

Kathleen Tattersall, OBE  
Chair, Ofqual  
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8 March 2010

Dear Kathleen,

**Ofqual consultation on the regulation of qualifications, examinations and assessments**

SCORE welcomes the opportunity to respond to the above consultation which it views as being an important exercise in determining the future of science education. We prefer, rather than answering individual questions formulated by Ofqual, to respond in a more holistic way by outlining four key principles for regulating and monitoring subject-based science curricula and qualifications:

- Strategic priorities for key subjects *must* be deliverable within any structure proposed;
- While all stakeholders have a unique voice, the needs of learners *must* be considered uppermost;
- Public and subject community confidence in the regulator *must* be maintained by ensuring that the regulation and monitoring process is long-term, transparent and above all rigorous;
- The tension between maintaining consistent standards and market forces *must* be confronted.

SCORE recommends that:

- The criterion for deciding whether a qualification is of 'national significance' –should refer to subjects of strategic importance, such as STEM subjects.
- When qualifications are developed, the regulator should ensure that there is clarity both in terms of who the qualification is for and where it will lead
- Ofqual should report to Parliament on its interaction with the subject community.
- There should be a formalised process of interaction between a range of professional bodies, subject associations and awarding organisations
- The inherent tension between maintaining standards and encouraging market forces should be monitored by the regulator
- The relationship between Awarding Organisations and publishers should be heavily monitored

## **Strategic priorities for key subjects *must* be deliverable within any structure proposed**

Key subjects within education can have a critical impact on society and economy. The sciences form a set of such subjects. How the needs of subjects are interpreted depends very much on who is undertaking the regulator, organisations in curriculum development, and Awarding Organisations. This in turn depends on what sort of subject expertise and pedagogical experience they may have. Both the regulator and Awarding Organisations offering these key subjects should have such expertise in house. In addition, they need to secure specialist input from subject communities which covers a range of perspectives, including teachers, professional bodies, employers and academics/researchers. This input is crucial from the early stages of subject criteria and specification development, to the piloting of courses and assessment systems, to the national roll out of curricula and qualifications, all of which takes time and resources.

We feel that the criterion for deciding whether a qualification is of 'national significance' – and should therefore be subjected to regulation by Ofqual – should refer to subjects of strategic importance, such as STEM subjects.

## **While all stakeholders have a unique voice, the needs of learners *must* be considered**

When qualifications are developed, there should be clarity both in terms of who the qualification is for and where it will lead. If the system, for example, results in too many 14-19 qualifications that are perceived as being of little value to learners or that hinder their smooth transition to further related study, then clearly this is entirely unacceptable. By contrast the availability of only a single course or qualification in a subject may restrict choice of career paths and fail to allow sufficient educational innovation which would be of benefit to both teachers and their learners. The regulator has a key role in overseeing the appropriate balance of interests.

## **Public and subject community confidence in the regulator *must* be maintained by ensuring that the regulation and monitoring process is long-term, transparent and above all rigorous**

Maintaining the confidence of the profession community means that the processes of consultation must be rigorous and transparent. It must also be a long-term, ongoing process. However, we note that there is a possible conflict of interests in terms of being transparent and maintaining public confidence. There may be a temptation for the regulator not to disclose information to the public because of external pressure from Government or major Awarding Organisations, or to do so only on an *ad hoc* basis. Transparency has not necessarily been demonstrated so far by Ofqual – for example the final deliberations on the GCSE Sciences mathematics requirements list were undertaken behind closed doors with little explanation of why the advice requested was not subsequently followed.

Currently new specifications have to seek evidence of support from nationally recognised subject associations. However, this is on the basis of scientific accuracy, and there are a range of bodies that can be approached. A formalised process of interaction between a range of professional bodies, subject associations and awarding organisations would lead to stronger specifications and greater support from the professional community. This must include specifying the roles of each, and having clear timetables for all involved. Timetables for engaging with stakeholders should allow sufficient time for consultations and responses to draft specifications. We support the Science and Learning Expert Group's recommendation that Ofqual should report to Parliament on its interaction with the subject community.

**The tension between maintaining consistent standards and market forces *must* be confronted**

There is an inherent tension between maintaining standards and encouraging market forces to operate. The commercial nature of some Awarding Organisations could risk driving standards down, rather than promoting choice and diversity in qualifications. For example, the commercial nature of some Awarding Organisations means they are incentivised simply to increase takeup with no corresponding balance to maintain standards. Diversity in qualifications, when schools offer a variety of courses to students, could be praised, but diversity can also result in students being offered no choice at all, and result in taking inappropriate qualifications that limit progression. In addition, Awarding Organisations often offer discounted packages of specifications, putting pressure on choice.

The relationship between Awarding Organisations and publishers needs to be heavily monitored. This relationship could mean that 'preferred' published resources are pushed in the direction of teachers, even if they are unsuitable for developing a depth of understanding of a subject. There are also issues with Chief Examiners writing text books as there is a perception amongst teachers that these books may contain 'insider information' and this could be seen to be a conflict of interest in terms of the Chief Examiners' role. This is potentially damaging to the teaching and learning of science.

The SCORE partners and I would be more than happy to meet with you to discuss these areas.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alan Wilson', with a horizontal line underneath.

Professor Sir Alan Wilson, FRS

**Chair of SCORE**

Cc Isabel Nisbet Acting Chief Executive, Ofqual