

# Pearson response to the Ofqual Consultation

## Completing GCSE, AS and A Level Reform

### August 2014

Pearson welcomes the opportunity to contribute to this key consultation on completing GCSE, AS and A Level Reform.

#### Information pages

1. Are the views expressed in response to this consultation your personal views or an official response from the organisation you represent? (tick one only)\*

( ) Personal views

**(x) Official response from an organisation/group**

If you ticked 'personal views', are you a ...? (tick one only)\*

( ) Student

( ) Parent/carer

( ) Teacher (but not responding on behalf of a school)

( ) Educational specialist (retired teacher, examiner, assessment expert, subject expert, governor) – please state which capacity

( ) General public (interested in education but no direct link) – please state which capacity

2. If you ticked 'official response from an organisation/group', please state which type of responding organisation you represent (tick one only)\*

**(x) Awarding organisation**

( ) Government department/agency or organisation

( ) Local authority

( ) University or higher education institution

( ) Employer

( ) School/college (please complete the next question)

( ) Other representative group / interest group (please skip to 'type of representative group/interest group')

3. Which school/college type do you represent?

( ) Academy and/or free school

( ) Comprehensive

( ) State selective

( ) Independent/private

( ) Special school

( ) Further education

( ) Sixth-form college

( ) None of the above (please state what)

4. Type of representative group/interest group

- Group of awarding organisations
  - Union
  - Business representative group
  - Equality organisation/group
  - Subject associations/learned societies
  - School or teacher representative group
- Other representative/interest group (please state what)

5. Nation\*

**(x) England**

- Wales
- Scotland
- Northern Ireland
- Other EU country (please state which)
- Non-EU country (please state which)

## Questions

**Q1.** To what extent do you agree or disagree with the following statement? Core content – common content across all exam boards offering a qualification – will help make sure qualifications are fit for purpose.

**(x) Strongly agree**

- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

**Q2.** To what extent do you agree or disagree with the following statement? Core content – common content across all exam boards offering a qualification – will help make sure qualifications are comparable across exam boards.

**(x) Strongly agree**

- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

**Q3.** To what extent do you agree or disagree with the following statement? Core content – common content across all exam boards offering a qualification – will help make sure qualifications are comparable over time.

- Strongly agree

**(x) Agree**

- Disagree
- Strongly disagree
- Don't know/no opinion

**Q4.** To what extent do you agree or disagree with the following statement? Core content – common content across all exam boards offering a qualification – will help make it easier for users\* to understand the qualification.

**(x) Strongly agree**

- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

\* Persons with a legitimate interest in the qualification or type of qualification made available by the awarding organisation, who may include: (a) Learners and Learners' representatives; (b) Centres; (c) Teachers; (d) employers and employers' representatives; (e) further and higher education establishments; (f) schools; (g) government departments and agencies; and (h) professional bodies.

**Q5.** We propose to set up a regulatory framework to let exam boards develop core subject content. To what extent do you agree or disagree with our proposal?

- ( ) Strongly agree  
**(x) Agree**  
( ) Disagree  
( ) Strongly disagree  
( ) Don't know/no opinion

**Q6.** If you disagree with our proposal, are there other options we have not considered?

Awarding organisations have now taken part in the development of subject content under two different arrangements. The first was the amendment of existing A level content, working with Professor Mark Smith to produce content for the Department for Education to consult widely. Under the second arrangement, the Department for Education supported awarding organisations in engaging with stakeholders in the drafting of new content for wide public consultation hosted by the DfE. Under both arrangements, Ofqual was heavily involved in ensuring that it was able to regulate the criteria. We feel that under both arrangements it has worked well having a body that is independent of the awarding organisations and Ofqual to oversee the process of content development with stakeholders.

Ofqual has now proposed a third arrangement where awarding organisations would be solely responsible for engaging with stakeholders and drafting the content. It is unclear to what extent Ofqual would be involved in this process and as Ofqual regulates awarding organisations, it is unclear where the boundaries in its role as regulatory authority and in curriculum development start and end. With no 'third party' involved in this process, there is a risk that public confidence in the process is diminished, either because awarding organisations are perceived to have alternative motives, or because Ofqual is perceived to have had too strong a hand from an assessment point of view. Pearson firmly believes that in the interests of public confidence an independent and respected third party is involved in one of the aspects of the development of new subject criteria – engaging with stakeholders, drafting, or public consultation.

In the consultation Ofqual has stated that it would impose regulatory requirements for awarding organisations to listen to stakeholders in the drafting of new content. Awarding organisations work with a large number of stakeholders including Higher Education, employers, subject associations, teachers, learned societies and educational assessment experts. It is rare for all stakeholders within a subject community to speak with one voice and so inevitably decisions have to be made which some stakeholders may disagree with. It is unclear from the consultation how Ofqual will decide whether awarding organisations have listened and acted appropriately under these circumstances and for this reason we recommend the involvement of a third party in stakeholder engagement or public consultation.

The proposals from Ofqual represent a significant increase in the resources being requested of awarding organisations and the limit of the additional resources required is unclear. For example, the proposals do not detail whether public consultation would be required and who would be responsible for it. The resources required would be even greater in the situation where only one awarding organisation is interested in developing a qualification, which is an important consideration some of the unreformed GCSEs, AS and A Levels are currently offered by only one awarding organisation. On this basis it is impossible to answer Question 10 in this consultation with any degree of confidence. Some of the affected subjects have very low entry and the proposals from Ofqual are the same for all subjects whether they have 20,000 or 200 learners. We believe that all learners deserve the best qualifications and there is a risk that it will not be possible for awarding organisations to produce the same quality qualifications for all subjects with these requirements. Some organisations may decide that they are not able to develop subject content and these subjects may be lost from provision. We recommend that alternative approaches are explored. As noted above we feel that an independent third party, such as a high profile academic from Higher Education, should be involved in one of the aspects of the development of new subject criteria – engaging with stakeholders, drafting, or public consultation.

**Q7.** To what extent do you agree or disagree that exam boards should consult with stakeholders and take their views into account when developing core content for all reformed GCSE, AS and A level qualifications?

**(x) Strongly agree**

- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

**Q8.** We have identified key stakeholder groups that need to be consulted in core content development (subject associations, teachers, employers, higher and further education, relevant equality groups). To what extent do you agree or disagree with our proposal that exam boards should include these groups when developing core content?

**(x) Strongly agree**

- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

**Q9.** Are there other stakeholders you believe should be consulted?

No. As noted in our answer to question 6 it is important to clarify whether public consultation would be required and who would be responsible for it. Our recommendation is that there should be public consultation on content for these subjects and that this should continue to reside with the DfE.

**Q10.** To what extent do you agree or disagree that the benefit of having additional (to those already being reformed) GCSE, AS and A level subjects is worth any additional costs incurred by exam boards in developing core content (common content across all exam boards offering a qualification)?

- ( ) Strongly agree  
**(x) Agree**  
( ) Disagree  
( ) Strongly disagree  
( ) Don't know/no opinion

**Q11.** To what extent do you agree or disagree that we should develop principles to determine in advance which remaining or new subject areas can be developed as GCSE, AS or A level qualifications?

- (x) Strongly agree**  
( ) Agree  
( ) Disagree  
( ) Strongly disagree  
( ) Don't know/no opinion

**Q12.** Please indicate the extent to which you agree or disagree with each statement below:

Current GCSEs/AS/A levels cannot always be easily distinguished from others with a similar title.

- ( ) Strongly agree  
**(x) Agree**  
( ) Disagree  
( ) Strongly disagree  
( ) Don't know/no opinion

Subjects that can be easily distinguished will help make it easier for users\* to understand the different qualifications available.

- (x) Strongly agree**  
( ) Agree  
( ) Disagree  
( ) Strongly disagree  
( ) Don't know/no opinion

\* Persons with a legitimate interest in the qualification or type of qualification made available by the awarding organisation, who may include: (a) students and their representatives; (b) Centres; (c) Teachers; (d) employers and employers' representatives; (e) further and higher education establishments; (f) schools; (g) government departments and agencies; and (h) professional bodies.  
GCSE/AS/A level subjects should be easily distinguished from other GCSE/AS/A level subjects.

**(x) Strongly agree**

- Agree  
 Disagree  
 Strongly disagree  
 Don't know/no opinion

GCSE/AS/A level subjects should only be developed if they meet the specific qualification purpose.

**(x) Strongly agree**

- Agree  
 Disagree  
 Strongly disagree  
 Don't know/no opinion

The performance of students taking GCSEs/AS/A levels in any subject should be able to be differentiated against the full grade range using the relevant grading scale.

**(x) Strongly agree**

- Agree  
 Disagree  
 Strongly disagree  
 Don't know/no opinion

GCSE/AS/A level subjects should be set at a level of demand consistent with that of reformed qualifications.

**(x) Strongly agree**

- Agree  
 Disagree  
 Strongly disagree  
 Don't know/no opinion

GCSE/AS/A level subjects should be capable of being validly assessed (mainly by exam assessment, except for those essential skills that can't be assessed by an exam).

**(x) Strongly agree**

- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

**Q13.** Do you think that requiring the last award of all unreformed GCSE qualifications by 2018 is appropriate?

Yes/**No**

If No, please comment in relation to the specific subjects.

The last award for GCSE subjects whose final start teaching date is 2015 should be 2017. The last award for GCSE subjects whose final start teaching date is 2016 should be 2018.

**Q14.** Do you think that requiring the last award of all unreformed A level qualifications by 2018 is appropriate?

Yes/**No**

If No, please comment in relation to the specific subjects.

The last award for A level subjects whose final start teaching date is 2015 should be 2017. The last award for A level subjects whose final start teaching date is 2016 should be 2018.

**Q15.** Do you think that requiring the last award of all unreformed AS qualifications by 2018 is appropriate?

Yes/**No**

If No, please comment in relation to the specific subjects.

**Q16.** To what extent do you agree or disagree that we should start to apply our principles, to discontinue similar or overlapping qualifications alongside the current reforms?

**(x) Strongly agree**

- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

**Q17.** Referring to the full list of qualifications we are proposing to discontinue as subjects are reformed, listed in appendix B, are there any other qualifications that should be included in the process?

**Yes/No**

If Yes, please comment in relation to the specific subjects.

**Q18.** Do any of the similar or overlapping qualifications we have proposed in appendix B serve a very distinct purpose from the reformed subjects?

**Yes/No**

If Yes, should any alternative qualifications be granted an exception to continue alongside the reformed ones in a given subject?

**Yes/No**

If Yes, please list and comment in relation to the specific subjects.

We would support an AS and A level in Engineering to be considered for reform for first teaching from 2017 (rather than an Applied AS and A level in Engineering).

There is stakeholder demand for an A level in Engineering from employers, HE academics and teachers as seen at a recent forum run by the Royal Academy of Engineering involving individuals from these stakeholders.

A level Engineering has the potential to introduce students to the broad field of engineering, in which scientific and mathematical understanding is applied to solve problems in real-world contexts. Contexts could draw on different branches of engineering, including civil, electrical, chemical and mechanical. This introduction could help students make informed decisions about their HE pathways and support the creative problem-solving skills often cited by Higher Education.

A level Engineering would be distinct from Design and Technology, as it would focus not on the design and making of a product, but on the idea of creative problem solving in real-world civil, chemical, mechanical and electrical engineering contexts. A level Engineering would also be distinct from the A level Sciences, as it would focus on the application of mathematical and scientific understanding to solve problems in civil, electrical, chemical and mechanical engineering contexts.

A level Engineering would not replace existing A level qualifications, such as Design and Technology or Physics, but could sit alongside and complement such qualifications.

**Q19.** Are there any potential equality impacts of our proposals for the next stage of GCSE, AS and A level reform that we have not identified?

**Yes/No**

If Yes, what are they?

Q20. Are there any additional steps we could take to mitigate any negative impacts of the proposals in this document on persons who share a protected characteristic?

**Yes/No**

If Yes, please comment on the additional steps we could take to mitigate any negative impacts.

Q21. Have you any other comments on the impacts of the proposals in this document on persons who share a protected characteristic?

**Yes/No**

If Yes, please comment in relation to the specific subjects.

Q22. Are there any potential regulatory impacts of the proposals in this document that we have not identified?

**Yes/No**

If Yes, what are they?