



Ofqual A level Regulatory Requirements consultation

SFCA Response

January 2014

About you

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

- Personal views
- Official response from an organisation/group (complete the type of responding organisation)

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

If you ticked 'official response from an organisation or group', please respond accordingly.

Type of responding organisation (tick one only)*

- Awarding organisation
- Government department/agency or organisation
- Local authority
- University or higher education institute
- Employer
- School/college (please complete the next question)
- Other representative group/interest group (please skip to type of representative group/interest group)

School/college type

- Academy and/or free school
- Comprehensive
- State selective
- Independent/private
- Special school

- Further education
 - Sixth-form college
 - None of the above (please state what)
-

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)

Membership organisation –represents the 93 Sixth Form Colleges in England that between them educate over 150,000 16-19 year olds each year.

Nation*

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

*Denotes mandatory fields

Consultation questions

Section 2: Background – The objective of AS qualifications

1. To what extent do you agree with the proposed objective of the AS qualifications?

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

2. Do you have any further comments relating to this section?

We support the objectives of the reformed AS qualifications, but do not believe the current proposals will actually achieve these objectives.

For example, the current AS qualification plays an important role in supporting progression to further study. At present, admission professionals in higher education use AS grades to inform the offer they make to students. In future, they will have to rely on GCSE grades or predicted grades from teachers. If the latter, some institutions will be forced into delivering internal mock exams at the end of year 12 to provide predicted grades; this will take crucial time away from teaching and learning that these new proposals were supposed to free up.

The current AS also allows students to understand the level of study required in comparison to GCSE and allows them to 'step up' in their A2 year. This flexibility is particularly valuable for less confident learners - particularly those from disadvantaged backgrounds. In a linear course of study, if students discover they are not well suited to their chosen A levels, they can end up with nothing to show for two years of work. Lower grades act as an obvious barrier to progression to further study. Furthermore, students will be less inclined to take AS exams which do not contribute to their A level grade.

One objective of the AS reforms is to broaden the range of subjects that students study. In reality, the reforms will see the 'typical' diet of 4 AS levels reduced to just 1. Breadth of study will be a major casualty of these new proposals. It is also important to highlight how the Government's changes to programme size and post-16 funding will have an adverse impact on the new AS qualification. Under the new arrangements, institutions will only be funded for approximately 600 hours per student each year. As a result, many institutions will be unable to offer students AS qualifications – further reducing the breadth of the curriculum. It is quite possible the AS qualification will become a relic of a bygone age and will simply wither on the vine.

Section 3: Assessment

In general, we broadly endorse the assessment arrangements proposed for each subject, and, in particular, the requirement for all exam boards to adhere to a fixed percentage of marks allocated to exam and non-exam assessments in each subject. However, with the increase in percentage of examinations to be taken at the end of the two year course, the focus will be on ensuring students undertake the final exam successfully which may lead to teachers teaching to the test – something these proposals have been designed to avoid.

Biology, Chemistry and Physics

Science practicals are vital in assessing a student's ability to apply their knowledge, analyse data and develop hypotheses whilst adhering to laboratory safety guidance. These skills are essential for students wishing to study science subjects in higher education. Excluding the outcome of these assessments in the overall grade devalues these skills and may lead to a reduced amount of time and attention in the developing of these skills. We propose for a percentage of the exam assessment to be allocated to the application of planning, analysis and evaluation skills which will ensure all institutions set time aside to carry out science practicals accurately.

We understand the rationale for Ofqual proposing the separate reporting of practical skills, however, focus should be on how exam boards can ensure accurate moderation of teacher assessment rather than excluding science practicals from the final grade.

General questions on A level assessment

61. To what extent do you agree that our proposals for A level assessment will support our aim of more secure and valid assessment?

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

62. To what extent do you agree that our proposals for A level assessment will support our aim of reducing incidents of malpractice in A level assessment?

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

63. We will be working with the exam boards to consider how greater assurances about the authenticity of students' work can be secured and the moderation of teachers' assessments enhanced. Do you have proposals to contribute to this work?

The authenticity of students' work can be captured through a teacher's level of understanding of a student's ability which a standardised assessment measure cannot demonstrate. Therefore, an element of teacher assessment should be incorporated.

If there is a concern that teacher assessments can, in a minority of cases, be over-generous and indiscriminating then exam boards can run statistical models which identify centres whose internal assessments are outside of a certain mathematical tolerance, in comparison with their performance in externally set papers. The marks for these centres would then be moderated – and a comment made to the centre about future practice.

Section 4: Assessment strategies

64. To what extent do you agree that exam boards should be required to develop and apply assessment strategies for A levels and AS qualifications?

- Strongly agree
- Agree
- Disagree

- Strongly disagree
- Don't know/no opinion

65. To what extent do you agree that our proposed requirements for an assessment strategy are appropriate?

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

Question types

66. To what extent do you agree that we should require exam boards to include in their exams questions that provide opportunities for students to gain marks by demonstrating their ability to:

a) integrate and apply their knowledge, understanding and skills across different aspects of the subjects;

b) construct a response which develops a sustained line of reasoning, is coherent, relevant, comprehensive and logically structured?

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

67. Do you have any further comments relating to this section?

It is important for students to not only demonstrate their understanding of the subject content, but also demonstrate their ability to apply their knowledge of subject content in the right context. We endorse the proposal for questions to encourage students to construct answers with a sustained line of reasoning that is logically structured. These essential skills need to be encouraged and should be embedded in a students learning. This will also reduce teachers teaching to the test, a key concern the Government has of the current qualification assessments.

Section 5: AS qualifications

68. To what extent do you agree that where AS content is identified within the A level content it should be used as the basis for developing the new AS qualification in the same subject?

- Strongly agree
- Agree
- Disagree

- Strongly disagree
- Don't know/no opinion

69. To what extent do you agree that where no AS content is prescribed, we should require the content to be drawn from the A level content in the same subject?

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

70. To what extent do you agree that AS qualifications should be assessed at a level of demand appropriate to the knowledge, skills and understanding to be reasonably expected of someone who had completed the first half of the A level course of study?

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

Teaching AS students with A level students

71. To what extent do you agree that our regulations should not prevent qualifications from being designed so that AS and A level can be co-taught, providing the design of a good quality, linear A level is not compromised as a result?

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

Assessment of AS qualifications

72. To what extent do you agree that for the subjects on which we are consulting (with the exception of art and design) all AS assessment should be by exam only?

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

73. Do you have any further comments relating to this section?

We fully support the proposal for the AS qualification to be at a level of demand appropriate to the knowledge, skills and understanding of someone who has completed the first half of an A level. AS levels are currently viewed as a stepping stone between GCSEs and a full A-level and therefore, students will be able to progress successfully onto the second stage of the full A-level with the core basis covered within the first half of the A level.

We think that co-teaching of AS levels and A levels is essential for institutions to deliver the curriculum. Institutions will be faced with creating a timetable which will incorporate the new AS and A level qualifications in the proposed 14 subjects as well as running these alongside the old AS and A levels qualifications which have a very different assessment structure.

We do not support the proposal for all AS levels (excluding Art and Design) to be assessed only through end of year exams. Exam assessment should only be used if it is the most appropriate means of determining and validating a student's performance. As outlined in the consultation, non-exam assessments in subjects such as History assess and develop student skills in research and writing analytically at length. They are core skills which students will use generally in higher education or employment and skills which institutions need to encourage in subjects.

Section 6: Conditions of Recognition for A level and AS qualifications

74. Do you have any comments on our proposed Conditions?

No

How our proposals fit within our regulatory framework

75. To what extent do you agree that A level and AS qualifications should be subject to an accreditation condition?

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

76. To what extent do you agree that the accreditation criterion we should apply when we decide whether or not to accredit A level and AS qualifications should be as follows:

The awarding organisation must demonstrate to Ofqual's satisfaction that it is capable of complying, on an ongoing basis, with all of the General Conditions

of Recognition that apply in respect of the qualification for which it is seeking accreditation, including all relevant Qualification Level Conditions and Subject Level Conditions.

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

77. Do you have any further comments relating to this section?

No

Section 7: Equality impact analysis

78. We have identified a number of ways the proposed requirements for reformed 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?

- Yes
 - No
- If so, what are they?

Although, we support the inclusion of fieldwork in Geography, particular consideration needs to be given to students from low income backgrounds. Students will need to be provided with equipment and adequate clothing to take part in the assessment.

LDD students will struggle under the new linear approach. Due to the inherent complexities of the learners needs, there must be the flexibility to ensure regular review of progression targets. However, this will be lost with the removal of modules.

79. Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

- Yes
- No

If so, please comment on the additional steps we could take to mitigate negative impacts

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

Under the new requirements, maths skills will be tested across most subjects, with some subjects such as Physics allocating 40% of the marks to the application of maths skills. This will affect a large cohort of students who have a lower grasp of mathematics which may reduce their overall grade in that subject. Institutions may consider changing their entry requirements for subjects which may restrict many students from undertaking their desired subjects.

Follow up/information sharing

We use quotes from responses to highlight views expressed in the consultation document. It is helpful to attribute those quotes to specific organisations. We will not name individuals. If you do not want us to attribute your organisation to the quote, please opt out by ticking the box below

Do not attribute my name/organisation to the quote

Please only respond to the next statement if you have ticked ‘no’ or ‘don’t know’ above.

We intend to forward your response to Department for Education where your comments are relevant to Department for Education’s consultation. If you do not want us to do this, please opt out by ticking the box below

Do not share my response with Department for Education

Personal data

For the purposes of the Data Protection Act, we are the data controller for any personal data you supply in response to this consultation. We will process all personal data (such as your name, address and any other identifying information) in accordance with the Data Protection Act 1998. In most circumstances, this means that your personal data will not be disclosed to third parties.

Please do **not**:

- provide information in comments boxes that might identify you unless you are content for that information to be released into the public domain; or
- provide information in your response that might lead to the identification of other living individuals.

Name	Deepa Jethwa
Name of organisation or group (if applicable)	Sixth Form Colleges’ Association (SFCA)
Your role (if applicable)	Policy Officer
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Would you be happy for us to contact you again in relation to this consultation response?

- Yes
- No

Additional information

How did you find out about this consultation?

- Ofqual's newsletters or website
- Media/press
- Internet search
- Department for Education (newsletter or website)
- Awarding organisations / exam boards
- Subject associations / learned societies
- Schools / headteacher / local authority
- Other (please state) _____

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