

A Level Reform Consultation



June 2012

Ofqual/12/5176

Consultation Questions

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

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

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

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

How to respond:

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

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

Questions on Section 1: Background and purpose

The following questions refer to Section 1: Background and purpose.

1. I believe that all equality issues have been considered in the accompanying equality analysis.

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

2. Do you have any comments or suggestions?

million+ is a university think-tank. A-levels are an important progression route to higher education and we welcome the opportunity to respond to this consultation, the outcome of which we regard as of critical importance to the diverse range of students for whom UK universities offer life-changing opportunities and a wide-range of courses, including programmes which are multi-disciplinary. Research (Including by Ofqual) confirms that A-levels are well-respected qualifications that compare well internationally. It is inaccurate to suggest that the proposed reforms to A-level will enable learners to maximise their choices and that the reforms will help to eliminate discrimination, harassment and victimisation. This implies that A-levels in their present form are likely to be more discriminatory. No evidence has been tabled to support this contention or the implied suggestion that the reform of A-levels will contribute to the elimination of discrimination. Accordingly we consider that there is little merit in claiming an equality outcome for which there is little or no evidence.

There is, however, robust evidence that the student profiles of universities in the UK differ. Students are known to present and progress to university with a range of pre-entry qualifications and grades and from diverse backgrounds. One in three undergraduate students enters university for the first time when they are over 21. Universities with the most inclusive student profiles, including in respect of age and ethnicity, have not historically been as well-funded in terms of public research funding. Nonetheless they undertake research of international excellence, offer high quality subject expertise, excellent teaching, support high levels of graduate employability and educate the majority of students in the UK. In addition they successfully promote, teach and accredit degree and higher education qualifications for students in countries and in partnership with institutions throughout the world.

Ofqual's proposal that HE engagement in A-level reform should be linked with institutional research funding would result in universities with the most socially exclusive student profiles and comparatively small numbers of undergraduate students being more highly valued than others. Linked to this proposal, the Ofqual consultation implies that some universities are also more respected than others. These definitions also risk equating excellence in research departments with excellence in pedagogy. We understand that Ofqual is undertaking more research in respect of an equality impact assessment. We welcome this nearing in mind that the current assessment is silent on key issues and implications of the current proposals.

Questions on Section 2: What we hope to achieve

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

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

4. I support the need for comparability of demand and content in different specifications in a subject.

Yes

No

Do you have any comments or suggestions?

million+ **strongly supports** Ofqual's aim to ensure equality of access so that applicants applying to higher education with A-levels have access to the full range of universities in the UK. However we are not convinced that the proposals tabled will enable this objective to be achieved and for the reasons outlined, we have reservations about the proposition that *only* universities should be allowed to determine subject content.

Academics have long been involved in the design of qualifications and recognition of the role of higher education in the development and improvement of A-level qualifications is welcome. Ofqual has assumed that this engagement should be undertaken via *universities* but the level and extent of university involvement in A-level reform and the reliance on institutional involvement as evidence of

higher education engagement is over-optimistic, impractical and is likely to prove excessively bureaucratic.

The overwhelming majority of students with A-level grades currently progress to university but progression to university via A-levels is only one part of the jigsaw. From a student perspective, A-levels must also command the confidence of employers, the staff who teach them and facilitate progression to other study and work routes e.g. apprenticeships.

Accordingly the expectation that higher education should lead the reforms is misplaced. There are no structures and or over-arching national framework in place whereby this could be effected; there are 5 awarding organisations, over 80 subjects offered at A-level, 150 higher education institutions with a potential interest and (as Ofqual correctly identifies) other key stakeholders, including teachers, schools and employers.

Ofqual's consultation reflects the Secretary of State for Education's view that the government should have no responsibility for A-levels. However, A-levels are promoted and offered in the context of an education system for which the Department for Education has responsibility up to the leaving age of 18. There is therefore a good case for the DfE to retain some overall accountability for a national qualification taught in the context of a national education system. In the event that Ministers remain of the view that government should relinquish all accountability for A-levels, it is unclear in which body or bodies overall responsibility for A-level development and design will reside in the future; bearing in mind that Ofqual is a regulator. Million+ would welcome a clear statement on this issue in the Government's response.

The abolition of the QCDA which had responsibilities for A-level content and subject criteria has removed a base upon which greater HE involvement could have been built. It is the assessment of the specifications (rather than subject criteria) that require improvement in some subjects. It is likely that the Secretary of State's aspirations for enhanced HE engagement will be best achieved by the establishment of a national framework.

This would have a number of merits. It would avoid duplication, ad-hoc solutions and could ensure the involvement of key stakeholders without creating a large bureaucracy. It would also minimise the risks that Ofqual has identified: namely that A-level development may end up by being inconsistent across subjects.

We **agree** with the principle of comparability of demand and content in different specifications in a subject and a common grading system. However as indicated above, we do not consider that these objectives can be achieved under the proposals tabled.

We also consider that expertise in respect of A-level assessment rests *primarily* in the awarding organisations.

Accordingly, million+ believes that Ministers should

- **clarify future lines of responsibility and accountability for A-levels including their design and development**
- **support the principle of a national framework as the most effective means of achieving their objectives**
- **provide funding for the development of a framework which is supported by all key stakeholders**
- **allow for this development in an amended timetable**

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

The following questions refer to Section 3: Design rules - The purpose of A levels.

5. I believe that Condition 1 adequately defines an appropriate primary purpose of A levels for regulation.

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Do you have any comments or suggestions?

Ofqual's consultation appears to be primarily concerned with what is sometimes referred to as the 'stretch and challenge agenda' linked with the interest and need to use to differentiate among the highest achieving candidates. The stretch and challenge agenda is important for all universities but it risks being too narrow a focus.

million+ considers that A-levels must also be accessible and encourage interest in the study of subjects, including the sciences, at a higher level. A-levels also serve an important purpose in providing opportunities for students to study a number of subjects which then enables them to make more informed choices about which areas or disciplines they wish to pursue at degree-level, in their professional careers and in the workplace.

If A-levels only focus on rigour and the stretch and challenge agenda, there are real risks that the gains that have been made in widening participation including in STEM subjects and the wider purpose of A-levels as a route into employment and higher level apprenticeships will be undermined.

million+ believes that Ofqual should set out a vision for A-levels that places equal value on the need to differentiate between candidates and the need to encourages participation.

We do not agree with Condition 1 (that GCE qualifications should provide a basis for school and college accountability measures at 18). This is a crude measure which takes no account of the quality of teaching or student profile. As with similar measures, this proposal continues to promote perverse incentives and encourages teachers to teach to the exam rather than improve understanding and the quality of teaching and learning.

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

The following questions refer to Section 3: Design rules

Condition 2 - Size and grading.

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Do you have any comments or suggestions?

The Ofqual research confirms that in general terms A-levels work for 75% of the cohort and that universities are able to use A-levels to support differentiation between applicants.

The challenges of differentiation of high achieving students would be better resolved by a review of the nature and type of assessments and marking schemes. As previously outlined it remains important that the right balance is achieved between stretching candidates and being able to cater for a range of abilities. There would also be merits in the long-term in exploring whether the system that could take greater account of the acquisition of other skills and learning methods for higher education study.

million+ is not convinced that a new grading structure needs to be introduced. This would create a number of problems in terms of comparisons between reformed and old A-levels particularly in view of the proposal to phase subject reform. A new grading structure would lead to confusion for students, schools and would create complexities in higher education where all universities would have to review grade requirements and offers.

It is also difficult to see how a new grading structure could be easily managed either in the context of the UCAS tariff and the UCAS Qualifications Information Review proposals.

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Do you have any comments or suggestions?

It would be more appropriate to consider this issue further within a review of assessment but there are significant potential risks to aspiration, participation and progression of moving to a different grading structure.

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Do you have any comments or suggestions?

million+ believed the introduction of A* was unlikely to provide significant assistance in discriminating between highly achieving students. While the use of A* in university admissions has increased there is no robust evidence to confirm its value.

There is value in ensuring transparency in respect of performance by students.

The following questions relate to the options regarding the future structure of A levels:

Condition 3 - Qualification structure and availability of assessments

10. The opportunity for assessment in January should be removed.

Strongly agree

Agree for AS

Neither agree nor disagree

Disagree for A2

Strongly disagree

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

Universities use the AS as a reference point for providing an indication of an applicant's performance to inform the admissions process. AS also allows students to study a greater breadth of subjects which both encourages students to study subjects they might not wish to take to full A-level (a particular issue for science subjects, which are often regarded as harder than others) and facilitates informed decision-making on progression options. This also allows students studying science A-levels to take some form of mathematics or non-STEM subjects such as a language to achieve a breadth of study post-16.

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

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

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

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

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

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

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

I think that the weighting should be split as follows:

There is a case to give higher weighting of e.g. 60% to A2

Do you have any further comments or suggestions?

million+

- agrees that the opportunity to resit AS in January should be removed.
- considers that the opportunity to resit A2 in January should be retained.

Many modern universities provide more flexible patterns of admission with courses commencing each semester. Entry to higher education in many universities is therefore not limited to September / October start dates and some students study part-time. There is no reason why students should lose the opportunity to resit A2 in January, following which they may wish to progress to university, continue with or enter employment. It is not in the interests of students to limit resits for A2 to the following summer.

It is not clear technically how variable weighting could be achieved for all subjects between AS and A2. Moreover this proposal could lead to a significant change in the specifications for each subject and therefore have an impact on admissions to higher education.

Questions on Section 3: Design rules - A level design

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

These proposals place new responsibilities with the awarding bodies. This is more likely to lead to variability among A-level qualifications - a risk that Ofqual has identified. It remains unclear how Ofqual anticipates that this risk will be mitigated and how the conditions can be fulfilled or maintained outside of a national framework.

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

Needed?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Sufficient?

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

Do you have any comments or suggestions?

Different subjects require different assessment components. In some subjects to limit the latter to three would be inappropriate. million+ considers that the nature of the subject should be the important factor in determining how a subject is assessed and will inform the most valid form of assessment. This will vary from subjects which require essay writing to other subjects where the emphasis may be on practical work or performance.

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

Needed?

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

Sufficient?

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

Do you have any comments or suggestions?

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

Needed?

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

Sufficient?

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

Do you have any comments or suggestions?

The emphasis appears to be on traditional subjects. There would be merit in reviewing the relevance of these conditions to all subjects prior to their final adoption

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

Needed?

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree

Sufficient?

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

Do you have any comments or suggestions?

While this is desirable in principle, Ofqual must clarify how it expects such comparability to be achieved bearing in mind the different awarding bodies.

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

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

Do you have any comments or suggestions?

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

- Strongly agree
- Agree
- Neither agree nor disagree

() Disagree

() Strongly disagree

Do you have any comments or suggestions?

Questions on Section 3: Design rules - Qualification support

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

million+ considers that these proposals confuse HE engagement via academic subject expertise with sign-off by universities. The proposals rely on valued judgments about the merits of different institutions and the subject expertise of their academics. As such they are unacceptable, risk undermining the reputation of the UK's world-class university system and fail to recognise that subject and pedagogic expertise is found throughout the sector.

We are opposed to proposals based on university sign-off system linked with historic patterns of institutional research funding with greater value ascribed to some institutions than others. Receipt of research funding bears no relation to the quality of teaching and learning or subject expertise.

The net result of these proposals is that universities with the most socially exclusive student profiles and comparatively small numbers of undergraduate students will be more highly valued than others in terms of HE engagement. Notwithstanding the equality implications of this approach, the purpose of A-levels is not restricted to the progression of students to a small sub-set of universities.

The proposals are undesirable for other reasons. Academics are not in a position to sign-off on behalf of their universities. A-level reform and design is not core academic business (as academics confirmed in their responses to Ofqual's own research). Academics move institutions, take-up employment outside of HE and posts in other countries and they take career breaks and retire. There would be no guarantee that the academic who had provided specialist subject advice would be even in post at a particular university after a period of time.

Bearing in mind the number of awarding bodies and subjects the format for HE engagement proposed is unrealistic and unsustainable even if the timetable for reform was extended.

Ofqual is silent on the level of support required for awarding bodies to evidence HE engagement and / or precisely what universities would be supporting. This could vary from the development of subject criteria, the specification and / or the assessment material.

There would also be a risk that university sign-off became a matter of perceived HE institutional prestige unrelated to teaching quality or expertise. This would be a poor and misleading basis on which to promote and offer national qualifications.

There is the added but significant risk that students, their families and schools would be influenced by university sign-off and make A-level choices based on the latter. This would undermine entirely Ofqual's objective that A-levels should be comparable as a national qualification and risk students and schools opting for A-levels for the wrong reasons.

Ofqual has recognised the limitation of Condition 8 (university sign-off) by including the section re Exceptions. Institutions have their own specialisms and universities which have benefitted from historic patterns of research funding by no means teach the full range of subjects offered at A-level. Expertise and curricula knowledge in respect of several subject areas resides primarily in modern universities and specialist institutions. As a result Ofqual has added further proposals re Exceptions (Condition 9). This illustrates the shortcomings in the proposals to evidence HE engagement on the basis of university sign-off.

million+ considers that

- i. the proposals for university 'sign-off' are unacceptable and excessively bureaucratic and fail to build-on the current involvement of higher education in the design of A-levels**
- ii. there is no merit in different criteria for evidence of HE engagement being applied according to the subject in question**
- iii. HE engagement should be refocused within the context of a national framework**

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

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

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

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

Do you have any comments or suggestions?

See above

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

See above

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

Yes

No

Do you have any comments or suggestions?

See above

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Do you have any comments or suggestions?

See above

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

Yes

No

If your answer is Yes, please give further details:

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

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

Questions on Section 4: Exceptions

The following questions refer to Section 4: Exceptions.

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

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

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

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

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

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

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

Please refer to previous answer above

Questions on Section 5: Making sure standards are right year on year

The following questions refer to Section 5: Making sure standards are right year on year.

32. These review arrangements are sufficient and appropriate to secure standards.

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

Do you have any comments or suggestions?

Questions on Section 6: Implementation

The following questions refer to Section 6: Implementation.

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

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

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

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

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

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

_____ physics, chemistry, biology

_____ French, German and Spanish

_____ mathematics

_____ English literature

_____ geography and history

_____ a combination

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

General questions

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

The timetable laid out for reform is not feasible especially since there is no structure, process or agreed format in place including for HE engagement to take them forward.

million+ does not support a phased approach to the introduction of new A-levels and any suggestion that the sciences should be a priority.

Change to qualifications pose risks in terms of outcomes for students and for progression including to higher education. There are no merits for students or schools and colleges in reforms being rushed. GCSEs are also under reform and there are risks in losing connectivity if A-levels are subject to fundamental reform at the same time.

Universities would also need to anticipate the impact of any reforms in their admissions procedures and criteria. Higher education institutions are already managing major reforms to fees, funding and student number controls linked with A-level grades in a short period of transition with high levels of unpredictability in respect of impact and of student demand including in some subjects.

There would be considerable advantages in terms of probity and outcomes if time was invested in agreeing structures and processes in the first instance.

As a result million+ considers that the academic year 2016-17 is feasible as the introductory date for new A-levels across all subjects to be introduced for teaching.

In summary million+

- **opposes a phased and piecemeal introduction of the new A-levels commencing with teaching of some subjects in 2014**
- **supports the principle that new A-levels across all subjects should be introduced for teaching in the same year**
- **considers that it would be feasible for new A-levels across all subjects to be introduced for teaching in the academic year commencing 2016-17**

In the meantime some improvements could be introduced by 2014 - for example the removal of repeated resit opportunities at AS level.

Million+ would welcome the opportunity to discuss this response further.

Your details

Name*: Pam Tatlow

Organisation*: million+ (university think-tank)

- School/College
- Training Provider
- Higher Education Institute
- Awarding Organisation
- Student/Learner
- Parent/Carer
- Employer
- Representative group/Interest Group
- Government Body/Organisation (national and local)
- Other (including General Public)

School / College type

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

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

Russell Group

million+

1994 Group

University Alliance

GuildHE

UUK

None of the above

Your role

Chief Executive

How many staff does your business employ (full or part time)?

Less than 50

50 to 249

250 or more

Representative group / interest group type

Learned Body / Subject expert group

Equalities group

Unions

Sector Skills Council (SSC)

QAA

UCAS

Other voluntary or community group

None of the above

Organisation name*

million+

Nation*

England

Wales

Scotland

Northern Ireland

International

Email address*

info@millionplus.ac.uk

May we contact you for more information?

Yes

Would you like us to treat your response as confidential?

Yes

We are changing the way we communicate. We want to write clearly, directly and put the reader first. Overall, do you think we have got this right in this document?

Yes

No

Do you have any comments or suggestions?

The consultation questions require consistent cross-referencing and would have been better placed within the text and there is no opportunity to comment on principles. There are also some omissions – for example there is no specific question about the timetable which is widely regarded as unachievable by many stakeholders.

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