

Pearson response to the Ofqual Consultation  
Developing new GCSEs, A levels and AS qualifications  
for first teaching in 2016 – Part 2  
19 November 2014

Organisation details

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**Would you like us to treat your response as confidential?\***

If you answer yes, we will not include your details in any list of people or organisations that responded to the consultation.

( ) Yes (x) No

**Is this a personal response or an official response on behalf of your organisation?\***

( ) Personal response (Please answer the question 'If you ticked 'Personal views'...')

(x) Official response (Please answer the question 'Type of responding organisation')

**If you ticked 'Personal views' which of the following are you?**

- Student
- Parent or carer
- Teacher (but responding in a personal capacity)
- Other, including general public (Please state below)

If you ticked "Official response from an organisation/group", please respond accordingly:

**Type of responding organisation\***

- Awarding organisation
- Local authority
- School or college (please answer the question below)
- Academy chain
- Private training provider
- University or other higher education institution
- Employer
- Other representative or interest group (please answer the question below)

**School or college type**

- Comprehensive or non-selective academy
- State selective or selective academy
- Independent
- Special school
- Further education college
- Sixth form college
- Other (please state below)

**Type of representative group or interest group**

- Group of awarding organizations
- Union
- Employer or business representative group
- Subject association or learned society
- Equality organisation or group
- School, college or teacher representative group
- Other (please state below)

**Nation\***

- England
- Wales
- Northern Ireland
- Scotland
- Other EU country
- Non-EU country

**How did you find out about this consultation?**

- Our newsletter or another one of our communications
- Our website
- Internet search
- Other

**May we contact you for further information?**

- Yes  No

## Questions

*GCSE in citizenship studies***Question 1: To what extent do you agree or disagree that GCSEs in citizenship studies should be assessed entirely by exam?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer:**

We agree that a greater proportion of the subject than currently should be assessed by exam, but disagree that GCSEs in citizenship studies should be assessed entirely by exam.

We support the fact that the revised subject content recognises the importance of active citizenship by retaining a requirement for students to take citizenship action, but we do not agree that the best way to validly and reliably assess this is through an examination.

In 3.5 of the consultation document it states that “we consider the most valid and reliable way for students to demonstrate the knowledge and understanding gained from taking citizenship action is through questions in the examination that require them to reflect on their practical experiences.” We find it very difficult to see how this could be validly assessed in an exam – we are concerned about what questions could be asked that would not be predictable and which would validly test students’ ability to apply their knowledge in a practical context. Their evaluation will not effectively differentiate their ability levels against AO2, application of understanding to actions.

We believe that assessing practical skills internally through non-examined assessment constitutes a more valid form of assessment than an external examination. If these practical skills are assessed in an examination, it is not possible to authenticate that the experiences candidates write about are their own or that they accurately reflect their contribution to or practical skills in taking citizenship actions. There is not necessarily a correlation between students being able to write a good description or analysis of a citizenship activity and their ability to actually carry out an effective citizenship action.

Moreover, there is the risk that students could be drilled to answer examination questions about citizenship activities using pre-prepared case studies, rather than drawing on their own experiences in their exam responses – this would be against the spirit of the subject content and would undermine the validity of the assessment.

We would propose that the 15% taking citizenship action element of the subject content should be assessed via non-examined assessment. It would be possible to produce examination board-set tasks that are manageable for centres and that could reliably be assessed by the awarding body, but which allowed students to demonstrate practically the skills of formulating enquiries, identifying research questions, using primary sources, advocating a viewpoint and representing other viewpoints. Evidence could be captured in the form of an artefact or report or through observation of, for example, a presentation or debate. We believe that in this way we could validly and reliably assess the skills set out in the draft subject content.

**Question 2: To what extent do you agree or disagree that GCSEs in citizenship studies should not be tiered?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

Current GCSEs in citizenship studies are untiered and we see no issues with retaining the current tried and tested model.

**Question 3: To what extent do you agree or disagree that the proposed assessment objectives are appropriate for GCSEs in citizenship studies?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We are concerned that the wording of the assessment objectives could be expressed more precisely and concisely. This will ensure consistency in interpretation across the awarding bodies and comparability in application over time. We propose the following wording:

AO1 - Demonstrate knowledge and understanding of citizenship concepts, terms and issues - we recommend removing 'themes' and 'debates' because these are encompassed by issues. We also recommend removing the reference to accurate use of terminology as this is an aspect of subject content and will be credited as part of QWC.

AO2 - Apply knowledge and understanding of citizenship concepts, terms and issues to a range of contexts and actions - 'range of contexts' encompasses all of the examples given in the current AO but ensures that this does not become limiting. We propose removing 'demonstrating an ability to make connections and organise ideas' as this is a differentiator of performance, not an objective.

AO3 - Analyse a range of evidence about citizenship issues, debates and actions (including different viewpoints) in order to develop arguments - remove themes as it is the same as issues. Viewpoints are a form of evidence, not necessarily the thing to be interpreted. This change of wording also helps to clarify the difference between AO3 and AO4, which are blurred in the version being consulted on.

AO4 - Evaluate evidence relating to citizenship issues, debates and actions, making reasoned judgements - we have proposed changing 'different perspectives' to 'evidence' to make the range of what can be evaluated broader. The idea of constructing arguments has been removed as this is covered by AO3.

**Question 4: To what extent do you agree or disagree that the proposed weightings of the assessment objectives are appropriate for GCSEs in citizenship studies?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We do not have any specific concerns about the weightings, however we are concerned that the broad nature of the content will make it challenging to achieve these weightings for AO3 and AO4. Our recommendation would be to amend the content rather than the AO weightings however.

**Question 5: Do you have any further comments relating to the assessment of this subject?**

- Yes  No

*GCSE in cooking and nutrition*

**Question 6: To what extent do you agree or disagree that for GCSEs in cooking and nutrition 50 per cent of the available marks should be allocated to exams, and 50 per cent to non-exam assessment?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We agree that it is appropriate to assess the subject through an equally weighted assessment of exam and NEA. This proposal facilitates the balance between the assessment of knowledge and understanding of the subject content with the demonstration of technical skills, equipping students with the knowledge, understanding and skills required to cook and apply the principles of food science, nutrition and healthy eating.

**Question 7: To what extent do you agree or disagree that GCSEs in cooking and nutrition should not be tiered?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We are not aware of any evidence to support tiering within this subject.



**Question 8: To what extent do you agree or disagree that the proposed assessment objectives are appropriate for GCSEs in cooking and nutrition?**

- Strongly agree  
 Agree  
 Neither agree nor disagree  
 Disagree  
 Strongly disagree

**Please give reasons for your answer**

We recommend the following amendments to AO2 and AO3:

**AO2 – change from:**

*Apply knowledge and understanding of food, cooking and nutrition, including developing and modifying recipes to meet particular requirements*

**To:**

*Apply knowledge and understanding of food, cooking and nutrition, including modifying recipes to meet particular requirements*

The word 'developing' is ambiguous here as it is not distinct from 'modifying'. In addition, 'developing' could imply that students are required to create recipes from scratch which is not the intention within this assessment objective. 'Modifying' includes the requirement to develop dishes so including only this word within the assessment objective makes the assessment of this skill more explicit.

It is not clear what the definition of 'recipes' is in this given context. We recommend defining the terms 'dish', 'menu' and 'recipe' in the subject content and within the interpretation of the assessment objectives to ensure there is a shared understanding of these terms. We would recommend the following definitions:

- Recipe – a list of ingredients and instructions of how to make a dish.
- Dish – means one item (can be any course).
- Menu – a balanced selection of dishes including starters, mains, desserts and accompaniments as appropriate.

If these definitions are accepted, the requirement for students to develop recipes is beyond the scope of GCSE and requires a more advanced level

of knowledge, understanding and skills. Our recommendation to remove the word 'developing' from the assessment objective would address this.

**A03** – change **from**:

*Demonstrate technical skills in planning, preparing, cooking and presenting a selection of recipes*

**To:**

*Demonstrate technical skills in planning, preparing, cooking and presenting dishes*

The phrase 'a selection of' is ambiguous as it places a quantitative requirement on this assessment objective which is then not made explicit; for example, it does not make clear how many recipes or what range of recipes would be required. The skills of planning, preparing, cooking and presenting which are assessed within this AO are captured in the first part of the sentence and do not require quantification in the second part.

It is not clear what the definition of 'recipes' is in this given context. We recommend defining the terms 'dish', 'menu' and 'recipe' in the subject content (see recommended definitions above) and within the interpretation of the assessment objectives to ensure there is a shared understanding of these terms. If the suggested definitions are accepted we recommend changing the wording in AO3 from 'recipes' to 'dishes' to reflect that students are required to plan, prepare, cook and present dishes rather than recipes (which are defined as a list of ingredients and instructions of how to make a dish).

**Question 9: To what extent do you agree or disagree that the proposed weightings of the assessment objectives are appropriate for GCSEs in cooking and nutrition?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

The proposed subject content requires students to demonstrate and apply a large proportion of technical skills. However, the emphasis of these technical skills in the subject content is not currently reflected in the proposed assessment objective weightings, with demonstrate knowledge and understanding (AO1) given the same weighting as demonstrate technical skills (AO3). We recommend reviewing the proposed assessment objective weightings to ensure that the appropriate balance is given to knowledge and understanding in the exam, and the demonstration of technical skills in the NEA.

We recommend the following amendments to the weightings of AO1 and AO3:

**AO1** – change **from** 25% **to** 15%

**AO3** – change **from** 25% **to** 35%

We agree that the weightings for AO2 and AO4 are appropriate and will enable the appropriate balance of these skills in the assessments (exam and NEA).

**Question 10: Do you have any further comments relating to the assessment of this subject?**

- Yes  No

*GCSE in design and technology*

**Question 11: To what extent do you agree or disagree that for GCSEs in design and technology 50 per cent of the available marks should be allocated to exams, and 50 per cent to non-exam assessment?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

Awarding organisations were involved in the drafting of the proposal for non-exam assessment (NEA). Pearson teams worked with other awarding body and Ofqual representatives on creating a rationale for the proportion of available marks allocated to exams and to NEA. The proposed NEA weighting of 50% was based on an earlier draft of the subject content. Subsequent changes to the subject content have shifted the focus more to the practical skills of designing and making and applying technical principles through the iterative design process. This change in emphasis requires a greater proportion of assessment through NEA. We recommend reviewing the proportion of NEA alongside the final proposed subject content and recommend an adjustment to 60 per cent of NEA.

**Question 12: To what extent do you agree or disagree that GCSEs in design and technology should not be tiered?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

Current GCSEs in design and technology are untiered and we see no issues with retaining the current tried and tested model.

**Question 13: To what extent do you agree or disagree that the proposed assessment objectives are appropriate for GCSEs in design and technology?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We recommend the following amendments to AO1 and AO4:

**AO4** – change AO4 to become AO1 to emphasise the hierarchy of skills evident through the AOs. *Demonstrating knowledge and understanding of designing, making and technical principles* underpins the skills explicit in the other AOs so moving this to AO1 reflects this. Note that if this recommendation is accepted, AO1, AO2 and AO3 will also need to be changed accordingly.

Following consultation with awarding organisations regarding the interpretation of assessment objectives, we recommend making the following amendments:

**AO1** – change **from:**

*Investigate design possibilities and considerations for development*

**To:**

*Investigate design possibilities and considerations for the development process*

This change emphasises that “investigate” requires exploration of the iterative design process rather than a linear approach for one development.

**AO2** – change **from:**

*Design and make products/prototypes that meet needs and solve problems*

**To:**

*Design and make products/prototypes that meet needs*

The inclusion of 'solve problems' is unnecessarily restrictive in the iterative design process and does not necessarily reflect the design purpose; students will not always be required to 'solve a problem'. Furthermore, in an iterative design process, a 'need' or a 'problem' will not always be the starting point for the design. Removing 'solve problems' from the assessment objective ensures that the emphasis is on 'needs', which can incorporate 'wants' and 'solving problems', and which develop through the development process.

**Question 14: To what extent do you agree or disagree that the proposed weightings of the assessment objectives are appropriate for GCSE qualifications in design and technology?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

Based on the subject content, we agree that the proposed weightings are appropriate.

**Question 15: Do you have any further comments relating to the assessment of this subject?**

- Yes  No

*GCSEs, A levels and AS qualifications in drama and drama and theatre*

**Question 16: To what extent do you agree or disagree that for GCSEs in drama 40 per cent of the available marks should be allocated to exams, and 60 per cent to non-exam assessment?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We believe that as a practical subject GCSE Drama can be most effectively assessed through non-examined assessment. However, given Ofqual's principles for the use of non-examined assessment and the proposed subject content we do not recommend any changes to this weighting.

**Question 17: To what extent do you agree or disagree that GCSEs in drama should not be tiered?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

Current GCSEs in drama are untiered and we see no reason to introduce tiering as part of this reform.

**Question 18: To what extent do you agree or disagree that the proposed assessment objectives are appropriate for GCSEs in drama?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We feel the proposed assessment objectives are largely appropriate, with the following amendments as indicated in previous discussions:

AO1 - we recommend changing 'through' to 'for' so that the AO reads "Create and develop ideas to communicate meaning *for* theatrical performance." This is to reflect the fact that this AO is not designed to be assessed through performance, but focuses on the process that students go through in creating dramatic work.

AO2 - we recommend adding 'to realise artistic intentions' so that the AO reads "Apply theatrical skills *to realise artistic intentions* in live performance." This would bring this AO into line with A level and ensure that skills are not assessed in isolation from the effective communication of meaning.



**Question 19: To what extent do you agree or disagree that the proposed weightings of the assessment objectives are appropriate for GCSEs in drama?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We recommend changing the weighting of AO1 from 25% to 20% and AO3 from 25% to 30%. With the weightings as they currently stand and the understanding that AO1 and AO2 must be assessed through NEA, this would result in 5% of AO4 being assessed via NEA and 15% being assessed in an exam. We believe that it is important that the element of AO4 that relates to evaluation of own work can most validly be assessed through NEA so that the evaluation can take place at the same time as the work being evaluated. We believe that this aspect of AO4 should be worth 10% and so would want to see 10% of AO4 being assessed through examination.

**Question 20: Do you have any further comments relating to the assessment of this subject?**

- Yes  No

**Question 21: To what extent do you agree or disagree that for AS qualifications in drama and theatre 40 per cent of the available marks should be allocated to exams, and 60 per cent to non-exam assessment?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

In light of the principles for the use of non-examined assessment and the proposed subject content, we do not recommend any changes to this weighting.

**Question 22: To what extent do you agree or disagree that for A levels in drama and theatre 40 per cent of the available marks should be allocated to exams, and 60 per cent to non-exam assessment?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

In light of the principles for the use of non-examined assessment and the proposed subject content, we do not recommend any changes to this weighting.

**Question 23: To what extent do you agree or disagree that the proposed assessment objectives are appropriate for A levels and AS qualifications in drama and theatre?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We feel the proposed assessment objectives are largely appropriate, however we would like to recommend one minor amendments as discussed at recent Technical Interpretations meetings.

In AO4 we recommend removing the word 'critical' as this is already encompassed by the phrase 'analytical and evaluative judgements' and criticality is something that we distinguish responses at the higher levels.

**Question 24: To what extent do you agree or disagree that the proposed weightings of the assessment objectives are appropriate for AS qualifications in drama and theatre?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We agree that the proposed weightings are appropriate based on the subject content.

**Question 25: To what extent do you agree or disagree that the proposed weightings of the assessment objectives are appropriate for A levels in drama and theatre?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer**

We agree that the proposed weightings are appropriate based on the subject content.

**Question 26: Do you have any further comments relating to the assessment of this subject?**

- Yes  No

*Equality impact*

**Question 27: We have identified a number of ways the proposed requirements for reformed GCSEs, A levels and AS qualifications may impact (positively or negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified? If so, what are they?**

Yes  No

**Question 28: Are there any additional steps we could take to mitigate any negative impact from resulting from these proposals on persons who share a protected characteristic? If so, please comment on the additional steps we could take to mitigate negative impacts.**

Yes  No

**Question 29: Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?**

Yes  No

*Accessibility of our consultations*

We are looking at how we provide accessible versions of our consultations and would appreciate it if you could spare a few moments to answer the following questions. **Your answers to these questions will not be considered as part of the consultation and will not be released to any third-parties.**

**Do you have any special requirements to enable you to read our consultations? (For example screen reader, large text, and so on)**

Yes  No

**Which of the following do you currently use to access our consultation documents? (Select all that apply)**

- Screen reader / text-to-speech software
- Braille reader
- Screen magnifier
- Speech to text software
- Motor assistance (blow-suck tube, mouth stick, etc.)
- Other

**Which of the following document formats would meet your needs for accessing our consultations? (Select all that apply)**

- A standard PDF
- Accessible web pages
- Large type PDF (16 point text)
- Large-type word document (16 point text)
- eBook (Kindle, iBooks or similar format)
- Braille document
- Spoken document
- Other

**How many of our consultations have you read in the last 12 months?**

- 1
- 2
- 3
- 4
- 5
- More than 5