-be removed to ensure tasks are set with appropriate demand (and assessment time in centres is controlled).

In addition the planning and hypothesis aspect of AO3 should be removed. There is

significant evidence that requiring full investigations leads to an over emphasis on planning which is not highly valued by stakeholders (in particular HE) and drives down overall demand. We therefore suggest the following:

AO3 7-12%

Experimental skills and methods

- identify and explain the factors that lead to experimental measurements being accurate and valid
- process and evaluate quantitative and qualitative data acquired through practical work, evaluate the design of experiments and experimental observations, draw conclusions and suggest improvements where appropriate.

AO4 0%

Carry out part investigations to show competency in the following:

- follow instructions accurately
- use scientific instrumentation, apparatus and materials appropriately
- work with due regard for safety, managing risks
- observe, measure and record accurately and systematically.

Evaluation in AO3 would still allow students to be assessed on their ability to improve upon plans or improve hypotheses, but by not expecting a full investigation; the need to plan at the beginning of practical is removed and so does not drive down overall demand of the assessment.

It is possible to assess AO3 by either internal or external assessment. External assessment of AO3 has the advantage of not being impacted by the quality of data obtained from a student's own work. It is Pearson's recommendation that AO3 is externally assessed.

Pearson is keen to investigate and develop technological solutions to for the external assessment of practicals and will continue to share outcomes with the Department.

3d Do the proposed subject content and assessment objectives for sciences, which includes biology, chemistry, physics and combined science, provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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The proposed content builds well on the prior learning outlined in the Key Stage 3 Programme of Study.

3e Will the proposed qualifications in sciences, which includes biology, chemistry, physics and combined science, secure sound progression for the purposes of further academic and vocational study?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Double Award

The Pearson Science Subject Panel referred to evidence that there is on average half a grade difference at A level between students who studied separate sciences at GCSE and those who studied Double Award at GCSE. The proposed content split will further exacerbate this educational inequality. If the students have completed double award science they will not have covered some of the materials which are covered by the separate science students. This material is required for further study at L3 (academic and vocational).

Pearson strongly recommends that Double Award content is chosen to enable progression to A level and further vocational study.

3f Will the combined science double award provide students with a sufficiently secure basis for progression to A level study of each of biology, chemistry and physics?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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As referred to above, if the students have completed double award science they will not have covered some of the materials which are covered by the separate science students. Some of this material is required for further study at A level.

The content shows some overlap with A level. We are aware that at the time of drafting the A level criteria were not available for comparison. We have, as requested, noted areas of overlap. The A level criteria have not been significantly criticised by HE stakeholders except in some key areas such as mathematical demand. While some examples of increased complexity of content at GCSE is laudable, in other places the knowledge requirement is too complex. The Pearson Science Subject Panel indicates that early exposure to some complicated concepts will discourage students and lead them to believe that they cannot 'do science'. This view is further confirmed by comparisons to leading international jurisdictions where the current content is, in the main, in line with what is studied in England at present. It is relevant to note that in 2011, GCSE sciences underwent a reaccreditation where one stated aim was to increase demand of the qualification. As a result, much of the general aims of the 2015 GCSE redevelopment were addressed by Pearson at that time.

Pearson recommends that changes to increase demand are undertaken with caution, although some are no doubt necessary.

Geography

4a Do the proposed subject content and assessment objectives for geography cover the appropriate knowledge and understanding for GCSEs in this subject?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Pearson has an advisory panel for GCSE Geography which consists of representatives of higher education (from both Education and Geography Departments), subject experts, and FE and school teachers. The responses to this consultation have been drawn up following discussion with this panel.

Subject Aims and Learning Outcomes

Our research of international geography learning has identified clear social aims relating to consideration of different perspectives and value systems. Research with stakeholders has also showed that the development of geographical argument, as stated in the Subject Aims, relies on an understanding of different perspectives. Pearson recommends adding the italicised words “..and understanding of a range of perspectives” to the final Subject Aims bullet point.

Subject Content

Through our stakeholder research (research with teachers, subject association and learned society colleagues, regulatory authorities and higher education) believe there is a relative over-prescription of scale in the draft subject content leading to the risk that students may be prevented from moving between scales in order to formulate their understanding. For example in the People and environment section, using ‘global’ in one section title and specifying ‘local’ and ‘regional’ scales in another section could make it more difficult to explore this content in combination with the place requirements found elsewhere in the criteria. Pearson recommends removing unnecessary prescription of scale that could limit the demand of specification content.

Pearson recommends that within Subject content, under the ‘Locational knowledge’ sub heading, that it reads ‘Locational knowledge and *spatial* context’. And subsequently that the first bullet be amended to ‘appreciation of different *environmental*, cultural and political contexts’ in order to bring further clarity to this section.

Our stakeholder evidence shows that it is better to refer to entire geological periods as

this is more logical and holistic. Pearson recommends rewording '2 million years' in the physical geography content to '2.6 million years (Quaternary)' in the Physical geography; *Changing weather..*section.

Our research with stakeholders supports our concern at the wording of the physical geography criteria which seems to focus on distinct processes, instead of related interaction of processes more suitable at GCSE. Students need to develop core geomorphological understanding.

Pearson recommends revision of the first paragraph under the Physical geography: processes and change section to read: '*Processes, landscapes and change* – How geomorphological processes work in combination with their geological context and human activity to influence the landscapes of the UK over time. This should include detailed reference to some distinctive physical landscapes in the UK (e.g..).'

4b Is the relative weighting of the assessment objectives right for geography?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Our stakeholder research and advisory panel agree that the relative weightings are appropriate.

4c We are working on options to ensure that fieldwork takes place. One option might be a letter, submitted to AOs and signed by the head teacher and head of geography, which states that fieldwork has taken place beyond the classroom and school grounds. Do you think this would be an effective measure to demonstrate that fieldwork has taken place beyond the classroom and school grounds?

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
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Do you have any other suggestions to verify that fieldwork has taken place beyond the classroom and school grounds?

We do not agree that a letter would be an effective measure to demonstrate meaningful fieldwork had taken place beyond the classroom and school grounds.

Our research shows that internationally there is little evidence of measures to ensure fieldwork is carried out. Geographical enquiry and data skills are occasionally assessed externally but practical fieldwork skills are not assessed in the jurisdictions we researched.

Our stakeholder research included Ofqual's Review of Standards 2001-2010 which stated A2 had become 'less demanding because of the removal of the coursework element'. Most stakeholders believe that unless fieldwork is directly assessed it will not be encouraged in schools and that the quality and quantity of fieldwork will be reduced.

Pearson recommends that the subject criteria should better express the expectation that fieldwork be embedded into specification content.

We suggest that GCSE specifications recommend the use of fieldwork and learning outside of the classroom and that this is ensured by the work of other agencies involved in the inspection of and/or maintenance of standards for teaching and learning. However, HE research and the Ofqual report lead us to propose it is appropriate and valid to assess fieldwork as a coursework component in GCE.

4d Do the proposed subject content and assessment objectives for geography provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Our stakeholder research indicates a risk in repetition of content in KS3 and KS4 without explicit separation.

Pearson recommends adding 'that builds on Key Stage 3' to the content wording '*The essential subject content outlined here provides the framework for developing a coherent study at GCSE **that builds on Key Stage 3.***'

And '*GCSE specifications in geography should require students to build on **key stage 3 knowledge...***'

4e Will the proposed qualifications in geography secure sound progression for the purposes of further academic and vocational study?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Our advisory panel and stakeholder consultations confirms our view that the qualifications will provide sound progression to further academic study. We recognise however that changes to GCE subject criteria may affect this position.

History

5a Do the proposed subject content and assessment objectives for history cover the appropriate knowledge and understanding for GCSEs in this subject?

<input type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input type="checkbox"/> No- overly demanding
<input checked="" type="checkbox"/> Not Sure		

Pearson has an advisory panel for GCSE History which consists of representatives of subject and teaching associations, academic educationalists, HE, examiners and practising school teachers.

The responses to this consultation have been drawn up following discussion with this panel.

Several Key Issues have been identified which are signposted throughout this response with our recommendations.

Subject Aims and Learning Outcomes (p3)

The posed question (5a) does not explicitly reference the Subject Aims and Learning Outcomes included on page 3 of the History GCSE subject content and assessment objectives. We wish to provide our feedback on these, particularly with regards to their role.

KEY ISSUE 1: As general aims and aspirations these are achievable, since specifications can be written in such a way as to align with, and encourage, this to take place. On the other hand, if it *is* intended that they must *all* be evidenced through assessment, then we cannot reliably and validly assess via 100% external assessment the following:

Bullet point 1: A student's knowledge and understanding of "the history of their locality". (Also, the reference to "locality" is problematic since the Scope of Study currently permits, but does not require, local history.) This is supported by study of international high performing jurisdictions where a study of local history tends to be either included as additional content which is not assessed but intended for enrichment (e.g. Scotland and Finland), or as school-based assessment (e.g. Hong Kong).

Bp1: A student's knowledge and understanding of "the wide diversity of human

experience”.

Bp2/3: A student’s development as an “independent student[s]” and their ability to “ask relevant questions about the past”.

Bp6: A student’s recognition that *“the discipline of history [...] helps them to understand their own identity [...] and provides them with a basis for further wider learning and study.”*

We therefore recommend that these student outcomes are not to be evidenced through assessment but remain as part of the general aims of the qualification.

Scope of study

KEY ISSUE 2: Bp1 and 2: “A substantial and coherent element”: The document does not make sufficiently clear whether the ‘substantial and coherent’ element must cover a longer period than the ‘depth’ study, one of which at least it must ‘include’, and which it is specified should cover a period of 25 to 50 years, or whether the ‘substantial and coherent’ element and the “depth” study are synonymous. We recommend that the ‘substantial and coherent element’ covers a longer period, since our research with stakeholders in the history community provides evidence that with current GCSE practice isolated periods can be studied in great detail leading to narrow courses of study. Evidence from high performing jurisdictions overseas would support this: courses tend to be very broad. We suggest that a minimum period of around 60 years would be appropriate for modern and early modern, with possibly a longer period for medieval: this would ensure comparability of demand since, in general terms, richer and more detailed evidence exists for the former. In addition, we would recommend that if “substantial and coherent” elements are defined more broadly, then it would be appropriate to compensate for this by reducing the chronological scope of the depth studies (for example to 15-30 years), although it would be useful if chronological ranges were included only as a guide and a proviso added that awarding organisations should provide a rationale for adding or subtracting years.

KEY ISSUE 3: Bp 1: British requirement: The document does not make sufficiently clear whether the “substantial and coherent” requirement for British history could be met via a solely British thematic or comparative study (within which there is an additional depth study). Our advisory panel are in favour of coherence within a new course and so we recommend that this is allowed within the criteria in order to avoid multiple episodic topics of study.

Depth studies: The term “different aspects” is used on page 5 to refer to: scale (local/national/international); types of history (political, social etc); and periods of time (long term/short term). In consultation with our advisory panel, we recommend that this is amended to “different perspectives” with a footnote to add

clarification.

The document does not make sufficiently clear what is meant by "*historical situation*" since this could refer to an issue, e.g. women's rights or to a detailed study of the history of a country, e.g. Britain in the 1920s and 30s.

Wider World: The document does not make sufficiently clear what would constitute "wider world". For example, would a study of the 100 Years War or Britain's involvement in India in the nineteenth century count as wider world?

The document does not make sufficiently clear what is meant by "group" in the following statement: ("*the depth study*...*might focus on different aspects of the history of one nation or **group**...*").

Overlapping periods: For comparability, in relation to the requirement for the depth studies not to be taken "from any overlapping fifty-year period", the document does not make sufficiently clear whether (a) no depth studies can be set within the periods 1450-1500 and 1700-1750; or (b) students must not be able to take two depth studies that overlap in years, e.g. one "medieval" and one "early modern" depth study, each covering the years 1450-1500.

KEY ISSUE 4: Thematic/comparative studies: We welcome the inclusion of this requirement in the criteria. However, discussions with our advisory panel highlight that there is no common understanding of the term 'comparative'. If it is meant that 'comparative' refer to comparisons *between* periods, e.g. comparing the reign of Edward I with Charles I, then we do not believe it will be suitable to developing students' understanding of the *process* of change *across* different periods (as we believe should be the intention), but rather simply what *has* changed (which in effect targets understanding of similarities/differences). If this were the case, then allowing both thematic and comparative approaches would not result in comparable student outcomes both within a specification and across different awarding organisations. We therefore recommend that the criteria refer just to "thematic" studies and that "change" be amended to "process of change".

The criteria state that the thematic studies "should take either a political, military, cultural, economic, social or religious theme". This implies only one theme is permitted per study. Our advisory panel support the view that it is not desirable (or often possible) to insist that a thematic study includes only one type of history since they are often inter-connected. We therefore recommend that this is reworded to state: "*these studies may focus on one or more of the following types of history: political, military [etc].*"

Comments on Historical Knowledge, Understanding and Method

KEY ISSUE 5: These should align with the aims, scope of study and assessment objectives. If it *is* intended that they must *all* be evidenced through assessment, then we cannot reliably and validly assess via 100% external assessment the following:

Bp2: Students' ability to "frame historical questions".

Bp3: We consider it to be unrealistic and inappropriate to expect students to be assessed on their ability to understand all of the connections listed. This would go far beyond what is expected from qualifications in other jurisdictions and is not supported by our advisory panel. In addition, this requirement is at odds with the Scope of Study. First, 'local history' is permitted, but not required, under Scope of Study. Secondly, requiring students to demonstrate understanding of the connections between "cultural, economic, social, political, religious and military history" also seems inconsistent since the Scope of Study does not require that specifications include all of these types of history within the "periods and themes". We therefore recommend that the wording is amended to: "understanding of the connections between different *perspectives* and themes studied, *for example*: between local, regional, national [...] and long term timescales."

Bp4: Our advisory panel confirms our view that if this criterion continues to include both "how and why" then "arguments" should not be included. If students are required to demonstrate understanding of "why arguments differ", this is likely to be counterproductive, leading to simplistic answers that state that "historians always disagree" or to rote-learned responses. If 'arguments' implies a historiographic approach, then we do not believe it is appropriate for this level. We therefore recommend it is amended to: "understanding of how evidence is used rigorously to make historical claims, discerning how and why *different* interpretations of the past have been constructed".

Comments on assessment objectives

Balance: We welcome the reduction of weighting of AO3 as this helps to address concerns many stakeholders have about the over-emphasis on source skills in the current GCSEs.

KEY ISSUE 6: AO1/AO2: We recommend that these are combined, just as they are in GCE. It is not possible to "demonstrate understanding of the past" (AO2) without "recalling, selecting and communicating knowledge and understanding" (AO1).

KEY ISSUE 7: AO3 bp1: We recommend that "source material" is changed to "contemporary sources" – our advisory panel emphasise that this is what historians understand by the term, and the inclusion of later sources (which are interpretations) in current GCSE source papers has been criticised. This change

would also help make this bullet point distinct from bp2.

KEY ISSUE 8: AO3 bp2: We recommend that “representations” be removed. There is a lack of clarity about what this term means, and it is not a term used in academic discourse or in the current National Curriculum.

AO3 bp1 and 2: We believe that the wording “as part of a historical enquiry” is unnecessary given the requirement for sources to be assessed “in the context of constructing valid responses to a significant historical question or hypothesis” (a requirement that we welcome).

Comments on Subject content (introductory paragraph p4)

The document does not make sufficiently clear what is meant by the statement that “*awarding organisations may...use any flexibility to increase depth, breadth or context within the specified topics or to consolidate teaching of the subject content*”. Clarity is important to ensure comparability between specifications, and so some exemplification (eg as a footnote) would be very helpful.

5b Is the relative weighting of the assessment objectives right for history?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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We welcome the reduction of the weighting of AO3 as this helps to address concerns many stakeholders have about the over-emphasis on source skills in the current GCSEs. Our advisory panel agree that that the suggested relative weighting is appropriate.

As mentioned in our response to 5c, however, we recommend that AO1 and AO2 are combined, just as they are in GCE, as it is not possible to “demonstrate understanding of the past” (AO2) without “recalling, selecting and communicating knowledge and understanding (AO1).

5c Should students be encouraged, as part of their GCSE history studies, to undertake a historical investigation that gives them the opportunity to conduct independent research into a historical issue, event or process of their choosing resulting in an extended essay?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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If so, how can this be achieved best?

KEY ISSUE 9: The detail provided as to the nature of such a historical investigation is provided on page 8 of the published document Reformed GCSE subject content consultation published by the DfE. From this detail, the suggestion of a non-assessed historical investigation could provide students with an opportunity to “demonstrate their ability to research and critically evaluate sources and deploy relevant evidence to support a structured analysis and argument.” It could also provide students with an opportunity for extended writing, more so than is practical in a written exam. Overall, this would offer very useful preparation for GCE and good progression.

If such an investigation were to be part of the GCSE requirements, then we think it would need to be assessed and recognised. If it did not have an assessed outcome, we have concerns that teachers and students will not devote the time and effort necessary to give it any real educational value. Also we would not consider it to be the role of awarding organisations to ensure that un-assessed work had taken place, determine and implement any sanction that should be applied if it did not take place, or determine how to ensure it had been done to an appropriate standard. However, Pearson does believe that it would also be valid to develop a GCSE in History which did not include a historical investigation as a formal part of the qualification, provided these skills to be encouraged through teaching and learning.

5d Do the proposed subject content and assessment objectives for history provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Many schools will not have to follow the national curriculum, and so any GCSE will have to be useable by those students who have and have not followed it. It is debatable that a subject like history contains 'essential knowledge' (as opposed to understanding and historical skills) in contrast to subjects like science and mathematics.

Moreover, the current national curriculum and the July draft of the national curriculum are quite loose in terms of how much depth schools need to go into, and so it is doubtful that any subject criteria could provide "assurance" that these are built upon and represented adequately.

However, for those students who have followed the national curriculum, the draft proposals do provide an *opportunity* to build on the national curriculum in the following ways.

- The requirement to study medieval and early modern history allow students to revisit periods studied earlier, acquiring more detailed knowledge and more sophisticated understanding, and/or covering topics that may have been studied before but in a different way.
- The inclusion of a thematic study spanning an extended period of time gives the possibility of studying a theme that spans the time periods covered in K1, KS2 and KS3. This could act allow students to build on knowledge and understanding of individual periods and integrate them into a "big picture" of an aspect of history.
- The subject criteria provide opportunities for GCSEs to extend students' knowledge by including topics that may be completely new to them.

5e Will the proposed qualifications in history secure sound progression for the purposes of further academic and vocational study, including encouragement of the ability to conduct independent study in the subject?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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We believe that the current proposals have the potential to secure progression for the purposes of further study. Our advisory panel support our concerns that the removal of internal assessment may have an adverse effect on progression, as discussed in our response to 5d above. This is a particular concern regarding progression to GCE.

Nevertheless, the explicit requirement to cover a broader range of historical periods should be helpful for progression (particularly to the study of history at GCE and beyond) by ensuring that they have a broader historical grounding than is currently the case; we know that it is currently a cause for concern in HE that many students have little recently-acquired knowledge of anything from before the twentieth century. The revised subject criteria go a long way to addressing this concern.

Modern and ancient languages

6a Do the proposed subject content and assessment objectives for modern and ancient languages cover the appropriate knowledge and understanding for GCSEs in these subjects?

<input type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input checked="" type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Please note that our comments relate only to Modern Foreign Languages.

Pearson has consulted representatives of HE, employers, school teachers and subject associations in the preparation of our responses.

Subject Content and Assessment Objectives

Our main concern is with the high demand of the proposed criteria which, without tiered papers, would push the qualification above the threshold for a large majority of students. We recommend that assessments for GCSE MFL qualifications retain a level of differentiation in order to ensure that learning a language until the end of Key Stage 4 remains a realistic goal for most students and does not become the preserve of the most able. The proposed scope of study which is very broad could not be assessed without differentiated papers.

As specified in the Ofqual documentation, qualifications will only be tiered if manageable assessments cannot be designed that would both allow students at the lower end of the ability range to demonstrate their knowledge, skills and understanding in the subject, and that would stretch the most able students, and content that would be exclusive to the higher tier can be identified. We feel MFL is an exact example of this situation.

The proposals appear to be designed around a premise that the main purpose of GCSE languages is to prepare students for an MFL A level and then a specialist language degree. While this is important and not to be ignored, the majority of students take a GCSE to prepare them for broader progression – into other subjects and into employment. These proposals emphasise rigour and a more academic approach to language learning, particular with the introduction of formal assessment of literary texts and translation and terms such as “complex” use of language which we feel are

inappropriate at this level.

The assessment objectives set a level of demand that is significantly higher than current AOs and uses terminology which is currently open to misinterpretation, e.g. “understand and respond to different types of spoken language” (does this mean the skills of listening and speaking are to be assessed synoptically?) and the term “effectively” in AO2 and 4 is open to interpretation. We strongly advise retaining the current AOs that assess the 4 skills discreetly.

Literary texts

There needs to be clarity about how ‘literary texts’ are to be used in assessment. We support the principle that students of this age should be introduced to literature in the target language, but recommend that this remains within the teaching and learning domain. To assess literary texts through literary criticism is too ambitious at this level, even for the highest achievers. Literary criticism has never been included in assessment at this level, nor in any of the other international jurisdictions included in our research and, if required, would be taught at the detriment of the four core language skills. There is also a danger that this might be carried out in English rather than in the target language.

Translation

In relation to the assessment of translation from or into the target language, we think that care should be taken not to expect students to develop the skills of professional translation which are highly complex. It is felt that at this level, translation could best be used as a tool for assessing knowledge of grammar rather than assessing accurate meaning (ie ‘pure’ translation). HE stakeholders in particular felt that the specialist skill of ‘pure’ translation was not appropriate at this level and some thought that it should not be learned until university study. However HE did recognise that translation could help students acquire grammatical knowledge. Therefore in relation to translation from English into the target language, it would be preferable to use short, unrelated sentences which are constructed to test specific grammar structures. This approach would be preferable to the translation of a passage which would make it harder to assess a wide range of grammar structures. We think that translation into the target language is only appropriate for higher level language students because of the greater complexity involved. In relation to translation from the target language into English, this should again be short sentences or a very short passage of no more than 50 words. The equality issues around translation should also be considered as ESL students would be required to translate from one foreign language (English) into another.

If translation is to be used to assess grammar, it could be included in the current AOs within the percentage of marks awarded for grammar. However, if translation is to be

assessed in the sense of conveying accurate meaning (ie 'pure' translation) then an additional Assessment Objective would be needed as translation is a specific skill which cannot be included in the assessment of reading and writing.

Questions and rubrics in the Target Language

We feel including questions in the target language prohibits access to the qualification for weaker students who would be unable to perform the task if they couldn't understand the rubrics. Additionally the level of demand of the language used in the questions would have to be much lower for all abilities to understand and therefore providing opportunities for stretch and challenge in the question would not be possible.

6b Is the relative weighting of the assessment objectives right for modern and ancient languages?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Please note that our comments relate only to Modern Foreign Languages.

Currently the Assessment Objectives are ambiguous and allow for various interpretations by Awarding Organisations (see our response to question 6a). We recommend retaining the wording of the assessment objectives that appear in the subject criteria of 2011 but we welcome the equal weighting for each language skill of 25%.

We recommend that the percentage allocated to knowledge and accurate application of grammar and structures of the language prescribed in the specification is prescribed at a minimum of 20% of the total marks of the qualification.

6c Do the proposed subject content and assessment objectives for modern and ancient languages provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Please note that our comments relate only to Modern Foreign Languages.

We do believe that the new GCSE subject content and assessment objectives will build upon the essential knowledge at KS2 and 3 being introduced in 2014 and will ensure good progression, for example the introduction of translation (however see comments above). Our concern, however, is that students entering yr 7 in 2013 may not have had the whole benefit of the new national curriculum when they reach GCSE, and may be at a disadvantage because they will not have had the opportunity or access to literary texts and translation as is now required in earlier key stages. We recommend that this issue be recognised and that measures are introduced to ensure that students affected are prepared in advance for progression into the new GCSE.

6d Will the proposed qualifications in modern and ancient languages secure sound progression for the purposes of further academic and vocational study?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Please note that our comments relate only to Modern Foreign Languages.

For those following an academic path, the subject criteria will ensure a solid preparation for A level study in languages particularly because of the added emphasis on grammar. The nature of the qualification does encourage students to learn and apply 21st skills such as metacognition, critical thinking and communicative skills which are valid for further academic or vocational study.

We do, however, have concerns relating to the increased difficulty of the content for those students who are not intending to progress onto language GCEs, and for whom an additional language is primarily supporting progression into other subjects or vocational pathways.

Please answer all the remaining questions, which include questions on literacy, numeracy and impact on specific groups of students.

7 Does the English language content cover the key elements of literacy needed for employment or further study?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Pearson's advisory panel for English defines literacy as follows:

Literacy is the ability to communicate using mutually dependent skills in reading and listening, and in writing and speaking. In order to fully succeed a student must be engaged with literacy and able to adapt to the changing ways in which it is defined and used.

Literacy enables students to read and listen critically, and to speak and write coherently, clearly and accurately. To be literate, students will be able to vary the form of communication according to the situation, and communicate in a full range of socio-cultural contexts. In a technological society, literacy also includes media and electronic texts. To be fully literate, students will have a secure working knowledge of spelling,

grammar, form and punctuation in written texts, and grammar in spoken communication.

Many of the arguments outlined in our response to questions in section 1 are relevant to the key elements of literacy.

We feel that the English content does not cover the key elements of Literacy needed for employment or further study. The main areas of concern are as follows:

Loss of digital texts from the assessment: Our advisory panel felt very strongly that the omission of the assessment of digital texts would not equip students with the reading skills they needed for either the workplace or progression onto further education. They argued, and used evidence from leading jurisdictions such as Hong Kong, Singapore, NSW and Ontario, that it was vital for 21st century students to be discerning and critical readers of digital media as it ensured that they gained vital visual literacy skills. We would advise that students should be permitted to study (and be assessed on) digital texts but would recommend that they were studied alongside more traditional print texts to allow students to analyse the differences between the texts. We would also welcome some guidance on the texts types that would be permissible as digital texts to ensure there is consistency across all Awarding Bodies.

Risk of rote learning of grammatical terminology: Although the focus on writing skills and the correct use of grammar within the criteria is welcomed, there is a concern that the focus on grammar and terminology could lead to rote learning rather than the application of grammar within writing. We would advise that the AOs are very clear about the allocation of grammar and the use of terminology to ensure that Awarding Organisations can integrate these skills into the mark schemes for writing.

Speaking and Listening skills: We feel that Speaking and Listening is a vital skill to accessing reading and writing and there have been a number of studies linking the importance of good verbal skills to students' overall literacy. It is therefore important that Speaking and Listening focuses on a range of skills in a number of contexts to ensure that students can express themselves clearly and confidently. Whilst preparing for presentations and responding to feedback are important, there are a number of skills involved in group discussion and listening and responding to a variety of different situations which are vital tools for literacy.

8 Does the mathematics content cover the key elements of numeracy needed for employment or further study?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Pearson's GCSE mathematics subject panel has defined numeracy as *the skill that is needed to appreciate number relationships, to solve problems (in particular complex real-world problems), to process information, to make decisions and to interpret data as well as solutions to real-world problems.*

We strongly recommend that the key elements of numeracy would be better developed if more weight is given to Number and Statistics in the GCSE content. The assessment Objective weightings for AO2 and AO3 need to be switched around, so AO2 is 20-30% and AO3 is 30-40%, as Numeracy underpins mathematical learning and enables young people to develop procedural, conceptual and practical aspects of mathematics, and this leads to mathematical fluency and being confidently numerate across the curriculum.

A mastery of Number and Statistics empowers young people to be able to recall number facts, select the appropriate method for solving complex real-world problems in context, understand and use quantitative methods, use technology appropriately and recognise when it is an inappropriate tool and being able to interpret, describe and discuss their work and use their solutions to support their conclusions and be able to make appropriate predictions. The development of these behaviours and attributes will equip young people with valuable skills to function competently and confidently in higher education and employment in the 21st century.

High performing jurisdictions ensure that by the end of the primary phase students have mastered all of number under the four operations. This, in turn, leads onto the capacity for developing deeper learning and understanding of more complex concepts and the ability to use their mathematical learning in a range of familiar and unfamiliar contexts. Appropriate revisions to the Assessment Objectives will help ensure that GCSE Mathematics students are better able to develop their numeracy skills, but the full benefit will be realised when the whole system is aligned to achieving this aim.

9 Do any of the proposals have potential to have a disproportionate impact, positive or negative, on specific pupil groups, in particular the 'protected characteristic' groups? (The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation); if they have potential for an adverse impact, how can we reduce this?

<input type="checkbox"/>	Yes - Positive impact	<input checked="" type="checkbox"/>	Yes - Negative impact	<input type="checkbox"/>	No
<input type="checkbox"/>	<u>Not Sure</u>				

English speaking and listening

The removal of the speaking and listening component from the final grading may have a positive impact on students with specific protected characteristics. However, other students who experience problems with written communication may be further disadvantaged.

Mathematics

In mathematics there could be an accessibility issue for ESOL students depending on the requirements for written communication in AO2.

Removal of internal assessment across all subjects

In general our view is that reduction of the methods of assessment will have a disproportionately hard impact on some students for which access to external examinations is an issue. However, we also recognise that some students with particular access requirements may benefit from the proposals. We will share our views with Ofqual.

10 Have you any further comments?

Mathematics annex A

Research with employers and HE:

Employers

- A report commissioned by Pearson Education (2011) by Kay Symons: Employers' requirements and qualifications in maths and English
- ACME (2011) Mathematical Needs: Mathematics in the workplace and higher education
- CBI 2012: Learning to Grow: what employers need from education and skills
- CBI 2013: Changing the pace: CBI/Pearson education and skills survey
- Employers on Pearson's BTEC Nationals advisory panels
- Employers on Pearson-sponsored Bacalaureate advisory panel

HE

- Pearson/Edexcel Universities research (2011 and 2012) - across all subjects that require GCSE mathematics
- Report commissioned UK Centre for Bioscience - J A Koenig: A survey of the mathematics landscape within bioscience undergraduate and postgraduate UK higher education.
- (interviewed for EBC/WCQ mathematics stakeholder engagement)
- HE representatives on Pearson's A level advisory panels (subjects that need GCSE mathematics)
- HE representatives on Pearson's BTEC Nationals advisory panels
- HE representatives on Pearson-sponsored Bacalaureate Advisory panel

Other research:

- The Employment Equation: Why our young people need more maths for today's jobs – Professor Jeremy Hodgen, Dr Rachel Marks (King's College, London, July 2013)

Mathematics annex B

Draft GCSE subject criteria – overlap with current GCE content

GCSE/GCE Core Mathematics

Draft GCSE criteria	GCE
	C1
calculate with roots, and with integer and fractional indices	Laws of indices for all rational exponents. The equivalence of $a^{m/n}$ and $\sqrt[n]{a^m}$ should be known.
state exactly the result of calculations with fractions, surds and multiples of π ; simplify and rationalise denominators	Use and manipulation of surds. Students should be able to rationalise denominators.
deduce and apply equivalence between algebraic and graphical representations of linear, quadratic, cubic, reciprocal, exponential and trigonometric relationships And * recognise, sketch and produce graphs of linear, quadratic, simple cubic functions, the reciprocal function $y = 1/x$ with $x \neq 0$, the exponential function $y = k^x$ for positive integer values of k, and the trigonometric functions $y = \sin x$, $y = \cos x$ and $y = \tan x$ * GCSE content which overlaps with content from more than one unit (C1 and C2)	Quadratic functions and their graphs. And Graphs of functions; sketching curves defined by simple equations. Geometrical interpretation of algebraic solution of equations. Use of intersection points of graphs of functions to solve equations. Functions to include simple cubic functions and the reciprocal function $y = \frac{k}{x}$ with $x \neq 0$. Knowledge of the term asymptote is expected.

<p>sketch translations and reflections of a given function</p>	<p>Knowledge of the effect of simple transformations on the graph of $y = f(x)$ as represented by $y = af(x)$, $y = f(x) + a$, $y = f(x + a)$, $y = f(ax)$.</p> <p>Students should be able to apply one of these transformations to any of the above functions (quadratics, cubics, reciprocal) and sketch the resulting graph.</p> <p>Given the graph of any function $y = f(x)$ students should be able to sketch the graph resulting from one of these transformations.</p> <p><i>If GCSE uses function notation to describe the transformation, then there is an overlap.</i></p>
<p>construct quadratic equations and solve algebraically by factorising, completing the square and using the formula; and solve approximately by using a graph (including those that require rearrangement)</p>	<p>Completing the square. Solution of quadratic equations.</p> <p>Solution of quadratic equations by factorisation, use of the formula and completing the square.</p>
<p>construct and solve simultaneous equations in two variables (linear/linear or linear/quadratic) algebraically, and approximately using a graph</p>	<p>Simultaneous equations: analytical solution by substitution.</p> <p>For example, where one equation is linear and one equation is quadratic.</p>
<p>solve linear and quadratic inequalities in one or two variables; represent the solution set on a number line, in set notation and on a graph</p>	<p>Solution of linear and quadratic inequalities.</p> <p>For example, $ax + b > cx + d$,</p> $px^2 + qx + r \geq 0, px^2 + qx + r < ax + b$
<p>generate terms of a sequence using term-to-term and position-to-term definitions</p>	<p>Sequences, including those given by a formula for the nth term and those generated by a simple relation of the form $x_{n+1} = f(x_n)$.</p>

<p>deduce linear and quadratic expressions to calculate the nth term of a sequence</p> <p>And</p> <p>deduce the sum of an arithmetic series, including where they arise in contextual problems</p>	<p>Arithmetic series, including the formula for the sum of the first n natural numbers.</p> <p>The general term and the sum to n terms of the series are required. The proof of the sum formula should be known.</p> <p>Understanding of Σ notation will be expected.</p>
	C2
<p>recognise and use triangle, square and cube numbers, arithmetic progressions and geometric progressions</p> <p>And</p> <p>construct and test conjectures about recursive and long term behaviour of geometric, quadratic and other sequences, including where they arise in contextual problems</p> <p><i>The proposed GCSE content is not clear, therefore it is not certain what the degree of overlap is.</i></p>	<p>The sum of a finite geometric series; the sum to infinity of a convergent geometric series, including the use of $r < 1$.</p> <p>The general term and the sum to n terms are required.</p> <p>The proof of the sum formula should be known.</p>
<p>apply trigonometric ratios, sine and cosine rules, and Pythagoras's theorem in two and three dimensions</p> <p>And</p> <p>derive and apply area = $\frac{1}{2} ab \sin C$ to calculate the area, sides or angles of any triangle</p>	<p>The sine and cosine rules, and the area of a triangle in the form $\frac{1}{2} ab \sin C$.</p>

<p>* recognise, sketch and produce graphs of linear, quadratic, simple cubic functions, the reciprocal function $y = 1/x$ with $x \neq 0$, the exponential function $y = kx$ for positive integer values of k, and the trigonometric functions $y = \sin x$, $y = \cos x$ and $y = \tan x$</p> <p>* GCSE content which overlaps with content from more than one unit (C1 and C2)</p>	<p>Sine, cosine and tangent functions. Their graphs, symmetries and periodicity.</p> <p>Knowledge of graphs of curves with equations such as</p> <p>$y = 3 \sin x$, $y = \sin\left(x + \frac{\pi}{6}\right)$, $y = \sin 2x$ is expected.</p> <p>And</p> <p>$y = a^x$ and its graph.</p>
<p>calculate or estimate areas under graphs, and interpret results in cases such as velocity-time graphs and graphs in financial contexts</p> <p>If GCSE statement 'estimate areas under graphs' refers to curves and means use of trapezium rule, then there is an overlap.</p>	<p>Approximation of area under a curve using the trapezium rule.</p> <p>For example,</p> <p>evaluate $\int_0^1 \sqrt{2x+1} \, dx$ using the values of $\sqrt{2x+1}$ at $x = 0, 0.25, 0.5, 0.75$ and 1.</p>
	<p>C3</p>
<p>understand and use function notation</p> <p>And</p> <p>express composition of two familiar functions using function notation</p> <p>And</p> <p>find the inverse of familiar one-to-one functions (e.g. linear functions,</p>	<p>Definition of a function. Domain and range of functions. Composition of functions. Inverse functions and their graphs.</p> <p>The concept of a function as a one-one or many-one mapping from \mathbb{R} (or a subset of \mathbb{R}) to \mathbb{R}. The notation $f : x \mapsto$ and $f(x)$ will be used.</p> <p>Students should know that fg will mean</p>

reciprocal function, squaring) expressed algebraically	'do g first, then f '. Students should know that if f^{-1} exists, then $f^{-1}f(x) = ff^{-1}(x) = x$.
solve growth and decay problems, including compound interest and use iterative processes	Approximate solution of equations using simple iterative methods, including recurrence relations of the form $x_{n+1} = f(x_n)$. Solution of equations by use of iterative procedures for which leads will be given.
	C4
apply addition and subtraction of vectors, multiplication of vectors by a scalar, and diagrammatic and column representations of vectors; construct geometric arguments and proofs	Algebraic operations of vector addition and multiplication by scalars, and their geometrical interpretations.

GCE Statistics

There is some overlap between GCSE probability and statistics draft content and content in S1 and a small amount in S2, however this has always been the case.

11 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

The number and type of questions is appropriate.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.

X

E-mail address for acknowledgement: Peter.Harris1@Pearson.com

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents.

Yes

No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.