

## Consultation Questions

This consultation considers proposals for the reform of A levels in England.

We are seeking views from higher education, employers, learned societies, colleges, schools and others so that A levels are the best that they can be.

The responses to this consultation will be independently evaluated and the evaluation published. If you do not want your response to this consultation published, you must state clearly that your response is confidential to us.

The deadline for responses to this survey is **11th September 2012**.

### How to respond:

Please respond to the questions we have asked using one of the following methods:

- completing the online response form at <http://comment.ofqual.gov.uk/a-level-reform/respond>
- emailing your response to [consultations@ofqual.gov.uk](mailto:consultations@ofqual.gov.uk), please include the consultation title in the subject line
- posting your response to A Level Reform Consultation, Reform Team, Ofqual, Spring Place, Coventry Business Park, Herald Avenue, Coventry, CV5 6UB

## 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?**

The equality analysis has not considered the potential impact of these proposals on students with lower levels of prior educational attainment (that often come from lower socio-economic groups). For example, these students can find the move from GCSE to AS level particularly challenging. January assessments provide an opportunity to gauge the difference between the two qualifications and can be used to identify and develop the study skills required to succeed at this level. Removing the opportunity to retake modules would also have a disproportionate impact on these students. These issues cut across the 'protected characteristics' (such as race, sex and disability) that are included in the equality analysis.

## **Questions on Section 2: What we hope to achieve**

The following questions refer to Section 2: What we hope to achieve.

**3. I support the general principles as set out in this section.**

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

**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?**

We agree that it benefits no one if universities (or employers) feel that they have to distinguish between different versions of the same A levels from different exam boards. But if 'equality of access to the full range of universities' is a major objective of these proposals, the full range of universities (and not just the Russell Group as the Secretary of State suggested in his letter to Ofqual in March 2012) should have a role in developing A levels.

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

**The following questions refer to 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?**

Paragraph 41 acknowledges that the purpose of A levels has evolved over time and although primarily designed to facilitate entry to HE, they now have now a wider role as a measure of skills, knowledge and understanding used by employers and others. We do not see this development reflected in the Condition 1 objective which seems to be returning to a narrower view of A levels relating primarily to the needs of a small number of 'leading' universities. We think the primary purpose of A levels is better stated as setting a standard of knowledge, understanding and skills of independent learning and communication across a wide range of academic disciplines appropriate to young people, which will enable them to progress to further study or employment. Greater consideration should be given to those young people that wish to progress to employment after their studies rather than higher education. Increasingly, the two are not mutually exclusive, but the consultation does not seem to regard employers as serious players in the reform process.

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

**The following questions refer to Section 3: Design rules**

### **Condition 2 - Size and grading.**

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

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

### **Do you have any comments or suggestions?**

As the changes to A levels will be phased in over a number of years, a new grading structure would further complicate what will in effect be a two tier system of old and new qualifications. More importantly, we do not believe there is a compelling case for changing the existing structure.

**7. The current number of grades, as specified in Condition 2, is appropriate for discrimination.**

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

### **Do you have any comments or suggestions?**

In our recent survey of Sixth Form Colleges, 79% felt that the current number of grades is appropriate for discrimination. If changes were to be made, several colleges suggested that it would be useful to either replace or complement the existing grading structure with the UMS score of candidates - this would remove, or at least cushion, the 'cliff edge' effect of the current grading system. On a related point, colleges frequently report there to be a high degree of variability in the marking of scripts, both within and between exam boards. This issue must be addressed as a matter of urgency.

**8. Even considering the other changes being made to A levels, the A\* grade (or similar) should be retained as it will continue to facilitate differentiation of achievement.**

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

**9. The expectations for the performance of learners should be set out for the upper and lower levels of the grading scale (currently grades A and E).**

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

**Do you have any comments or suggestions?**

In our recent survey of Sixth Form Colleges, 74% felt that the A\* grade should be retained. There is evidence that it helps to motivate some students and is understood and valued by universities and employers.

**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

While January examinations can be time consuming and eat into teaching time, they also provide a useful opportunity for students to be assessed on the work that they have completed in the first term and to reduce the exam burden and pressure in the summer term. The results of January assessments can also motivate students to work harder and succeed at the end of the year. Many students respond to the result of a 'real' assessment more than their teachers' feedback or mock examinations. Also see our response to Question 2.

**11. I believe that Option 1 is the right option - Removing the AS qualification – which would mean a return to a linear two year course of study.**

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

**12. I believe that Option 2 is the right option - Making the AS a standalone qualification but where the results do not contribute to the A level.**

- Strongly agree

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

**13. I believe that Option 3 is the right option - Retaining the AS qualification in its present form – but making changes as outlined in paragraphs 48-53.**

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

**Do you have any comments or suggestions on these three options?**

This is without question the most important proposal in the consultation document. The overwhelming majority of Sixth Form Colleges wish to retain the AS qualification and agree most strongly with Option 3.

The AS qualification plays a significant role in broadening choice post-16 and allows students to try new subjects and refine their areas of specialisation. As a result, the risk of drop out and non completion is greatly reduced – if a student chooses the wrong subject in September, (many things can go wrong in the transition from year 11) they can complete the course, gain a valuable qualification carrying UCAS points but not carry on to full A level.

The 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.

Breadth is a key characteristic of the Sixth Form College curriculum and has formed a central part of the sector's success. The Government's proposed changes to programme size and post-16 funding cannot be disentangled from the A level reform process as they are likely to mean that state funded schools and colleges will only be able to fund the delivery of three A levels. At present, students welcome the flexibility to continue with their original 'fourth choice' AS through to a broad study programme at A2.

Related to this, some Sixth Form Colleges have reported that students are already making increasingly narrow subject choices at A level. This has in part been driven by a perception that subjects outside the English Baccalaureate GCSE grouping are not valued by the HE sector. Announcements by the Secretary of State have reinforced this view and plans to introduce 'facilitating subjects' (as described in the *Informed choices* publication produced by the Russell Group of universities) into post-16 performance league tables will reinforce it further. In this context, abolition of the AS level could further accelerate the decline in students pursuing a broad range of subjects at A level. As an aside, the list of facilitating subjects seems arbitrary and includes (for example) geography but not economics or law.

We strongly believe that the Curriculum 2000 reforms should not be lost and any plan to change them should be considered as part of this consultation.

Options 1 and 2 are not regarded as worthy of serious consideration. Option 1 in particular is regarded as a regressive, politically motivated proposal driven primarily by instinct rather than evidence. While Option 2 is preferable to Option 1, it is unclear how a standalone AS qualification would co-exist with the A level, particularly in relation to content, delivery and assessment.

**The following questions relate to Option 3 - Retaining the AS qualification – but making changes as outlined in paragraphs 48-53.**

**14. The opportunity for AS/A2 assessment and therefore resits in January should be removed.**

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

**15. I believe that where a student resits an assessment the highest mark should count towards the student's qualification.**

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

**16. AS and A2 should contribute equally to the overall outcome of A levels.**

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

**I think that the weighting should be split as follows:**

**Do you have any further comments or suggestions?**

Students with lower levels of prior educational attainment are most likely to suffer if resits in January are removed. On balance, we think that they should be retained, although we do accept that there should be a limit on the number of resits. While there is understandable concern about the contribution that multiple resits make to grade inflation, removing the option to resit altogether will have a disproportionate impact on the most marginal students.

Condition 3 for Option 3 seems to suggest that a student wishing to re-sit any one of the externally assessed components related to AS or A2 will have to re-sit *all* of them. This seems wasteful for the student who has performed well in one of the externally assessed components (but will have to go through the motions of the resit) and unnecessarily expensive, as they will have to pay a resit entry fee for an assessment in which they have already performed well in.

On the AS/A2 split, it is difficult to arrive at a consensus. To a certain extent, it depends on the subject and on the design of the qualification assessment. In some subjects, similar topics are revisited at A2 but a higher degree of knowledge and understanding are required. In other subjects, there is less overlap between the two years. Some colleges feel that AS needs to have an equal contribution to the overall outcome of A levels so that it remains a valid qualification in its own right. Others would be content with a 60/40 split in favour of A2.

### **Questions on Section 3: Design rules - A level design**

**The following questions refer to Section 3: Design rules - A level design.**

**17. To enable Ofqual to secure standards in A levels (GCEs), the rules outlined in Condition 4 are:**

**Needed?**

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

**Sufficient?**

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

**Do you have any comments or suggestions?**

We would support a shift to include more questions that require responses to be produced through extended writing. This would prepare students more effectively for the world of higher education in particular. But there would need to be a related change in assessment to reward candidates for their levels of understanding, rather than their exam technique. We are also mindful of the fact that multiple choice and short answer questions are still used widely at GCSE level. It is important that reforms to GCSEs and A level are joined up - radical change to the design of A levels could make the transition between the two qualifications even more challenging for students than it is at present.

**18. To enable Ofqual to secure standards in A levels (GCEs), the rules outlined in Condition 5 are:**

**Needed?**

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

**Sufficient?**

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

**Do you have any comments or suggestions?**

**19. To enable Ofqual to secure standards in A levels (GCEs), the rules outlined in Condition 6 are:**

**Needed?**

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

**Sufficient?**

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

**Do you have any comments or suggestions?**

**20. To enable Ofqual to secure standards in A levels (GCEs), the rules outlined in Condition 7 are:**

**Needed?**

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

**Sufficient?**

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

**Do you have any comments or suggestions?**

We agree that the assessment requirements of different awarding bodies should be comparable. It is important to dispel the perception (some colleges would say the reality) that - in the same subject - some awarding bodies have more challenging specifications than others. While we would not support a move to a single exam board for each subject, it is important that Ofqual looks closely at this issue to ensure students, universities and employers have confidence in all A levels, irrespective of the awarding body used.

**21. I believe that a minimum of 60 per cent external assessment is the correct proportion for most subjects.**

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

**Do you have any comments or suggestions?**

**22. I believe that the weighting of synoptic assessment should be flexible.**

- Strongly agree
- Agree

Neither agree nor disagree

Disagree

Strongly disagree

**Do you have any comments or suggestions?**

### **Questions on Section 3: Design rules - Qualification support**

**The following questions refer to Section 3: Design rules - Qualification support.**

**23. I believe that universities should be able to provide this level of engagement.**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

**24. I believe that the level of support required is sufficient to demonstrate that the qualification will allow progression to study at higher education.**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

**Do you have any comments or suggestions?**

Question 23 is ambiguous. We do not think universities ‘should’ provide the necessary degree of engagement as, fundamentally, we think their proposed role in A level development is too prominent. Nor do we think universities ‘could’ provide the required degree of engagement as the higher education sector is facing enormous pressures of its own, and we would question the degree to which universities would have the time or inclination to ‘be at the centre of A level reform’. Universities certainly have a role to play in the development process, but this should be in partnership with the education professionals responsible for delivery. Schools and colleges should be at the centre of A level reform and not – as it feels from the current proposals – consigned to the margins.

While university involvement is important to the reform process, their formal endorsement of a particular A level could send out confusing signals to the student ‘consumer’ and result in unintended consequences. It could be understood that universities will only accept students with A levels that they have endorsed. Likewise, if a given university has not endorsed a particular A level, it could be interpreted that they do not value that particular qualification from that particular awarding body.

**25. Do you have any suggestions about how we might categorise universities as defined in Condition 8?**

This is a troubling proposal. The number of universities (at least 20, and at least 12 that are respected in their field of study) seems entirely arbitrary. Many A level subjects cut across different fields of study in higher education, so it is unclear how this link will be made in practice. The categorisation of universities as ‘respected’ or ‘leading’ is highly subjective. Excellence exists outside of the Russell Group and it is worth noting that around 10% of HE is delivered in a Further Education setting and that private HE providers are beginning to receive degree awarding powers.

The Secretary of State has made it clear that he wants ‘our best, research intensive universities such as those represented by the Russell Group’ to have a major role in the development of A levels. We have already noted the influence of the Russell Group’s *Informed choices* publication and the list of ‘facilitating subjects’ that has found its way into the post-16 performance league tables. There has been a parallel policy shift away from a broad-based widening participation agenda towards one that focuses on increasing fair access to so called ‘leading’ institutions – for which the Russell Group is often used as shorthand. While we have expressed our reservations about the prominent role that is envisaged for universities in the A level reform process, we still believe they have a role to play - but university involvement should not be limited to a small group of institutions favoured by the Secretary of State.

**26. Would you propose a different number or proportion of universities providing support?**

Yes

No

**Do you have any comments or suggestions?**

We agree with the conclusion of the House of Commons Education Committee (in their recent report on the administration of examinations for 15–19 year olds in England) that national subject committees would provide a useful way of engaging universities and other stakeholders in A level reform. Rather than having a fixed quota of universities, these expert groups could have the flexibility to determine what universities to approach on a subject by subject basis. They could (and should) also ensure that schools and colleges are sufficiently well represented.

**27. I believe that the level of support required is sufficient to demonstrate that most universities will accept a qualification for entry.**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

**Do you have any comments or suggestions?**

See response to Q24. While universities will publically endorse certain A levels under these proposals, they will also retain autonomy over their admissions policy and continue to consider a wide range of factors (not just attainment) when making offers to candidates.

**28. I believe that the support required should also provide additional assurances to those set out in paragraphs 73 and 74.**

Yes

No

**If your answer is Yes, please give further details:**

As we have already outlined at length, it is important that a broad range of stakeholders and a broad range of universities are involved in the A level reform process.

**29. I believe that exam boards should be expected to consult schools, colleges and employers specifically for each qualification.**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

## **Questions on Section 4: Exceptions**

**The following questions refer to Section 4: Exceptions.**

**30. Exceptions to Condition 1 should be allowed in relation to the purpose of A levels.**

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

**31. Exceptions to Conditions 4–7 should be allowed in relation to the design of A levels.**

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

**32. Exceptions to Condition 8 should be allowed in relation to the support secured for an A level.**

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

( ) Strongly disagree

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

Related to our response to Q25, the prominent role envisaged for a small group of universities may make it difficult for qualifications in subjects that are not recognised or respected by these institutions to receive formal endorsement. This may well be the policy intent – but it would be damaging to lose certain subjects (and subjects with a large practical element would be at particular risk) – simply because they do not map against the courses offered by a small group of universities.

## **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.**

**34. These review arrangements are sufficient and appropriate to secure standards.**

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

**Do you have any comments or suggestions?**

## **Questions on Section 6: Implementation**

**The following questions refer to Section 6: Implementation.**

**35. I support the proposed staged approach to the reform of A levels.**

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

A staged approach (particularly in the timescale envisaged) will be problematic, but is preferable to introducing all of the proposed changes at the same time. That said, the current timetable for implementation is unrealistic, and more time should be taken to introduce these changes to minimise the risk of disruption to students – particularly given the wider reform of 16-19 funding and study programmes, and changes to GCSEs.

**36. I agree that all current A levels should have been reviewed by 2018.**

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

**37. I agree that the priority subjects for implementation in September 2014 should be:**

Please rank in order of preference, 1 being your first choice.

- \_\_\_3\_\_\_ physics, chemistry, biology
- \_\_\_5\_\_\_ French, German and Spanish
- \_\_\_4\_\_\_ mathematics
- \_\_\_2\_\_\_ English literature
- \_\_\_6\_\_\_ geography and history
- \_\_\_1\_\_\_ a combination

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

We asked our members to rank the priority subjects in order and they are included above. That said, there was some disquiet that only the subjects linked to the English Baccalaureate and the Russell Group list of facilitating subjects were available to choose from. We have expressed our concerns on this elsewhere in our consultation response.

## General questions

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

We have outlined our views on these proposals in some detail. As a high performing sector responsible for one fifth of the A levels sat in England each year, we hope our views will be given due consideration. In particular, we think that it is vital to retain the AS qualification, albeit with some of the changes outlined in the consultation document. A return to a linear, two year course of study would be damaging for students (particularly those from disadvantaged backgrounds) and would almost certainly lead in an increase in drop out and non completion rates. At a time when one of the Government's key policy objectives is to increase the number of young people in education or training, this makes little sense. Many Sixth Form Colleges believe that, whatever the result of this consultation exercise, the Secretary of State will press ahead with plans to return to a linear model. This, alongside the Government's proposed changes to programme size and post-16 funding would make it extremely difficult for Sixth Form Colleges to offer the sort of broad, holistic curriculum offer that has formed a key part of the sector's success. Reducing choice in this way is not in the best interests of universities, employers, or most importantly of all – students.

### Your details

#### Name\*

James Kewin

#### Organisation\*

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

- Parent/Carer
- Employer
- Representative group/Interest Group
- Government Body/Organisation (national and local)
- Other (including General Public)

**School / College type**

- Academy and/or Free School
- Comprehensive
- State Selective
- Independent
- Special School
- FE/Sixth Form
- None of the above

**Is your institution a member of any of the following groups?**

- Russell Group
- Million+
- 1994 Group
- University Alliance
- GuildHE
- UUK
- None of the above

**Your role**

Deputy Chief Executive

**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\***

Sixth Form Colleges Forum

**Nation\***

England

Wales

Scotland

Northern Ireland

International

**Email address\***

james.kewin@local.gov.uk

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

Yes

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

Yes

**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

**Do you have any comments or suggestions?**

We wish to make our publications widely accessible. Please contact us if you have any specific accessibility requirements.

First published by the Office of Qualifications and Examinations Regulation in 2012

© Crown copyright 2012

You may re-use this publication (not including logos) free of charge in any format or medium, under the terms of the [Open Government Licence](#). To view this licence, visit [The National Archives](#); or write to the Information Policy Team, The National Archives, Kew, Richmond, Surrey, TW9 4DU; or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk)

This publication is also available on our website at [www.ofqual.gov.uk](http://www.ofqual.gov.uk)

Any enquiries regarding this publication should be sent to us at:

Office of Qualifications and Examinations Regulation	
Spring Place	2nd Floor
Coventry Business Park	Glendinning House
Herald Avenue	6 Murray Street
Coventry CV5 6UB	Belfast BT1 6DN

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346