

Pearson response to the Ofqual Consultation on AS and A level Geography Conditions and Guidance

March 2015

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 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'...')

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

Question 1

Do you have any comments on the draft Conditions for new A levels and AS qualifications in geography?

(X) Yes () No

If yes, please provide them here:

Pearson disagrees with Condition 2.3 on page 11 and the proposal for non-examined assessment to be marked by an awarding organisation. It is Pearson's view that this proposal will lead to an invalid assessment of independent investigation skills and will compromise an awarding organisation's ability to deliver the qualification securely.

Validity and reliability of assessment

Teacher assessed non-examined assessment is a more valid assessment of an independent investigation than marking by an awarding organisation.

The DfE subject content states all A level Geography students must carry out one independent investigation which draws on fieldwork. Fieldwork requires students to apply their knowledge and understanding to a real-world location. The investigation provides an opportunity for students to frame their own investigation question, independently apply their geographical knowledge, understanding and skills in order to collect, present and analyse the data they have collected, make decisions about how to adapt their investigation methods to suit the fieldwork location and independently communicate their findings. Given teachers will have overseen this work by the student, it is Pearson's view that teachers are best placed to judge whether students have followed this sequence of investigation and whether they have worked independently.

As the teacher holds specialist knowledge of the themes of study, the fieldwork location and the conditions under which the data collection was carried out, it should therefore be the teacher assessing the independent investigation rather than an external examiner. It will be difficult for an external marker to mark reliably because the marker is highly unlikely to be familiar with the fieldwork location and so might not be able to verify the data or conclusions presented by the student.

Compromising the DfE requirements

In order for awarding organisations to recruit, contract and standardise a sufficient number of expert markers with specialist knowledge of the question or issue being investigated and the fieldwork location, we would need to prescribe the location in which fieldwork is carried out. This would not be in the spirit of the

recommendations in the GCE Geography ALCAB report nor would it meet the requirements of the DfE subject content, which state a student must individually develop a question or issue and the investigation must draw on the student's own research.

Alignment with other GCE qualifications

The proposal for awarding organisations to mark the A level Geography non-examined assessment is not aligned with the new, accredited, A level History, English Literature and English Language specifications despite the fact the non-examined assessments in all of the above mentioned qualifications are assessing independent research and extended writing skills. It is Pearson's view that a consistent approach should be taken to the assessment of subjects where the nature of skills and type of task being undertaken by students is similar.

Operational impact

External assessment of the A level Geography non-examined assessment, which involves a report in the region of 4000 words and is based on any aspect of the core or non-core specification content, would be very challenging to implement in terms of examiner recruitment and expertise, without it impacting negatively on an awarding organisation's ability to deliver the qualification on time and with high quality of marking maintained.

We expect the number of A level entries to increase due to increased numbers of GCSE and AS Geography entries, partly as a result of the change in performance measures. This would therefore create a significant burden on awarding organisations. Given the non-examined assessment can be based on any topic, this will impact further on our ability to recruit markers with a sufficient range of specialist geographical and locational knowledge. Recruitment of AAs in the current GCE Geography specification requires significant investment to convert interested invitees to examiners each series as the conversion rate in this subject is low. Should this NEA component require external marking, this effort in recruiting and retaining AAs would be significantly increased and would require fair remuneration of AAs for marking an essay that could take up to an hour per submission to mark. The current total examiner demand for the legacy GCE Geography qualification at Pearson is 262. Non-examined assessment markers will be recruited from the same pool of examiners for other AS and A level Geography papers. Given the increase in number of external assessments, from 4 AS and A2 units to 6 AS and A level assessment components, this will exacerbate further the challenge of recruiting

expert markers and may impact on an awarding organisation's ability to deliver other external assessments securely.

Analysis of legacy specification assessment data

Analysis of the performance of coursework in both legacy Edexcel A level Geography specifications shows coursework units perform in line with expectations for the qualification.

In the legacy Edexcel A level Geography Specification A, Unit 3 consisted of two optional papers. Paper 1 of Unit 3 was the coursework investigation and Paper 2 was the examined skills paper. Our analysis of outcomes at each grade from summer 2005 to summer 2008 on this unit found performance by candidates was consistent and comparable across the two optional components. Where there was a deviation in the cumulative percentages for each component it was not the case that cumulative percentages for the coursework option were always higher; outcomes at grade A, for example, were always higher in the examined component whereas outcomes at C were higher on the examined component in two of the four examination series considered here. In Paper 1 the cumulative percentages of candidates at A, C and F remained consistent throughout the specification. Comparison of the assessment data from Papers 1 and 2 shows a very close correlation between the cumulative percentages for both the examined and the coursework papers.

Pearson recognises there are benefits of awarding organisations marking the non-examined assessment, but the benefits do not outweigh the risk of having an invalid assessment of independent investigation skills, or the operational difficulties this would pose. Nor does it sufficiently reflect the purpose of students carrying out a truly independent investigation under the terms set out in the subject criteria. We would welcome the opportunity to review this proposal with Ofqual and the other awarding organisations and agree on appropriate controls to ensure the quality of teacher marking.

Improvements to internal assessment and external moderation

External moderation of teacher marks by awarding organisation provides assurance on the reliability of teacher marking. Where there is evidence teacher marking is not accurate the moderator then makes an adjustment to this marking to bring it in line with agreed standards. Where there is evidence of systematic differences in marking standard an adjustment is applied to the whole of the centres' marks. External moderation therefore makes teacher marking a reliable form of assessment.

Standardisation of moderators involves training, standardising and monitoring

external moderations to ensure there is a consistent approach to applying the marking criteria and to the scrutiny of teachers' marking. This will ensure external moderation is reliable.

Teacher training will provide assurance teacher marking is valid and reliable.

Training events will ensure teachers will understand the assessment standard and how to apply the mark scheme correctly.

Teacher annotation of student work demonstrates the mark scheme has been applied accurately and provides assurance on the reliability of marking. Teachers annotate student work to show where marks have been allocated which enables the external moderation to judge whether the mark scheme has been used correctly.

In order to provide further assurances as to the validity of external moderation we are keen to explore further mechanisms that can be employed to ensure the authenticity of work submitted to ensure outcomes in NEA are consistent with outcomes in examination components, and NEA achieves an ideal relationship between its intended and actual weight when contributing to overall grades. Some additional controls are suggested below. We would like to discuss these with Ofqual and the other awarding organisations.

- ***Standardisation training for teachers***

Teacher training on marking non-examined assessment will be offered. We could explore the ways of facilitating compulsory attendance including the use of online platforms to ensure equal access by centres. In addition to explaining and demonstrating the application of marking criteria this training would emphasise the need for appropriate task setting and the instructions for the level of teacher support permissible.

- ***Authentication of student work***

An independent investigation proposal could be submitted prior to the student undertaking the investigation. This proposal could be reviewed by a Principal Moderator who would provide feedback on the suitability of the investigation proposal and any necessary amendments. This could be used as an opportunity for a teacher to outline what support the student would need for their planned investigation.

A report authentication form could confirm the work is authentic, individual to the student and the investigation relates to the specification. This form would be signed by both student and teacher.

- ***Teacher Feedback***

To ensure teacher marking is reliable and student work authentic, we suggest the following guidance is provided by Ofqual in relation to teacher feedback on the non-examined assessment in A level Geography.

- Teachers must check and approve the independent investigation proposal to ensure it is appropriate and linked to the specification.
- Teachers must give guidance on the assessment criteria to enable the student to take the initiative in planning their own investigation.
- Any additional support provided to a student by the teacher must be recorded on the student's non-examined assessment authentication form.
- Teachers can review the investigation report before it is handed in, on two occasions.
- The first review can be after the planning phase, prior to the independent investigation proposal being submitted to the awarding organisation.
- The second review can be of the student's first draft of the report.
- Teachers must not give detailed feedback to individual students about how to improve work in order to meet the assessment criteria. This includes indicating errors or omissions and intervening to improve the presentation of work.
- The feedback provided should only enable students to take the initiative in making amendments, rather than detailing what amendments should be made. This means teachers cannot provide templates and model answers.
- Once work has been submitted and receives a mark teachers must not return it to the student to make changes.

• ***Consistency of outcomes across NEA and examined components***

A statistical review of teacher marking could be considered. This would be in addition to the statistical regression process and is already being explored for GCSE Computer Science. The proposed NEA component would target AO3. Elements of the examined papers – particularly any synoptic elements – will target AO3 also. After moderation has taken place, a review would be undertaken of relative performance on AO3 in the examined components and in the NEA investigation. In this way, a further check is performed to ensure the marks achieved by a candidate in the NEA are plausible in relation to the marks achieved in an examination.

This check would further ensure the authenticity of the candidate's NEA submission in light of their performance on the examination component. Should performance on the NEA investigation be found to be at odds with performance in the examination, additional or whole samples can be requested for further review by a Principal

Moderator.

- ***Achieved weight versus intended weight***

Awarding bodies may wish to explain, in their Assessment Strategies, how they would monitor the relative achieved weighting of each assessment component in comparison to the intended weight as set out in the specification. Where the achieved weighting is markedly at odds with the intended weight, further investigative work would be carried out. This would further ensure the specification is operating as it should and a teacher marked NEA component is not undermining it.

Question 2

Do you have any comments on the draft assessment requirements for new A levels and AS qualifications in geography?

(X) Yes () No

If yes, please provide them here:

As stated in our response to question 1, Pearson disagrees with Condition 2.3 on page 11 and the proposal for non-examined assessment to be marked by an awarding organisation. It is Pearson's view that this proposal will lead to an invalid assessment of independent investigation skills and will compromise an awarding organisation's ability to deliver the qualification securely.

Pearson recognises there are benefits of awarding organisations marking the non-examined assessment, but the benefits do not outweigh the risk of having an invalid assessment of independent investigation skills, or the operational difficulties. Nor does it sufficiently reflect the purpose of students carrying out a truly independent investigation under the terms set out in the subject criteria.

We would welcome the opportunity to review this proposal with Ofqual and other awarding organisations and agree on appropriate controls to ensure the quality of teacher marking through task approval, clear and detailed marking criteria, student exemplar responses and external moderation of teacher marks by the awarding organisation.

It is Pearson's view that AO3 Strand 3 needs rewording. This is because there is crossover between AO3 Strand 3 'construct arguments and draw conclusions', and AO3 Strand 2 'interpret, analyse and evaluate data and evidence'. We would argue that in demonstrating the skill of evaluating data and evidence, students will be following a line of argument and reaching a conclusion.

We recommend therefore that AO3 Strand 3 should be replaced with 'Communicate findings'. In addition the following interpretation should be included in the interpretation and definitions: 'There are a number of ways in which findings can be communicated. This may include written responses or data responses'. We think this wording is more appropriate because it targets the skill of producing a logical write-up of fieldwork results, using a range of presentation methods.

Question 3

Do you have any comments on the draft Guidance on assessment objectives for new A levels and AS qualifications in geography?

Yes No

Question 4

We have not identified any ways in which the proposed requirements for new A levels and AS qualifications in geography would impact (positively or negatively) on persons who share a protected characteristic. Are there any potential impacts we have not identified? If so, what are they?

Yes No

Question 5

Are there any additional steps we could take to mitigate any negative impact 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 6

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

Yes No