



Regulating Endorsement and Examiner-author Conflicts

SCORE's response to the Ofqual consultation

6 May 2014

Introduction

1. SCORE is a partnership of organisations, which aims to improve science education in UK schools and colleges by supporting the development and implementation of effective education policy. The partnership is currently chaired by Professor Julia Buckingham and comprises the Association for Science Education, Institute of Physics, Royal Society, Royal Society of Chemistry and Society of Biology.
2. In summary:
 - Textbooks are intended to guide teachers and learners through the full breadth and depth of a subject in order to support rounded, relevant teaching and learning. Every endeavour must be made to design and publish textbooks in support of this aim.¹
 - Teachers should be in a position of professional authority to choose a textbook based on this aim. For various reasons detailed below this is currently not the case, creating an environment that directly undermines the status of teaching.
 - The current system, whereby awarding organisations (AOs) are able to develop closed relationships with preferred publishers undermines the aims for guidance materials due to the commercial interest placed on this activity.
 - The endorsement of support materials through preferred publishers is a competitive, commercial activity structurally underpinned by a system in which multiple AOs compete within the qualifications market.
 - As a result of the AO and publisher relationship, the link between assessment specifications and textbook content has led to a situation in which ‘teaching to the test’ is driven and perpetuated by the perception that endorsed textbooks contain ‘inside knowledge’ about examinations.
 - To avoid this unintended and perverse behaviour in schools SCORE believes that there should be one single AO; that textbooks and revision guides are accredited externally; and that there is a ban on authors of in-print textbooks from being examiners.

Perverse impacts in schools and teaching

3. SCORE is in agreement with Ofqual that the relationship between AOs and publishers is leading to perverse and negative behaviour in schools.
 - The perception that textbooks hold ‘inside information’ indirectly leads to teaching to the test in some cases.
 - The perception that the subject is defined solely by the content of the textbook discourages broader reading and study.
 - Many schools and teachers feel obliged to buy specific materials endorsed by the same AO that provides the qualification in that subject.

¹ For some evidence-based information into the use of textbooks in teaching and learning, and the impact of ‘teaching to the test’, see ESRC Targeted Initiative on Science and Mathematics Education, [The National Curriculum Review: A synthesis of research evidence from TISME](#), (2010), p.9; and Better: Evidence-based Education, [Linking textbooks to science learning](#) (2010)

- Whenever an AO changes a qualification specification, schools are obliged to invest in updated materials, or risk letting students down with outdated guidance.
 - This also means that if a school wishes to change specifications and choose another AO, it may feel precluded from doing so due to the financial implications of buying a completely new set of textbooks.
 - In addition, the close relationship between AOs and textbook publishers throughout the development of specifications leads to perverse behaviour whereby a publisher can direct the content included in specifications through commercial interest (see paragraph 7).
4. Many of the issues associated with the over-identification of textbooks with particular specifications stem from the commercially competitive environment in which AOs operate. If there were a single AO, as in most other countries, that organisation could concentrate on producing high quality specifications and publishers would be free to produce textbooks that offered a broad overview of the subject. The notion of endorsement would disappear and the decision on which textbook to use would be taken by the teacher, drawing on her or his professional judgement.²

Previous statement from SCORE

5. In March 2012, SCORE responded to an Ofqual call for evidence on ‘Qualification support material and services’.³ SCORE reiterates the statements made in the response. We are making a distinction between a textbook and a course guide that forms part of a curriculum-developed course (see paragraph 10):
- AOs must not:
 - Talk in detail to textbook publishers until after specifications have been accredited; unless Ofqual has decided that the book has been developed as a course guide alongside a curriculum-developed course (see Paragraph 10).
 - Endorse particular textbooks (unless they have been independently accredited).
 - Be owned by publishers where there is clear evidence of this having too much influence on qualifications development and the outcome of examinations.
 - Allow their current examiners to contribute to textbooks that are explicitly linked to the specification they are involved with.

Weak proposals

6. Under ‘Condition C3: Arrangements with publishers’⁴ the term ‘reasonable steps’ is ambiguous, and there is no guideline as to how Ofqual would judge criteria with which AOs choose to endorse resources. This indicates that it would be possible for AOs to

² For a guide to the differences in awarding organisation models and some international comparisons see the House of Commons Education Select Committee report [The administration for 15-19 year olds in England, Part II: changes to the system](#) (July 2012)

³ [SCORE response to the Ofqual call for evidence on Qualification support material and services](#); (March 2012)

⁴ Ofqual; [Regulating Endorsement and Examiner-Author Conflicts: A consultation on Regulating AOs’ Endorsement Processes of Textbooks and other Support Materials and the Risks Arising where Examiners Write Resources](#). (2014) p.30

decide what expectations are placed on their own submissions of evidence thereby undermining the independent authority of Ofqual.

7. There is no regulation of the schedule within which AOs work with publishers to create new materials, including revision guides. Currently it is possible that AOs carry out the development of assessment specifications whilst also working with publishers to create accompanying support materials. Given the cost of publishing, once textbooks are approved for print, AOs are less likely to initiate changes to the text, even if the specifications require revision. This is extremely detrimental to the development of high quality assessment specifications.⁵
8. The Ofqual statement that ‘endorsement processes... [give] students and teachers confidence that the resources properly cover the specification of the qualification’⁶ is itself evidence of too heavy an emphasis being placed on using textbooks by teachers, students and also parents, in order to predict and devise strategies for examinations rather than learning the subject in the round. If a textbook appears to be strongly aligned to assessment, students, parents and teachers will naturally have more ‘confidence’ in achieving higher grades through using that resource.
9. It is also unclear from the proposals how often, on what basis, and to what ends AOs would participate in the submission of evidence to Ofqual. This detail appears to have been omitted in the interests of AO confidentiality; however, to bring credibility to the regulation process, it is necessary to clarify these technicalities.

SCORE recommends that:

- Ofqual specifies the types of evidence expected from AOs so that the regulation process is made transparent and it is made clear that Ofqual is delineating minimum standards of expectation;
- Ofqual publishes a plan of how this regulation framework and the evidence collected from AOs will be monitored;
- Textbooks and revision guides are accredited by external experts;
- Ofqual uses its independent authority to ensure that regulatory processes are detailed, rather than broad enough to satisfy AO demands for confidentiality.

Differences in models for endorsement

10. It is essential that these regulations do not prevent innovation or the development of new curricula or courses – often with significant external funding. Examples of innovative curriculum-developed courses are Salters Chemistry, Advancing Physics and Salters Nuffield Biology; each of these courses was developed with external funding from, for example, the University of York and the Nuffield Foundation.

Therefore, we are making a distinction between a textbook and a course guide. We suggest that Ofqual makes judgements on this or a similar distinction.

⁵ In innovative specification development (as noted above) assessment and material development can occur simultaneously, due to the involvement of unaffiliated subject experts on the material development.

⁶ Ofqual; [Regulating Endorsement and Examiner-Author Conflicts: A consultation on Regulating AOs' Endorsement Processes of Textbooks and other Support Materials and the Risks Arising where Examiners Write Resources](#). (2014) p.3

- A textbook is a book (or resource) that is developed by a publisher to match a specification that is provided to them by the AO. There has been no significant curriculum development and the authors have not been involved in philosophical discussion or review of the draft specification.
- A course guide is a set of materials developed to support a curriculum-developed course; it is likely that there has been significant funding of research, a philosophical approach and a coherent package of materials; the authors will have been involved in the curriculum-development and will have been in discussions with the AO as the specification has been developed and iterated.

In cases where an external sponsor is involved, the materials produced to accompany the specifications are developed by unaffiliated organisations, with no involvement in the awarding of the qualifications themselves.

11. The merit in this approach is that the external sponsor has little commercial interest in resource development, but is committed to improving the science curriculum in teaching in the science subjects; as opposed to a model whereby publishers develop resources for commercial purposes only.

SCORE recommends that:

- The external accreditation of textbooks by independent experts is adopted as a sustainable model supporting broad textbook development and avoiding the re-writing of textbooks every time a specification changes. This model could be endorsed by AOs, who would be required to provide a clear reason why they do not endorse an expert accreditation if that decision were taken;
- If the proposed regulations are implemented, Ofqual should not jeopardise the innovative approach to expert, external involvement in specification and textbook development as highlighted in examples above.
- Ofqual should further pursue a model in which external sponsors support the development of rich, broad resources for the benefit of education as a whole. This model would require an approach that separates the act of resource development from the act of publishing.