

Pearson Submission to the Commons Select Committee Follow up Inquiry on examinations for 15 to 19 year olds in England May 2014

1. Pearson welcomes this inquiry into exam reforms, and this submission follows on from our submission to the inquiries in [2012/13](#). This is the largest exam reform in a generation, which includes the recalibration of GCSEs and learning from international best practice, so it is welcome that the reforms are subjected to the Committee's ongoing scrutiny.
2. In responding to the Secretary of State's proposed changes in 2012 Pearson announced it had established a World-class Qualifications panel of experts, chaired by Sir Michael Barber, which would advise Pearson on the development of the new Key Stage 4 qualifications. The membership of the Panel is available [here](#). Since then, the work of the panel has been expanded to include A level, BTEC and apprenticeship developments.
3. We have undertaken a rigorous development to four key principles of demanding, rigorous, inclusive and empowering and which has involved:
 - Benchmarking content to the best performing jurisdictions in the world
 - Benchmarking assessments both in the UK and overseas to ensure that assessments test what they set out to and that they are at the right level of demand
 - Establishing Expert Subject Groups drawing on independent subject specific expertise from Higher Education, schools and employers to challenge and validate our qualifications
 - Subjecting our final qualifications to rigorous external scrutiny against the DfE content and Ofqual accreditation criteria in advance of submission
4. Since our previous submission to the Committee, Ofqual has accepted Pearson's application to be recognised to develop, deliver and award GCSE 9-1 qualifications.
5. Since that time our above-mentioned international Expert Panel has also agreed wholeheartedly to endorse the development process for our World Class Qualifications, specifically GCSE and A Level. The Expert Panel commented in particular on the quality of the work, and the degree of commitment and teamwork right across the organisation. Dr Peter Hill[i], global assessment expert and Panel member, commented,

"...the documentation reviewed is outstanding for its coherence, thoroughness and attention to detail and can be regarded as representing world-class best practice. What is even more impressive is the short amount of time in which it has been developed and the large number of staff engaged in their development, all of who have acquired an understanding of the big picture and a commitment to common outcomes."

6. Throughout the process of reform Pearson has been collaborated and engaged with Ofqual and the Department in an ongoing dialogue about reform that has made the timetable for change more manageable and the content and nature of assessment more deliverable.
7. The scale of change is, however, unprecedented and the reform needs to be understood in the context of other system-wide reforms, making it difficult to predict the combined consequences of these changes.
8. There are also fundamental changes to the regulatory landscape with this being the first major programme of reform for which Ofqual has taken responsibility. This has included a new regulatory programme which they have consulted on and includes:
 - Qualification criteria (including a new grading scale)
 - Subject Conditions (removing tiering and reducing coursework)
 - Industry Standards
 - A new Ofqual and DfE Governance structure
9. The pace of change has meant that Awarding Organisations have been undertaking most of the developments according to principles outlined in consultation documents and using information from the Ofqual Management Boards and other working groups. There have been late changes in some areas and some of the regulations have not yet been finalised.
10. There are risks still being managed and that will need to be managed throughout the implementation of these qualifications. For example, it is still not clear to us what systematic interventions will be made to ensure that teachers are prepared to teach these new, more demanding qualifications. In Mathematics, for example, the amount of content has been increased, needing additional time in schools and it is unclear as yet how the workforce is being expanded and trained systematically to manage this.
11. We believe it is important that, while addressing the major challenge of implementing reform, significant attention is paid to the practical issues facing students who will potentially sit a combination of the outgoing qualifications and the new ones. Communication with, and support for centres will be critical in minimising the impact of these changes on learners.

12. In particular schools and colleges will be looking at the curriculum for their learners in relation to the new Progress 8 measure at a time when many qualifications are changing in fundamental ways. It won't be easy for schools and colleges to select the right curriculum for the right learners at the start of these reforms. The programme of study for key stage 3 is changing only a year ahead of the first teaching of new GCSEs. There will be learners who won't have had the benefit of a key stage 3 programme designed to prepare them for new GCSEs and it will be difficult for centres to take account of this in their planning.
13. The Year 10 cohort starting in September 2014 will be the last group taking the existing GCSEs in English and Maths. Those who fail to achieve a good grade (grade C) in those subjects will be required to continue studying them with a view to achieving the GCSE before they complete their full time education at 18. Those who are not yet ready to retake the GCSE in November 2016 - often the ones having most difficulty with the subject - will have to retake in 2017 or 2018. By then, only the new GCSEs will be available, and these will include significant differences from the current model. Consideration should be given to making a further assessment opportunity on the current specifications in summer 2017, purely as a retake, for this group of students.
14. New qualifications are going to be phased in over a 3 year period. There is likely to be confusion amongst the public about these changes. With GCSEs, grades are going to change from the A*-G model to a number-based system. For results in 2017 and 2018 there will be a mix of some subjects on letter grades and some on number grades. It is likely to be 2019 before all have moved to a number basis.
15. There is a similar volume of change post-16 to qualifications and the accountability system, although changes to the qualifications are less fundamental. Schools and colleges will shortly be making decisions about the courses they offer for first teaching in September 2015. In particular they will need to decide if they will let their learners take AS Levels when it is unclear whether the funding will be in place for learners to study a fourth subject. It is also unclear to centres what HE is going to expect in the way of AS.
16. As set out in this submission, there has been a good and ongoing dialogue between the Awarding Organisations, the Department and the regulator, and we have made huge progress. However that dialogue will need to intensify – and include the centres themselves – if we are to deliver on a vision of new, world class qualifications in England.

[i] Dr Peter Hill is the former Chief Executive of the Australian Curriculum, Assessment and Reporting Authority. From 2004 to 2007, Dr Hill was Secretary General of the Hong Kong Examinations and Assessment Authority, where he played a key role in developing and implementing changes in curriculum, assessment and certification.