10 December 2012

Dear Sir/Madam,

We will not be responding to the detailed consultation document on the reform of Key Stage 4 qualifications but would rather make two general points.

The first echoes concerns expressed in the letter of 19th November 2012 from the Chief Regulator at Ofqual to the Secretary of State for Education. The Nuffield Foundation takes the stand that qualification reform can be better achieved ‘if it is not combined with significant market changes’ and if it is carried out in a more measured, coordinated and consensual manner. We make this point based on a fifty-year track record of curriculum development work, spanning periods both before and after the introduction of the national curriculum. Before the national curriculum, this work shaped both curricular specifications and resources to meet those specifications. Since the introduction of the national curriculum, our work has changed fundamental aspects of existing qualifications rather than the entire qualification framework. For example, we established the idea of different routes through a suite of GCSE science qualifications in Twenty First Century Science, and we took an innovative approach to coursework and context-led biology in the Salters-Nuffield Advanced Biology course.

The innovations embedded within all of these developments could have resulted in seriously flawed content and implementation if we had not supported extensive piloting and in-depth, formative evaluation. In the case of Twenty First Century Science, the underpinning ideas originated in an extensive strategic development project including a series of seminars and a summative report, ‘Beyond 2000’, (Nuffield Foundation 1998). This addressed some well-documented challenges and their possible solutions. We believe that it is essential for curriculum change to be well considered, evidence-based and carefully developed, even if that takes a few years.

Secondly, we are not convinced that the proposed franchising model is the best method for ‘ending the perverse incentives created by the interaction of our qualifications and accountability system’. SCORE has recommended the formation of National Subject Committees and ACME has also produced a ‘thought piece’ on this for mathematics (http://www.acme-uk.org/media/9589/acme_standingcommitteejune2010.pdf). We think that such a framework is worthy of exploration since it would enable the development of a single
suite of qualifications, which could then be run by all Awarding Organisations. Furthermore, this mechanism would allow for greater curricular coherence and expert oversight, including the coordination of assessment, curriculum, learning and teaching resources, and teacher professional development. As ACME points out, this will need to be ‘properly resourced’.

Yours faithfully,

Josh Hillman
Director of Education