



Department  
for Education

# Reforming Key Stage 4 Qualifications

## Consultation Response Form

The closing date is: 10 December 2012  
Your comments must reach us by that date.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

**Please tick if you want us to keep your response confidential.**

Reason for confidentiality:

Name	David Igoe, Chief Executive
Organisation (if applicable)	Sixth Form Colleges' Forum
Address:	Local Government House Smith Square Westminster SW1P 3HZ

If your enquiry is related to the policy content of the consultation you can contact The Department on:

Telephone: 0370 000 2288

e-mail: [KS4QualReform.CONSULTATION@education.gsi.gov.uk](mailto:KS4QualReform.CONSULTATION@education.gsi.gov.uk)

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Consultation Unit by e-mail: [consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@education.gsi.gov.uk) or by telephone: 0370 000 2288 or via the Department's '[Contact Us](#)' page.

Please mark the box that best describes you as a respondent.

<input type="checkbox"/> School	<input type="checkbox"/> College	<input type="checkbox"/> Academy
<input type="checkbox"/> Higher Education Institute	<input type="checkbox"/> Further Education Institute	<input type="checkbox"/> Local Authority
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Parent	<input type="checkbox"/> Student
<input type="checkbox"/> Union	<input type="checkbox"/> Employer-Business Sector	<input type="checkbox"/> Governor
<input type="checkbox"/> HT/Teacher	<input type="checkbox"/> Awarding Organisations	x Other

Please Specify:

The Sixth Form Colleges' Forum is the representative organisation for 92 of the 94 designated Sixth Form Colleges. This response is based on our own consultation with the regional representatives of our Curriculum and Quality Policy Committee who, in turn, will have consulted Colleges in their respective regions.

## Title

1 Do you agree that the new qualifications should not be called "GCSEs"?

Agree

Disagree

Not sure

Comments:

Our view is that the new qualifications will require a different name to avoid confusion. However, it is also important to ensure that the relationship of the new qualifications with GCSEs is clear, especially as they will co-exist for some time and there may, therefore, be a case to retain the title GCSE but indicate the difference between subjects that count towards the E-Bacc by adding a letter (e.g. E-GCSE).

2 a) Do you agree that the new qualifications should be called English Baccalaureate Certificates?

Agree

Disagree

Not sure

Comments:

We are sure most will comment on the potential for confusion given the existence of the E-Bacc as a KS4 performance measure. However, if the idea is to cement the link between qualifying certificates which contribute to the E-Bacc., then there is a logic to the name English Baccalaureate Certificate. See above for further thoughts on this.

2 b) If not, what alternative title should be adopted?

Comments:

See above

### High expectation of performance and accurate grading

3 Do you agree with our expectations for grading structures, set out in paragraphs 5.4 to 5.5?

<input type="checkbox"/> Agree	<input checked="" type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:

Although there was minority support for the proposals, the weight of the responses disagreed.

The main concerns centred on the need to maintain a common grading system across examinations and subjects at KS4 which should curtail the opportunity to innovate. There is plenty of evidence from previous reforms to show that different grading systems leads to confusion and is no better at differentiating performance.

4 Do you believe that we should insist on a common grading structure for all English Baccalaureate Certificates or should we allow Awarding Organisations the freedom to innovate?

<input checked="" type="checkbox"/> Common Grading Structure	<input type="checkbox"/> Freedom to innovate	<input type="checkbox"/> Other
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Comments:

We strongly support a common grading structure for all subjects. The existing structure allows comparability between subjects for a range of key groups such as parents and employers.

In addition, the consultation states that the new qualifications 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.

### No tiering

5 Do you agree that it will be possible to end tiering for the full range of subjects that we will be creating new qualifications for?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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Comments:

Although our sector had mixed views about this, the main view was that tiering had a place and it would be prodigiously difficult to design assessments and papers which genuinely allowed students to perform at all levels.

We acknowledge that a two tier system can limit the aspirations of young people. However, we also feel that students work at different paces and benefit from the opportunity to discuss with their teacher the most appropriate assessment and level appropriate for their needs.

6 Are there particular approaches to examinations which might be needed to make this possible for some subjects?

Yes

No

X Not Sure

Comments:

There is a case for graded papers in Mathematics (a return to the old Elementary and Additional 'O' levels?).

In any paper that is designed for the whole ability range, there would need to be a straightforward way for students to know which are the basic and challenging questions. Different systems have been tried in the past (e.g. questions getting progressively harder; basic and optional supplementary questions; colour coding) and all found wanting. This is a serious challenge for the exam boards.

**Assessed 100% by examination, or minimising reliance on internal assessment**

7 a) We intend that English Baccalaureate Certificates should be assessed 100% by externally marked examinations. Do you agree?

All

English

mathematics

sciences

history

geography

languages

x None

Comments:

An overwhelming number of our members do not favour a single end-test approach with all examinations marked externally.

The consultation states that the new qualifications will aim to provide students with the level of knowledge and skills expected in comparison to international competitors. We do not think that a single end-test approach will deliver this aim effectively.

Coursework and other forms of internal assessment are valuable tools which intrinsically tease out worthwhile set of skills. In addition, key skills that students should be encouraged to attain to enable them to move on to further study or employment, such as research skills, will be lost through reliance on an examination at the end of the course.

Furthermore, the new qualifications need to take account of different learning styles and pace of working based on a student's aptitudes, and, therefore, different modes of assessment structures should be considered.

7 b) If not, which aspects of English, mathematics, the sciences, history, geography or language do you believe absolutely require internal assessment to fully demonstrate the skills required, and why?

Comments:

Science practicals  
Geography fieldwork  
Speaking and listening in Modern Foreign Languages.

Each of these test core competences related to these specific subjects which cannot be assessed by other means.

### Size requirement for syllabus

8 Should our expectation be that English Baccalaureate Certificates take the same amount of curriculum time as the current GCSEs? Or should schools be expected to place greater curriculum emphasis on teaching the core subjects?

Same amount of curriculum time

Greater curriculum emphasis

Other

Comments:

A range of views were expressed but generally we feel there is too much focus on subjects rather than on knowledge and skills attained through subjects. If, as the consultation states, there is a need to provide greater assurance of literacy and numeracy, both can be extended and developed in all subjects and, therefore, all subjects should be provided with the same amount of teaching time.

While we understand that the core subjects require strong focus, we do feel that the list of core subjects has narrowed the curriculum and there are many important elements which are in danger of being neglected e.g. creative subjects such as Drama etc which positively enrich a student's education and provide opportunities for self expression, team-work and improvisation which may not be available elsewhere in the Curriculum.

### Examination aids

9 Which examinations aids do you consider necessary to allow students to fully demonstrate the knowledge and skills required?

Comments:

In Mathematics where arithmetic skills are being tested then calculators and other aids should not be used. However, in higher order Mathematics and Science, calculators and formula sheets can have a place in arriving at solutions which demonstrate a good grasp of mathematical and/or scientific concepts.

Similarly in English and languages, a text can be provided to allow students to show a grasp of structure and form without having to first demonstrate a proficient memory of the text.

### Subject suites

10 Do you agree that these are appropriate subject suites? If not, what would you change?

X Yes

No

Not Sure

Comments:

There is an argument for a Mathematics syllabus which comprises broadly functional Mathematics and is different to Mathematics (P&A). This should be focussed on post-16 students who will be required to continue with Mathematics having failed Mathematics at KS4.

11 Is there also a need for a combined science option covering elements of all three sciences?

Yes

No

Not Sure

Comments:

Combined science is useful for students whose aptitude requires a predominantly humanities programme where three sciences would crowd their timetables but keeps their knowledge of science across the disciplines at a reasonable level.

### Track Record

12 What qualities should we look for in English Baccalaureate Certificates that will provide evidence that they will support students to be able to compete internationally?

Comments:

Acceptability by other jurisdictions for progression to level 3 programmes.

### **Assurance of literacy and numeracy**

13 Do you agree that we should place a particular emphasis on the successful English language and mathematics qualifications providing the best assurance of literacy and numeracy?

Agree

Disagree

X Not sure

Comments:

We agree that Mathematics and English are crucial to assuring literacy and numeracy but would want to see the development of options which emphasise functional skills alongside standard programmes (see 10 above).

## School and Post-16 institution Support

14 In order to allow effective teaching and administration of examinations, what support do you think Awarding Organisations should be:

a) Required to offer?

Comments:

We think that marking schemes with exemplar materials should be provided to all teachers to clearly identify the difference in grade boundaries.

We welcome preparation meetings for staff teaching the new qualifications.

Although there is a view that the provision of past papers encourages and supports 'teaching to the test', we feel that for new qualifications, it is important for students and teachers to get a flavour of the type of questions they will face.

14 b) Prevented from offering?

Comments:

We accept that face to face support between examiners and teachers can be problematic but it is, nevertheless, valuable for teachers to meet examiners and to network with colleagues at these meetings.

15 How can Awarding Organisations eliminate any unnecessary burdens on schools and post-16 institutions relating to the administration of English Baccalaureate Certificates?

Comments:

We would suggest the following:

Free training around subject specific delivery and training in the use of online facilities such as e-AQA; giving enhanced results analysis. Regular newsletters sent to all providers and representatives from the sector on committees.

Consistency in terms of grading, transparency in terms of the definition of required levels, so that it is clear how to align marks, levels and grades.

### **Qualification supports progression of lower achievers**

16 Which groups of students do you think would benefit from a "Statement of Achievement" provided by their school?

Comments:

This re-run of Record of Achievement can be valuable for students to take to employers and for progression interviews but it is in danger of just becoming a low-level indicator of poor performance. See further comments below.

17 How should we ensure that all students who would benefit from a "Statement of Achievement" are provided with one?

Comments:

We suggest that if **all** students received this statement then it would have more status and would be less likely to be seen as simply a badge of poor achievement.

This will provide valuable information about each student for post-16 institutions in addition to the grades they receive helping providers provide a more enhanced and tailored programme for their students.

## Equalities

18 a) Do you believe any of the proposals in this document have the potential to have a disproportionate impact, adverse or positive, on specific pupil groups?

X Adverse impact

Positive impact

Both

No impact

Comments:

We do not feel that the proposals have seriously considered students of all ability ranges, and in particular, students from lower attainment levels. Currently, 40% of learners do not achieve 5 grades A\*-C grade. We feel, therefore, that these students will be completely lost in the new qualification and will not be catered for. The current proposals will lead to a large cohort of students unable to achieve well and unable to study further, and this will seriously limit aspirations. We think it is vital for coursework and other internal assessments to remain to help students where a natural confidence in academic ability has not been inculcated and where a teacher's judgement is required.

A restricted and prioritised curriculum may have a negative impact on students whose talents or motivations are in other areas for example, in

creative arts.

Furthermore, there is little information about plans for students who are not entered for the new qualifications, therefore, completely disregarding an entire cohort of students.

18 b) If they have potential for an adverse impact, how can we reduce this?

Comments:

In straight terms, abandon the plans for the EBCs and consider revising current GCSEs to make them more fit for purpose and reliable.

### Implementation

19 Should we introduce reformed qualifications in all six English Baccalaureate subjects for first teaching in secondary schools in 2015, or should we have a phased approach, with English, mathematics and sciences introduced first?

In all six subjects from 2015

Phased approach

X Other

Comments:

We feel that a phased approach will help schools learn some lessons before the new tranche. However, from an operational view, it would be difficult for schools to deliver two sets of different qualifications at the same time.

It is important to establish whether schools have the capacity to deliver all six at the same time.

20 How best can we prepare schools for the transition to these reformed, more rigorous qualifications?

Comments:

The lead time for this kind of comprehensive change is generally two years. Teachers will need detailed training on specifications and methodology and ideally the exams would be tested in a pilot and revised accordingly.

GCSE was introduced over this kind of time scale.

21 How long will schools need to prepare to teach these reformed qualifications?

Up to 12 months

12 - 18 months

X More than 18 months

Other

Comments:

See above

## Languages

22 Should all languages in which there is currently a GCSE be included in our competition?

Yes

No

Not Sure

Comments:

There should be a focus on languages which are most frequently used in the business world and these should be included in the competition.

23 Should the number of languages for which English Baccalaureate Certificates are identified be limited? If so, which languages should be included?

Yes

No

Not Sure

Comments:

24 Given the potential number of new languages qualifications to be developed, should they be introduced to a later timescale than history and geography English Baccalaureate Certificates?

Yes

No

Not Sure

Comments:

## Post-16

25 Should we expect post-16 institutions to be ready to provide English Baccalaureate Certificates at the same time as secondary schools?

Yes

No

X Not Sure

Comments:

Presumably 16+ students opting for a level 2 GCSE course in the first year the examination is offered, will need to be taught EBC subjects. Also, as it will be a requirement to offer English and Mathematics to students without at least GCSE grade C, Colleges will have to be able to offer the EBC in those subjects.

We anticipate a big problem with legacy GCSE requirements. Do Colleges have to be able to offer courses in both GCSE and EBC?

26 How best can we support post-16 institutions to prepare to provide English Baccalaureate Certificates?

Comments:

Making training opportunities available on a par with those planned for schools and Academies.

## Choosing the best qualification in each subject

27 Do you agree that five years is an appropriate period for the new qualifications to feature in the performance tables before the competition is rerun?

Agree

Disagree

X Not sure

Comments:

Given the amount of work involved in developing examinations and assessment processes, five years is a worryingly short time window for awarding bodies to make the appropriate investment in people and systems. Conversely a longer period (say 8 years) probably means any expertise in a subject area may be lost within the AO which loses the competition.

28 Please let us have your views on responding to this call for evidence (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Further Comments not included above:

Our sector raised the following additional issues:

We hope that the development of the E Bacc qualifications will tie in with the development of the new A levels and that the issues of transition will be addressed. There is definitely a need to see the smooth transition of qualifications in many subject areas and this is to be applauded. The fact that some areas are left out of this review is a concern - particularly in the creative curriculum.

Still not clear about the genuine options available for those students who are more technically or vocationally inclined and it is not at all clear whether the new qualifications will allow our 'technological age' students to use their technology skills in a way that is meaningful to them (i.e. a genuine paradigm shift).

There is a case for reviewing KS4 qualifications on a wholesale basis

including whether we need to have a KS4 assessment at 16 at all.

A few respondents described the GCSE/EBC structure as inherently flawed. They believe it will create uncertainty about the standards and status in both GCSE and EBC qualifications and bring the whole KS4 exam system into disrepute. In addition, they believe increasing segregation between GCSE and EBC qualifications, i.e. between 'soft' and 'hard' qualifications, will lead to a segregation of non-academic and academic students with a likelihood that this would correlate with social class divisions.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

**Please acknowledge this reply X**

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes  No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed and emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, Tel: 0370 000 2288 / email: [carole.edge@education.gsi.gov.uk](mailto:carole.edge@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 10 December 2012

Send by post to:

Public Communications Unit  
Level 1 Area C  
Castle View House  
East Lane Runcorn  
WA7 2GJ

Send by e-mail to: [KS4QualReform.CONULTATION@education.gsi.gov.uk](mailto:KS4QualReform.CONULTATION@education.gsi.gov.uk)