1. SUMMARY AND KEY POINTS

1.1 Concerns about the depth and rigour of the A Level can be addressed without losing the AS exam taken at the end of Y12, and its many benefits.

1.2 The benefits of AS, linked to the full A-Level, include:

- breadth and flexibility of subject choice in the sixth form
- objective assessment of academic trajectory, which helps students to make properly informed and appropriate choices about university applications
- making possible fair and transparent admissions based on public examination results received immediately before the point of application

1.3 The proposals risk significantly disadvantaging students at English schools by removing their ability to present evidence of recent academic achievement when applying to universities.

1.4 The proposals risk introducing unfairness into University admissions. Some English schools and colleges may choose to enter students for three or more subjects at AS Level at the end of Year 12, while others, driven by resource constraints, may enter students for only one AS, or none at all. This could easily create a two-tier admissions system based on schools’ resources and policies.

1.5 The proposals risk denying the “late bloomer” an opportunity to shine. Around 9% of our 2012 entry performed significantly below the average for our field in GCSE but received an offer, based in significant part on their excellent performance at AS. Over 80% of that group of offer holders were from state schools. Many had changed institution between Year 11 and Year 12.

1.6 In the face of these risks, no compelling case has been made by the Secretary of State for such a fundamental restructuring of sixth-form examinations.

1.7 A return to linear A Levels will not mean less testing, just less externally-moderated and reliable testing.

1.8 The University of Cambridge favours allowing time for recently implemented reforms, such as the removal of January resits, to bed down before deciding to jump to an unproven system.
1.9 If de-coupling of AS and A-level is to go ahead as proposed, the University of Cambridge believes all students should continue to sit fully-funded AS-levels at the end of Year 12 in every subject which they are taking.

2. **ABOUT THE UNIVERSITY OF CAMBRIDGE**

2.1 The University of Cambridge’s mission statement is “to contribute to society through the pursuit of education, learning, and research at the highest international levels of excellence.”

2.2 We are committed to recruiting the ablest and best-qualified undergraduates with the greatest academic potential from every background.

2.3 We subscribe to the Schwartz principles of fair access, and in particular we seek to recruit those students best-suited to take our courses. Our own research, and that carried out by HEFCE, has found that outstanding success in the public examination system is the key factor in doing well at Cambridge (Parks, 2011).

3. **THE VALUE OF AS IN ITS CURRENT FORM**

3.1 Over the past fifteen years the University of Cambridge has made significant progress in increasing our state sector intake to a proportion in line with attainment levels in UK sixth-forms (Sewell, 2013).

3.2 Curriculum 2000 and the AS Level have played an enormous role in enabling us to increase our state sector admissions without compromising on academic standards or introducing quotas.

3.3 We value the AS, taken across three or more subjects as a public examination at the end of Year 12, very highly. It equips us to fulfil this commitment to fair admissions and fair access. It enables us both to appropriately reward merit and to reliably identify potential, transparently and fairly.

3.4 AS Level, in its current form, has significant educational benefits. In particular, the Curriculum 2000 approach has allowed students to make subject choices that can be refined after a year’s experience of sixth-form study, and to accurately judge their progress, which is critical to making well-judged HE applications.

3.5 Improving A Level from its strong base in no way requires the removal of Year 12 examinations. We remain confident in the effectiveness of A Level as a preparation for study at Cambridge.

3.6 Against this background, we would like to offer brief comments on the following issues from the previous reports:-
• The extent to which A Levels required reforming to maintain confidence in the examination (considered in *The administration of examinations for 15-19 year olds in England*)

• The need for Ministers to consider the cumulative impact and the risks of change (recommended in *2012 GCSE English results*)

• The need for OFQUAL and Ministers to listen when concerns are raised (recommended in *2012 GCSE English results*)

• Whether the reforms will reduce the burden of assessment (considered in *The administration of examinations for 15-19 year olds in England*)

• The impact of change on the three-country approach to UK qualifications (raised in *2012 GCSE English results*)

• Concerns about the pace of change (raised in *From GCSEs to EBCs: the Government’s proposals for reform*)

4. **TO WHAT EXTENT DID A LEVELS REQUIRE REFORMING TO MAINTAIN CONFIDENCE IN THE EXAMINATION?**

4.1 In early 2013 the Secretary of State for Education instructed OFQUAL to return to a linear 2-year A Level structure, arguing that this would “enhance the reputation of A levels, better prepare more students for higher education, and ensure that competition for university places is fairer.”

4.2 The University of Cambridge’s institutional response to all consultations on this matter has been very clear: Concerns about the depth and rigour of the A Level can be addressed without losing the AS exam taken at the end of Y12, and its many benefits. (see, for example, University of Cambridge, 2012).

5. **WHAT ARE THE RISKS OF CHANGE? HAVE THESE BEEN ADEQUATELY CONSIDERED BY MINISTERS?**

5.1 AS, linked to the full A-Level, has great value to students, parents, schools and colleges, and higher education institutions, because it:

• Permits breadth and flexibility of subject choice in the sixth form
• Provides an objective assessment of academic trajectory, which helps students to make properly informed and appropriate choices about university applications
• Enables fair and transparent admissions based on public examination results received immediately before the point of application

*Breadth and flexibility of choice*
5.2 AS gives students the opportunity to try a contrasting or unfamiliar subject – such as a language, science or economics – with the ability to “cash in” after one year of study if the subject does not suit them.

5.3 At present, after receiving their AS results, students can pick their strongest three out of four, or four out of five, subjects to take forward to A-Level at the end of Year 13, based on objective evidence.

5.4 Under a linear A-Level system, students will have to commit to their A-level subjects at the end of Year 11 for the duration of their sixth form studies, and, most importantly, before they have made choices about HE – which often depend on specific subject combinations and levels of attainment.

5.5 Without AS, students will lose this opportunity to revise their subject choices if they find that their academic priorities have changed.

Objective assessment of trajectory

5.6 Without AS results in all of their subjects, students will have little or no sense of the progress they are making beyond teachers' predictions, which have been proved time and again to be overwhelmingly inaccurate. That seriously puts at risk the ability of students to apply with confidence to HE.

5.7 Predicted grades are known to be unreliable indicators. Properly moderated Year 12 results both provide a boost to the ambitions of the over-cautious, and a check to the unrealistic aspirations of the over-confident. Without this objective indicator of progress, many more students will make poorly-targeted choices.

5.8 Experience has demonstrated that an entrance examination, as recommended to us by the Secretary of State, is not a better predictor than AS UMS. Any entrance examination also risks being perceived as a barrier to entry that may deter applicants from backgrounds with less experience of high-level university entry.

5.9 Many state school applicants will be less competitive on the basis of their GCSEs alone. Around 9% of our 2012 entry performed significantly below the average for our field in GCSE but received an offer, based in significant part on their excellent performance at AS. Over 80% of that group of offer holders were from state schools. Many had changed institution between Year 11 and Year 12.

Fair and transparent admissions, on a level playing field.

5.10 The AS provides an up-to-date, objective and transparent record of academic progress at the point of application. Its use in our admissions process has allowed us simultaneously to raise standards and to widen participation, without engaging in positive discrimination.
5.11 A particular risk of the proposed reforms is that some English schools and colleges may choose to enter students for three or more subjects at AS Level at the end of Year 12, while others, driven by resource constraints, may enter students for only one AS, or none at all.

5.12 This could easily create a two-tier system based on schools’ resources and policies; it risks unfairness being introduced into University admissions.

5.13 In the face of these clear benefits of the current structure of A-Levels, and the risks of losing the AS in its current form, no compelling case has been made by the Secretary of State for such a fundamental restructuring of sixth-form examinations.

6. THE NEED FOR OFQUAL AND MINISTERS TO LISTEN WHEN CONCERNS ARE RAISED

6.1 The University of Cambridge has expressed its concerns over threats to the AS consistently since 2010. (Parks, 2010)

6.2 We have evidence which shows that AS is a good to excellent predictor of university performance, and a better one than GCSE results. (Partington, 2011)

6.3 In an exchange of letters in January 2013, we offered to present our Evidence on the value of AS to his team at the DfE. This was not taken up.

6.4 We do not feel that our evidence-based concerns have been heeded by the Secretary of State.

7. WHETHER THE REFORMS WILL REDUCE THE BURDEN OF ASSESSMENT

7.1 A return to linear A Levels will not mean less testing, just less externally-moderated and reliable testing. If all external Year 12 examinations disappear, schools and colleges will still need to set significant internal tests at the end of the year, to measure progress and to provide indications for university entry. Gains in teaching time, if any, will be slight.

7.2 Given a choice between an externally set and marked AS, or a school-based mock examination, many stakeholders have advised us that they would prefer to be able to enter candidates for the AS in each of their A-Level subjects.

7.3 However, this would require “co-teachability” within the A Level syllabus and sufficient resources being made available to schools to ensure that all students can sit exams in this way.

7.4 We are advised by schools and colleges that co-teachability of AS Level and Year 1 of A Level, in which students intending to take AS and those intending to skip the examination will be taught together, will involve practical
difficulties in the run-up to AS examinations unless all students routinely sit AS-Levels in all their subjects.

7.5 If de-coupling of AS and A-level is to go ahead as proposed, we believe all students should continue to sit fully-funded AS-levels at the end of Year 12 in every subject which they are taking.

8. THE IMPACT OF CHANGE ON THE THREE-COUNTRY APPROACH TO UK QUALIFICATIONS

8.1 The Welsh Government and the Northern Ireland Government have both committed to continuing to offer the AS, in its current form, to their students.

8.2 The HMC have expressed an interest in continuing to offer AS to their students, possibly by adopting the CIE syllabus.

8.3 It appears that only English State School pupils will be denied the opportunity to sit AS at the end of Y12.

8.4 The proposals thus risk significantly disadvantaging students at English schools by removing their ability to present evidence of recent academic achievement when applying to universities.

9. CONCERNS ABOUT THE PACE OF CHANGE

9.1 The reformed A-Levels are to be taught from September 2015. This cohort will begin considering their UCAS decisions in early 2016. They deserve a clear steer on how their applications will be assessed by this university and others. However, there is still no clarity on issues including:

- What level of funding will actually be available
- The content and level of the new AS exam
- The timing of the new AS exam
- What co-teaching actually entails.
- Whether offers based on marks averages would be robust and defensible
- What impact the proposed “core maths” qualifications will have on the ability of schools to teach Further Maths in the sixth form.

9.2 We have welcomed the removal of January sitting of modules as well as the development of more ‘stretch and challenge’ elements in assessment. We favour allowing time for these recently implemented reforms to bed down before deciding to jump to an unproven system.

9.3 This would also allow a considered approach to the reform of content, where necessary, rather than the overly hasty rush that has characterised the current reforms.

10. REFERENCES
Parks, G. (2010) *Letter from Dr Geoff Parks, Director of Admissions for the Cambridge Colleges, to the Secretary of State for Education, the Rt Hon Mr Michael Gove.* Available at: http://www.admin.cam.ac.uk/offices/admissions/responses/alevelreform.pdf

Parks, G. (2011). *School background is not a factor in Cambridge degree success.* Available at: http://www.admin.cam.ac.uk/offices/admissions/research/school_background.html

Partington, R. (2011) *The Predictive Effectiveness of Metrics in Admission to the University of Cambridge.* Available at: http://www.admin.cam.ac.uk/offices/admissions/research/a_levels.html
