

# Consultation on New A Level Regulatory Requirements



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## Foreword by the Chief Regulator

I am pleased to present Ofqual's second consultation on the regulation of A levels in England.

A levels are one of the most important qualifications that we regulate. A wide choice of qualifications is available for people aged 16 to 18, but A levels remain a very popular option, taken by a quarter of a million students each year. We know that employers value them and that they are a key qualification for many students planning to go to university. We want A levels to be the best possible preparation for students as they go on to the next stage of their lives.

Our research has highlighted that while higher education representatives and teachers agree that A levels prepare most students well for higher education, higher education staff believe that new undergraduates lack some of the skills essential for undergraduate learning, for example skills for researching, finding sources, essay writing, problem solving, analysis and critical thinking.<sup>1</sup>

We are taking steps to address any of these shortcomings that might be the product of the structure and assessment of A levels. We are starting with A levels in fourteen of the most widely taken subjects. We are aiming to have these available for first teaching in September 2015. We will consult on changes to other A levels, including Mathematics and Further Mathematics, at a later stage. Alongside the changes we propose, the Department for Education is hosting a consultation on proposed changes to the content of A levels in these subjects.

We are changing the way we regulate GCSEs, AS qualifications and A levels. We will hold exam boards to account for the quality of their assessments and set clear conditions with which exam boards must comply when designing and delivering the qualifications. We are seeking views on the new requirements we propose to place on the exam boards that award A levels.

Finally, we are seeking views on our proposals for the design and assessment of the AS qualification, which the Government has decided should be decoupled from the A level and offered as a fully stand-alone qualification.

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<sup>1</sup> John Higton, James Noble, Sarah Pope, Naomi Boal, Steven Ginnis, Rory Donaldson and Helen Greevy of the Ipsos MORI Social Research Institute (April 2012), *Fit for Purpose? The view of the higher education sector, teachers and employers on the suitability of A levels*. Commissioned by Ofqual: [www.ofqual.gov.uk/files/2012-04-03-fit-for-purpose-a-levels.pdf](http://www.ofqual.gov.uk/files/2012-04-03-fit-for-purpose-a-levels.pdf)

Whatever your views on the assessment and the regulation of A levels, we want to hear them. I encourage you to take the time to respond to this consultation, which is open until 17th January 2014. You may wish to read the consultation on content available from the Department for Education's website<sup>2</sup> alongside this one and respond to both. I look forward to hearing from you.

A handwritten signature in black ink, appearing to read 'G Stacey', with a long horizontal flourish extending to the right.

Glenys Stacey  
Chief Regulator, Ofqual

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<sup>2</sup> [www.education.gov.uk/consultations](http://www.education.gov.uk/consultations)

# **Part 1: Our proposed changes**

## **About this consultation**

- 1.1 This consultation is about proposed changes to A levels and to the AS qualification, in particular how they are designed, assessed and regulated. Some of the proposals apply to all subjects. Others are specific to the following subjects: biology; chemistry; physics; psychology; English language; English literature; English language and literature; history; geography; art and design; business;<sup>3</sup> computer science;<sup>4</sup> economics and sociology. The Department for Education is hosting a consultation separately on new content for these subjects.
- 1.2 Our aim is for revised A levels and AS qualifications in these subjects to be taught in schools in England from September 2015. New AS qualifications in these subjects will therefore be awarded for the first time in the summer of 2016 and A levels in the summer of 2017.
- 1.3 We will consult later on changes to the design and assessment of other A levels. We know that A level mathematics and A level further mathematics require significant changes to make them linear and ensure that they are capable of supporting progression to higher education (see paragraph 2.3). We aim to have A level mathematics and A level further mathematics available for first teaching in September 2016. We will consult on these changes in due course.
- 1.4 We are seeking views in particular on assessment arrangements (how assessments should be designed and conducted); assessment objectives (the abilities that candidates taking that qualification should be required to demonstrate); new assessment strategies; and the design and assessment of the new AS qualifications.
- 1.5 We are not proposing significant changes to A levels and AS qualifications beyond those on which we have previously consulted. The main changes arise from the Government's decision to make the AS a free-standing qualification that will not contribute to the award of an A level. That said, we are proposing

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<sup>3</sup> Currently this subject is known as business studies. Views are being sought in the consultation on content hosted by the Department for Education on changing this to business. We use the proposed new title in this consultation.

<sup>4</sup> Currently this subject is known as computing. Views are being sought in the consultation on content hosted by the Department for Education on changing this to computer science. We use the proposed new title in this consultation.

some changes to the assessment arrangements, most notably in biology, chemistry and physics (where we are proposing that practical assessments should be separately reported on the qualification certificate) and in geography, (where we are proposing that fieldwork should be assessed by non-exam assessment).

- 1.6 We will consult later on proposed changes to the A levels and AS qualifications in other subjects.
- 1.7 This consultation considers proposals for the reform of A levels and AS qualifications in England. Ministers in Wales and Northern Ireland will determine the future of A levels and AS qualifications in their respective countries. Where we refer to 'A levels' and 'AS qualifications' we mean A levels and AS taken in England and by 'Government' and 'ministers' we mean Westminster Government and Westminster ministers.

## **How to respond to this consultation**

- 1.8 We would like to know your views about our proposals for new A level and AS qualifications. Our consultation is available from <http://comment.ofqual.gov.uk/a-level-regulatory-requirements-october-2013> . The deadline for responses to this consultation is 17th January 2014.
- 1.9 Please respond in one of the following ways:
  - Complete the online response form at <http://surveys.ofqual.gov.uk/s3/a-level-regulatory-requirements-consultation-questions-october-2013> .
  - Email your response to [consultations@ofqual.gov.uk](mailto:consultations@ofqual.gov.uk) – please include the consultation title ('Consultation on New A Level Regulatory Requirements') in the subject line of the email and be clear who you are and in what capacity you are responding.
  - Post your response to A level Reform Consultation 2013, Ofqual, Spring Place, Coventry Business Park, Herald Avenue, Coventry, CV5 6UB.
- 1.10 We will only consider your response if you complete the information page. To evaluate responses properly, we need to know who is responding and in what capacity.
- 1.11 We will publish the evaluation of responses together with an updated equality impact analysis. Please note we may publish all or part of your response unless you tell us (in your answer to the confidentiality question) that you want us to treat your response as confidential.



1.12 If you have views on the draft A level content you should respond to the consultation hosted on the Department for Education's website.<sup>5</sup>

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<sup>5</sup> Following consultation, any change to the subject content could necessitate a corresponding change to the draft assessment objectives and associated regulatory requirements and vice versa.

[www.education.gov.uk/consultations](http://www.education.gov.uk/consultations)

## Background

- 2.1 In March 2012, the Secretary of State for Education set out a programme of reform for A levels intended to give universities, as those with the strongest interest in maintaining standards in A levels, more say over their future direction. The programme also included making A levels linear, with all exams taken at the end of the course of study. Subsequently, in an exchange of letters<sup>6</sup> with Ofqual's Chief Regulator, the Secretary of State confirmed that the AS should become a separate, stand-alone qualification, also taught and assessed on a linear basis and at the same standard as the current AS.
- 2.2 Last year, we published two pieces of research: 'Fit for Purpose',<sup>7</sup> which looked at perceptions of A levels among universities, employers and teachers; and a report comparing A levels with similar qualifications internationally.<sup>8</sup> In light of our findings we consulted on A level reform between June and September 2012. There was broad public consensus that A levels are largely fit for purpose. Many academics, however, welcomed the proposed reform of one or more aspects of A level assessment that they considered to have a negative impact on teaching and learning.
- 2.3 Following the Government's decisions, exam boards undertook to review together the content requirements in the current A level criteria for a number of subjects, seeking views from a range of higher education institutions. The review was chaired by Professor Mark Smith, Vice Chancellor of Lancaster University and covered the subjects with the highest entries together with computing (because of its introduction as a programme of study at Key Stage 4). The subjects reviewed were: art and design; business studies; biology; chemistry; computing; economics; English language; English literature; English language and literature; geography; history; mathematics and further mathematics; psychology; physics; and sociology. The final report concluded that, for the qualifications to be made linear and capable of supporting progression to higher education, the content of two subjects required no

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<sup>6</sup> The three letters are available from:

[www.ofqual.gov.uk/documents/letter-from-secretary-of-state-on-a-level-reform-january-2013](http://www.ofqual.gov.uk/documents/letter-from-secretary-of-state-on-a-level-reform-january-2013)  
[www.ofqual.gov.uk/documents/letter-from-secretary-of-state-on-a-level-reform-march-2013](http://www.ofqual.gov.uk/documents/letter-from-secretary-of-state-on-a-level-reform-march-2013)  
[www.ofqual.gov.uk/documents/letter-to-secretary-of-state-on-a-level-reform-march-2013/](http://www.ofqual.gov.uk/documents/letter-to-secretary-of-state-on-a-level-reform-march-2013/)

<sup>7</sup> Fit for Purpose, see reference on page 3.

<sup>8</sup> Ofqual (2012) *International Comparisons in Senior Secondary Assessment*. Available from:  
[www.ofqual.gov.uk/standards/research/international-comparability](http://www.ofqual.gov.uk/standards/research/international-comparability)

changes, twelve subjects required minor changes and two (mathematics and further mathematics) required significant changes. We published the report in September 2013.<sup>9</sup>

- 2.4 The exam boards have proposed changes to the content of these subjects, in light of the findings of this review. The Department for Education is hosting a consultation on the content proposed by the exam boards.<sup>10</sup>
- 2.5 In light of the significant changes identified for mathematics and further mathematics new A levels and AS qualifications in these subjects will be introduced later, following consultation. This will provide an opportunity to consider the differences we found in our international research between mathematics and further mathematics A levels and similar courses taken in other countries.
- 2.6 Our consultation seeks views on changes to how A levels and AS qualifications will be structured, assessed and regulated. It seeks views on the proposed accreditation criteria and on the Conditions of Recognition that would give effect to our proposed changes. It also seeks views on assessment arrangements and assessment objectives for each subject.

## **Regulating A levels and AS qualifications**

- 2.7 Our role is to make sure that A levels and AS qualifications give a reliable indication of the knowledge, skills and understanding of the students to whom they are awarded. We also make sure that the standard of the qualifications in each subject is consistent between exam boards' versions of the qualifications (specifications) and over time. We do this by:
- applying recognition criteria to determine which organisations are recognised to award the qualifications;<sup>11</sup>
  - applying an accreditation requirement condition to the qualifications, under which an exam board must demonstrate that it meets the criteria we have published in respect of A levels and AS qualifications (see para 6.20);

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<sup>9</sup> Professor Mark E, Smith (July 2013), *Independent Chair's report on the review of current GCE 'specification content' within subject criteria: A report to Ofqual*. The full report is available at [www.ofqual.gov.uk/files/2013-09-06-smith-review-of-specification-content-july-2013.pdf](http://www.ofqual.gov.uk/files/2013-09-06-smith-review-of-specification-content-july-2013.pdf)

<sup>10</sup> This consultation is available from: [www.education.gov.uk/consultations](http://www.education.gov.uk/consultations)

<sup>11</sup> Available from: [www.ofqual.gov.uk/how-we-regulate/regulatory-documents](http://www.ofqual.gov.uk/how-we-regulate/regulatory-documents)

- requiring the exam boards that are recognised to award the qualifications to follow the *General Conditions of Recognition*<sup>12</sup> and any other regulatory requirements that apply to the qualifications (see part 2);
- monitoring the delivery and award of the qualifications in practice, taking regulatory action against an exam board where we find that it is not, or is at risk of not, delivering and awarding the qualifications in line with the requirements.<sup>13</sup>

2.8 The grading standard of the new A levels and AS qualifications will not be different from that of the current versions and despite the changes, we are proposing A levels and AS qualifications will remain substantially the same qualifications as at present. The exam boards that are already recognised to award A levels and AS qualifications will therefore continue to be recognised to award the new versions of the qualifications.

2.9 We are seeking views on the regulatory requirements for the new qualifications, and on the draft Conditions that will give effect to these requirements.

2.10 We are seeking views in particular on: changes to assessment arrangements; changes to the form and timing of assessments; question types; new assessment objectives; proposals to require exam boards to develop and apply assessment strategies; reform of AS levels and new accreditation requirements.

### **The objective of A level and AS qualifications**

2.11 We have previously sought views on the purpose of A level qualifications,<sup>14</sup> namely that A level qualifications should:

- define and assess achievement of the knowledge, skills and understanding which will be needed by students planning to progress to undergraduate study at a UK higher education establishment, particularly (although not only) in the same subject area;
- set out a robust and internationally comparable post-16 academic course of study to develop that knowledge, skills and understanding;

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<sup>12</sup> <http://www.ofqual.gov.uk/how-we-regulate/>

<sup>13</sup> Further information is available from: [www.ofqual.gov.uk/regulatory-actions](http://www.ofqual.gov.uk/regulatory-actions)

<sup>14</sup> The findings report that followed our consultation is available from: [www.ofqual.gov.uk/documents/analysis-of-the-consultation-carried-out-into-higher-education-involvement-in-gce-a-levels-and-amended-gce-a-level-criteria-design-rules](http://www.ofqual.gov.uk/documents/analysis-of-the-consultation-carried-out-into-higher-education-involvement-in-gce-a-levels-and-amended-gce-a-level-criteria-design-rules)

- permit UK universities to accurately identify the level of attainment of students;
- provide a basis for school and college accountability measures at age 18; and
- provide a benchmark of academic ability for employers.

2.12 We also propose that exam boards should design AS qualifications with the objective that they:

- provide evidence of students' achievements in a robust and internationally comparable post-16 course of study that is a sub-set of A level content;
- enable students to broaden the range of subjects they study; and
- support progression to further study or employment.

**Consultation Question 1: To what extent do you agree with the proposed objective of the AS qualifications?**

**Consultation Question 2: Do you have any further comments relating to this section?**

## Assessment

### Changes to assessment arrangements (including non-exam assessment)

3.1 Assessments can take many forms, which broadly divide into written exams set and marked by exam boards and non-exam assessments. Written exams are traditionally used to assess knowledge and understanding. Skills such as those used to create an artefact or conduct a science experiment are usually assessed in ways other than by exam.

### Assessment in current A levels and AS qualifications

3.2 A levels and AS qualifications are currently assessed in several ways:

- Written exams set and marked by the exam boards.
- Written assessments completed under non-exam conditions in which students complete written assessment tasks, set either by the exam board or by the teacher. The tasks are usually marked by a teacher, with samples of marked work being checked by exam board moderators, who can adjust the marks to bring them in line with national standards.
- Other assessments, such as laboratory tasks in science and performance in physical education or theatre studies, usually marked by a teacher. In some cases, marks for these can be adjusted in a similar way to those for written non-exam assessment. In other cases, there is no evidence of each candidate's performance available for moderators to check. Teachers' marks therefore stand.

### Assessment in new A levels and AS qualifications

3.3 When deciding whether or not to include non-exam assessment in each A level subject, we propose to refer to the principles we proposed for reformed GCSEs.<sup>15</sup> These are:

- a. Non-exam assessment should only be used when it is the only valid way to assess essential elements of the subject.

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<sup>15</sup> Further information on our GCSE consultation is available from: <http://comment.ofqual.gov.uk/gcse-reform-june-2013>

- b. Non-exam assessment must strike a balance between valid assessment of essential knowledge and skills, sound assessment practice and manageability.
  - c. Any non-exam assessment arrangements should be designed to fit the requirements of the particular subject, including the relative weighting of written exams and other components assigned to it.
  - d. Non-exam assessment should be designed so that the qualification is not easily distorted by external pressures from the wider system.
- 3.4 In line with our position on GCSEs, we propose that where subject content can be validly assessed by written exams, set and marked by exam boards, this should be the default method of assessment. But we recognise that non-exam assessments have their place in A levels. The pressures on A levels are not the same as those placed on GCSEs, and there are some essential subject skills required for progression to higher education.
- 3.5 We have considered our proposals for A level assessment alongside the proposals for GCSE assessment we made earlier in the year,<sup>16</sup> although we have not yet made final decisions on GCSE assessment. We have considered assessment arrangements on a subject-by-subject basis, reflecting the GCSE and A level curriculum proposals and the nature of the skills that are difficult to assess through a written exam.
- 3.6 There is a view that subject content or other requirements that will not be assessed will not be taught, and there is no doubt that assessments can lead teachers to deliver the curriculum in a way that will help their students to get the best marks. It is not possible to design assessments that will assess validly and reliably all the knowledge and skills needed for a broad and deep study of the subject, so if teaching is focused narrowly on the test, the quality of education is likely to suffer. However, assessment should not be designed with the aim of regulating delivery of the curriculum where doing so would compromise the assessment.
- 3.7 In general, our approach has been that non-exam assessment causes greater difficulty at GCSE than at A level because of (i) the size of the GCSE cohort, which can create logistical difficulties in organising, moderating and standardising non-exam assessment, (ii) the greater pressure to which GCSEs

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<sup>16</sup> Further information on our GCSE consultation is available from: <http://comment.ofqual.gov.uk/gcse-reform-june-2013>

are subject as a result of accountability arrangements, and (iii) the smaller size of GCSEs and less available teaching time in each subject, which adds to the logistical pressures of any non-exam assessment.

- 3.8 We have considered the appropriate balance of exam and non-exam assessment at A level on a subject-by-subject basis. In doing so we have taken into account the balance struck at GCSE and the skills higher education institutions consider should have been assessed in students arriving for undergraduate study in these subjects.
- 3.9 In order to strike a better balance between exam and non-exam assessment we are proposing three main changes to the way A levels are assessed. We propose, in summary, to:
- (a) define – as with GCSEs – the percentage of marks to be allocated to exam and non-exam assessment in each subject, removing the current flexibility and promoting comparability between exam boards;
  - (b) require the separate reporting of performance in practical assessments in biology, chemistry and physics, in order to facilitate less predictable practical assessments and address concerns about the conduct of the assessments and their failure to discriminate between students;
  - (c) require a non-exam assessment of fieldwork skills in geography.
- 3.10 We also propose to work with the exam boards to strengthen the moderation of teacher marking and reduce incidents of malpractice where non-exam assessments are used.
- 3.11 Our proposals for the assessment arrangements for each of the subjects on which we are consulting are set out in the next sections.
- 3.12 Our proposed weighting of non-exam assessment in A levels for each subject is as follows:



<b>Subject</b>	<b>Current weighting of non-exam assessment in A levels</b>	<b>Proposed contribution to grade of exam and non-exam assessments in A levels</b>	<b>A qualification requirement, separately reported, assessed by teachers and moderated by the exam boards</b>
Biology	20–30%	100% exam	Yes of practical skills
Chemistry	20–30%	100% exam	Yes of practical skills
Physics	20–30%	100% exam	Yes of practical skills
Psychology	None	100% exam	No
English Language	15–40%	80% exam, 20% non-exam	No
English Literature	15–40%	80% exam, 20% non-exam	No
English Language and Literature	15–40%	80% exam, 20% non-exam	No
History	15–20%	80% exam, 20% non-exam	No
Geography	None	80% exam, 20% non-exam	No
Art and design	100%	100% non-exam	No
Business	None	100% exam	No
Computing	15–40%	80% exam, 20% non-exam	No
Economics	None	100% exam	No
Sociology	None	100% exam	No

3.13 We are proposing that assessment of AS qualifications should be wholly by exam in all subjects except art and design (see section 5).

## **Changes to assessment objectives**

- 3.14 The assessment objectives for each subject describe the principal abilities that candidates taking that qualification should be required to demonstrate. They have a key regulatory role in ensuring that:
- candidates are assessed on the relevant abilities for the subject and on an appropriate balance of those abilities;
  - requirements are comparable between different exam boards' specifications, and over time.
- 3.15 Assessment objectives are included within the current subject criteria for A level and AS qualifications. The A levels and AS qualifications we accredit require students to demonstrate they have met these objectives in the context of the subject content.
- 3.16 Exam boards use assessment objectives when they are designing and setting their assessments, to ensure that the key abilities for the subject are targeted appropriately and proportionately. We use assessment objectives when we are deciding whether to accredit a qualification and when we monitor design and delivery of assessments throughout the life of the qualification.
- 3.17 We have worked with subject experts to develop and improve the current assessment objectives. In revising the current A level assessment objectives, we have aimed to make sure they are as clear as possible and that they:
- a. fulfil their core purpose of describing the abilities that a candidate taking the relevant qualification should be required to demonstrate;
  - b. specify only the abilities that candidates should be required to demonstrate, not the content itself;
  - c. relate to each qualification as a whole, and so address the full range and balance of abilities that are relevant;
  - d. are sufficiently precise and detailed that they can be used consistently for setting and evaluating assessments;
  - e. provide a degree of flexibility in their application to enable alternative approaches where these are legitimate.
- 3.18 Following this consultation we will finalise the assessment objectives for the subjects on which we are consulting. We will make it a regulatory requirement that exam boards design their specifications and their assessments in accordance with these objectives.

3.19 The draft assessment objectives for each of the subjects on which we are consulting are set out below. In some cases the A level and AS qualification have different relative weightings for an objective.

## Biology, Chemistry, Physics

### Assessment arrangements

- 3.20 Practical skills are currently assessed in each A level in biology, chemistry and physics. The assessment tasks are set by the exam boards or, in some cases, by centres themselves. The assessments are supervised and marked by students' teachers, or supervised by the teachers and marked by the exam board. The outcomes form part of the overall grade awarded to the student.
- 3.21 There are five issues with current assessment of practical skills in science.
- 3.22 First, the data that we collect from exam boards as part of our review of standards programme shows that current practical skills assessments do not discriminate well between students; the whole cohort gets marks that are more closely clustered than they do in exams.
- 3.23 Second, the same data shows that in the non-examined units marked by teachers, and particularly in chemistry, students' performance in practical assessments greatly exceeds their performance in their written exams. The range of marks allocated to students by teachers marking the practical assessments is at the top end – and in the worst cases the most frequently occurring mark is 40 out of 40.
- 3.24 Third, there is a view that the current approach to assessing practical skills in science can constrain teaching.<sup>17</sup> Teachers may focus on the skills that are typically required for the assessments at the expense of developing a wider range of skills. The types of assessment task set may not vary greatly year on year, because the exam boards set assessment tasks that can be undertaken in a fixed period of time and use equipment available in sufficient quantity to all students. Teachers can therefore predict the skills their students will be required to demonstrate and can choose to teach accordingly.
- 3.25 Fourth, it is not possible for all students, even within the same school or college, to undertake their assessments at the same time. Exam boards allow a period of time for assessments during which it is almost impossible to keep the nature of the task confidential. Requiring all assessments to be undertaken at the

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<sup>17</sup> See, for example, the House of Commons Science and Technology Committee report *Practical experiments in school science lessons and science field trips*, September 2011: [www.publications.parliament.uk/pa/cm201012/cmselect/cmsctech/1060/1060i.pdf](http://www.publications.parliament.uk/pa/cm201012/cmselect/cmsctech/1060/1060i.pdf)

same time would be unmanageable for some schools and colleges but the current flexibility leaves open the possibility of malpractice. We are concerned about the increasing number of allegations of malpractice in the conduct of these assessments. For example, this year we were alerted to 53 investigations into alleged teacher or student malpractice in respect of one exam board's A level practical science assessments.<sup>18</sup> We believe the actual number of incidents is likely to be higher, as not all will come to light or be reported to us.

- 3.26 Fifth, in contrast to some other subjects in which non-exam assessment is used, there is no verifiable evidence of the student's performance of the practical skills being assessed, limiting the effectiveness of exam board moderation of teacher marking. In principle it would be possible to introduce recording of the skills performance. But the time it would take for a class of students to undertake the assessment would be considerably increased if each student's performance had to be recorded separately, and in any case the problem of students taking assessments at different times would still exist. The cost (both financial and in terms of wider resources) might also be disproportionate to the benefit.
- 3.27 Practical skills in biology, chemistry and physics are highly valued by higher education and are an intrinsic part of the subjects. Some interest groups, such as SCORE (Science Community Representing Education), strongly support more emphasis on the development of these skills in A level students.<sup>19</sup>
- 3.28 We do not question whether A level students should develop practical skills in these subjects. The issue for us is whether and, if so, how these practical skills should be assessed and reported in the context of the relevant A level qualification.
- 3.29 Having listened to subject experts in biology, chemistry and physics, we propose that the development of conceptual and theoretical understanding of experimental methods should be assessed in the written exams. We propose that students' abilities to undertake practical work should also be assessed and that these assessments should continue to be marked by teachers, with marking moderated by the exam boards. However, we propose that the outcomes of the practical assessment should be reported on the certificate but not contribute to the overall grade.

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<sup>18</sup> It is regrettable that as a result 700 students received estimated grades.

<sup>19</sup> See for example SCORE's report *Resourcing practical science at secondary level*: <http://www.score-education.org/media/11805/score%20resourcing%20secondary.pdf>

- 3.30 We propose that exam boards should be required to set out in their assessment strategies how they will assess both practical skills and the related theoretical and conceptual understanding.
- 3.31 This approach would create opportunities for exam boards to be more innovative in their approach to practical assessments, allowing a wider range of skills to be assessed, and in different ways. Because the current assessments contribute to the grade, exam boards have to prioritise security and reliability over validity. Although safeguards would have to be in place to protect the integrity of the new practical assessments, the current constraints, which lead to predictability, could be relaxed. This should mean that students will be taught a wider range of skills. Teachers will not feel under pressure to exaggerate or be over-generous in their assessment, because the assessments will not contribute to the grade on which their own performance and that of their school or college may be judged.
- 3.32 We will model the impact of reporting the outcomes of students' non-exam assessments separately on their certificates in A level biology, chemistry and physics, including how this will affect their overall grades. We will use this information to consider how to set standards so that we minimise any advantage or disadvantage to students in the first cohort taking the new A levels.
- 3.33 The separate reporting of the discrete practical skills assessment will enable users of the qualifications to identify students who might excel at practical skills but be weaker on other aspects of the subject, and vice versa. This may be important information. A university recruiting to a highly theoretical course, for example, might be more interested in a student's performance in their exams, than in their performance in practical assessment, whereas a university or an employer recruiting to a highly practical course or job might place more weight on performance in the practical assessment. When both are reported together in an overall grade, differential performance in the various aspects of the subject is masked, as one element will compensate for the other.
- 3.34 Students whose disability affects their ability to manipulate scientific equipment currently risk receiving a lower overall grade if they do not perform well in the practical assessment. If they cannot handle the equipment at all because of their disability they will seek an exemption from the practical assessment, or an assistant will undertake the practical, following their instructions, on their behalf, forgoing marks that are allocated to the actual manipulation of the equipment. Separate reporting will allow more accurate reporting of their skills and abilities and enable students whose practical skills are affected by a disability to have their understanding and knowledge fully recognised in their award.

3.35 There is a concern that unless the outcome of the assessment contributes to the overall grade, practical skills will not be taught, or taught well. We do not think it right, however, that we should include non-exam assessment in the overall grade where doing so would compromise the reliability of that assessment. Schools, colleges and teachers should not disregard important skills that are needed for students' progression just because the outcomes of the assessment of those skills do not contribute to the overall grade. The best teachers do not constrict their lesson planning to focus solely on what will contribute to the grade when teaching and inspiring their students.

3.36 We recognise that there is a range of views within the science community on how science skills should be assessed and reported and we look forward to reading responses to our proposals.

**Consultation Question 3: To what extent do you agree that exams in biology, chemistry and physics should include questions to assess conceptual and theoretical understanding of experimental methods?**

**Consultation Question 4: To what extent do you agree that practical skills in biology, chemistry, and physics should continue to be assessed?**

**Consultation Question 5: To what extent do you agree that the results of practical skills assessments in biology, chemistry and physics should be reported separately on the certificate and not count towards the final grade?**

### **Assessment objectives**

3.37 The proposed assessment objectives for biology, chemistry and physics specify more clearly than the current version the core abilities required by the subject. Candidates' knowledge and understanding (AO1) is proposed as a discrete assessment objective, with their ability to select, organise and communicate presented separately, as it can relate to any type of ability in the subject. Candidates' application of their knowledge and understanding (AO2) and their ability to analyse and evaluate (AO3) are proposed as discrete assessment objectives, rather than being conflated, to reflect their importance. The permitted ranges proposed are narrower than those in the current provision to ensure greater comparability in the way the abilities may be targeted in specifications and assessments. The range allows variation between the assessment objectives based on the abilities they comprise.

#### Proposed assessment objectives

<b>Biology, Chemistry and Physics</b>		<b>A level</b>	<b>AS</b>
<b>AO1</b>	Demonstrate knowledge and understanding of	30–35%	35–40%

	scientific ideas, processes, techniques and procedures.		
<b>AO2</b>	Apply knowledge and understanding of scientific ideas, processes, techniques and procedures: <ul style="list-style-type: none"> <li>■ in a range of theoretical and practical contexts;</li> <li>■ when handling qualitative and quantitative data, to solve scientific problems.</li> </ul>	40–45%	40–45%
<b>AO3</b>	Analyse, interpret and evaluate a range of scientific information, ideas and evidence to: <ul style="list-style-type: none"> <li>■ make judgements and reach conclusions (including in relation to issues);</li> <li>■ refine practical design and procedures.</li> </ul>	25–30%	20–25%

*The ability to use mathematical skills at a level appropriate for GCE A level Science must be tested across the assessment objectives. (The weighting of mathematical skills within each science subject must be at least 10 per cent for biology; 20 per cent for chemistry; and 40 per cent for physics.)*

*The ability to select, organise and communicate information and ideas coherently using appropriate scientific conventions and vocabulary must be tested across the assessment objectives.*

*The following definitions apply in relation to the assessment objectives:*

- **Knowledge** includes facts, specialist vocabulary, principles, concepts, theories, models, practical techniques, studies and methods.
- **Processes** include collecting evidence, explaining, theorising, modelling, validating, interpreting, planning to test an idea and peer reviewing.
- **Issues** include those that are ethical, social, economic, environmental, cultural, political and technological.

Current assessment objectives for biology, chemistry, physics

<b>AO1</b>	<i>Knowledge and understanding of science and of How science works:</i> <ul style="list-style-type: none"> <li>■ Recognise, recall and show understanding of scientific knowledge.</li> <li>■ Select, organise and communicate relevant information in a variety of forms.</li> </ul>	AS: 30– 40%	A2: 20– 30%	A level: 25– 35%
<b>AO2</b>	<i>Application of knowledge and understanding of science and of How science works:</i>	AS: 30–	A2: 40–	A level:



	<ul style="list-style-type: none"> <li>■ Analyse and evaluate scientific knowledge and processes.</li> <li>■ Apply scientific knowledge and processes to unfamiliar situations including those related to issues.</li> <li>■ Assess the validity, reliability and credibility of scientific information.</li> </ul>	40%	50%	35–45%
<b>AO3</b>	<p><i>How science works: Biology, chemistry, physics, geology, electronics and environmental science:</i></p> <ul style="list-style-type: none"> <li>■ Demonstrate and describe ethical, safe and skilful practical techniques and processes, selecting appropriate qualitative and quantitative methods.</li> <li>■ Make, record and communicate reliable and valid observations and measurements with appropriate precision and accuracy.</li> <li>■ Analyse, interpret, explain and evaluate the methodology, results and impact of their own and others' experimental and investigative activities in a variety of ways.</li> </ul> <p><i>How science works – psychology:</i></p> <ul style="list-style-type: none"> <li>■ Describe ethical, safe and skilful practical techniques and processes, selecting appropriate qualitative and quantitative methods.</li> <li>■ Know how to make, record and communicate reliable and valid observations and measurements with appropriate precision and accuracy, through using primary and secondary sources.</li> <li>■ Analyse, interpret, explain and evaluate the methodology, results and impact of their own and others' experimental and investigative activities in a variety of ways.</li> </ul>	AS: 20–40%	A2: 20–40%	A level: 20–40%

**Consultation Question 6: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in biology, chemistry?**

**Consultation Question 7: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 8: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 9: Do you have any further comments relating to these subjects?**

## Psychology

### Assessment arrangements

3.38 Psychology A level is currently assessed wholly by exam. We are not proposing any change to this arrangement.

**Consultation Question 10: To what extent do you agree that for psychology A level all assessment should be by exam?**

### Assessment objectives

3.39 The proposed wording of the psychology assessment objectives is the same as that for biology, chemistry and physics. It specifies more clearly than the current wording the core abilities required for the subject. Candidates' knowledge and understanding (AO1) is proposed as a discrete assessment objective, with their ability to select, organise and communicate presented separately since it can relate to any type of ability in the subject. Candidates' application of their knowledge and understanding (AO2) and their ability to analyse and evaluate (AO3) are proposed as discrete assessment objectives, rather than being conflated, to reflect their importance. The permitted ranges proposed are narrower than those in the current provision to ensure greater comparability in the extent to which the abilities may be targeted in specifications and assessments.

#### Proposed assessment objectives

Psychology		A level	AS
<b>AO1</b>	Demonstrate knowledge and understanding of scientific ideas, processes, techniques and procedures.	30–35%	35–40%
<b>AO2</b>	Apply knowledge and understanding of scientific ideas, processes, techniques and procedures: <ul style="list-style-type: none"> <li>■ in a range of theoretical and practical contexts;</li> <li>■ when handling qualitative and quantitative data, to solve scientific problems.</li> </ul>	30–35%	30–35%
<b>AO3</b>	Analyse, interpret and evaluate a range of scientific information, ideas and evidence to: <ul style="list-style-type: none"> <li>■ make judgements and reach conclusions (including in relation to issues);</li> <li>■ refine practical design and procedures.</li> </ul>	35–40%	30–35%

*The ability to use mathematical skills at a level appropriate for GCE A level science must be tested across the assessment objectives. (The weighting of mathematical skills within psychology must be at least 10 per cent.)*

*The ability to select, organise and communicate information and ideas coherently using appropriate scientific conventions and vocabulary must be tested across the assessment objectives.*

*The following definitions apply in relation to the assessment objectives:*

- **Knowledge** includes facts, specialist vocabulary, principles, concepts, theories, models, practical techniques, studies and methods.
- **Processes** include collecting evidence, explaining, theorising, modelling, validating, interpreting, planning to test an idea and peer reviewing.
- **Issues** include those that are ethical, social, economic, environmental, cultural, political and technological.

#### Current assessment objectives

3.40 These are as for biology, chemistry and physics (see above).

**Consultation Question 11: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in psychology?**

**Consultation Question 12: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 13: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 14: Do you have any further comments relating to this subject?**

## **English language, English literature and English language and literature**

### **Assessment arrangements**

- 3.41 English language, English literature, and English language and literature are currently assessed using a mixture of exam and non-exam assessment. There is currently a permissible range of 15 to 40 per cent of marks for non-exam assessment. In practice, most specifications have non-exam assessment at the top end of this range.
- 3.42 Some of the skills that are essential for these subjects could not be assessed in a valid way by exams, such as the ability to produce extended pieces of writing, which may involve drafting and revising over a period of time. We are concerned, however, that allowing 40 per cent of the marks to be derived from non-exam assessment tips the balance too heavily toward non-exam assessment. We propose that for English language, English literature and English language and literature, 20 per cent of marks should be allocated to non-exam assessments.
- 3.43 We remain concerned about the risks that students' work is not in all cases authentic and about the consistency of teachers' marking. We will be working with exam boards to consider how greater assurances can be secured as to the authenticity of students' work and how the moderation of teacher assessment can be enhanced without undermining the validity of the assessments. Our work in this area will go across all subjects where non-exam assessment is used. We would welcome your views on these issues.

**Consultation Question 15: To what extent do you agree that for English language, English literature and English language and literature A levels, 20 per cent of the available marks should be allocated to non-exam assessments?**

### **English language assessment objectives**

- 3.44 The proposed wording specifies more clearly than the current wording the core abilities for the subject. This includes increasing the number of assessment objectives from four to five, as well as modernising the requirements and improving the technical accuracy of the assessment objectives. The proposed wording also gives a greater degree of comparability across the three A level English subjects. The permitted ranges proposed are narrower than those in the current provision and also vary between AO1, AO2 and AO3 on the one hand and AO4 and AO5 on the other, based on the extent to which these abilities need to be targeted.

Proposed

English Language		A level	AS
<b>AO1</b>	Select and apply methods of language analysis as appropriate, using associated terminology and coherent, accurate written expression.	Each of AO1, AO2 and AO3 can be targeted in the range 20–30%	Each of AO1, AO2 and AO3 can be targeted in the range 20–30%
<b>AO2</b>	Demonstrate critical understanding of concepts and issues relevant to language use.		
<b>AO3</b>	Analyse and evaluate how contextual factors and language features are associated with the construction of meaning.		
<b>AO4</b>	Explore connections across texts, informed by linguistic concepts and methods.	Each of AO4 and AO5 can be targeted in the range 10–15%	Each of AO4 and AO5 can be targeted in the range 10–15%
<b>AO5</b>	Demonstrate expertise and creativity in the use of English to communicate in different ways, informed by study and understanding.		

Current

<b>AO1</b>	Select and apply a range of linguistic methods, to communicate relevant knowledge using appropriate terminology and coherent, accurate written expression.	Each AO can be targeted in the range 20–30% at each of AS and A level
<b>AO2</b>	Demonstrate critical understanding of a range of concepts and issues related to the construction and analysis of meanings in spoken and written language, using knowledge of linguistic approaches.	
<b>AO3</b>	Analyse and evaluate the influence of contextual factors on the production and reception of spoken and written language, showing knowledge of the key constituents of language.	
<b>AO4</b>	Demonstrate expertise and creativity in the use of English in a range of different contexts, informed by linguistic study.	

**Consultation Question 16: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in English language?**

**Consultation Question 17: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 18: To what extent do you agree that the proposed weightings are appropriate for AS?**

**English literature assessment objectives**

3.45 The proposed wording specifies more clearly than the current wording the core abilities for the subject. This includes increasing the number of assessment objectives from four to five, as well as improving the appropriateness for the subject of the way the requirements are expressed. The proposed wording also gives a greater degree of comparability across the three A level English subjects. The permitted ranges proposed are narrower than those in the current provision and also vary between AO1, AO2 and AO3, on the one hand, and AO4 and AO5, on the other, based on the extent to which these abilities need to be targeted.

Proposed

English Literature		A level	AS
<b>AO1</b>	Articulate personal, informed and creative responses to literary texts, using associated terminology and concepts, and coherent, accurate written expression.	Each of AO1, AO2 and AO3 can be targeted in the range 20–30%	Each of AO1, AO2 and AO3 can be targeted in the range 20–30%
<b>AO2</b>	Demonstrate critical understanding in analysing the ways in which writers shape meanings in literary texts.		
<b>AO3</b>	Demonstrate understanding of the significance and influence of the contexts in which literary texts are written and received.		
<b>AO4</b>	Explore connections across literary texts.	Each of AO4 and AO5 can be targeted in the range 10–15%	Each of AO4 and AO5 can be targeted in the range 10–15%
<b>AO5</b>	Explore literary texts, informed by different interpretations.		

Current

<b>AO1</b>	Articulate creative, informed and relevant responses to literary texts, using appropriate terminology and concepts, and coherent, accurate written expression.	Each AO can be targeted in the range 15–35% at each of AS,
<b>AO2</b>	Demonstrate detailed critical understanding in analysing the ways in which structure, form and language shape meanings in literary texts.	

<b>AO3</b>	Explore connections and comparisons between different literary texts, informed by interpretations of other readers.	A2 and A level
<b>AO4</b>	Demonstrate understanding of the significance and influence of the contexts in which literary texts are written and received.	

**Consultation Question 19: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in English literature?**

**Consultation Question 20: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 21: To what extent do you agree that the proposed weightings are appropriate for AS?**

### English language and literature assessment objectives

3.46 The proposed wording specifies more clearly than the current wording the core abilities for the subject. This includes increasing the number of assessment objectives from four to five, as well as emphasising more clearly in the requirements the integrated/combined nature of the subject. The proposed wording also gives a greater degree of comparability across the three A level English subjects. The permitted ranges proposed are narrower than those in the current provision and also vary between AO1, AO2 and AO3 on the one hand and AO4 and AO5 on the other based on the extent to which these abilities need to be targeted.

#### Proposed

English language and literature		A level	AS
<b>AO1</b>	Select and apply concepts and approaches from integrated linguistic and literary study as appropriate, using associated terminology and coherent, accurate written expression.	Each of AO1, AO2 and AO3 can be targeted in the range 20–30%	Each of AO1, AO2 and AO3 can be targeted in the range 20–30%
<b>AO2</b>	Demonstrate critical understanding in analysing the ways in which meanings are shaped in a range of texts.		
<b>AO3</b>	Demonstrate understanding of the significance and influence of the contexts in which texts are produced and received.		
<b>AO4</b>	Explore connections across texts, informed by linguistic and literary concepts and methods.	Each of AO4 and AO5 can be	Each of AO4 and AO5 can
<b>AO5</b>	Demonstrate expertise and creativity in the use of		



	English to communicate in different ways, informed by study and understanding.	targeted in the range 10–15%	be targeted in the range 10–15%
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Current

<b>AO1</b>	Select and apply relevant concepts and approaches from integrated linguistic and literary study, using appropriate terminology and accurate, coherent written expression.	Each AO can be targeted in the range 15–35% at each of AS, A2 and A level
<b>AO2</b>	Demonstrate detailed critical understanding in analysing the ways in which structure, form and language shape meanings in a range of spoken and written texts.	
<b>AO3</b>	Use integrated approaches to explore relationships between texts, analysing and evaluating the significance of contextual factors in their production and reception.	
<b>AO4</b>	Demonstrate expertise and creativity in using language appropriately for a variety of purposes and audiences, drawing on insights from linguistic and literary studies.	

**Consultation Question 22: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in English language and literature?**

**Consultation Question 23: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 24: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 25: Do you have any further comments relating to these subjects?**

## **History**

### **Assessment arrangements**

- 3.47 History is currently assessed using a mixture of exam and non-exam assessment. In current A levels 15 to 20 per cent of marks are allocated to non-exam assessment.
- 3.48 The skills that are currently assessed through non-exam assessment, such as research skills and writing analytically and at length cannot be assessed in a valid way in exams. These are essential skills for the subject and as preparation for higher education. We propose to retain non-exam assessment for the assessment of such skills, but with a common proportion of 20 per cent of the marks across all specifications.
- 3.49 We remain concerned about the risks that students' work is not in all cases authentic and about the consistency of teachers' marking. We will be working with exam boards to consider how greater assurances can be secured as to the authenticity of students' work and how the moderation of teacher assessment can be enhanced without undermining the validity of the assessments. Our work in this area will go across all subjects where non-exam assessment is used. We would welcome your views on these issues.

**Consultation Question 26: To what extent do you agree that for the history A level 20 per cent of the available marks should be allocated to non-exam assessments?**

### **Assessment objectives**

- 3.50 The proposed wording specifies more clearly than the current wording the core abilities for the subject. Candidates' knowledge and understanding (AO1) is proposed to remain a discrete assessment objective owing to the inter-related nature of the abilities it comprises. However, the permitted weighting proposed for it is lower than it is currently, which enables a higher permitted weighting for candidates' ability to demonstrate the higher-order skills of analysis and evaluation (AO2 and AO3). The main two forms that this may take – in relation to source material and in relation to representations and interpretations – are proposed as discrete assessment objectives, rather than being conflated, to reflect their importance.

Proposed

History		A level	AS
<b>AO1</b>	Demonstrate, organise and communicate knowledge and understanding to explain, analyse and evaluate the key features, characteristics and concepts related to the period(s) studied, making substantiated judgements and exploring, as relevant: <ul style="list-style-type: none"> <li>■ cause / consequence;</li> <li>■ change / continuity;</li> <li>■ similarity / difference;</li> <li>■ significance within an historical context.</li> </ul>	50–60%	50–60%
<b>AO2</b>	Analyse and evaluate a range of appropriate source material (primary and/or contemporary to the period) within its historical context.	20–30%	20–30%
<b>AO3</b>	Analyse and evaluate, in relation to the historical context, how aspects of the past have been interpreted and represented in different ways.	20–30%	20–30%

Current

<b>AO1</b>	Recall, select and deploy historical knowledge appropriately, and communicate knowledge and understanding of history in a clear and effective manner. Demonstrate their understanding of the past through explanation, analysis and arriving at substantiated judgements of: <ul style="list-style-type: none"> <li>■ key concepts such as causation, consequence, continuity, change and significance within an historical context;</li> <li>■ the relationships between key features and characteristics of the periods studied.</li> </ul>	60–70%
<b>AO2</b>	a) As part of an historical enquiry, analyse and evaluate a range of appropriate source material with discrimination. b) Analyse and evaluate, in relation to the historical context, how aspects of the past have been interpreted and represented in different ways.	30–40%

**Consultation Question 27: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in history?**

**Consultation Question 28: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 29: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 30: Do you have any further comments relating to this subject?**

## **Geography**

### **Assessment arrangements**

3.51 Currently A level geography students are expected to undertake fieldwork to develop their skills and understanding of the subject, but fieldwork skills and understanding are assessed wholly by exam. We have received representations from the subject community arguing in support of a direct assessment of fieldwork skills and raising concerns about the effectiveness of the assessment of these skills by exam. We accept those concerns: geography fieldwork skills are hard to demonstrate in a written exam.

3.52 The Royal Geographical Society, in its response to our earlier consultation on A level reform, is among those who have highlighted the importance of fieldwork to students' understanding of the subject and for progression to study geography in higher education.<sup>20</sup> Again, we accept the argument: fieldwork skills are integral to the subject at this level of study.

3.53 Given the significance of the skills for progression to higher education, and the nature of the skills required, we are proposing that fieldwork skills should be assessed in a non-exam assessment at A level. We propose that 20 per cent of the marks should be allocated to this assessment.

3.54 We take a different view at GCSE. We have recently consulted on a proposal not to have a fieldwork assessment in new GCSEs in geography and we are considering the responses we received.<sup>21</sup> The GCSE geography cohort is, of course, much larger than that for A level geography (in 2012 in England

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<sup>20</sup> Ofqual Consultation on A level reform, Response from the Royal Geographical Society (with IBG): [www.rgs.org/NR/rdonlyres/8F86D3F6-49C7-4041-BC10-851723875B20/0/OfqualConsultationonAlevelreformRGSIBGresponse.pdf](http://www.rgs.org/NR/rdonlyres/8F86D3F6-49C7-4041-BC10-851723875B20/0/OfqualConsultationonAlevelreformRGSIBGresponse.pdf)

<sup>21</sup> The Department for Education in its consultation on GCSE geography content sought views on proposals to make sure fieldwork is undertaken in schools.

163,604 students were awarded a geography GCSE, and 27,604 an A level in the subject). Our proposals for GCSE geography took into account the logistical issues created by a compulsory fieldwork requirement for GCSE students and the challenges of making sure all students entered for GCSE geography have undertaken their fieldwork assessment. The writing of the fieldwork assessment in the classroom under controlled conditions diverts time away from teaching and learning, which can be significant in a small qualification such as a GCSE. There are also concerns about the authenticity and marking of some controlled assessments. These issues were explained in more detail in our report on controlled assessment in GCSE.<sup>22</sup>

3.55 In contrast to our proposals for science practical assessments we propose that the outcome for A level geography fieldwork assessment should contribute to the A level grade. The geography fieldwork assessment will take place over a period of time, and it can be more student-led than science practical assessments. It will draw on different aspects of the course and will result in a written report, the marking of which can be moderated by exam boards. In contrast, the science practical assessment assesses a more discrete range of skills. For these reasons we think it right to include it in the grade.

3.56 We will work with the exam boards to consider how authenticity of the work and the quality of teacher marking and its moderation can be secured. We will keep the effectiveness of any new geography fieldwork assessment under close review.

**Consultation Question 31: To what extent do you agree that for the geography A level 20 per cent of the available marks should be allocated to non-exam assessments?**

### **Assessment objectives**

3.57 The proposed wording specifies more clearly than the current wording the core abilities for the subject. It provides a more detailed reflection of the meaning of the relevant generic abilities in this particular context. The permitted ranges proposed are narrower than those in the current assessment objectives to ensure greater comparability in the extent to which the abilities may be targeted in specifications and assessments.

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<sup>22</sup> Review of Controlled Assessment at GCSEs June 2013: [www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf](http://www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf)

Proposed

<b>Geography</b>		<b>A level</b>	<b>AS</b>
<b>AO1</b>	Demonstrate knowledge and understanding of key geographical concepts, processes, interactions and change at a variety of scales.	30–40%	40–50%
<b>AO2</b>	Apply knowledge and understanding to analyse, interpret and evaluate key geographical concepts, information and issues in different contexts.	30-40%	20-30%
<b>AO3</b>	Select and use a variety of geographical information, methods, skills and techniques to investigate questions and issues and communicate geographical findings.	20–30%	20–30%

*The ability to use mathematical skills at a level appropriate for GCE A level Geography must be tested across the assessment objectives. The weighting of mathematical skills within this subject must be 10 per cent for each of AS and A level.*

Current

<b>AO1</b>	Demonstrate knowledge and understanding of the content, concepts and processes.	30–55%
<b>AO2</b>	Analyse, interpret and evaluate geographical information, issues and viewpoints and apply understanding in unfamiliar contexts.	20–40%
<b>AO3</b>	Select and use a variety of methods, skills and techniques (including the use of new technologies) to investigate questions and issues, reach conclusions and communicate findings.	25–45%

**Consultation Question 32: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in geography?**

**Consultation Question 33: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 34: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 35: Do you have any further comments relating to this subject?**

## Art and Design

### Assessment arrangements

3.58 Art and design is currently assessed wholly by non-exam assessment, because of the nature of the skills being assessed. The skills cannot be assessed by exams. We propose to require that 40 per cent of the marks must be allocated to tasks set by the exam board, to address current inconsistency in practice.

**Consultation Question 36: To what extent do you agree that art and design should be assessed by non-exam assessment only?**

### Assessment objectives

3.59 The proposed wording is slightly more concise than the current wording to ensure a clear emphasis on the core abilities for the subject.

#### Proposed

Art and Design		A level	AS
<b>AO1</b>	Develop ideas through sustained and focused investigations informed by contextual and other sources, demonstrating analytical and critical understanding.	20–30%	20–30%
<b>AO2</b>	Explore and select appropriate resources, media, materials, techniques and processes, reviewing and refining ideas as work develops.	20–30%	20–30%
<b>AO3</b>	Record ideas, observations and insights relevant to intentions, reflecting critically on work and progress.	20–30%	20–30%
<b>AO4</b>	Present a personal and creative response that realises intentions and, where appropriate, makes connections between visual and other elements.	20–30%	20–30%

#### Current

<b>AO1</b>	Develop their ideas through sustained and focused investigations informed by contextual and other sources, demonstrating analytical and critical understanding.	Each AO can be targeted in the range 20–30%
<b>AO2</b>	Experiment with and select appropriate resources, media, materials, techniques and processes, reviewing and refining their ideas as their work develops.	
<b>AO3</b>	Record in visual and/or other forms ideas, observations and insights relevant to their intentions, demonstrating an ability to reflect on their work and progress.	
<b>AO4</b>	Present a personal, informed and meaningful response	



	demonstrating critical understanding, realising intentions and, where appropriate, making connections between visual, written, oral or other elements.	
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**Consultation Question 37: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in art and design?**

**Consultation Question 38: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 39: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 40: Do you have any further comments relating to this subject?**

## Business

### Assessment arrangements

3.60 Business studies<sup>23</sup> is currently assessed wholly by exam. We are not proposing any change.

**Consultation Question 41: To what extent do you agree that for business A level all assessment should be by exam?**

### Assessment objectives

3.61 The proposed wording specifies more clearly than the current wording the core abilities for the subject. It provides a more detailed reflection of the meaning of the relevant generic abilities in this particular context.

#### Proposed

Business		A level	AS
<b>AO1</b>	Demonstrate knowledge of terms, concepts, theories, methods and models to show an understanding of individuals and organisations and how they deal with business opportunities, problems and issues.	20–30%	25–35%
<b>AO2</b>	Apply knowledge and understanding to various business contexts to show how individuals and organisations are affected by and respond to opportunities, problems and issues.	20–30%	20–30%
<b>AO3</b>	Analyse opportunities, problems and issues within business, showing an understanding of the impact on individuals and organisations of external and internal influences.	20–30%	20–30%
<b>AO4</b>	Evaluate quantitative and qualitative information to make informed judgements and propose evidence-based solutions to business opportunities, problems and issues.	20–30%	15–25%

*The ability to use mathematical skills at a level appropriate for GCE A level Business must be tested across the assessment objectives. The weighting of mathematical skills within this subject must be at least 10 per cent for each of AS and A level.*

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<sup>23</sup> Currently this subject is known as business studies. Views are being sought in the consultation on content hosted by Department for Education on changing this to business.

Current

<b>AO1</b>	Demonstrate knowledge and understanding of the specified content.	20– 30%
<b>AO2</b>	Apply knowledge and understanding to problems and issues arising from both familiar and unfamiliar situations.	20– 30%
<b>AO3</b>	Analyse problems, issues and situations.	20– 30%
<b>AO4</b>	Evaluate, distinguish between and assess appropriateness of fact and opinion, and judge information from a variety of sources.	20– 30%

**Consultation Question 42: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in business?**

**Consultation Question 43: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 44: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 45: Do you have any further comments relating to this subject?**

## Computer Science

### Assessment arrangements

3.62 Computing<sup>24</sup> is currently assessed by a mixture of exam and non-exam assessment. Fifteen to 40 per cent of the marks can be allocated to non-exam assessments. We consider this wide range to be unhelpful when we seek to secure comparability between specifications, and we believe the higher end of the range allows more non-exam assessment than is necessary for the subject. Some non-exam assessment remains necessary, however, to allow assessment of candidates' practical skills, including the stages of developing, testing and evaluating a programme.

3.63 We propose that all computer science specifications should allocate 20 per cent of the marks to non-exam assessment. As with other subjects, we will consider with the exam boards how concerns about authenticity of students' work and consistency of teacher marking can be addressed.

**Consultation Question 46: To what extent do you agree that for the computer science A level 20 per cent of the available marks should be allocated to non-exam assessments?**

### Assessment objectives

3.64 The proposed wording specifies more clearly than the current wording the core abilities for the subject. This approach is more aligned to that proposed in the other reformed A level subjects and is also more coherent with the requirements for the subject at Key Stage 4. The permitted ranges proposed are lower and narrower than those in the current provision to ensure greater comparability in the extent to which the abilities may be targeted in specifications and assessments.

#### Proposed

Computer Science		A level	AS
<b>AO1</b>	Understand and apply the fundamental principles and concepts of computer science, including abstraction, logic, algorithms and data representation.	30– 35%	40– 45%
<b>AO2</b>	Analyse problems in computational terms, and have repeated	30–	25–

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<sup>24</sup> Currently this subject is known as computing. Views are being sought in the consultation on content hosted by Department for Education on changing this to computer science.

	practical experience of writing computer programmes in order to solve such problems.	35%	30%
<b>AO3</b>	Design, use and evaluate computing systems, as relevant, to solve problems, including in relation to new and unfamiliar systems.	30–35%	25–30%

*The ability to use mathematical skills at a level appropriate for GCE A level Computer Science must be tested across the assessment objectives. The weighting of mathematical skills within this subject must be at least 10 per cent for each of AS and A level.*

Current

<b>AO1</b>	<b>Knowledge and understanding</b> Describe and explain the purpose and characteristics of a range of computing applications and show an understanding of the characteristics of computer systems (hardware, software and communication) that allow effective solutions to be achieved. Describe and explain the need for and the use of various forms of data organisation and processing to support the requirements of a computer-based solution. Describe and explain the systematic development of high-quality solutions to problems and the techniques for implementing such solutions, including the use of a programming language. Comment critically on the consequences of current uses of computing, including economic, social, legal and ethical issues.	42.5–57.5%
<b>AO2</b>	<b>Skills</b> Analyse a problem and identify the parts that are appropriate for a computer-based solution. Select, justify and apply appropriate techniques and principles to develop data structures and algorithms for the solution of problems. Design, implement and document an effective solution using appropriate hardware and software, including the use of a programming language.	42.5–57.5%

**Consultation Question 47: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in computer science?**

**Consultation Question 48: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 49: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 50: Do you have any further comments relating to this subject?**

## Economics

### Assessment arrangements

3.65 Economics is currently assessed wholly by exam. We are not proposing any change.

**Consultation Question 51: To what extent do you agree that for economics all assessment should be by exam?**

### Assessment objectives

3.66 The proposed wording specifies more clearly than the current wording the core abilities for the subject. It provides a more detailed reflection of the meaning of the relevant generic abilities in this particular context.

#### Proposed

<b>Economics</b>		<b>A level</b>	<b>AS</b>
<b>AO1</b>	Demonstrate knowledge of terms, concepts, theories, methods and models to show an understanding of the behaviour of economic agents and how they are affected by and respond to economic issues and problems.	20–30%	20–30%
<b>AO2</b>	Apply knowledge and understanding to various economic contexts to show how economic agents are affected by and respond to economic issues and problems.	20–30%	20–30%
<b>AO3</b>	Analyse issues and problems within economics, showing an understanding of their impact on economic agents.	20–30%	20–30%
<b>AO4</b>	Evaluate economic arguments and qualitative and quantitative evidence to make informed judgements relating to economic issues and problems.	20–30%	20–30%

*The ability to use mathematical skills at a level appropriate for GCE A level Economics must be tested across the assessment objectives. The weighting of mathematical skills within this subject must be at least 15 per cent for AS and 20 per cent for A level.*

#### Current

<b>AO1</b>	Demonstrate knowledge and understanding of the specified	20–
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	content.	30%
<b>AO2</b>	Apply knowledge and understanding of the specified content to problems and issues arising from both familiar and unfamiliar situations.	20– 30%
<b>AO3</b>	Analyse economic problems and issues.	20– 30%
<b>AO4</b>	Evaluate economic arguments and evidence, making informed judgements.	20– 30%

**Consultation Question 52: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in economics?**

**Consultation Question 53: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 54: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 55: Do you have any further comments relating to this subject?**

## Sociology

### Assessment arrangements

3.67 Sociology is currently assessed wholly by exam. We are not proposing any change.

**Consultation Question 56: To what extent do you agree that for sociology all assessment should be by exam?**

### Assessment objectives

3.68 The proposed wording specifies more clearly than the current wording the core abilities for the subject. It provides a more detailed reflection of the meaning of the relevant generic abilities in this particular context. The permitted ranges proposed are lower than those in the current provision and vary between the assessment objectives based on the abilities they target.

#### Proposed

<b>Sociology</b>		<b>A level</b>	<b>AS</b>
<b>AO1</b>	Demonstrate and communicate knowledge and understanding of: <ul style="list-style-type: none"> <li>■ sociological theories, concepts and evidence;</li> <li>■ sociological research methods</li> </ul>	35– 45%	40– 50%
<b>AO2</b>	Select, interpret and apply to a range of theoretical and practical contexts: <ul style="list-style-type: none"> <li>■ sociological theories, concepts and evidence;</li> <li>■ sociological research methods.</li> </ul>	30– 40%	30– 35%
<b>AO3</b>	Analyse and evaluate sociological theories, concepts, research methods and evidence in order to: <ul style="list-style-type: none"> <li>■ present sociological arguments in a structured and reasoned format;</li> <li>■ make judgements;</li> <li>■ draw conclusions.</li> </ul>	20– 30%	20– 25%

#### Current

<b>AO1</b>	Knowledge and understanding of the theories, methods, concepts and various forms of evidence outlined in sections 4, 5 and 6 and of the links between them. Communication of knowledge and understanding in a clear and effective manner.	Each AO can be targeted in the
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<b>AO2</b>	Demonstration of skills of application, analysis, interpretation and evaluation as indicated in sections 9–13.	range 45–55%
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**Consultation Question 57: To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in sociology?**

**Consultation Question 58: To what extent do you agree that the proposed weightings are appropriate for A level?**

**Consultation Question 59: To what extent do you agree that the proposed weightings are appropriate for AS?**

**Consultation Question 60: Do you have any further comments relating to this subject?**

### **General questions on A level assessment**

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

**Consultation Question 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?**

**Consultation Question 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?**

## Assessment strategies

- 4.1 We are increasing the emphasis we place on good assessment in the way we regulate A level and AS qualifications.<sup>25</sup> This is in line with our qualification standards objective.
- 4.2 As with GCSEs, we propose that each exam board must develop an assessment strategy for its A levels and AS qualifications which will make clear how the exam board will, for each qualification, design, set and deliver high-quality, effective assessments on an ongoing basis.
- 4.3 In producing assessment strategies, we will require exam boards to explain how their assessments meet the Conditions of Recognition applicable to the relevant qualification, how they are fit for purpose<sup>26</sup> and are appropriate for the method of assessment and the qualification. Exam boards will need to draw on research and current good practice on assessment design when developing their strategies.
- 4.4 We propose that assessment strategies should show how an exam board's assessments will comply with the general Conditions of Recognition and address the three main areas of the qualification life cycle, namely:
- the initial design and standard-setting arrangements for the qualification;
  - the design, setting, delivery and marking of the assessments for each series;
  - the review and evaluation it undertakes of its strategy and its assessments after each series of assessments.

**Consultation Question 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?**

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<sup>25</sup> We are doing the same for GCSE qualifications.

<sup>26</sup> We set out in the Conditions of Recognition assessment qualification will be fit for purpose so far as it secures the requirements of validity, reliability, minimising bias, comparability and manageability. These attributes are particularly important in relation to assessments.

**Consultation Question 65: To what extent do you agree that our proposed requirements for an assessment strategy are appropriate?**

### **Question types**

- 4.5 Views from the higher education sector on students' abilities to think critically, develop sustained lines of reasoning and integrate their understanding from across their studies were reported in the report we commissioned from Ipsos Mori.<sup>27</sup> It was suggested by some who participated in the survey that the style of exam questions in current A levels might discourage the development of these skills. We therefore propose that exam boards should be required to include questions that provide students with the opportunities to gain marks by demonstrating their ability to (i) integrate and apply their knowledge, understanding and skills across different aspects of the subject; and (ii) construct a response which develops a sustained line of reasoning, is coherent, relevant, comprehensive and logically structured.

**Consultation Question 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?**

**Consultation Question 67: Do you have any further comments relating to this section?**

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<sup>27</sup> [www.ofqual.gov.uk/documents/fit-for-purpose-the-view-of-the-higher-education-sector-teachers-and-employers-on-the-suitability-of-a-levels](http://www.ofqual.gov.uk/documents/fit-for-purpose-the-view-of-the-higher-education-sector-teachers-and-employers-on-the-suitability-of-a-levels)

## AS qualifications

- 5.1 The Government has decided that AS qualifications should be decoupled from A levels, making them completely free-standing qualifications<sup>28</sup>. Currently, although AS qualifications are awarded in their own right, assessments for the AS qualification also contribute to the final A level qualification grade (with an intended weighting of 50 per cent). The decoupling of the qualifications means that students will be able to take new A levels without also taking an AS qualification in the subject. Students will not have to take exam board assessments half way through their A level course, as is typically the case now. The A level qualification will become a fully linear qualification with all exams taken together at the end of a (typically) two-year course.
- 5.2 For some subjects, specific content for the AS qualification has always been identified. Where this is the case, this is highlighted in the draft A level content.<sup>29</sup> We propose that for other subjects an exam board wishing to offer an AS in a qualification must draw its content from the published A level content. In other words, the content of an AS will be a sub-set of the content for the corresponding A level. This will promote comparability between AS qualifications and facilitate progression for students who, having taken the AS in a qualification, want to progress to an A level in the subject. If all AS qualifications draw on A level content and the qualifications are co-taught, students who decide to stop their A level course after a year may be able to enter for an AS qualification instead.
- 5.3 We propose that the new AS qualifications will be set and assessed at the same level of demand as now. This means that the level of demand of each AS assessment should be appropriate to the knowledge, skills and understanding reasonably expected of a student who had completed the first half of the A level course of study in that subject, as now (whether or not the student was actually taking the corresponding A level).

**Consultation Question 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?**

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<sup>28</sup> [www.ofqual.gov.uk/documents/letter-from-secretary-of-state-on-a-level-reform-march-2013](http://www.ofqual.gov.uk/documents/letter-from-secretary-of-state-on-a-level-reform-march-2013)

<sup>29</sup> [www.education.gov.uk/consultations](http://www.education.gov.uk/consultations)

**Consultation Question 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?**

**Consultation Question 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?**

## **Teaching AS students with A level students**

- 5.4 When AS qualifications become free-standing, exam boards are likely to wish to design them so that students can be taught in the same classes as students in their first year of study for the A level in the subject. The AS and the A level will in this way be co-teachable. This will make the AS course easier for schools and colleges to deliver. It will also make it easier for a student who has completed the AS qualification to progress to the A level qualification should they wish, or to stop their studies at that point but be in a position to resume them later should they wish. Students who take the AS qualification and go on to take the A level will not gain any credit for the A level from the fact they have already been awarded the AS qualification. Those students who are planning to take the full A level will not be required to take the AS qualification.
- 5.5 We propose that our regulations should not prevent the production of co-teachable AS and A levels, providing the design of a good quality, linear A level is not compromised as a result. Nevertheless, we acknowledge that it might not be possible to design all AS qualifications so that they are co-teachable with A levels because for some subjects it might not be possible to divide up the content such that it can be coherently assessed at the end of the first year. The A level is the primary qualification, not to be compromised to facilitate co-teachability with the AS qualification.

**Consultation Question 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?**

## **Assessment of AS qualifications**

- 5.6 We will regulate the forms of assessment that can be used in AS qualifications. Because the A level and the AS are each to be discrete qualifications, with assessments at different levels of demand, assessments taken for the award of an AS must not also be used for the award of the A level.

- 5.7 In contrast to the A level, it is not a purpose of the AS qualification that it should support progression to higher education. It is not, therefore, essential that skills students should have demonstrated before they enter a higher education programme in a particular subject are assessed by the corresponding AS qualification.
- 5.8 If we were to require the skills that are to be assessed for the A level to also be assessed for the AS, schools and colleges would have to manage, for example, different science practical assessments for AS and A level students and different fieldwork assessments for AS and A level geography students. A student who, having taken the AS, wished to progress to the A level would have to be assessed in those skills again. Such an approach could become unmanageable and might reintroduce some of the problems, such as assessment disrupting teaching and learning, that we are seeking to address with these reforms.
- 5.9 We propose that, for the subjects on which we are currently consulting, and with the exception of art and design (which we propose should be assessed wholly by non-exam assessment), all AS assessment should be by exam only.

**Consultation Question 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?**

**Consultation Question 73: Do you have any further comments relating to this section?**

## **Part 2: Conditions of Recognition**

## Conditions of Recognition for A level and AS qualifications

- 6.1 We place general Conditions of Recognition on all the awarding organisations<sup>30</sup> we regulate [www.ofqual.gov.uk/how-we-regulate](http://www.ofqual.gov.uk/how-we-regulate) .
- 6.2 We are consulting on draft Conditions that would give effect to the proposals set out earlier in this document. We will refine the drafting of these Conditions, if adopted, following the consultation. If, in light of responses to the consultation, we change our proposals, we will change the Conditions accordingly.
- 6.3 We propose that these general Conditions should apply to A levels and AS qualifications beyond those about which we are consulting in this document. We will consult, however, on whether to dis-apply any of these Conditions or parts of these Conditions, and whether we need to introduce further subject specific Conditions, when reforming the assessment and regulation of the qualifications in other subjects.
- 6.4 Exam boards are required by the general Conditions of Recognition to comply with other regulatory documents, such as the *Code of Practice*<sup>31</sup>. Following this consultation, we will make consequential changes to the documents that currently apply to A levels and AS qualifications as necessary.

### Reporting student performance

- 6.5 A levels will continue to be graded A\*–E and AS qualifications from A–E. For both qualifications students may be unclassified (U), in which case they do not receive a certificate. We will publish these grading requirements in a separate regulatory document which we may update from time to time. We will also update our regulatory document on certificate requirements to address the separate reporting of skills if this is taken forward following the consultation. We propose to introduce the following condition:

#### GCE1 Specified levels of attainment

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<sup>30</sup> We call the awarding organisations we recognise to award A levels and AS qualifications exam boards. General Conditions can apply to all awarding organisations and be in respect of all qualifications, or they can apply to some qualifications only.

<sup>31</sup> Available from: [www.ofqual.gov.uk/documents/gcse-gce-principal-learning-and-project-code-of-practice](http://www.ofqual.gov.uk/documents/gcse-gce-principal-learning-and-project-code-of-practice)



**GCE1.1** An awarding organisation must ensure that the specification for each GCE Qualification that it proposes to make available sets out specified levels of attainment which comply with the requirements which may be published by Ofqual and revised from time to time.

### **Level of demand**

- 6.6 Students who take an A level currently take assessments that are at two different levels of demand. They take assessments at the end of their first year of study that are used for the award of the current AS qualification. The assessments taken for the AS reflect the fact that students are half way through a two-year course of study at which point their understanding of and maturity in a subject is naturally less developed than it will be a year on.
- 6.7 Students then take assessments at the end of the programme for the award of the A level qualification. These assessments are at a higher level of demand.
- 6.8 Exams for new A levels will be taken at the end of the course, as they will be linear qualifications. There will no longer be a need for assessments to be at different levels of demand. All A level assessments must therefore be at the same level of demand – the level of demand of the assessments now taken by A level students at the end of the course.
- 6.9 An exam board that offers an AS qualification will have to design assessments for that qualification. The same assessments cannot be used for both the A level and the AS. The assessments for the AS qualification must reflect the level of understanding and maturity a student can reasonably be expected to have developed in the subject after a year's study.
- 6.10 We propose to introduce the following conditions:

### **GCE2 Level of demand**

**GCE2.1** An awarding organisation must take all reasonable steps to ensure that all assessments for a GCE A level qualification which it makes available are set at the same Level of Demand.

**GCE2.2** An awarding organisation must take all reasonable steps to ensure that the Level of Demand of each assessment for each GCE AS qualification which it makes available is appropriate to the knowledge, skills and understanding to be reasonably expected of

**Learners who have completed the first half of a course of study designed to lead to the award of a GCE A level qualification in the same subject.**

## **Timing of assessments**

6.11 Both A levels and AS qualifications are to be linear qualifications with all exams taken at the end of the course, which we consider to be May and June. We will consider, at a later stage, whether it is appropriate to permit resits in November for any or all A levels and AS qualifications. Non-exam assessments may be taken at an earlier stage in the course.

6.12 Where non-exam assessments are used the exam board must not communicate or confirm a student's mark from that non-exam assessment before it communicates the overall outcome of the qualification. This is to discourage a school or college from making repeat submissions of non-exam assessment outcomes to an exam board.

6.13 We propose to introduce the following conditions.

### **GCE3      Timing of assessments**

**GCE3.1      An awarding organisation must ensure that in respect of each GCE Qualification which it makes available a Learner is assessed during the months of May and June only.**

**GCE3.2      In respect of each GCE Qualification which it makes available an awarding organisation must ensure that it –**

**(a)      issues a single result in respect of each Learner following completion by that Learner of the assessments to be taken for that qualification, and**

**(b)      does not communicate to a Centre or a Learner confirmation of, or changes to, any mark for an assessment in advance of the issue of that result.**

**GCE3.3      Condition GCE3.1 does not apply in respect of –**

- (c) any assessment where evidence generated by a Learner in that assessment is marked by a Centre, and
- (d) a GCE Qualification where a GCE Subject Level Condition states that its application is excluded in respect of that qualification.

## **Question types**

6.14 We propose to introduce the following conditions:

### **GCE4 Question types**

**GCE4.1** In designing and setting the assessments for a GCE Qualification which it makes available or proposes to make available, an awarding organisation must ensure that, taken together, those assessments include questions or tasks which allow Learners to –

- (a) provide extended responses, and
- (b) demonstrate their ability to draw together different areas of knowledge, skills and/or understanding from across a full course of study for that qualification,

and that Learners are appropriately rewarded for doing so.

**GCE4.2** For the purposes of Condition GCE4.1(a) an ‘extended response’ is evidence generated by a Learner which is of sufficient length to allow that Learner to demonstrate the ability to construct and develop a sustained line of reasoning which is coherent, relevant, comprehensive and logically structured.

## **Type of assessment**

6.15 We propose that all A level and AS assessment is undertaken by examinations, set and marked by the exam boards, unless a subject requires that an alternative or additional form of assessment be used. In line with this requirement we propose to introduce the following condition.

### **GCE5 Assessment by Examination**

**GCE5.1** An awarding organisation must ensure that every assessment for a GCE Qualification which it makes available is an Assessment by Examination.

**GCE5.2** Condition GCE5.1 does not apply in respect of a GCE Qualification where a GCE Subject Level Condition states that its application is excluded in respect of that qualification.

6.16 Where a subject requires an alternative or additional form of assessment we propose to put in the place the following condition:

**GCE(x)2** Non-examination assessment

**GCE(x)2.1** Condition GCE5.1 does not apply to any GCE [*subject*] qualification that an awarding organisation makes available or proposes to make available.

### **Assessment strategies**

6.17 We propose that each exam board must develop an assessment strategy for each of its A level and AS qualifications, as discussed in section 4. We propose that the assessment strategy must be prepared before the exam board makes its qualifications available and that we should review it when the exam board submits its proposed qualifications for accreditation. We propose to introduce the following Condition of Recognition:

**GCE6** Assessment strategy

**GCE6.1** An awarding organisation must, before first making available a particular GCE Qualification –

- (a) set an assessment strategy for that qualification, and
- (b) ensure that the assessment strategy complies with any requirements which may be published by Ofqual and revised from time to time.

**GCE6.2** In particular, an awarding organisation must ensure that the assessment strategy for a GCE Qualification sets out how the awarding organisation intends to secure, on an on-going basis, compliance with its Conditions of Recognition in respect of the

assessments for that qualification.

**GCE6.3** An awarding organisation must design, set, deliver and mark all assessments for a GCE Qualification in compliance with its assessment strategy for that qualification.

**GCE6.4** An awarding organisation must -

- (a) upon receiving a request from Ofqual to do so, promptly review its assessment strategy so as to assure itself that its assessment strategy meets the requirements of Conditions GCE6.1 and GCE6.2,
- (b) revise its assessment strategy where necessary following that review,
- (c) comply with any requirements that Ofqual has specified in writing in relation to revisions to its assessment strategy, and
- (d) promptly notify Ofqual of any revisions made to its assessment strategy following that review.

**GCE6.5** An awarding organisation must –

- (a) upon receiving a request from Ofqual to do so, justify to Ofqual’s satisfaction its compliance with its assessment strategy for a GCE Qualification in respect of any particular assessment for that qualification, and
- (b) give effect to any recommendation that Ofqual may make in respect of its compliance with its assessment strategy.

## **Qualification content**

6.18 The content for the A level subjects on which we are currently consulting will be made available by the Department for Education. For some subjects the A level content will identify the content that is to be covered by an AS qualification in the same subject. Where no content is specified for an AS qualification we

propose that the exam board draws the content from the A level content. This will allow for co-teaching and for students to progress to an A level in the subject if they so wish.

6.19 We propose to introduce the following condition:

**GCE(x)1 Compliance with the Secretary of State’s subject requirements**

*For qualifications where AS content is specified by the Secretary of State*

**GCE(x)1.1** An awarding organisation must ensure that each GCE A level and AS [*subject*] qualification which it makes available or proposes to make available complies with the requirements relating to that qualification set out in the Department for Education document entitled ‘[x]’, dated [month/year].

**GCE(x)1.2** An awarding organisation must ensure that in the design and delivery of each GCE A level and AS [*subject*] qualification which it makes available or proposes to make available it has regard to any recommendations or guidelines relating to that qualification set out in the Department for Education document entitled ‘[x]’, dated [month/year].

*For qualifications where AS content is not specified by the Secretary of State*

**GCE(x)1.1** An awarding organisation must ensure that each GCE A level [*subject*] qualification which it makes available or proposes to make available complies with the requirements relating to that qualification set out in the Department for Education document entitled ‘[x]’, dated [month/year].

**GCE(x)1.2** An awarding organisation must ensure that in the design and delivery of each GCE A level [*subject*] qualification which it makes available or proposes to make available it has regard to any recommendations or guidelines relating to that qualification set out in the Department for Education document entitled ‘[x]’, dated [month/year].

**GCE(x)1.3** An awarding organisation must ensure that the content of each GCE AS [*subject*] qualification which it makes available or proposes to make available is drawn from the content set out for a GCE A level in the Department for Education document entitled '[x]', dated [month/year].

**Consultation Question 74: Do you have any comments on our proposed Conditions?**

**How our proposals fit within our regulatory framework**

6.20 We have the power to make certain types of qualifications subject to an accreditation requirement. Where a qualification type is subject to such a requirement, we check that each proposed qualification of that type complies with the relevant accreditation criteria that we have published before an exam board is allowed to award the qualification.

6.21 A level and AS qualifications are currently subject to an accreditation requirement and, in view of their importance, we propose that this should continue to be the case.

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

6.22 When we consider a proposed qualification we must decide whether it meets the requirements in our accreditation criteria. Currently the accreditation criteria which we use to assess A level and AS qualifications are set at qualification level.<sup>32</sup> Those criteria also make reference to subject level criteria within which the assessment objectives and requirements as to content in relation to each particular subject are found.<sup>33</sup>

6.23 The current accreditation criteria will no longer be appropriate to revised versions of A levels and AS qualifications as they were drafted to reflect qualifications with a modular structure and the current connection between AS and A levels.

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<sup>32</sup> *The Criteria for GCE AS and A-level Qualifications:* [www.ofqual.gov.uk/documents/criteria-for-gce-as-and-a-level-qualifications](http://www.ofqual.gov.uk/documents/criteria-for-gce-as-and-a-level-qualifications)

<sup>33</sup> [www.ofqual.gov.uk/ofdoc\\_categories/subject-criteria](http://www.ofqual.gov.uk/ofdoc_categories/subject-criteria)

6.24 We are now reflecting our regulatory requirements in relation to the structure of the revised qualifications in new Conditions of Recognition. Those requirements will therefore take effect through the Conditions and the current form of accreditation criteria will no longer be necessary. We therefore propose replacing the existing accreditation criteria for A levels and AS qualifications with the following single criterion:

***The awarding organisation must demonstrate to Ofqual's satisfaction that it is capable of complying, on an on-going 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.***

6.25 This will provide a more robust approach to accreditation as it will require an exam board to demonstrate how each proposed qualification will be capable of meeting all of the requirements that apply to it under the Conditions. The same requirements will then apply, through the Conditions, throughout the life of the qualification.

6.26 We will provide guidance at a later date indicating the types of evidence that an exam board may submit with its application for accreditation to demonstrate that it meets this criterion.

**Consultation Question 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.***

6.27 The *Criteria for GCE AS and A-level Qualifications* are also regulatory documents, as are the individual subject level criteria for A levels and AS qualifications. This means that, under Condition D5.1, exam boards must comply with the requirements set out in those documents on an on-going basis. If we proceed with our proposal to have a single accreditation criterion we will also remove the *Criteria for GCE AS and A-level Qualifications* from our list of regulatory documents. This is because the new requirements regarding qualification structure will be imposed directly by the new qualification level and subject level Conditions on which we are consulting.



- 6.28 If we proceed with our proposals in regard to assessment objectives, the individual subject level criteria for A levels and AS qualifications will also be amended in respect of their function as regulatory documents to reflect those new assessment objectives.
- 6.29 We are currently considering how best to accommodate the content requirements, on which there is a separate consultation hosted by the Department for Education, within our regulatory framework. As stated above, the previous content requirements were contained within the same document as the assessment objectives for each subject. On the basis that the content requirements in respect of each subject might sit within a document published by the Department for Education we are consulting on a subject level condition which mandates adherence, on a subject-by-subject basis, to the requirements laid out in those documents. If the content requirements are not published by the Department for Education we will consider placing them within a regulatory document as is currently the case.

**Consultation Question 77: Do you have any further comments relating to this section?**

## **Part 3: Impact**

## Equality impact analysis

### Ofqual's role, objectives and duties

- 7.1 Our statutory objectives include the qualifications standards objective, which is to secure that the qualifications we regulate:
- a) give a reliable indication of knowledge, skills and understanding; and
  - b) indicate
    - i. a consistent level of attainment (including over time) between comparable regulated qualifications; and
    - ii. a consistent level of attainment (but not over time) between qualifications we regulate and comparable qualifications (including those awarded outside of the UK) which we do not regulate.<sup>34</sup>
- 7.2 We must therefore regulate so that qualifications properly differentiate between students who have demonstrated they have the knowledge, skills and understanding required to attain the qualification and those who have not.
- 7.3 We also have duties under the Apprenticeship, Skills, Children and Learning Act 2009 to have regard to the reasonable requirements of relevant students, including those with special educational needs and disabilities, of employers and of the higher education sector,<sup>35</sup> and to aspects of government policy when so directed by the Secretary of State.<sup>36</sup>
- 7.4 As a public body, Ofqual is subject to the public sector equality duty (PSED).<sup>37</sup> This duty requires us to have due regard to the need to:
- a) eliminate discrimination, harassment, victimisation and any other conduct which is prohibited under the Equality Act 2010;
  - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

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<sup>34</sup> Apprenticeships, Skills, Children and Learning Act 2009 section 128 (2)

<sup>35</sup> *Ibid.*, section 129(2).

<sup>36</sup> *Ibid.*, section 129(6).

<sup>37</sup> Equality Act 2010, section 149.

- 7.5 The exam boards that design, deliver and award AS and A level qualifications are required by the Equality Act, among other things, to make reasonable adjustments for disabled people taking their qualifications, except where Ofqual has specified that such adjustments should not be made.
- 7.6 When we decide whether such adjustments should not be made, we must have regard to:
- a) the need to minimise the extent to which disabled persons are disadvantaged in attaining the qualification because of their disabilities;
  - b) the need to secure that the qualification gives a reliable indication of the knowledge, skills and understanding of a person upon whom it is conferred;
  - c) the need to maintain public confidence in the qualification.
- 7.7 Legislation therefore sets out a framework within which we must operate. We are subject to a number of duties and we must aim to achieve a number of objectives. These different duties and objectives can, from time to time, conflict with each other. For example, if we regulate to secure that a qualification gives a reliable indication of a student's knowledge, skills and understanding, a student who has not been able to demonstrate the required knowledge, skills and/or understanding will not be awarded the qualification. A person may find it more difficult, or impossible, to demonstrate the required knowledge, skills and/or understanding because they have a protected characteristic. This could put them at a disadvantage relative to others who have been awarded the qualification. It is not always possible for us to regulate so that we can both secure that qualifications give a reliable indication of knowledge, skills and understanding and advance equality between people who share a protected characteristic and those who do not. We must review all the available evidence and actively consider all the available options before coming to a final, rational decision.
- 7.8 Qualifications cannot be used to mitigate inequalities or unfairness in the education system or in society more widely that might affect, for example, students' preparedness to take the qualification and the assessments within it. Whilst a wide range of factors can have an impact on a student's ability to achieve a particular mark in an assessment, our influence is limited to the way the qualification is designed and assessed.
- 7.9 We require the exam boards to design qualifications to give a reliable indication of the knowledge, skills and understanding of those on whom they are conferred. We also require the exam boards to avoid, where possible, features

of a qualification that could, without justification, make a qualification more difficult for a student to achieve because they have a particular protected characteristic. We require exam boards to monitor whether any features of their qualifications have this effect.

7.10 In setting the overall framework within which exam boards will design, assess and award the reformed A levels and AS qualifications we want to understand the possible impacts of the proposals on persons who share a protected characteristic.

7.11 The protected characteristics under the Equality Act 2010 are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnerships;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

7.12 It should be noted that under section 149 of the 2010 Act, Ofqual is not required to have due regard to impacts on those who are married or in a civil partnership.

### **Equality impact analysis relating to proposed changes to A and AS levels**

7.13 During the consultation we will continue to review the relevant literature that might help us identify any potential impacts of the proposals on students who share a protected characteristic. We have drawn our early analysis of the literature for this initial equality impact analysis. We will also seek views from interested groups during the period of this consultation.

7.14 We will continue to seek views from our Access Consultation Forum and External Advisory Group for Equalities.

7.15 Our equality impact analysis for our earlier consultation on A level reform might also be of interest,<sup>38</sup> together with the analysis we have undertaken in relation to similar proposals relating to qualification structure in the context of reforms to GCSEs.

## **Assessment arrangements**

### **Biology, chemistry and physics**

7.16 We judge that our proposal that practical skills in biology, chemistry and physics should continue to be assessed, with the outcome of the assessment reported separately from the grade, is likely to have a mainly positive impact for students whose disability makes it difficult for them to handle science equipment in an assessment context. Some disabled students will have difficulty undertaking practical assessments that require manipulative skills. The proposed separate reporting will make sure the grade they receive from their written exam is not depressed by their performance in the practical assessment.

7.17 A student who cannot perform any aspect of the practical assessment will be given an exemption from this assessment or have the use of a practical assistant, as is now the case. We will consult separately on how an exemption should be reported on the student's certificate and will consider what equality impacts this may have.

7.18 However, we are also aware that the separate reporting of practical skills may have a negative impact on some students who find written exams difficult because of their disability. For these students the removal of practical assessments from incorporation within the overall A level grade may be unwelcome.

7.19 We have not identified anything in our planned approach to non-exam assessment in biology, chemistry and physics that would have a negative impact on students because of their racial group, sex, age, religion or belief, pregnancy or maternity or sexual orientation, or as a result of gender reassignment.

### **English and history**

7.20 The skills of independent reading, research and extended writing in the three English A levels and in history A levels are valued by higher education. We

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<sup>38</sup> [www.ofqual.gov.uk/files/2012-11-08-equality-analysis-of-the-a-level-reform-consultation.pdf](http://www.ofqual.gov.uk/files/2012-11-08-equality-analysis-of-the-a-level-reform-consultation.pdf)

propose that the non-exam assessment in these subjects needed to assess these skills should contribute 20 per cent of the total marks available for the A level qualifications. For most specifications in the English language, English literature and English language and literature this would represent a reduction in the weight given to non-exam assessment. There will be no or little change for history. In our view, a 20 per cent weighting will be sufficient to ensure that the skills of independent research and extended writing are taught and receive adequate recognition in the overall assessment weightings.

- 7.21 Concerns about a reduction of non-exam assessment in GCSE qualifications were raised during our recent consultation on GCSE reform. These concerns centred on the impact on students of being assessed in a concentrated period in the summer months and of being assessed predominantly by way of exam. This could have an impact on students who are not available, for whatever reason, during the concentrated period of assessment.
- 7.22 Concerns were also raised with us that girls might be adversely affected by a decrease in the weighting of non-exam assessments relative to boys. Our research of the relative performance of girls and boys in GCSE English over a period of time when assessments changed between exam and non-exam requirements does not support this concern. Neither does our research into National Curriculum Assessments at Key Stage 2 (typically at age 11), although we are mindful that the age difference between Key Stage 2, GCSE and A level must be taken into account.
- 7.23 Research on the performance of summer-born students suggests that increasing the proportion of assessment taken at the end of the course could have a positive impact as inequalities between students born at different times of the year are evened out.
- 7.24 In the process of our work on the reduction of non-exam assessments in GCSEs, it was suggested that an increased emphasis on exam assessment in the summer months raised potential issues for students who are fasting, specifically during years in which Ramadan coincides with the exam period. We met with representatives the Muslim Council of Britain to seek their views on the potential impact on students who were fasting during the exam period and on the steps that might be taken to mitigate this impact. The JCQ (Joint Council for Qualifications – a membership organisation representing the views of exam boards) was also present at the meeting. The two bodies have agreed to work together to consider how the exam timetable can best be constructed to reduce any negative impact of fasting on students during the summer exams.

7.25 We have not identified any potential impact on our planned approach to non-exam assessment in the English A levels and history A levels that would have a negative impact on students because of their racial group or sexual orientation.

**The non-exam assessment of extended projects in computing**

7.26 The non-exam assessment in A level computer science is required to test students' skills in working on extended projects that require the analysis, design, testing and evaluation of a specified programming task.

7.27 We have not identified any potential impact on our planned approach to non-exam assessment in computer science that would have a negative impact on students because of their race, sex, age, religion or belief, pregnancy or maternity or sexual orientation, or as a result of gender reassignment.

**Reintroduction of non-exam assessment of fieldwork skills in geography**

7.28 Current subject criteria for geography require fieldwork skills to be tested using a limited series of exam questions. However, the current arrangements are inconsistent across exam boards and the assessment is considered by subject experts to provide inadequate preparation for those students wishing to study geography in higher education.

7.29 Professor Mark E, Smith's report referred to a consensus from HE and learned societies that fieldwork should be a requirement in A level geography, although issues of the robustness of internal assessments were also noted. The importance of fieldwork assessment was also reported in the Royal Geographical Society's response to our consultation on controlled assessment (2012). The Society considers fieldwork and first hand research to be an essential part of the discipline of geography.

7.30 Professor Mark E, Smith's report highlighted concern about the decline of quantitative skills in geography students, and opportunities for understanding and applying quantitative skills could be incorporated into fieldwork assessments. The practical skills taught in fieldwork activity cover geographical fieldwork observation, measurement techniques, investigation approaches and analytical skills. Students are able to consider the full data-handling cycle as opposed to the analysis and manipulation of pre-collected data provided in an exam. Non-exam assessment also provides an opportunity for assessing an individual research project, written independently by the student over a period of time. These are all skills that provide good preparation for higher education.

7.31 As students taking A level geography are already expected to undertake fieldwork, the re-introduction of a specific non-exam assessment of fieldwork



should not introduce a new requirement to undertake fieldwork activities that is not currently in place.

- 7.32 Certain types of fieldwork (for example, in physical geography, the analysis of coastal path erosion) could impact on students with particular physical disabilities who may not be able to access the chosen fieldwork site. However, schools are already required to ensure that appropriate reasonable adjustments are made for disabled students, and they take this into account when they select the fieldwork experience.<sup>39</sup>
- 7.33 Arrangements will have to be made for students who are absent when the fieldwork exercise and/or the writing of the assessment takes place to do them at another time. Such absence may occur because of a disability, pregnancy or maternity or gender reassignment. However, exams might also be missed for the same reasons.
- 7.34 Fieldwork that involves an overnight stay may affect students with certain types of disabilities that require particular care or access arrangements. Research into the impacts on students with disabilities<sup>40</sup> who have undertaken fieldwork in higher education has identified a range of possible impacts on students, including limited access to medication, the walking distances involved and the need to take notes in a non-classroom environment.
- 7.35 We are satisfied that the proposed change to the way fieldwork is assessed will not introduce new difficulties, as the A level is already designed to require students to undertake fieldwork. We are also satisfied that fieldwork is such an inherent part of the subject that its removal could not be justified.
- 7.36 We have not identified any potential impact on our planned approach for the re-introduction of non-exam assessment in geography that would have a negative impact on students because of their race, sex or age, sexual orientation, religion or belief.

## **AS qualification**

- 7.37 The AS level will become a free-standing qualification. Our consultation proposes that new AS levels should cover a sub-set of the A level content for

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<sup>39</sup> [www.equalityhumanrights.com/advice-and-guidance/education-providers-schools-guidance/providing-education-and-access-to-any-benefit-service-or-facility/](http://www.equalityhumanrights.com/advice-and-guidance/education-providers-schools-guidance/providing-education-and-access-to-any-benefit-service-or-facility/)

<sup>40</sup> Hall, T., Healey, M. & Harrison, M (2002) *Fieldwork and disabled students: discourses of exclusion and inclusion*, *Transactions of the Institute of British Geographers*.

the subject and be assessed at a lower level of demand to the A level, but at the same level of demand as current AS qualifications.

- 7.38 We have not identified any potential impact of these proposals on students who share protected characteristics.
- 7.39 We propose that for the subjects on which we are consulting the AS qualification should be assessed wholly by exam, with the exception of art and design.
- 7.40 The issues with regard to non-exam assessment that are considered above for A levels also apply to AS art and design (the only AS qualification upon which we are consulting which includes non-exam assessment).

**Consultation Question 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? If so, what are they?

**Consultation Question 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? If so, please comment on the additional steps we could take to mitigate negative impacts.

**Consultation Question 80:** Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?

## **Regulatory impact assessment**

- 8.1 We published in November 2012 a regulatory impact assessment<sup>41</sup> that followed our last consultation on A level reform. This considered the quantitative and qualitative costs and benefits of a range of options for A level reform to a range of stakeholders including exam boards, schools and colleges, students and higher education.
- 8.2 We will work with stakeholders during this consultation to estimate the costs of the new, more detailed, regulatory proposals set out in this consultation. The changes are explained below.

### **Assessment objectives and arrangements**

- 8.3 We will estimate the cost to the exam boards of re-developing A levels in line with our proposals. In estimating these costs we will consider specifically the additional costs to the exam boards of developing and following an assessment strategy.

### **AS qualifications**

- 8.4 Our first impact assessment considered the impact of different approaches to AS qualifications. We will now investigate the cost to exam boards of maintaining a suite of AS qualifications alongside their associated A levels. We will also seek views from schools and colleges and higher education on the likely demand for AS qualifications.

### **Non exam assessment**

- 8.5 We will consider the costs to exam boards and schools and colleges of delivering non-exam assessment at the proposed proportions.

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<sup>41</sup> [www.ofqual.gov.uk/documents/impact-assessment-of-a-level-reforms](http://www.ofqual.gov.uk/documents/impact-assessment-of-a-level-reforms)

## **Annex A: New A Level Regulatory Requirements Consultation Questions**

## **All questions**

This consultation is about proposed changes to A level assessment objectives (the types of ability used for testing candidates' knowledge, understanding and skills in a subject); assessment arrangements (how assessments should be designed and conducted); and the design and assessment of AS qualifications (once they are free-standing qualifications that do not contribute to the award of an A level).

This consultation considers proposals for the reform of A levels in England. Ministers in Wales and Northern Ireland will determine the future of A levels in their respective countries. Where we refer to 'A levels' we mean A levels offered in England and therefore regulated by us. Where we refer to 'government' and 'ministers' we mean 'Westminster government' and 'Westminster ministers'.

The A level subjects we are consulting on in this document are: biology; chemistry; physics; psychology; English language; English literature; English language and literature; history; geography; art and design; business; computing; economics and sociology. Our aim is for revised A levels in these subjects to be taught in schools in England from September 2015. New AS qualifications in these subjects will therefore be awarded for the first time in the summer of 2016 and A levels in the summer of 2017.

## **How to use the consultation documents**

We would like to know your views about our proposed regulatory requirements for A level and AS qualifications. Our consultation is available from <http://comment.ofqual.gov.uk/a-level-regulatory-requirements-october-2013> .

If you have views on the draft content of A levels you should respond to the consultation hosted by the Department for Education and available from <https://www.education.gov.uk/consultations> .

. Following consultation, any changes to subject content could necessitate an appropriate change to the draft assessment objectives and vice versa.

We will only consider your responses to the consultation questions if you complete the information page. In order for us to evaluate responses properly, we need to know who is responding and in what capacity.

We will publish the evaluation of responses to the consultation following the consultation period. Please note we may publish all or part of your response unless you tell us in your answer to the confidentiality question that you want us to treat your response as confidential.

The deadline for responses to this consultation is **17th January 2014**.

## **How to respond to this consultation**

Please respond to the consultation questions in one of the following ways:

- Complete the online response form at <http://surveys.ofqual.gov.uk/s3/a-level-regulatory-requirements-consultation-questions-october-2013> .
- Email your completed response document to [consultations@ofqual.gov.uk](mailto:consultations@ofqual.gov.uk) – please include the consultation title ('Consultation on New A Level Regulatory Requirements') in the subject line of the email and be clear about who you are and in what capacity you are responding.
- Post your response to **A level Reform Consultation 2013**, Ofqual, Spring Place, Coventry Business Park, Herald Avenue, Coventry, CV5 6UB.

## Information pages

### 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)
- 

**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 agree with the objectives stated, but we do not feel that the proposals outlined in the consultation will permit UK universities to accurately predict potential at the relevant juncture in the admissions process, and that this should be included in objectives. Setting aside subject content or knowledge, de-coupling as envisaged will in any case render AS Level much less useful as a tool to support progression to HE, as, at present, it acts as a vital progress-test that helps students hone appropriate choices for HE in terms of both subject and institution. All students should still sit four (funded) AS Levels at the end of Year 12 otherwise the great value we have derived from it will be lost.*

*We are also concerned that the objective to "enable students to broaden the range of subjects they study" will not be delivered unless AS Level in a fourth subject is compulsory and funded. Otherwise most schools/colleges will in practice drop down to three subjects, and this will have a detrimental impact upon transition to HE, especially in STEM subjects.*

### Section 3: Assessment

#### Biology, Chemistry, Physics

3. To what extent do you agree that exams in biology, chemistry and physics should include questions to assess conceptual and theoretical understanding of experimental methods?  
 Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

4. To what extent do you agree that practical skills in biology, chemistry, and physics should continue to be assessed?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

5. To what extent do you agree that the results of practical skills assessments in biology, chemistry and physics should be reported separately on the certificate and not count towards the final grade?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

6. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in biology, chemistry and physics?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

7. To what extent do you agree that the proposed weightings are appropriate for A level?

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

8. To what extent do you agree that the proposed weightings are appropriate for AS?

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

9. Do you have any further comments relating to these subjects?

*Students should be required to attend and complete practicals and these should account for a proportion of the final grade otherwise schools//colleges will not offer or be able to resource these. In order to ensure that schools do take the development of practical skills seriously consideration might be given to a system that reports practical skills assessment separately, but penalises the overall grade if the practical assessment is below a defined threshold. We are not convinced that the proposals address the importance of and the impact on practical assessments sufficiently.*

*Whilst we broadly agree that overall the proposed weightings are appropriate for A Level, there is some feeling amongst colleagues that Assessment Objective 3 should have the highest weighting for A Level. Some concern has also been expressed about the limited amount of mathematical skills within Biology.*

#### Psychology

10. To what extent do you agree that for psychology A level all assessment should be by exam?

- Strongly agree
- Agree

- Disagree
- Strongly disagree
- Don't know/no opinion
11. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in psychology?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion
12. To what extent do you agree that the proposed weightings are appropriate for A level?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion
13. To what extent do you agree that the proposed weightings are appropriate for AS?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion
14. Do you have any further comments relating to this subject?

***Whilst we broadly agree with the weightings, we feel that at A level, there should be a greater emphasis on the conceptual challenges in AO3. While Psychology shares much with Biology at A level, and it is important that***

*students are knowledgeable about findings and procedures, there is a much smaller body of assured findings and a much wider range of investigative methods and approaches for Psychology than there are for Biology.*

*We believe that AO2 should include awareness of some differences in psychological science and biological science. We also believe that history (the history of concepts in psychology and appreciation of the change in questions asked) should be included in "issues" as outlined on page 28 of the consultation document.*

English language, English literature and English language and literature

15. To what extent do you agree that for English language, English literature and English language and literature A levels, 20 per cent of the available marks should be allocated to non-exam assessments?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

English language

16. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in English language?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

17. To what extent do you agree that the proposed weightings are appropriate for A level?

Strongly agree

Agree

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

18. To what extent do you agree that the proposed weightings are appropriate for AS?

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

English literature

19. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in English literature?

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

20. To what extent do you agree that the proposed weightings are appropriate for A level?

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

21. To what extent do you agree that the proposed weightings are appropriate for AS?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

English language and literature

22. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in English language and literature?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

23. To what extent do you agree that the proposed weightings are appropriate for A level?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

24. To what extent do you agree that the proposed weightings are appropriate for AS?

Strongly agree

Agree



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

25. Do you have any further comments relating to these subjects?

*We believe that 20% of the available marks being allocated to non-exam assessments is too low and most students will complete more non-exam assessments than this at university. The addition of another Assessment Objective and redistribution of the criteria has some positive benefits, as does the different weighting. It is crucial, however, that an element of holistic marking be retained. That attention has been paid to different interpretations is necessary but not sufficient; the engagement with other writings must also be critical. Connections across literary texts must make sense in terms of overall argument, not be forged for their own sake.*

*We do not believe that there is sufficient differentiation between the skills required for AS and A Level, there is an insufficient degree of separation between the two and it is not clear what either the relationship or the progression is between the two.*

### History

26. To what extent do you agree that for the history A level 20 per cent of the available marks should be allocated to non-exam assessments?

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

27. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in history?

- Strongly agree
- Agree
- Disagree

- Strongly disagree
- Don't know/no opinion
28. To what extent do you agree that the proposed weightings are appropriate for A level?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion
29. To what extent do you agree that the proposed weightings are appropriate for AS?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion
30. Do you have any further comments relating to this subject?

*We are concerned that unless the Extended Project Qualification is retained, and accessible to all, HEIs will see a diminution in the ability of first-year students to engage in deep, independent study. The separation out of assessment of sources and assessment of historiography is likely to make students' understanding of these things even more artificial and clunky than it is now. This is not what history is all about. History is about understanding the past and allowing it to talk to the present. To this end, AO2 and AO3 should be embedded within AO1.*

*We would consider the disaggregation of AO3 from AO1 and AO2 a retrograde step and we do not support it. The proposed weightings are too heavily skewed towards AO2 and AO3. We will end up with students spending half their time being assessed on their understanding of sources and historiography but the point of history is to explain. Perhaps the only major problem with A Level History currently is that students really don't 'get' either sources or historiography, precisely because they*

*have learned about them in the abstract rather than in service to the main historical objective. History isn't fundamentally different from English or Geography, and yet these subjects don't have such artificial divisions prescribed.*

Geography

31. To what extent do you agree that for the geography A level 20 per cent of the available marks should be allocated to non-exam assessments?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

32. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in geography?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

33. To what extent do you agree that the proposed weightings are appropriate for A level?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

34. To what extent do you agree that the proposed weightings are appropriate for AS?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

35. Do you have any further comments relating to this subject?

*We agree that non-exam assessments should be part of the A-level, and the proposed 20% would seem appropriate and commensurate with science subjects. Broadening non-exam assessment would also replicate assessment in undergraduate Geography courses, and 20% would compare fairly with the assessment of work at Cambridge. There is a concern with the moderation of this assessment at a school level, as recognized in point 3.56, but these are the same for other forms of science moderation, and we do not feel that this should count against the desire to broaden assessment.*

*On assessment objectives, we are very happy with the tweaks with the wording, but less so with the weightings. Our concern – this is the principal reason for our expressing 'don't know/no opinion' here – is that more information is needed to approve this. For Cambridge, we might be worried for instance about the apparent downgrading of the upper limit allottable to AO3 (from 25-45% to 20-30%), which to us represents an assessment of the kind of proactivity most needed by students making the transition to university. It may in fact be the case that most exam boards at the moment do not go above 30% for AO3, but at first glance it looks like the seemingly simpler assessment objectives are bumped up, particularly at the new format AS. We are already aware that many students can score very highly through efficient, rote learning of prescribed elements, without being particularly strong on insight, initiative and independence.*

*The weightings for Geography seem very flexible compared with other subjects and for this reason we are concerned about comparability across Awarding Bodies.*

Art and design

36. To what extent do you agree that art and design should be assessed by non-exam assessment only?
- Strongly agree
  - Agree
  - Disagree
  - Strongly disagree
  - Don't know/no opinion
37. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in art and design?
- Strongly agree
  - Agree
  - Disagree
  - Strongly disagree
  - Don't know/no opinion
38. To what extent do you agree that the proposed weightings are appropriate for A level?
- Strongly agree
  - Agree
  - Disagree
  - Strongly disagree
  - Don't know/no opinion
39. To what extent do you agree that the proposed weightings are appropriate for AS?
- Strongly agree
  - Agree

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

40. Do you have any further comments relating to this subject?

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Business

41. To what extent do you agree that for business A level all assessment should be by exam?

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

42. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in business?

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

43. To what extent do you agree that the proposed weightings are appropriate for A level?

- Strongly agree

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

44. To what extent do you agree that the proposed weightings are appropriate for AS?

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

45. Do you have any further comments relating to this subject?

### **Computer science**

46. To what extent do you agree that for the computer science A level 20 per cent of the available marks should be allocated to non-exam assessments?

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

47. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in computer science?

- Strongly agree
- Agree
- Disagree

- Strongly disagree
- Don't know/no opinion
48. To what extent do you agree that the proposed weightings are appropriate for A level?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion
49. To what extent do you agree that the proposed weightings are appropriate for AS?
- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion
50. Do you have any further comments relating to this subject?

*The proposed weighting of mathematical skills is startlingly low at 10% especially in contrast to Biology (similarly proposed 10%), Chemistry (proposed 20%), Physics (proposed 40%). Whereas 10% might have been appropriate for the old subject "ICT", a modern computing curriculum requires fluency with mathematics and concepts of abstraction. We would expect to see a minimum of 20-25% weighting on mathematical skills.*

*At A Level, we would have expected elementary treatments of complexity (such as found in simple searching or sorting algorithms) to require familiarity with mathematical concepts such as linear, quadratic, polynomial, exponential, logarithm, and the ability to use algebra.*



***Treating Computing as similar to Biology in terms of the weighting of assessment to be based on mathematics seems strange and unaccountable.***

***The wording/meaning of AO3 is opaque and inadequately differentiated from AO2.***

***The issue of how A Level Computing (or Computer Science) should be assessed and regulated should probably be re-visited after the Awarding Bodies have published proper up-to-date specifications for A-level Computing, which follow on from the 2014 GCSE specifications for Computing. Principles of assessment cannot be considered totally in isolation from that which is being assessed.***

### Economics

51. To what extent do you agree that for economics all assessment should be by exam?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

52. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in economics?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

53. To what extent do you agree that the proposed weightings are appropriate for A level?

Strongly agree

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

54. To what extent do you agree that the proposed weightings are appropriate for AS?

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

55. Do you have any further comments relating to this subject?

*In principle asking students to do some project work as part of their assessment is a good idea, and there are many subjects where this works well. At degree level it is vital and as such Cambridge has a compulsory dissertation in the Economics Tripos.*

*We broadly feel that what is proposed is a useful clarification of the current objectives. However, clarification is required on the new requirement that 'the ability to use mathematical skills at a level appropriate for GCE A level Economics must be tested across the assessment objectives. The weighting of mathematical skills within this subject must be at least 15 per cent for AS and 20 per cent for A level'.*

*We assume that 'a level appropriate for GCE A level Economics' means GCSE Mathematics and thus excludes Calculus. We find it hard to see how most of the mathematical skills taught at GCSE can realistically be applied to Economics, and we have concerns about attaching a 15-20% weighting to such skills. On the other hand if all that is meant here is that students should be able to sketch and interpret graphs, and will be rewarded for this, then this would be desirable.*

Sociology

56. To what extent do you agree that for sociology all assessment should be by exam?
- Strongly agree
  - Agree
  - Disagree
  - Strongly disagree
  - Don't know/no opinion
57. To what extent do you agree that the proposed assessment objectives are appropriate for A level and AS qualifications in sociology?
- Strongly agree
  - Agree
  - Disagree
  - Strongly disagree
  - Don't know/no opinion
58. To what extent do you agree that the proposed weightings are appropriate for A level?
- Strongly agree
  - Agree
  - Disagree
  - Strongly disagree
  - Don't know/no opinion
59. To what extent do you agree that the proposed weightings are appropriate for AS?
- Strongly agree
  - Agree

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

60. Do you have any further comments relating to this subject?

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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?

*We would recommend using anti-plagiarism software, similar to that used in most universities. We would also recommend greater stringency in the recruitment of suitably qualified examiners who should receive full and appropriate training.*

*We are concerned that end loading the system may produce less secure and valid outcomes, even if assessment is improved, especially if students are looking towards Higher Education, which does include a considerable amount of coursework and is not 'sudden death'.*

#### **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?

*The challenge will be in preventing this from becoming something else that is 'taught to the test'. If this occurs there will be few benefits, if any. What is really required is expert marking that does not need overly prescriptive indicators to mark to. There is no comment in the current proposals on this, nor any recognition that the flexible assessment of high-end ability might be in tension with reliability.*

### 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?

*The University of Cambridge disagrees with the assertion in 5.7 that “it is not a purpose of the AS qualification that it should support progression to higher education.”*

*We believe AS has a vital role in supporting progression to HE – and would like to point out that section 2.12 of this consultation document states that exam boards should design AS qualifications with the objective that ‘they support progression to further study or employment’.*

*Our own research has shown that AS is a good to excellent predictor of university performance.*

*AS, taken at the end of Year 12 and linked to full A Level, is vital to students, parents and universities because it:*

- *Permits breadth and flexibility of subject-choice in the sixth form*
- *Helps students to make properly informed and appropriate choices about university applications*
- *Boosts those who lack confidence*
- *Enables under-performing students to demonstrate their true potential for more demanding study*
- *Enables fair and transparent admissions based on recent public examination results*

*In order to facilitate progression to HE, we believe that all students should be able to take 4 AS levels, including one in each of their full A Level subjects.*

*AS and Fair Admissions:*

*AS, taken at the end of Year 12, is fundamental to fair admissions. It 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 widen participation without engaging in positive discrimination.*

*Using AS UMS enables the University of Cambridge to deliver an admissions selection process which has many of the benefits of a post-qualification application process and none of the drawbacks.*



*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 contributing towards a full A Level.*

*We are extremely concerned that students in England will be disadvantaged in light of the decision in Wales and Northern Ireland to retain Year 12 assessment.*

*We would strongly recommend giving schools/colleges in England the option to decide whether to offer modular or linear A Levels, and allow them to decide based on the best interests of their students.*

**Co-teachability:**

*We agree with the proposal in 5.2 that an exam board wishing to offer an AS should draw its content from the published A Level content, in order to facilitate progression and co-teachability.*

*We believe co-teachability is the least worst way forward, as it gives schools the option to continue offering AS to their students.*

*However, co-teachability is less attractive than retention of AS in its current form. AS Level and year 1 of A Level will only be co-teachable up to a certain point, since the teaching of students sitting AS Level will need to diverge from that of those sitting only A Level in the same subject several weeks before examinations, in order to allow for appropriate examination preparation.*

*We believe this will cause significant disruption to schools/colleges and may in some cases render co-teachability unpractical, unless all students routinely sit AS Levels in all of their subjects. We regard the latter as desirable.*

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

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

*We do not believe that it is appropriate for AS content to be specified by the Secretary of State, irrespective of subject, and educational matters such as this should not be open to political interference.*

*We strongly support the conditions outlined in section 6.18 regarding qualification content in relation to co-teaching.*

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?

*Organisations should meet certain criteria in addition to the specific qualification criteria. This is important since, although it places additional burden on Awarding Bodies, we feel it is important for OFQUAL to focus on recognising bodies rather than individual instances of qualifications. We would rather the fitness of the organisation to offer qualifications is the focus of regulation, rather than over-restrictive regulation of individual qualifications.*

*We agree that organisations should comply with the General Conditions, but again these should be the focus of regulatory activity, with reduced focus on the Qualification and Subject Level conditions.*

## **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?

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.

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

*We feel that you have covered the impact of persons who share a protected characteristic very well, however, you should be mindful of the timetabling of examinations (especially given the increase in the proportion of examined assessment) particularly in relation to religious observances (such as fasting).*

*We are aware that there is evidence to suggest that single modes of assessment can bias against certain groups – we would like assurances that this has been considered thoroughly and carefully by OFQUAL.*

*Whilst this sits outside this particular consultation, you should also be mindful of the JCQ regulations which have tightened the guidance in respect of standard score levels required for students to access exam*

***adjustments (which would have a disproportionate impact on students with SpLD of exceptional intellectual ability).***

### 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.

<b>Name</b>	<i>Dr Mike Sewell (Director of Admissions for the Cambridge Colleges)</i>  <i>Mr Jon Beard (Director of Undergraduate Recruitment)</i>
-------------	--

<b>Name of organisation or group (if applicable)</b>	<i>University of Cambridge</i>
<b>Address (if organisation only)</b>	<i>Cambridge Admissions Office, Fitzwilliam House, 32 Trumpington Street, Cambridge, CB2 1QY</i>
<b>Email address</b>	<i>admissions@cam.ac.uk</i>

**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

**Do you have any comments or suggestions about the style of writing?**

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

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