



Response to Ofqual's A Level Reform Consultation

September 2012

Questions on Section 1: Background and purpose

The following questions refer to Section 1: Background and purpose.

1. I believe that all equality issues have been considered in the accompanying equality analysis.

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

2. Do you have any comments or suggestions?

Ofqual notes in its equality analysis that: *'proposals regarding the elimination of modular assessments, following the input from respondents to recent research, may have a potential impact on learners. In particular, we recognise that a single high-stakes examination system may not be suitable for all candidates.'* This suggests that research should be carried out on the potential (equality-related) impact of eliminating modular assessments before going ahead with any proposals.

Questions on Section 2: What we hope to achieve

4. I support the need for comparability of demand and content in different specifications in a subject.

- Yes
- No

Do you have any comments or suggestions?

In 2011-2012, the Nuffield Foundation undertook a project to analyse the mathematics embedded in a range of A level subjects: Business Studies, Computing, Economics, Geography, Psychology and Sociology (www.nuffieldfoundation.org/mathematics-level-assessments). This project complemented a parallel study on the mathematical content of science A levels, undertaken by SCORE (www.score-education.org/policy/qualifications-and-assessment/mathematics-in-science). Both studies showed that it is possible for students who are ostensibly following the same course of study to have widely different levels of exposure to quantitative approaches. This was due in part to variation in different specifications in a subject, and to the absence of a framework for determining and regulating the extent, difficulty and type of mathematics assessed in subjects.

There is also an inconsistency between the greater 'difficulty' of STEM A levels, as revealed through ALIS data, and government funded initiatives aimed at encouraging more students to progress in these subjects.

Questions on Section 3: Design rules - The purpose of A levels.

5. I believe that Condition 1 adequately defines an appropriate primary purpose of A levels for regulation.

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

Do you have any comments or suggestions?

Ofqual's *Condition 1 – Objective* states that an awarding organisation must ensure that each GCE qualification: *'Defines and assesses achievement of the knowledge, skills and understanding which will be needed for Learners planning to progress to undergraduate study at a UK higher education institution, particularly (although not only) to study the subject concerned.'*

The emphasis on *'particularly to study the subject concerned'* may be inappropriate for mathematics. JCQ and UCAS data for 2011 show that 80,000 students took A level mathematics, but fewer than 8,000 of them enrolled to study mathematics at university. Therefore it is important that mathematics qualifications are designed for *all* learners and not just for a minority.

Condition 1 – Objective also states that an awarding organisation must ensure that each GCE qualification: *'Permits UK universities to accurately identify the level of attainment of Learners'*.

Assessments should be designed to provide information on a broad range of knowledge and skills rather than reductive 'attainment levels'. This will enhance the use of this qualification in the broad range of suggested potential roles.

Questions on Section 3: Design rules - Size and grading.

Condition 2 - Size and grading.

6. A new grading structure should be introduced for new A levels.

Do you have any comments or suggestions?

If the A* is meant to be an indicator of excellence then simply basing it on a percentage of marks achieved may not be adequate. If it is meant to provide finer resolution, then Ofqual should carry out a comparative analysis of other options (e.g. having A+, A, A-, B+, B, B-, etc. or reporting marks with or without grade boundaries). Decisions should be based on the evidence.

The following questions relate to the options regarding the future structure of A levels:

Condition 3 - Qualification structure and availability of assessments

10. The opportunity for assessment in January should be removed.

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

Research should be carried out into the advantages and disadvantages of multiple assessment opportunities in a year and their timing. Action should be based on evidence from this research, taking into account differential effects on the range of social groups, different subjects and student abilities.

On Questions 11, 12 and 13, relating to removing or retaining the AS qualification, decisions about A level structure should consider inconsistent effects across the target ability range and across different subjects. As an example, the 1982 Cockcroft Report, *Mathematics Counts* (pages 180-181: <http://www.educationengland.org.uk/documents/cockcroft/cockcroft11.html>), made a cogent case for I Level courses in mathematics and statistics, effectively standalone AS level courses spread over two years.

Do you have any further comments or suggestions?

We would like to have seen a more nuanced and evidence-based analysis of the structure and timing of assessments, in particular to counter the pressures of teaching to the test and to restrict 'strategic' sittings and re-sits (which aim to improve grades but could negatively impact learning and student well-being). Please see page 2 of <http://store.aqa.org.uk/over/pdf/AQA-ANDREW-HALL-SPEECH-ACME-2011.PDF> for a related discussion.

Questions on Section 3: Design rules - Qualification support
(on universities supporting the design of qualifications)

Do you have any comments or suggestions?

We would need to see relevant evidence before commenting on the proposed models. The consultation document says there '*will be no subject criteria setting out core content requirements in key A level subjects*'. Specifically, there is an absence of evidence to suggest how universities will provide coordinated and coherent input for specific subjects. There is also a range of needs associated with the various degrees that require individual A level subjects such as mathematics. For this reason, we suggest that Ofqual consider constituting national subject committees. For mathematics, ACME has a related discussion document www.acme-uk.org/media/9589/acme_standingcommitteejune2010.pdf. We also support SCORE's suggestion for the role of professional bodies in science A levels.

Questions on Section 4: Exceptions

The following questions refer to Section 4: Exceptions.

- 33. If you anticipate that there will be particular challenges for specific subjects which may require exceptions, please outline them below.**

Mathematics is a 'service' subject for a range of disciplines, and particular care will need to be taken to ensure that the views of all relevant stakeholders are taken into account.

Questions on Section 5: Making sure standards are right year on year

The following questions refer to Section 5: Making sure standards are right year on year.

Do you have any comments or suggestions?

We would like to see arrangements in place to provide the relevant subject specific expertise needed for Ofqual to evaluate standards.

Questions on Section 6: Implementation

The following questions refer to Section 6: Implementation.

Do you have any suggestions for other subjects/combinations of subjects?

The timeline should be determined by the need for professionally developed curricula and qualifications, which have been adequately piloted, and where support for teaching and learning is in place. Ordering should take into account the associated time requirements of each subject group.

General questions

38. Do you have any additional comments in relation to all proposals as set out in Sections 1- 6.

We have concerns with the consultation and review process. There is little transparency in the process and the overall timeline is worryingly short. There also seems to be a shortage of evidence on which to make important decisions. The primary and secondary Programmes of Study have been drafted by informal advisory groups and individuals. Drafting has been carried out by non-specialist civil servants, with a level of confidentiality that is not consistent with genuine consultation. This leads to concern about the role of specialist organisations and stakeholders in the process. We know that SCORE, ACME and Education for Engineering have similar concerns.

We would therefore recommend that you publish all evidence and the names of advisors consulted. Any commercial interests should be disclosed. Further development should involve groups and individuals selected through a transparent process, to include the necessary expertise and experience.

Your details

Name*

Josh Hillman

Organisation*

- School/College
- Training Provider
- Higher Education Institute
- Awarding Organisation
- Student/Learner
- Parent/Carer

Ofqual 2010

- Employer
- Representative group/Interest Group
- Government Body/Organisation (national and local)
- Other (including General Public) – Charitable Foundation

Your role

Director of Education

How many staff does your business employ (full or part time)?

- Less than 50
- 50 to 249
- 250 or more

Representative group / interest group type

- Learned Body / Subject expert group
- Equalities group
- Unions
- Sector Skills Council (SSC)
- QAA
- UCAS
- Other voluntary or community group
- None of the above

Organisation name*

Nuffield Foundation

Nation*

- England
- Wales
- Scotland
- Northern Ireland
- International

Email address*

kwoodruff@nuffieldfoundation.org

May we contact you for more information?

Yes

Would you like us to treat your response as confidential?

No

We are changing the way we communicate. We want to write clearly, directly and put the reader first. Overall, do you think we have got this right in this document?

- Yes
- No