



From Transition to Transformation – Strategic Regulation of Awarding Organisations and Qualifications

SCORE response to the Ofqual consultation

31 January 2011

About SCORE

SCORE is a partnership of six 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 Graham Hutchings FRS and comprises the Association for Science Education, Institute of Physics, Royal Society, Royal Society of Chemistry, Science Council and Society of Biology.

SCORE welcomes the opportunity to respond to the Ofqual consultation on the regulation of awarding organisations and qualifications. Regulation of assessment is necessary to ensure the interests of learners are protected and SCORE strongly recommends that the needs of the learners must be considered uppermost.

Rather than answering individual questions formulated by Ofqual, SCORE finds it more appropriate to comment on the consultation as a whole. SCORE partners' response covers Ofqual's role in:

- Setting and maintaining standards
- Improving the qualification development process
- Managing conflicts of interest
- Ensuring levels of appropriate expertise.

Setting and maintaining standards

1. SCORE partners strongly support the statement 'The market alone cannot be relied upon to make sure that the standards of comparable qualifications are consistent' (2.2.1). Currently there is an inherent tension between maintaining standards and encouraging market forces to operate. The system incentivises awarding organisations to increase take-up with no corresponding incentives to maintain standards.
2. SCORE recommends that Ofqual must have a clear and transparent approach to setting and monitoring standards. Ofqual's approach to setting standards and the controls it will use are not yet clear and further clarification is required on the following:
 - a. **Risk** – Item 4.7.3 proposes that Ofqual will 'decide which qualifications are to be subject to accreditation on the basis of judgement about the level of risk presented to learners or to the qualifications system'. However, there is little clarity on how or when risk will be assessed in terms of standards and at which stage Ofqual will step in. GCSE Science is a prime example where confidence in the qualification has fallen. Ofqual's review of the science GCSEs has commented on the standards of assessment and subsequently Ofqual has attempted to address these issues with the awarding organisations for several years in a row without success. SCORE seeks clarification on how Ofqual will identify and enforce change in response to subject specific issues as well as the systemic issues outlined in the consultation document.
 - b. **Demand** – SCORE welcomes the importance Ofqual places on being explicit in criteria and specifications regarding the level of demand required of the learner. Ofqual has not yet provided examples of how specifications and criteria demonstrate appropriate levels of demand. Any requirement for the level of demand to be consistent over time

should not prevent awarding organisations from raising standards or addressing any existing lack of parity between different subjects and/or similar qualifications, or restrict them from instigating change to bring qualifications in line with the highest standards identified from international evidence.

- c. **Assessment** - Standards are set and maintained both through specifications and assessments. Item 4.1.2 states that the criteria should define the level of demand required of learners so that awarding organisations can develop their qualifications with a clear understanding of the standard required. Ofqual should ensure the appropriate level of demand is demonstrated in assessment materials (including how questions are set) and not just by the level of 'demand' of subject content. SCORE recommends that assessments should be reviewed by an expert panel before they are approved for use. Professional bodies and subject associations should be involved in this review – either through direct involvement or through proposing members of subject review panels.
- d. **Flexibility** - SCORE partners acknowledge that an overarching framework for regulated qualifications is required to ensure comparability across subjects. However, this overarching framework should not restrict subject criteria unnecessarily, particularly if it will affect the quality of the qualification.

The development of new criteria and their related specifications

- 3. SCORE strongly agrees that Ofqual should revise the way qualifications are developed. Ofqual should consider the following when it revises the process:
 - a. **Transparency** – the process of criteria development and specification accreditation is not transparent. Ofqual should publish the conditions used to test whether a qualification should be regulated. Awarding organisations and Ofqual should be required to provide a summary of consultation responses and the actions they have taken in response.
 - b. **Professional and learned societies** – Professional Bodies and Learned Societies embody subject knowledge and expertise. Consequently, SCORE proposes that Ofqual and the Societies work closely to develop a protocol for the development of the criteria and specifications for GCSEs, A-levels and related 'national' examinations. The current requirement for 'support' from relevant sectors does not function well in science and needs to be reviewed to ensure that all parties know the role(s) they have and at what stage any intervention is required. Many of these associations rely on membership input to consultations which takes time and resource to gather – this should be recognised by Ofqual and the awarding bodies.
 - c. **Higher Education and employers** – End users of qualifications must have confidence in qualifications. SCORE supports the move towards developing qualifications with advice from end users but Ofqual and awarding organisations have yet to propose how this will be achieved. Professional and learned societies should have a role to play in ensuring stakeholders are engaged with qualification development and SCORE proposes that Ofqual work alongside these societies to develop qualifications.
 - d. **Effective consultation** – Ofqual should ensure that the consultation period on new criteria and specifications is more effectively planned. Ofqual should allow adequate time and provide improved mechanisms for consultation and engagement with appropriate stakeholders, including teachers.

- e. **Research and evidence** – To ensure the development of high quality and effective qualifications, all changes should be based on research and evidence. Ofqual's procedure must ensure that they, and awarding organisations, are required to demonstrate use of robust evidence and research.
- f. **The qualification cycle** - The current life time of 5 years for GCSEs and A-levels is not necessary if the qualifications are fit for purpose and reach the required standard. This life time does not allow Ofqual or awarding organisations to use evidence about the impact of the previous specification when developing a new specification. The short cycle is additionally a huge drain on resources and time constraints can affect the piloting of new qualifications and the consultation process.
- g. **Progression** – Ofqual should require awarding organisations to demonstrate that new and revised qualifications have been developed for a specific purpose, and that the qualification enables students to progress to further learning or employment.

Managing conflicts of interest

- 4. SCORE is very concerned about the management of conflicts of interest between awarding functions and any other activities awarding organisations (and their related companies) undertake. Good specifications should support effective teaching, learning and assessment, without being influenced or constrained by commercial interests and/or connected activities. [See 6 below.]
- 5. Ofqual is responsible for using its enforcement powers to ensure that there is no conflict of interest in any one awarding organisation and that the commercial nature of awarding organisations does not conflict with maintaining standards. The enforcement powers listed under Section 7 of the consultation document are not strong enough to ensure this.
- 6. Activities that Ofqual should consider under its remit include:
 - a. **Awarding organisation endorsement of text books** - This leads to text books being very tightly matched to specific specifications and their associated examinations. Schools may feel it would be necessary to replace entire sets of text books if they changed specifications. This may lead to a reluctance to change specifications for educational reasons. Additionally, the relationship between the specifications being developed by awarding organisations and the production of textbooks that support those specifications can, as was experienced in 2010, lead to unresponsiveness by awarding organisations to feedback on their proposed specifications. We therefore recommend that Ofqual works to break the link between specification/assessment development and the commercial publications that provide resources in support of a specification.
 - b. **Commercial packaging of qualifications** – Different qualifications (eg GCSEs in English and Science) can and are grouped together by awarding organisations in package deals for centres. The cost of such a grouping, rather than the quality of a particular qualification within it, can affect centre's choices. Ofqual should have the authority to ensure that pricing structures of individual qualifications, and packages, are regulated.
 - c. **Reducing the burden of fees** – Ofqual should seek to reduce the existing high burden qualification fees place on schools. The amount secondary schools in England pay for

qualifications fees has risen from £154 million in 2002-3 to £281 million in 2008-9¹. This does not include any fees schools pay awarding organisations for other services, such as training courses for new specifications.

- d. **Marketing of unaccredited qualifications** – In 2010, some awarding organisations marketed unaccredited GCSE science qualifications to schools, leading to possible confusion as to the status of the qualifications . Ofqual must ensure that for those qualifications that need to be accredited, specifications can be marketed only after accreditation.
 - e. **Training** – The role of senior examiners and awarding organisations in providing continuing professional development for schools should be regulated, as this may be overly closely related to improving grades rather than improving teaching and learning.
7. Ofqual has not yet published the strategy it will use to identify and keep such connected activities under review. SCORE therefore remains concerned that the proposed division of responsibilities between Ofqual and the accountable officer (of the awarding organisation) may weaken the regulation of awarding organisations and their qualifications.

Appropriate subject expertise

8. SCORE recognises that Ofqual regulates a wide range of qualifications. However, Ofqual's approach to regulation needs to recognise that key subjects and their related qualifications can have a critical impact on society and economy.
9. The way the needs of individual subjects are interpreted depends very much on the roles, responsibilities and expertise of the regulator and awarding organisations. Ofqual should consider the following:
- a. **In-house subject expertise** – Ofqual and awarding organisations offering key qualifications (such as GCSEs and A-levels in the sciences) should have related subject expertise in-house.
 - b. **External specialist input** – Ofqual and awarding organisations should also be required to secure specialist input from subject communities (including teachers, professional bodies, employers and academics) at all stages of qualification development (including assessment). SCORE proposes that professional bodies and subject associations should be involved at all stages of qualification development – either through direct involvement or through proposing members of subject review panels. [Also see 3b.]
 - c. **Transparency** – Ofqual should ensure that the independent advice it receives does not come from individuals with close links to awarding organisations or from one particular part of the subject community (for example current or recent examiners).

¹ <http://www.ofqual.gov.uk/files/2010-03-19-Annual-Market-Report.pdf>