

# **Analysis of the consultation carried out into higher education involvement in GCE A levels and amended GCE A level criteria (design rules)**

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# 1 Executive summary

## 1.1 Introduction

- The 2010 White Paper *The Importance of Teaching* set out the policy intention that universities and learned bodies should be involved in the future development of A levels and that resit rules would be changed to prevent A level students resitting large numbers of units.<sup>1</sup> In June 2012, in response to the White Paper and findings from its national and international research, Ofqual published, for consultation, a proposed regulatory approach to implementing A level reform in England, which included nine new general conditions of recognition for GCE qualifications. The proposed conditions are included as Appendix 1 of this report. Key messages from the consultation are presented in this executive summary.

## 1.2 Consultation process

- Stakeholders were invited to respond to an online questionnaire or to submit their views by email or letter. The consultation took place between 19 June and 11 September 2012. In total, 891 completed questionnaires were included in the analysis, together with 54 other responses to the consultation, submitted in different formats. In addition, a total of 167 participants from a range of stakeholder groups took part in a focus group at one of seven consultation events held between July and September 2012. The events were used to encourage stakeholders to respond to the online questionnaire and to give them an opportunity to discuss the proposals in detail with other stakeholders. It was also a chance to gain the participants' perspectives on the potential impact of the proposals in practice and any issues or risks that might be associated with implementing them. Feedback from the focus groups has been included in the analysis reported here.

## 1.3 Key messages

- It was evident from the responses of many representative organisations that there had been widespread consultation with their members and often discussion between organisations too. There was broad consensus from stakeholders that A levels were

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<sup>1</sup> § 4.47 and 4.48.

largely fit for purpose.<sup>2</sup> Many participating stakeholders, however, welcomed the reform of one or more aspects of A level assessment that were considered to have had a negative impact on teaching, learning and student development, most commonly: modular design, January assessments and/or multiple opportunities for resits. The majority of stakeholders participating in the consultation welcomed the increased role of universities and higher education institutions (HEIs) in the development of A levels, and strongly supported the general principles of the proposed regulatory approach.

- Stakeholders recognised that the consultation was about Ofqual’s regulatory process, and not the policy behind the reforms, but there were high levels of concern about the implementation of reform and the proposed regulatory approach. One recurring issue with the reforms identified by representative organisations (and across the full range of stakeholders participating in the consultation) was that universities and HEIs were not included in any current or proposed infrastructure or process identified for the design and development of A levels. Some stakeholder groups raised an associated issue about government withdrawing from accountability for A levels as national qualifications, questioning how the work required for the reforms would be prioritised and funded in universities and HEIs if there was no intervention from, for example, the Department for Business, Innovation and Skills (BIS).

### **1.3.1 General principles**

- There were commonly held fears that, without a co-ordinating group/body for an A level subject, a hierarchical system of A levels would arise based on which universities endorsed a particular subject and/or specification within a subject. Stakeholders felt strongly that this development would reduce equality of access for students to the full range of universities, and the students most severely affected would be those without access to informed advice about which A levels/specifications are required for their preferred courses. Several representative organisations and special interest groups argued for the

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<sup>2</sup> This term is used to indicate that A levels are generally recognised as providing a reliable indicator of a student’s specific subject knowledge and understanding, of academic and more generic skills, and of suitability for progression to undergraduate study and/or employment.

establishment of national subject committees as a means of strengthening HEI engagement with the development of A levels and ensuring a non-hierarchical qualifications system.

### 1.3.2 The purpose of A levels

- Although responses to the questionnaire showed broad agreement with the primary purpose of A levels outlined in Condition 1 of the consultation document, many stakeholders expressed specific concerns,<sup>3</sup> including:
- Other destinations (for example, employment and the development of wider skills important for this education phase) were not given sufficient recognition. HEI participants felt that the purpose A levels served in the higher education (HE) admission process was not only subject specific but also a general indicator of a broader range of knowledge and skills.
- Generally, employers were considered to require similar ‘skills’ to those valued by HE, but stakeholders at the consultation events considered it very important that employers should be involved somewhere in the examination design process, so that employment as a destination (including after graduation) was not forgotten.
- The reference to ‘internationally comparable’ in Condition 1 was considered unclear. Several focus group participants felt that it was important that this should be understood as ‘can be compared’ rather than ‘are equivalent’. Some exam boards questioned what the mechanism for measuring comparability was and whether any development of a ‘measure’ should be the responsibility of individual exam boards.
- The majority of stakeholder groups were concerned that school and college accountability was included in Condition 1 as a secondary purpose of A levels. Although school and college participants recognised that, in practice A level results were used in this way, most stakeholder groups thought that there was a tension between the primary purpose and the inclusion of school accountability measures: end result (performance) against preparation for HE.

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<sup>3</sup> Either in written submissions or in focus groups.



### 1.3.3 The AS and January assessment

- All stakeholder groups strongly supported retaining the AS qualification and its relationship with A2. There was also strong support for removing the January assessment window, as assessments in January were generally considered to disrupt teaching and learning. Some stakeholders, however, proposed that the January assessment window should be maintained in special circumstances, with many commenting that it was important for some protected groups, including students with special educational needs (SEN) or a disability.
- There was considerable debate on whether a 50:50 weighting was an appropriate split for AS/A2. There was broad consensus that AS did not really represent 50% of the progress required to achieve an A level but that in practice the actual weighting of the AS was less than 50% anyway. Stakeholders strongly supported the view that the highest mark should count towards a student's qualification, if the student resits an assessment.

### 1.3.4 Implementation

Stakeholders expressed serious concerns about implementation. Specifically:

- There was an overall sense among HEI representative groups and individual HEIs that it would not be advisable or operationally feasible for the HE sector to take on the 'ownership of the exams', particularly in terms of the consultation's current proposal that it should formally endorse all A levels. Several HEI representative groups saw it as important that learned societies should be engaged in A level development on an equal footing with HEIs, and that schools and colleges and, where appropriate, employers should have a role in the process.
- All stakeholder groups, including HEIs, expressed concern that the proposed timescale for the reform of A levels was unrealistic and might lead HE to decline to be associated with the design and development of the new qualifications.
- Many participants expressed concern that the reform of A levels was happening in isolation, without a full understanding of change taking place in other parts of the education system. The raising of the school leaving age, the increase in university fees and the new funding mechanisms for Key Stage 5 (KS5), for example, might all

affect A level participation. In the absence of any programme of study for KS5, participants felt that the regulatory approach must enshrine comparability of curricula to ensure equality of access for students from all schools and colleges.

### **1.3.5 Grading and standards**

- Stakeholders had mixed views on whether a new grading structure should be introduced to accompany the new A levels. The most frequently cited reasons for maintaining the current grading structure were that it was seen as broadly fit for purpose and it was widely understood by stakeholders. Respondents assumed, however, that the demand of the new A levels would be broadly the same as that of the old. If there was to be any recalibration of A level grade boundaries, participants generally felt that, for it to be widely understood, grading would need to be suitably different and/or made suitably transparent.
- There was wide support for comparability of demand between specifications for the same subject so that, for example, a B grade in A level French from one exam board meant the same as a B grade in A level French from another exam board.

## 2 Introduction

### 2.1 The consultation focus

The 2010 White Paper *The Importance of Teaching* set out the policy intention that universities and learned bodies should be involved in the future development of A levels and that resit rules would be changed to prevent A level students resitting large numbers of units.<sup>4</sup> In June 2012, in response to the White Paper and findings from its national and international research, Ofqual published, for consultation, a proposed regulatory approach to implementing A level reform in England.<sup>5</sup> The consultation document outlines the general principles that guided the development of the proposed approach:

- There should be stronger university involvement in the development of A levels.
- Regulation of A levels should improve the validity of qualifications and their assessment, while allowing for flexibility in assessment to support improved teaching and learning.
- Regulation should consider the needs of those who use the qualification.
- The regulatory burden should be minimised.

The qualifications system should, therefore ensure:

- Equality of access for students to the full range of universities – different A level specifications in a subject should not present a barrier to students having equal access to courses at all universities (subject to the level of their performance), and comparability of demand and content across different specifications within a subject.

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<sup>4</sup> *A levels are a crucial way that universities select candidates for their courses, so it is important that these qualifications meet the needs of higher education institutions. To ensure that they support progression to further education, higher education or employment, we are working with Ofqual, the awarding organisations and higher education institutions to ensure universities and learned bodies can be fully involved in their development. We specifically want to explore where linear A levels can be adapted to provide the depth of synoptic learning which the best universities value. (§ 4.47)*

*The current GCSE and A level system allows for resits of modules, which can be seen as undermining the qualifications and educationally inappropriate. In 2008, QCDA collected information from a sample of A levels and found that between two-thirds and three-quarters of students re-sat at least one unit. It is our view that this is a cause for concern. We will ask Ofqual to change the rules on resits to prevent students from resitting large numbers of units. We will consider with Ofqual in the light of evaluation evidence whether this and other recent changes are sufficient to address concerns with A levels. (§ 4.48)*

<sup>5</sup> There are currently five exam boards that are recognised to design, deliver and award A level qualifications in England, Wales and Northern Ireland. The Welsh Government regulates A level qualifications in Wales, and the Council for the Curriculum, Examinations and Assessment (CCEA) regulates them in Northern Ireland.

- Support for selection to universities – a common structure and grading system for A levels, to enable them to be used in university selection procedures.

The consultation document also includes proposed design rules for A levels, set out in nine new general conditions of recognition for GCE qualifications. **Appendix 1 outlines the nine conditions referred to throughout the consultation document. The conditions can also be read in the context of the consultation document, included as hyperlink in Appendix 2.**

Following the publication of this consultation document, Ofqual carried out a formal consultation process between June and September 2012. The aim of the consultation was to identify the level of endorsement of the proposed approach and to highlight any concerns or areas where there was a lack of clarity. AlphaPlus Consultancy Ltd was commissioned by Ofqual to undertake an independent evaluation of the data collected from the consultation. This report outlines the methodology used in the consultation process to collect and analyse data, and describes stakeholder responses to the consultation document.

The equality analysis referred to in the consultation document is included as Appendix 3.

## 3 The consultation process

### 3.1 Data collection methods

Stakeholders were able to engage with the consultation by:

- responding to the consultation questionnaire
- taking part in a focus group at a consultation event.

The types of data available for analysis, therefore comprised:

- quantitative data from the consultation questionnaire<sup>6</sup>
- qualitative data from the consultation questionnaire (in the form of free-text responses), qualitative data from the consultation events (in the form of stakeholders' noted views), and qualitative data from written submissions to the consultation (in the form of letters or papers submitted).

The data collected and analysed is summarised below.

#### 3.1.1 Consultation questionnaire

The consultation questions were made available as an online questionnaire,<sup>7</sup> available from 19 June to 11 September 2012, with the online questionnaire's web address being published on the Ofqual website. Responses to the consultation were accepted in a range of formats: the consultation questionnaire, and also by letter or email. In total, 945 responses were received and included in the analysis: 891 completed consultation questionnaires, and 54 responses submitted in different formats. Appendix 4 – Data sources, provides more detail on the data sources used in the analysis.

#### 3.1.2 Consultation focus group events

A total of 167 participants from a range of stakeholder groups attended one of seven consultation events held between July and September 2012. The events were used to encourage stakeholders to respond to the consultation questionnaire and to give them an opportunity to discuss the proposals in detail with other stakeholders. It was also a chance

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<sup>6</sup> The majority of questions in the consultation questionnaire required a scaled response where respondents were asked to say whether they strongly disagreed, disagreed, neither agreed nor disagreed, agreed, or strongly agreed with specific questions about the consultation. There were also a small number of yes/no questions and a similar number of free-text response questions. Most of the closed-form questions (scaled and yes/no) also provided an option for an additional free-text response using the prompt, 'Do you have any comments or suggestions?'

<sup>7</sup> Delivered using SurveyGizmo: <http://www.surveygizmo.com/>

to gain the participants' perspectives on the potential impact of the proposals and on any issues or risks that might be associated with the implementation of the proposals in practice.

The consultation events were based around a series of focus groups, with participants allocated, where possible, to a group based on the type of organisation they represented (for example, school and colleges, subject association). Participants were asked as a group to identify the areas of the consultation of most interest and relevance to them. An *AlphaPlus* facilitator then ensured that these topic areas were given priority in the discussions. At the penultimate event, where there was a large and diverse group of participants, an additional round-table session was held in the afternoon to allow discussion of key issues across stakeholder groups.

### **3.2 Data analysis**

All responses to the consultation were analysed. Questionnaire data was imported into SPSS<sup>8</sup> for statistical analysis. Free-text responses from the consultation questionnaire and extended narrative responses that had been submitted (for example, letters and technical papers) were coded by theme. Key features of the analysis are as follows:

- Responses were received from individuals, organisations, and groups of organisations. In the analysis, therefore, responses have been considered in relation to the role of the respondent, the type of response (individual, organisation, group), and the stakeholder group of the respondent.
- From the qualitative responses to the consultation and the feedback at the consultation events, it is evident that, despite concerns about the timing of the consultation (over the summer), there has been widespread internal discussion by representative organisations and special interest groups, and discussion between different representative organisations and special interest groups. Any endorsement of a common viewpoint, following discussion, has often been referenced in consultation responses.
- Analysis has taken into account the fact that responses may be multi-layered with, for example, responses from individual university lecturers from different

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<sup>8</sup> SPSS is a statistical analysis software package: <http://www-01.ibm.com/software/analytics/spss/>

departments of the same university, an organisation-level response from the university, and a representative response from the mission group the university is a member of. By a similar token, there might be responses from subject teachers within a school, a school response from the same school, as well as responses from union bodies representing school teachers, and from subject associations.

- In a few instances where there have been multiple responses from individuals in an organisation, further statistical analysis has been undertaken to ensure that this does not bias any of the key messages identified from the consultation, especially in the few cases in which there is less consensus among participants.

More than half of the stakeholders who responded to the consultation requested that their submissions be treated as confidential, and all the focus group events were carried out on a confidential basis. All consultation submissions have, therefore been treated confidentially in this report.

## 4 Summary of consultation responses

The consultation focuses on A levels in England. The majority of responses to the consultation questionnaire were from England (859); in addition, there were 10 responses from Wales, 5 from Northern Ireland, 2 from Scotland and a further 15 international responses.<sup>9</sup> The breakdown by stakeholder group is shown in Figure 1.

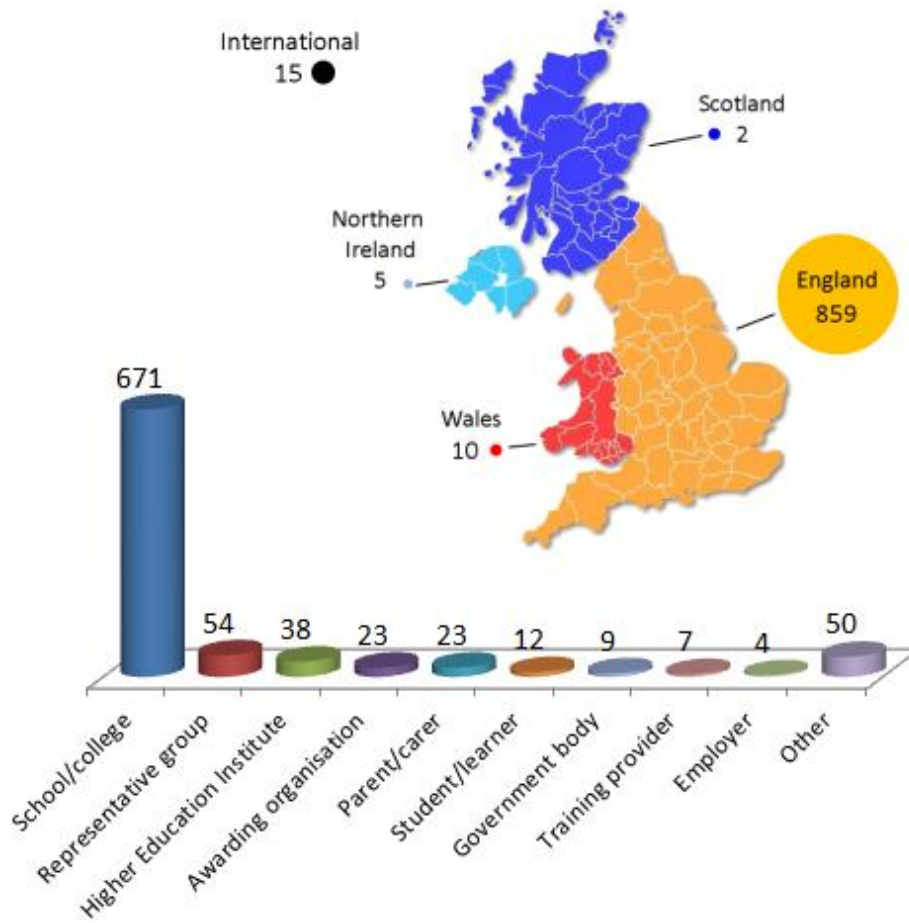


Figure 1: Breakdown of stakeholder responses by nation and type

### 4.1 Representativeness

As with any public consultation, responses were received from a self-selecting range of participants, which introduces the potential for selection bias.<sup>10</sup> Accordingly, there can be no assumption that the stakeholders who have responded to the consultation are fully representative of the wider stakeholder population. The data has, therefore been analysed

<sup>9</sup> International respondents were deemed to be those based outside the UK. Organisations based in the UK were categorised as such, even if operating internationally; 28 respondents did not provide information on their nation.

<sup>10</sup> Selection bias occurs when characteristics of the subjects selected for the study are systematically different from those in the target population.



to provide some indication of just how representative the consultation sample is of the wider population of Ofqual stakeholders.

#### 4.1.1 Representativeness of schools and colleges in the questionnaire

Figure 2 presents the breakdown of schools and colleges that responded to the questionnaire. Academies and/or free schools provided the largest number of responses (26%).

Figure 3 presents this breakdown as a proportion of the overall number of schools in England from each category, using data from EduBase.<sup>11</sup> This figure shows that approximately one in three further education (FE)/sixth form colleges responded and a similar number of independent schools, but that less than 10% of comprehensives did so. Based on these figures, Figure 4 shows how over-represented (positive numbers) or under-represented (negative numbers) each school/college type is compared with what number would be expected if all school/college types had responded in proportion to the number of centres of each type in England.

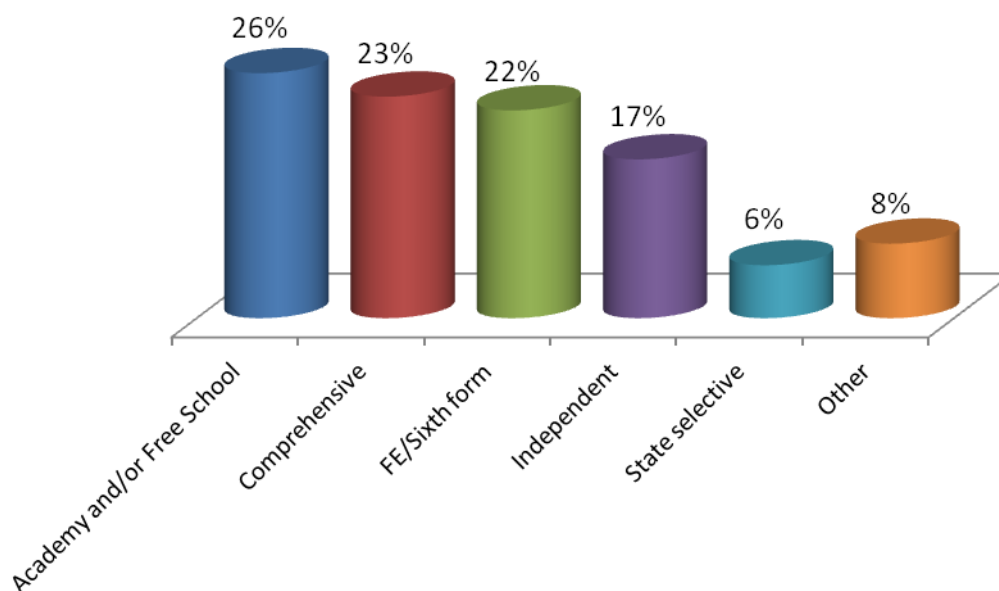


Figure 2: Breakdown of stakeholder responses by school/college type (%)

<sup>11</sup> <http://www.education.gov.uk/edubase/home.xhtml>

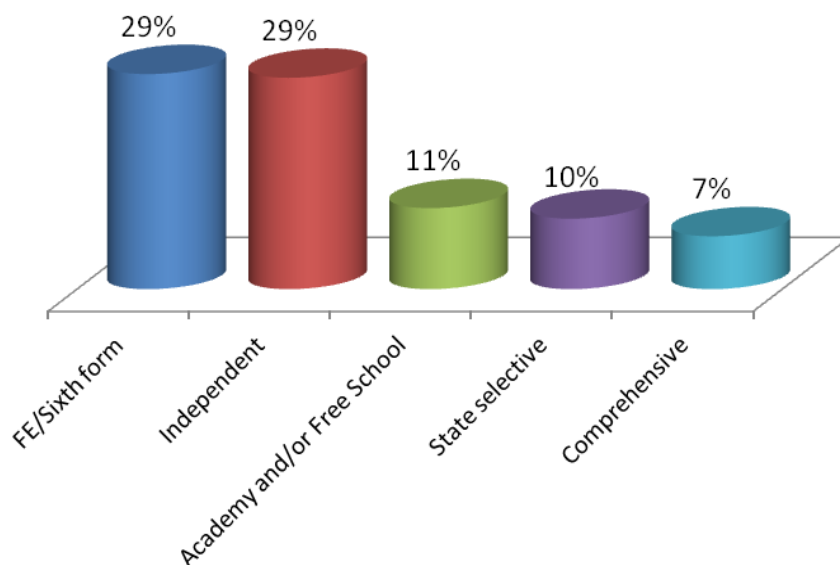


Figure 3: Breakdown showing the number of each school/college type responding to the consultation as a proportion of the overall number of that school/college type in England (%)

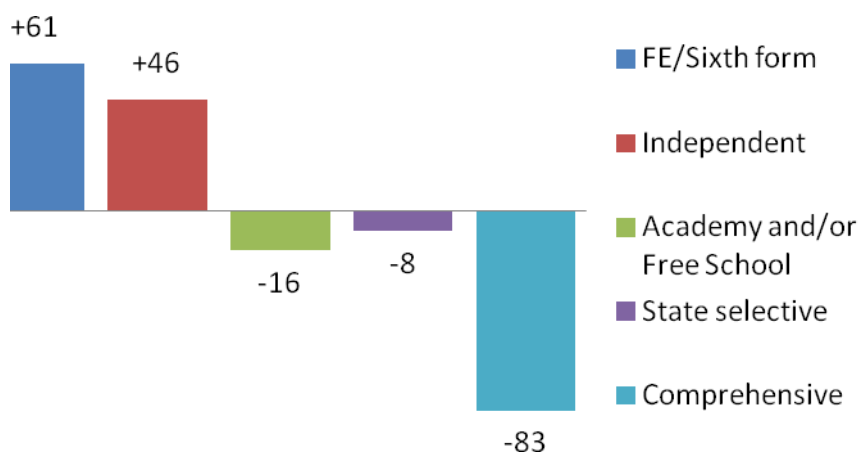


Figure 4: Representativeness of each school/college type responding to the survey (over-representation shows as a plus figure, under-representation as a minus)

From Figure 4 it is clear that FE/sixth form colleges and independent schools are strongly represented in the questionnaire responses, while comprehensive schools are comparatively poorly represented. There are two reasons, however, why these figures should be treated with caution:

- The precise number of schools in each category nationally is difficult to gauge. The data used in this analysis has been extracted from EduBase, but EduBase is not

completely up to date, and the EduBase categories do not map directly onto the categories used in the questionnaire.

- The data from EduBase includes schools without a sixth form, a significant number of which will be comprehensives. It is unlikely that such schools would have responded to an A level consultation to the same extent as schools offering post-16 provision, which would affect how well comprehensive schools as a whole appear to be represented.

Given these caveats, it is difficult to say with certainty what would constitute a representative sample of schools and colleges for the purposes of this consultation.

#### 4.1.2 Representativeness of higher education institutions responding to the questionnaire

There were 38 questionnaire responses from individuals within HEIs, originating from 35 different institutions. Figure 5 shows the proportion of each HEI affiliation represented in the questionnaire responses: for example, 71% of Russell Group universities were represented by individual responses to the questionnaire. Please note that HEI representative groups and special interest groups, and letter-only, responses are not included in the chart.

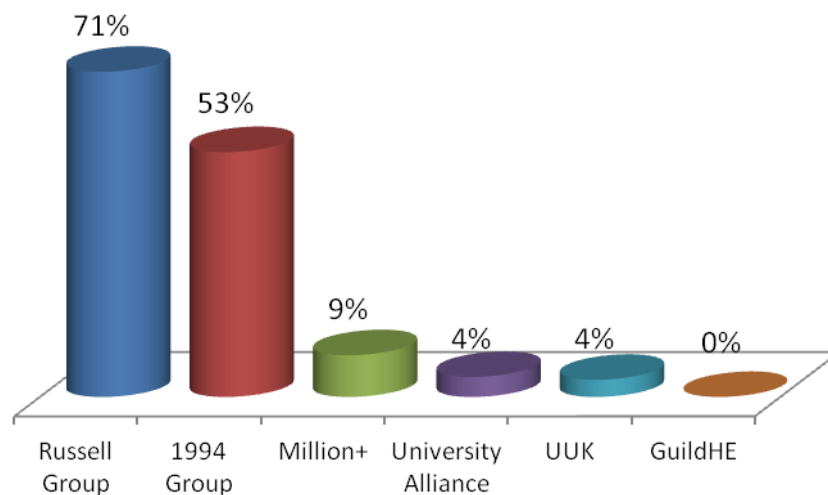


Figure 5: Representativeness of HEIs responding to the questionnaire, by affiliation (%)

### 4.1.3 Representativeness of representative groups responding to the questionnaire

There were 54 questionnaire responses from representative groups or special interest groups. Of these, 5 were from unions and 20 were from learned bodies or subject groups. Figure 6 shows the breakdown of learned bodies/subject groups that are affiliated with individual subjects.

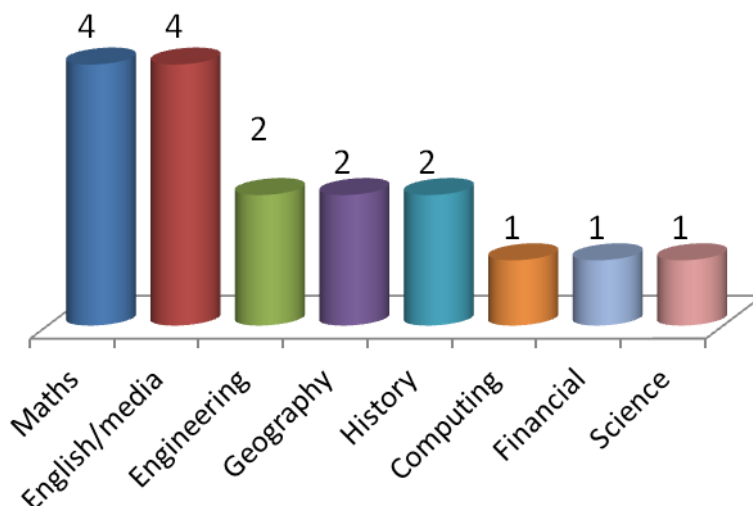


Figure 6: Breakdown of learned bodies/subject groups responding to the questionnaire, by discipline

A further 22 representative or special interest groups submitted narrative-only responses (for example, letters).

### 4.1.4 Representativeness of other stakeholder groups responding to the questionnaire

All five exam boards that are recognised to develop, deliver and award A level qualifications in England, Wales and Northern Ireland made a submission to the consultation.

There were too few submissions from parents/carers (23), students/learners (12), government bodies (9), training providers (7) and employers (4) to support any analysis of representativeness.

## 4.2 Equality analysis

Ofqual included its equality analysis document for scrutiny as part of the consultation process. The document focuses on protected characteristics as required by the Equality Act 2010.<sup>12</sup>

### 4.2.1 Quantitative questionnaire responses

Just under half of the respondents to the questionnaire (49%, n=876) agreed or strongly agreed that all equality issues had been considered in the analysis (see Figure 7), with 17% disagreeing or strongly disagreeing. Explicit concerns were raised by some stakeholder groups in the qualitative responses.

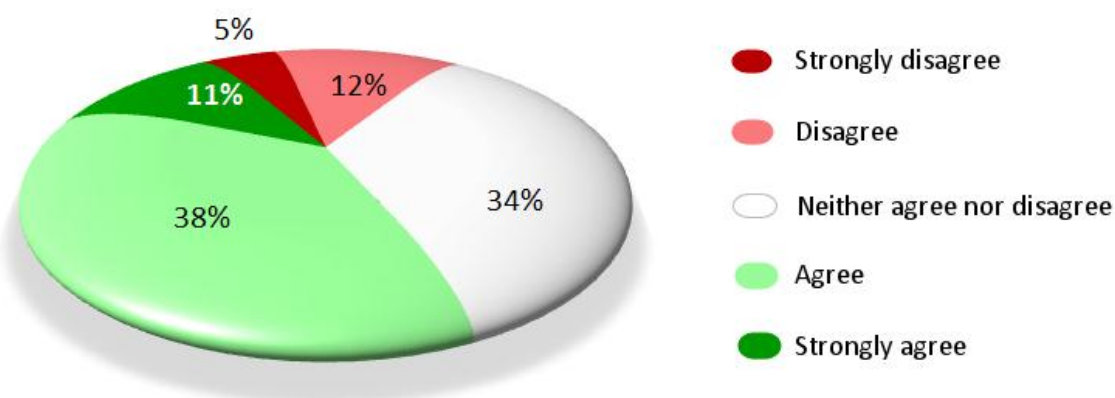


Figure 7: Stakeholder responses to the statement 'I believe that all equality issues have been considered in the accompanying equality analysis' (n=876) (%)

### 4.2.2 Qualitative responses

The focus of the equality analysis on protected characteristics only was a concern to several representative groups responding to the online consultation and for some participants at the consultation events.<sup>13</sup> It was suggested that there should be a full assessment of the likely impact of the reforms in relation to other contexts such as school type, performance and expectations.

## 4.3 Support for general principles

The questionnaire asked respondents about their support for the general principles set out in the consultation document.

<sup>12</sup> Protected characteristics are race, sex, disability, marriage and civil partnership, religion or belief, age, sexual orientation, gender reassignment, pregnancy and maternity.

<sup>13</sup> A significant majority of participants in the consultation events were not aware of the equality analysis document until it was raised in the focus groups.

### 4.3.1 Quantitative questionnaire responses

Respondents to the questionnaire provided strong support for the general principles outlined in the consultation document (see Figure 8). The qualitative responses, however, revealed a more complex picture.

Figure 8 also shows the breakdown by stakeholder group of the 15% of respondents who showed little support for the general principles, either disagreeing or strongly disagreeing with the statement provided.

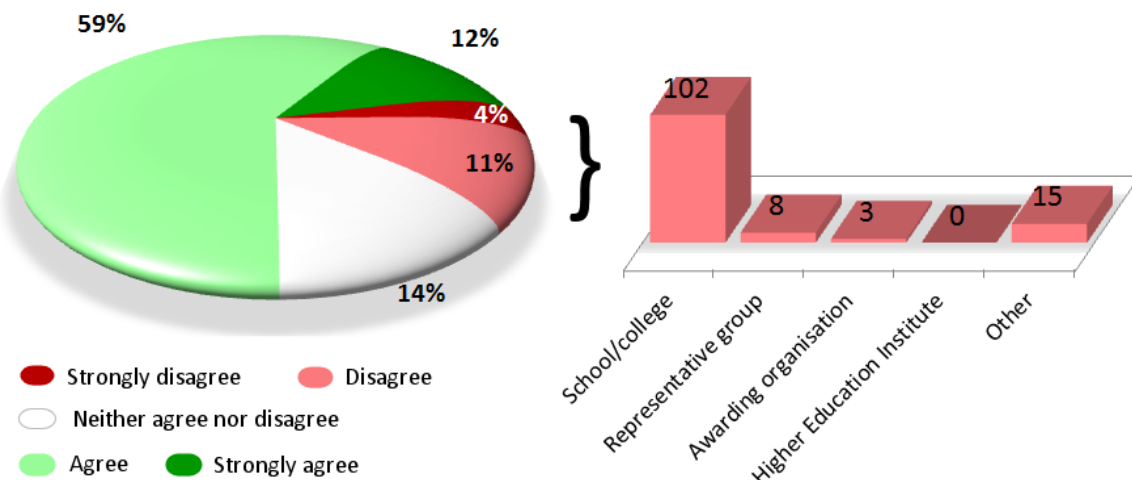


Figure 8: Proportion of stakeholder responses to the statement ‘I support the general principles as set out in this section’ (n=868)

### 4.3.2 Qualitative responses

Many stakeholders (including HEI and other representative /special interest groups) expressed the opinion that A levels were broadly fit for purpose.<sup>14</sup> Concerns were, however, voiced about specific aspects of the assessment of A levels that can have a negative impact on teaching, learning and student development. Key issues raised in the qualitative data included the following:

- Although there was general support from all stakeholder groups for some level of university involvement in the development of A levels, there were concerns that the general principles guiding the reform to regulation were too narrow, adequately recognising neither the wider use of A levels nor the role of other qualifications in progression to HE.

<sup>14</sup> This term is used as an indicator of a student’s specific subject knowledge and understanding, of academic and more generic skills, and of progression to undergraduate study and/or employment.

- Whether stakeholders were supportive or not of stronger university involvement in the development of A levels, there were serious, widespread concerns across all the stakeholder groups about the current lack of infrastructure or process to ensure effective implementation of the proposed regulatory changes, especially within the timeframes suggested.
- Stakeholders often identified the need for a ‘group/body’ to take ownership of A level development at subject level, the membership of which would understand the requirements of both students at this phase of their educational development and also the end-users of A levels.
- Even though individual academics from universities are currently often involved as part of a wider team in the development of subject content for A levels, some stakeholders felt that increasing the number of university academics involved, and their level of involvement, would require much greater co-ordination. Several individual HEIs and university representative bodies commented that it is important to distinguish between greater engagement in determining A level subject content and design on the one hand and ‘institutional’ endorsement or formal ‘sign-off’ of the qualifications on the other. Across the stakeholder groups there were concerns that the range of HEI courses students progress to from A levels meant a multi-disciplinary approach was required. Science, technology, engineering and mathematics (STEM) subjects in particular were frequently cited as being required for a wide range of HEI courses.
- There were commonly held fears that, without a co-ordinating group/body for an A level subject, a hierarchical system of A levels would arise based on which universities endorsed a particular subject and/or specification within a subject. Stakeholders felt strongly that this would reduce equality of access for students to the full range of universities, and the students most severely affected would be those without access to informed advice about which A levels/specifications are required for their preferred courses.

*The purpose for the new A levels will need to carefully articulate the desired balance between increasing uptake and challenging the most able in order to avoid a multi-*

*tiered system where A levels from different exam boards fulfil different aims.*

(Representative organisation)

- Several representative organisations and special interest groups argued for the establishment of national subject committees as a means of strengthening HEI engagement with the development of A levels and ensuring a non-hierarchical qualification system. Some of these groups (including the majority of HEI representative groups) also strongly challenged the idea that accountability for national qualifications can be removed from government. Stakeholders also wondered how the work required for the reforms would be prioritised and funded in universities and HEIs if there was no intervention from, for example, BIS.
- There was a concern that dwelling too much on the perceived problems with A levels may undermine the international status of the exam as a benchmark qualification.

Focus group discussions highlighted the need for agreement on the use of the terms ‘universities’ and ‘higher education institutions’ (HEIs). Some groups used the terms interchangeably, while others commented on the need for clarity in the use of the two terms.

### **4.3.3 Comparability of demand**

Over 92% of questionnaire respondents supported the need for comparability of demand and content across different specifications in a subject (n=858). Many stakeholder groups (including HEIs, exam boards and representative and special interest groups), however, expressed concern that the proposed reforms would undermine the concept of comparability and equality of access. It was thought that the coherence of the A level ‘brand’ would be threatened by the lack of infrastructure (discussed in Section 4.3.2) and the loss of subject criteria. There was general support for some degree of difference in content and methods of assessment between specifications, but the majority of respondents felt that these should be comparable. In the absence of any programme of study for KS5, respondents felt that the regulatory approach must enshrine comparability of curricula to ensure equality of access for students from all schools and colleges.



#### 4.4 Primary purpose of A levels for regulation

##### 4.4.1 Quantitative questionnaire responses

Almost three in four respondents (n=869) to the questionnaire agreed or strongly agreed that Condition 1 in the consultation document adequately defines an appropriate primary purpose of A levels for regulation (Figure 9). There was also strong support for allowing exceptions.

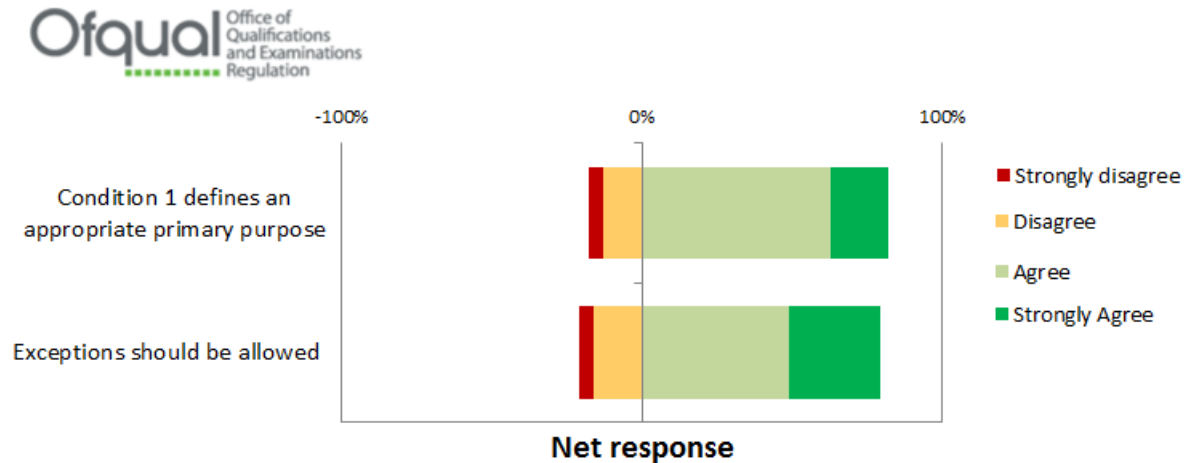


Figure 9: Respondents agreeing that Condition 1 defines an appropriate primary purpose of A levels (n=869) for regulation and that exceptions should be allowed (n=852) (%)

Figure 10 shows the breakdown of those who disagreed or strongly disagreed (16%) with the proposed primary purpose of Condition 1, the largest group being schools/colleges (91) and representative groups (17).<sup>15</sup>

<sup>15</sup> Of the 136 respondents who disagreed or strongly disagreed with the proposed primary purpose of Condition 1, 51 also disagreed or strongly disagreed with the general principles (from a total of 128 who disagreed or strongly disagreed with the general principles).

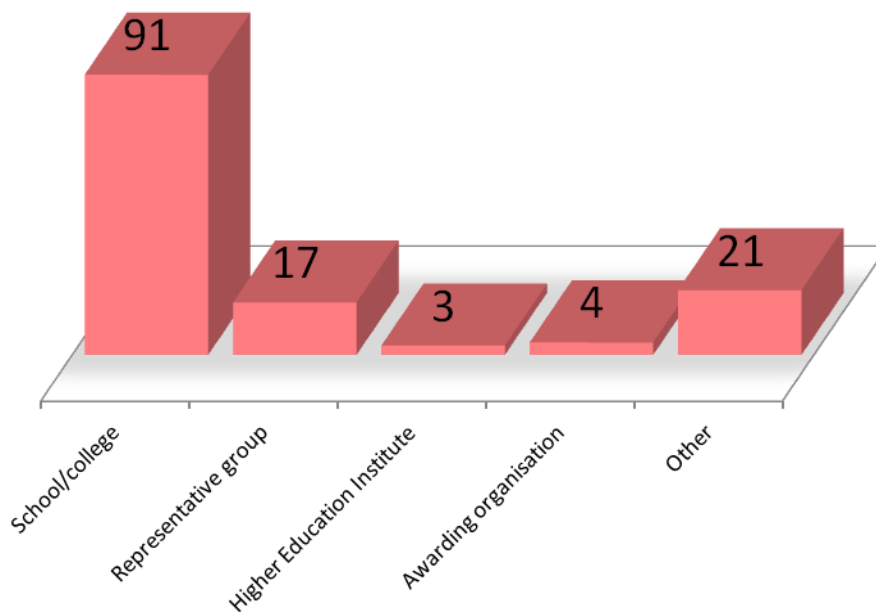


Figure 10: Breakdown by stakeholder group of those who disagreed or strongly disagreed with the statement 'I believe that Condition 1 adequately defines an appropriate primary purpose of A levels for regulation'

#### 4.4.2 Qualitative responses

In the qualitative responses, where there was some level of disagreement across the stakeholder groups that Condition 1 defines an appropriate primary purpose of A levels for regulation, comments from schools, colleges, HEIs, representative /special interest groups and exam boards were broadly similar:

- Preparation for entry to higher education should not be the main or only purpose of A level qualifications; they should be robust qualifications in their own right and signifiers of educational achievement. They should also cater for the large number of young people who do not progress to university.
- The raising of the school leaving age to 18 means that A levels will increasingly become the entry qualification for a greater range of post-compulsory education destinations.

Equally, where there was agreement with the primary purpose of A levels for regulation outlined in Condition 1, many respondents expressed concern that other destinations (for example, employment and the development of wider skills important for the 16–19 education phase) were not sufficiently recognised. HEI participants felt that the purpose of

using A levels for admission to HE was both to identify subject-specific achievement and to be a general indicator of a broader range of knowledge and skills. Some participants from schools and colleges raised the point that students would need to make decisions at the end of year 11 between studying A levels or other qualifications (vocational qualifications, for example), which would essentially determine whether or not the student would have access, or at least equal access, to higher education.

The reference to ‘internationally comparable’ in Condition 1 was considered unclear. Several focus group participants felt it was important that this should be understood as ‘can be compared’ rather than ‘are equivalent’. Some exam boards wondered what the mechanism for measuring comparability was and whether any development of a ‘measure’ should be the responsibility of individual exam boards.

Generally, employers were considered to require similar ‘skills’ to those valued by HE but stakeholders at the consultation events considered it very important that employers should be involved somewhere in the examination design process, so that employment as a destination (including following graduation) was not forgotten. It was considered too narrow to refer to the A level as a benchmark for ‘academic’ ability, when what students need is something to help them to enhance their future employability.

Most stakeholder groups were concerned that Condition 1 proposed including school and college accountability as a purpose of A levels. School and college participants recognised that in practice this was currently the case, but most groups thought that there was a tension between the primary purpose of A levels for regulation outlined in Condition 1 and the inclusion of school accountability measures: end result (performance) against preparation for HE. One HEI representative group summed up the concerns expressed in many responses:

*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.*  
(HEI representative group)

## 4.5 Grading

### 4.5.1 Quantitative questionnaire responses

The consultation posed four questions on the grading of A levels. Net responses to these four questions from the questionnaire are shown in Figure 11 (n=877, n=872, n=869, n=868 respectively). There was strong support for the idea that the current number of grades was appropriate for discrimination, and there was support, too, for the A\* grade, and for maintaining grade descriptors at the upper and lower levels of the grading scale. There was far less support for the idea that a new grading structure should be introduced, with 56% either disagreeing or strongly disagreeing with the idea and only 27% agreeing or strongly agreeing (n=868). Figure 12 shows the breakdown by stakeholder group of those disagreeing or strongly disagreeing with the introduction of a new grading structure; it also shows, on the right-hand side of the figure, the breakdown by stakeholder group of the 56% who either disagreed or strongly disagreed with the statement.

The qualitative data provides more detail on the views of stakeholders in relation to grading.

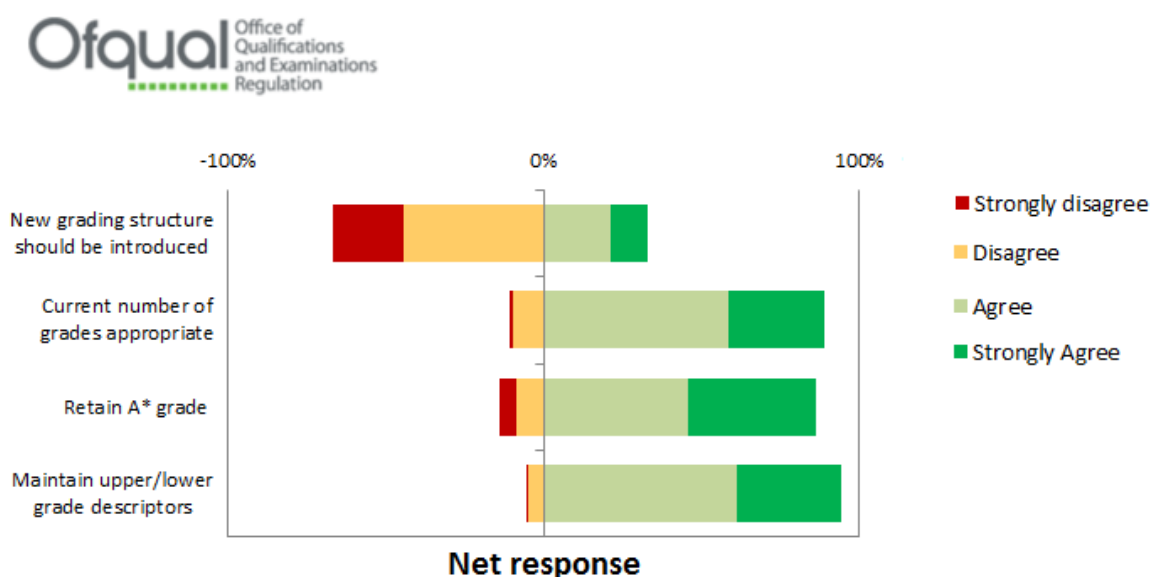


Figure 11: Respondents agreeing/disagreeing with four questions posed by the consultation relating to A level grading (%)

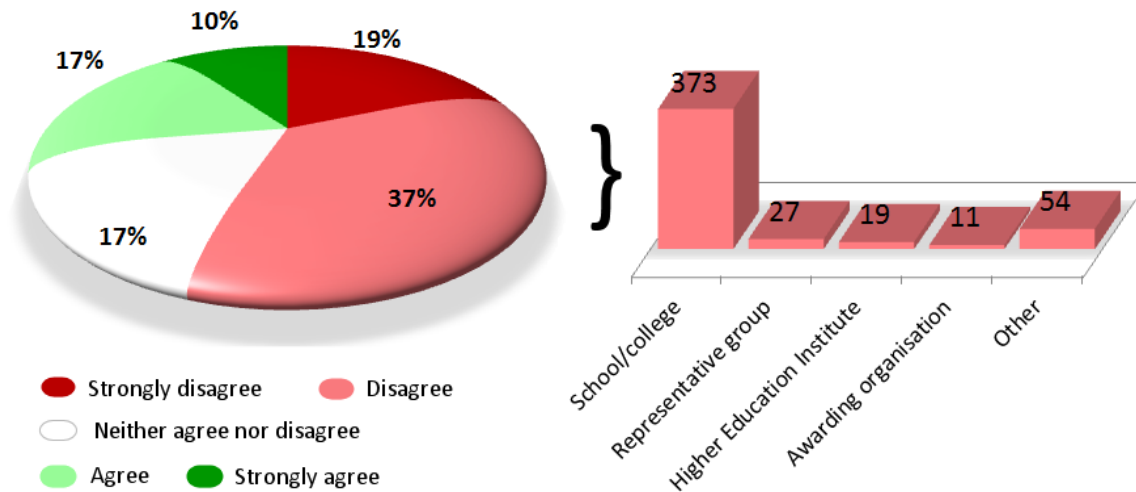


Figure 12: Stakeholder responses (n=877) to the statement 'A new grading structure should be introduced for new A levels' (%)

#### 4.5.2 Qualitative responses

The most frequently cited reason for not wanting to introduce a new grading structure was that the current system was fit for purpose and widely understood by stakeholders.

Stakeholders understood, however, that this was based on the assumption that the demand of the new A levels would be broadly the same as that of the old. Some stakeholders qualified their views by saying that in some circumstances, for example if it turned out that there was a change in the proportion of students gaining A grades, grading would need to be suitably different.

Where participants wanted a new grading system, comments were largely based on the need for the grading structure to identify the difference in new A levels. For example, a response from one Russell Group HEI commented that it was already challenging to compare the A level grades of mature students from 1991, 2001 and 2011, and that a new scoring system would help to make this clear for the future. A 1994 Group HEI expressed the view that continuing with the grading system (as indicated in Condition 2) could lead to confusion in terms of how grades were interpreted. These two HEIs agreed that a new grading system should be clear and simple enough for all stakeholders to understand, while also being sufficiently different from the existing scheme to ensure that the two were not confused. Another Russell Group HEI proposed that percentages should be published in addition to grades, on the basis that the introduction of the A\* grade had been helpful in identifying the most able students, but that selectors still found it difficult to account for the range of

achievement within other grade boundaries (even when using Unified Mark Scheme (UMS) scores). These comments were broadly reflected in free-text responses from other stakeholder groups, including several subject interest groups.

Of those responding to the questionnaire who wanted a new grading structure (241), the majority were also in support of maintaining the current number of grades and/or retaining the A\* grade or similar, as shown in Figure 13.

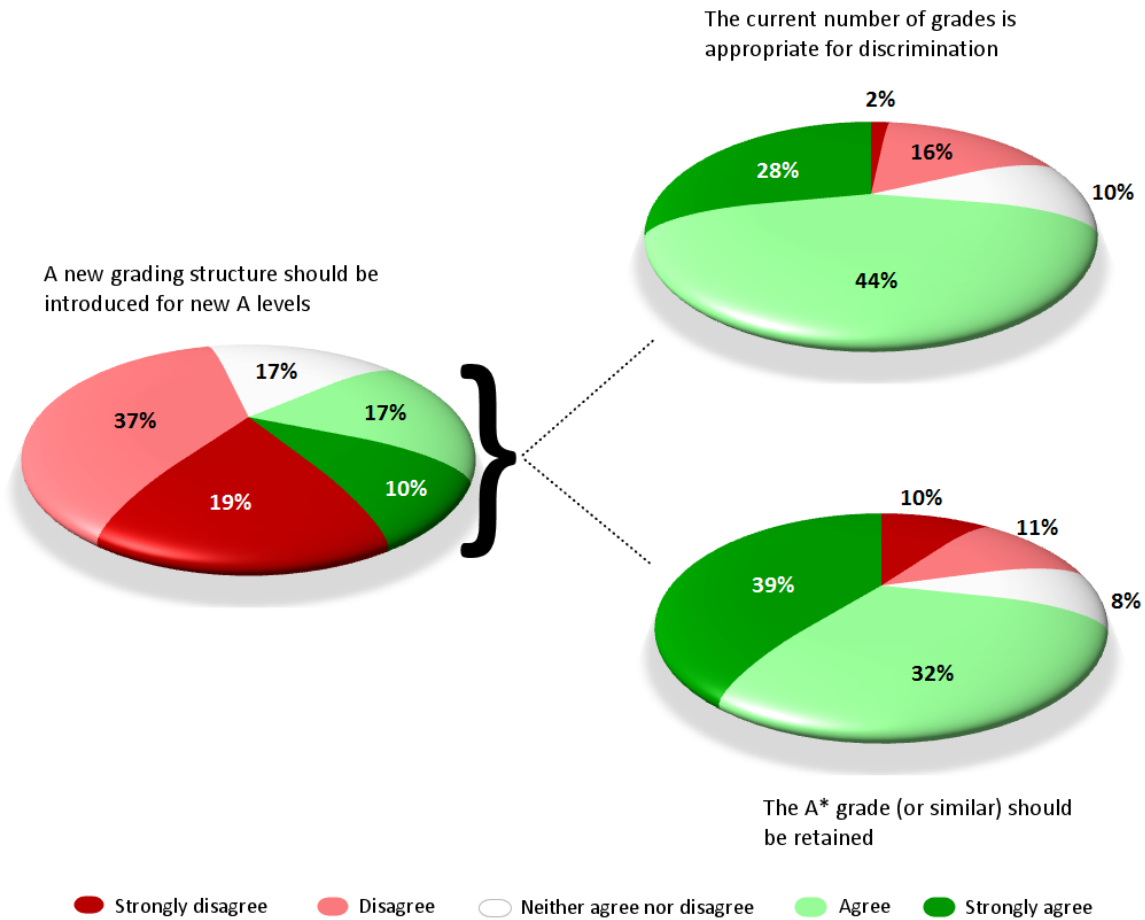


Figure 13: Proportion of stakeholders wanting a new grading structure for new A levels, with further breakdown of the views of agreeing or strongly agreeing stakeholders (27% of all stakeholders, n=877) on two other statements

Comments made in support of responses about changes to the grading system raised three main issues:

- the high-stakes nature of threshold grades
- discriminating across the higher-attaining students – the A\* grade
- the complex and opaque nature of awarding grades at A level (based on norm referencing and criterion referencing).

Participants from schools and colleges, in particular, expressed concern about the high-stakes nature of threshold grades for gate-keeper qualifications such as A levels. There were concerns about students who narrowly miss a higher grade – comments were based on the perception that, sometimes, examination questions, mark schemes and the markers might not always reward performance accurately, and a single mark might mean the difference between the desired grade or not. There were some participants who suggested ‘finer’ grading, such as a percentage or numerical score, although others expressed concern that such approaches might create difficulties in ensuring comparability of standards over time.

Some stakeholders suggested more detailed reports of student performance, to give a greater indication of student abilities and to gauge performance within grades (for example, strong or weak grade B).

Figure 14 shows the widespread support (noted above) for retaining the A\* grade or similar. Narrative responses, however, suggested that participants felt that the way in which the A\* grade is awarded might not necessarily identify the highest performing students. In mathematics, in particular, it was considered that the A\* grade could be achieved through high levels of accuracy rather than extended mathematical reasoning. Respondents, while not opposed to maintaining a grade that signified high performance, nevertheless had an issue with the statistical/mechanistic approach to awarding the A\* grade.

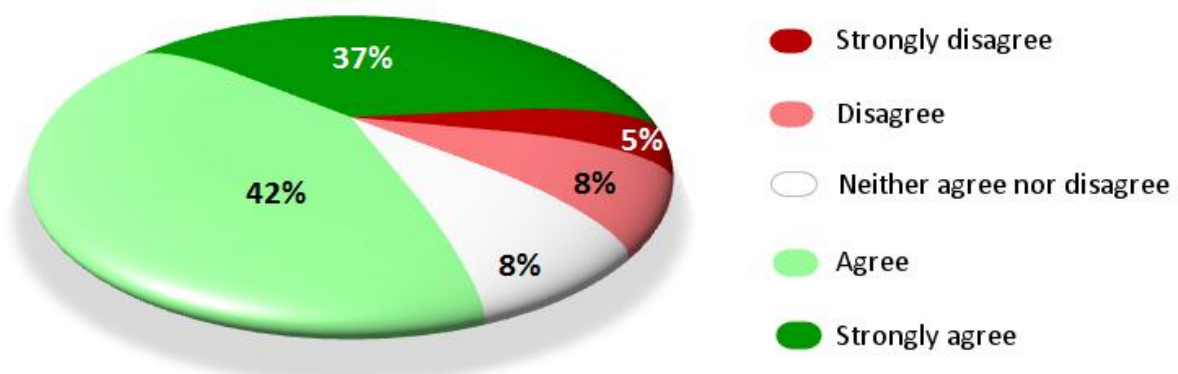


Figure 14: Stakeholder responses to the statement ‘Even considering the other changes being made to A levels, the A\* grade (or similar) should be retained as it will continue to facilitate differentiation of achievement’ (%) n=869

## 4.6 Qualification structure and availability of assessments

### 4.6.1 Quantitative questionnaire responses

Of the three options proposed for the structure of the A level,<sup>16</sup> the questionnaire found strong support for Option 3 (retaining the AS in its present form but making changes as outlined in paragraphs 48–53 of the consultation).

Two thirds of respondents (66%, n=869) either agreed or strongly agreed with Option 3. By contrast only 12% (n=851) either agreed or strongly agreed with Option 1 (removing the AS), and 15% (n=849) either agreed or strongly agreed with Option 2 (making the AS a stand-alone qualification, but where the results do not contribute to A level). In terms of opposition to the three options, 22% either disagreed or strongly disagreed with Option 3, compared with 83% of respondents who either disagreed or strongly disagreed with Option 1, and 77% of respondents who either disagreed or strongly disagreed with Option 2. The net response for the three options is shown in Figure 15.

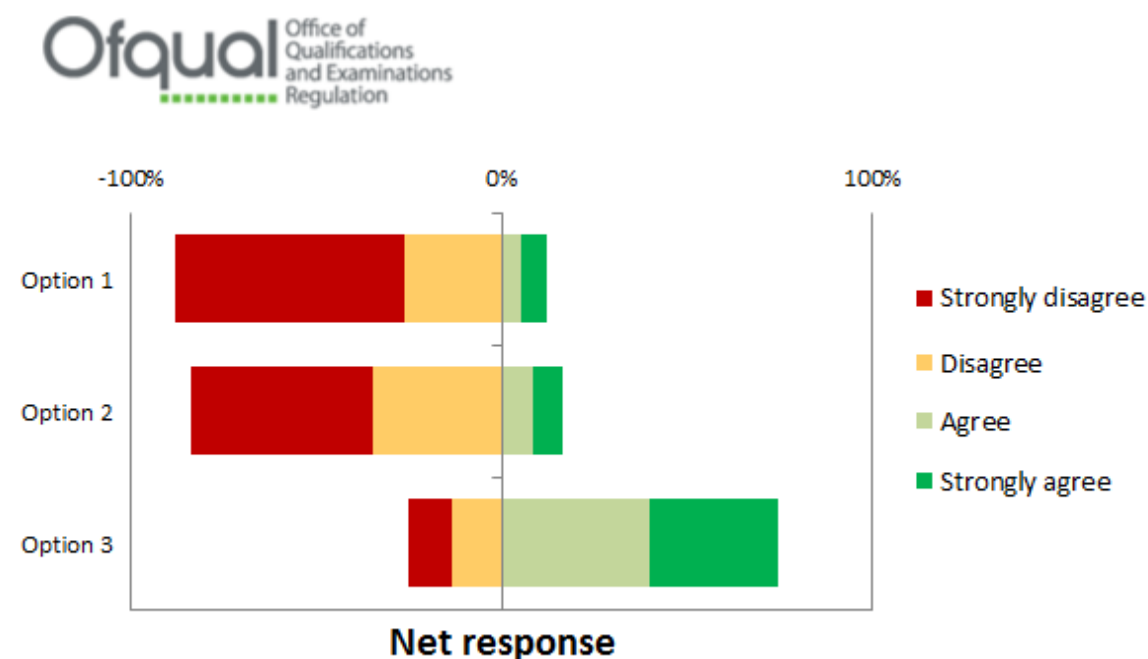


Figure 15: Stakeholder responses to the three options for the structure of the A level (all stakeholders) (%)

<sup>16</sup> Option 1: Removing the AS qualification – a return to a linear two-year course of study with all the assessment at the end of the course. Option 2: Making the AS a stand-alone qualification where the results do not contribute to the A level. The AS could be completed in one year but the A level would be a two-year course of study and assessment as in Option 1. Option 3: Retaining the AS qualification and its relationship to the A level as at present but making changes to January assessments and resitting opportunities (see paragraphs 48–53 of the consultation document).



As shown in Figure 16, the views of respondents in HEIs were broadly similar to those of the wider stakeholder group.

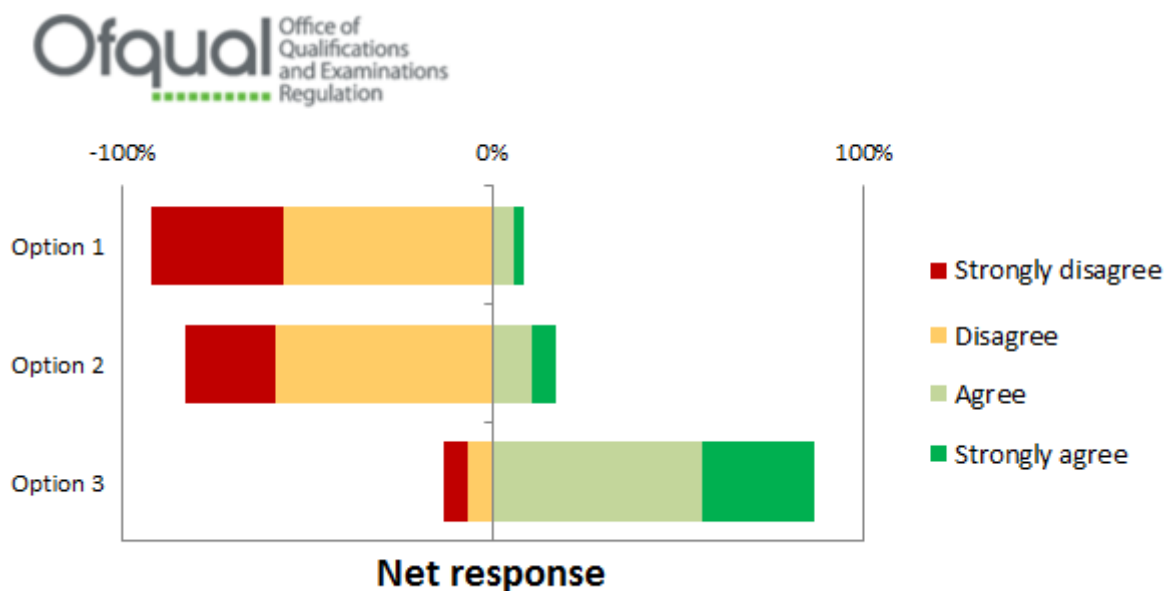


Figure 16: HEI respondents' responses to the three options for the structure of A levels (%), all n=38

#### 4.6.2 Qualitative responses

The majority of all stakeholder groups were in favour of maintaining the AS, and, therefore, they rejected Option 1. Their reasons for doing so were that the AS:

- allowed breadth of study – the opportunity for students to take an additional smaller qualification in a contrasting subject alongside their main A level subjects brought valuable breadth and flexibility; it also aided informed decision making on progression options
- was a valuable qualification in its own right – particularly in STEM subjects and modern foreign languages

- was useful to some HEIs in the selection process as an indicator of post-GCSE achievements
- encouraged participation and retention of students at A level and acted as an incentive for some students to continue, in particular, with mathematics (cf. the government's policy of encouraging post-16 mathematics) and with subjects – such as geography, engineering, economics and physics – where students would need to apply mathematics
- enabled students and schools to monitor students' progress through their chosen courses
- contributed to ensuring that students took their year-12 studies seriously
- facilitated the transition from GCSE to A level study
- was very useful for developing knowledge and skills needed for successful study and achievement at A level, at university and in life-long learning
- supported social mobility and equality of opportunity for those who would struggle with a two-year linear programme.

Participants from schools and colleges, in particular, felt that subjects perceived as 'harder' (such as science subjects) would see a substantial drop in numbers if the safety net of the AS was removed.

## **4.7 January assessment**

### **4.7.1 Quantitative questionnaire responses**

Over half of the stakeholders supported the removal of the opportunity for assessment in January (see Figure 17, n=872).



*"The opportunity for assessment in January should be removed."*



Figure 17: Stakeholder responses to the statement 'The opportunity for assessment in January should be removed' (%), n=872

Figure 18, below, shows the breakdown of stakeholder responses to this statement by stakeholder group. There was significantly<sup>17</sup> more support for the removal of the opportunity for assessment in January from respondents in HEIs than there was from respondents from the wider stakeholder base.

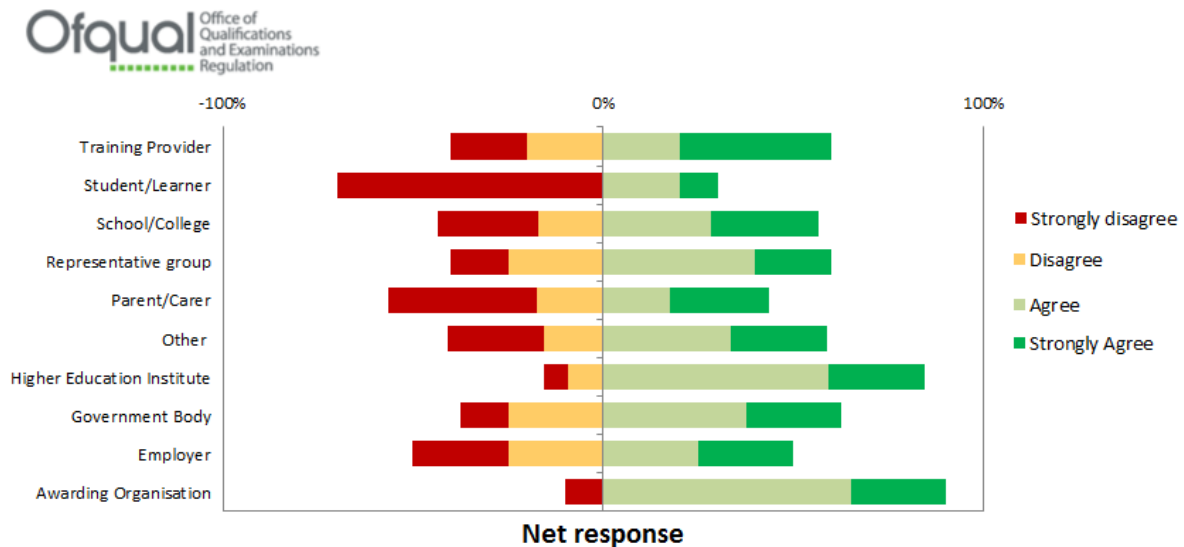


Figure 18: Stakeholder responses to the statement 'The opportunity for assessment in January should be removed', by stakeholder group (%), n=872

There was a small majority (just under 50%) of support for the removal of AS/A2 assessment, and, therefore, resits, in January, which Figure 19 (n=881) breaks down by stakeholder

<sup>17</sup> A Pearson chi-squared test of independence was performed to determine whether HEI stakeholders and other stakeholder groups responded differently to this question. The difference was significant at the 0.05 level ( $X^2=14.7$ ,  $df=4$ ,  $p=0.005$ ).

group. No individual stakeholder group’s responses were significantly different<sup>18</sup> from those of the combined stakeholder group at the 0.05 significance level.

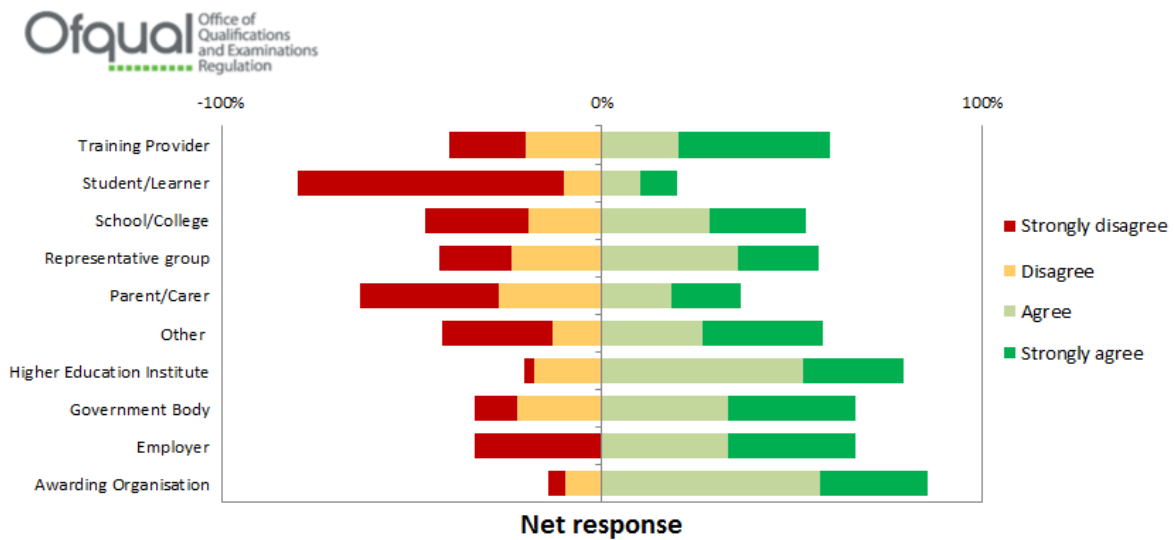


Figure 19: Stakeholder responses to the statement ‘The opportunity for AS/A2 assessment and therefore resits in January should be removed’, by stakeholder group (%), n=881

#### 4.7.2 Qualitative responses

Focus group responses and analysis from the free-text responses to the opportunity for assessment in January show that responses varied depending on whether the January assessment would be for (i) special circumstances only (ii) resits only or (iii) all circumstances. A further difference related to whether the opportunity was for both AS and A2 groups, for AS only, or for A2 only.

The focus groups generally supported removing the January assessments, although some participants wanted exceptions for special circumstances, such as illness or bereavement. The January assessment window was also considered particularly important for some protected groups who may have experienced some disruption to their education, and for students with SEN and/or a disability, who, in addition to other needs they might have, need time to adjust to the assessment format, which is different from that of GCSE.

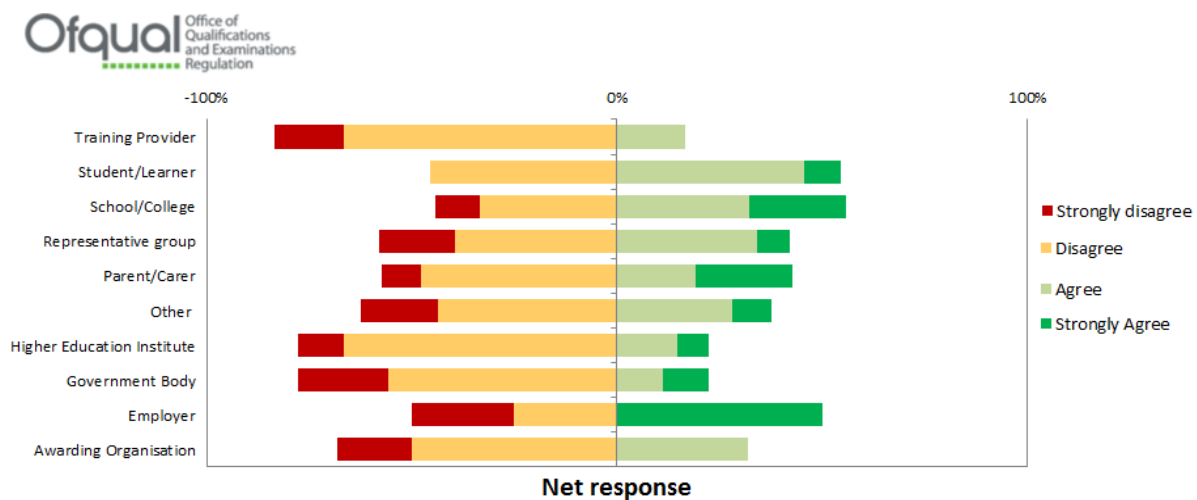
Assessments in January were generally considered to disrupt teaching and learning. There was some support for a November resit window for students after year 13.

<sup>18</sup> Based on Pearson chi-squared tests.

## 4.8 The contribution of AS to A level outcomes

### 4.8.1 Quantitative questionnaire responses

Respondents were evenly split over whether AS and A2 should contribute equally to the overall outcome of A levels: 41% agreed or strongly agreed with this principle, while 43% disagreed or strongly disagreed (n=875). Figure 20 shows the breakdown of this response by stakeholder group. No individual stakeholder group's responses were significantly different<sup>19</sup> from those of the combined stakeholder group at the 0.05 significance level.



**Figure 20: Stakeholder responses to the statement 'AS and A2 should contribute equally to the overall outcome of A levels', by stakeholder group (%), n=875**

There was considerable debate on whether 50:50 was an appropriate weighting. There was broad consensus that AS did not really represent 50% of the progress required to achieve an A level, but the simplicity of a 50:50 split was appealing. There were different views on whether AS should be viewed as 'half an A level' or at a lower level than A2 – although a 40:60 split was proposed by many respondents. Research undertaken by one exam board suggested that there would be inconsistent outcomes across subjects if the ratio was to change. Another exam board confirmed that the actual weighting achieved by AS was lower than the intended weighting. This is because students tend to drop AS subjects where they have not performed well, which results in a fairly similar group, in terms of their AS UMS score, continuing to the full A level. It is therefore performance in the more demanding A2 units that differentiates and determines the A level grade achieved.

There was strong support from respondents for the view that, if a student resits an

<sup>19</sup> Based on Pearson chi-squared tests.

assessment, the highest mark should count towards the student's qualification: almost 83% agreed or strongly agreed with this view, with just over 11% disagreeing or strongly disagreeing (n=880). One exam board suggested that, given the requirement for candidates to resit all externally assessed components, counting a higher mark changed the nature of the assessment:

*Requiring candidates to resit **all** of the externally assessed components of the AS or A2 makes the components seem like linear components. However, counting the higher mark of the component towards the learner's qualification makes them seem like units. The components would have to be awarded independently and would need to make use of UMS to ensure comparability between series. [...]*

*If, as a consequence of this, Ofqual were to decide that it was the scores on the components from the most recent series that counted, then the AS and A2 would become 'linear'. The components would no longer need to be graded and the notion of resitting AS would disappear, as candidates would be 'retaking' the qualification each time. (Exam board)*

The consensus from the majority of respondents was that the highest mark should count.

## **4.9 Variety of question types**

### **4.9.1 Quantitative questionnaire responses**

The questionnaire asked respondents whether the rules about question types in A levels, which are outlined in Condition 4, were (a) needed (n=867) and (b) sufficient (n=864). Figure 21 summarises the responses, showing that half of the respondents felt that the rules in Condition 4 were needed and sufficient, while just over one-tenth felt that the rules in Condition 4 were needed but not sufficient. Individuals working for, or associated with, exam boards are the most likely to consider Condition 4 necessary but not sufficient.

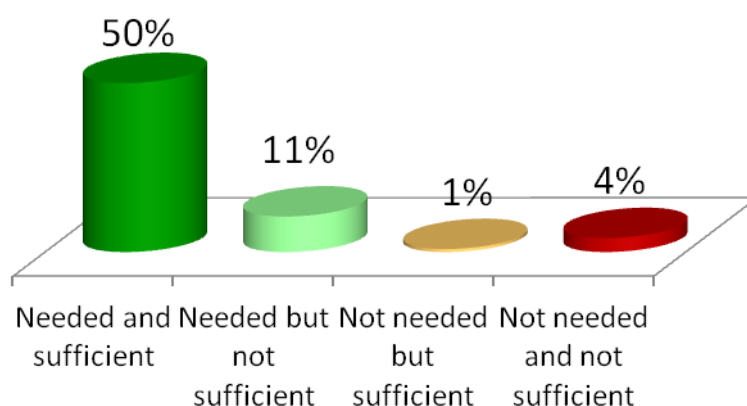


Figure 21: Stakeholder views on Condition 4 (%)

#### 4.9.2 Qualitative responses

Many of the responses relating to the use of a range of question types focused on the inappropriateness of some question types, with particular misgivings about the use of multiple-choice questions. Overall, however, participants felt that the use of a range of question types should be enforced only if it was appropriate for a subject. Likewise, multiple-choice and a balance of low-mark tariff questions should be used only where appropriate for the type of knowledge and skills being assessed.

Some considered that mathematics and science required exceptions. Members of the mathematics and science communities, however, welcomed the opportunity to include extended-response-style questions.

One exam board felt that Conditions 4 and 6 could be covered within the general validity condition.

#### 4.10 Synoptic assessment

##### 4.10.1 Quantitative questionnaire responses

Figure 22 summarises the responses to the question asking whether the rules about synoptic assessment, outlined in Condition 5, were (a) needed ( $n=855$ ) and (b) sufficient ( $n=847$ ). It shows that 59% of respondents felt that Condition 5 was needed and sufficient, and that less than one-tenth felt that the rules in Condition 5 were needed but not sufficient. Again, individuals working for, or associated with, exam boards are the most likely to consider Condition 5 necessary but not sufficient, although to a lesser degree than for Condition 4.

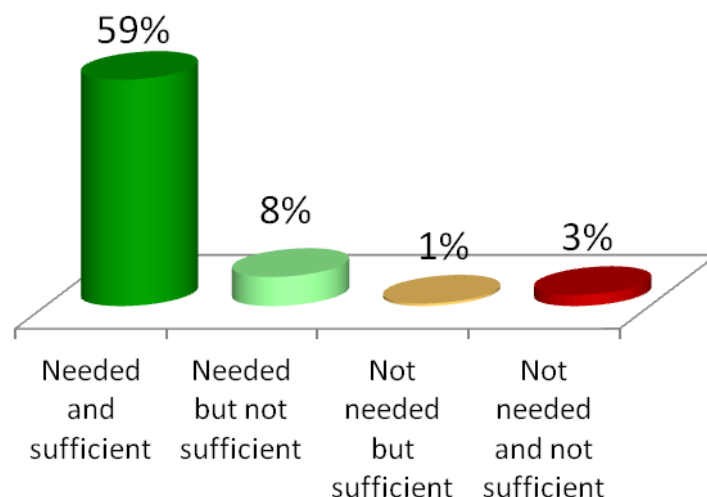


Figure 22: Stakeholder views on Condition 5 (%)

#### 4.10.2 Qualitative responses

Participants at the consultation events felt that the term ‘synoptic’ was unclear and that Condition 5 needs to clarify its meaning and be open to the possibility that this might look different in different subjects, while still needing to be comparable within a subject.

### 4.11 Purpose of assessment

#### 4.11.1 Quantitative questionnaire responses

The questionnaire asked respondents whether the rules outlined in Condition 6 – relating to the need to make clear the purpose of the assessment and to set out the balance between knowledge of the subject and application of skills – were (a) needed (n=856) and (b) sufficient (n=846). Figure 23 summarises the responses to this question, showing that 60% of respondents felt that the rules outlined in Condition 6 were needed and sufficient, while approximately one in twenty felt that the rules were needed but not sufficient. There was no significant stakeholder pattern.



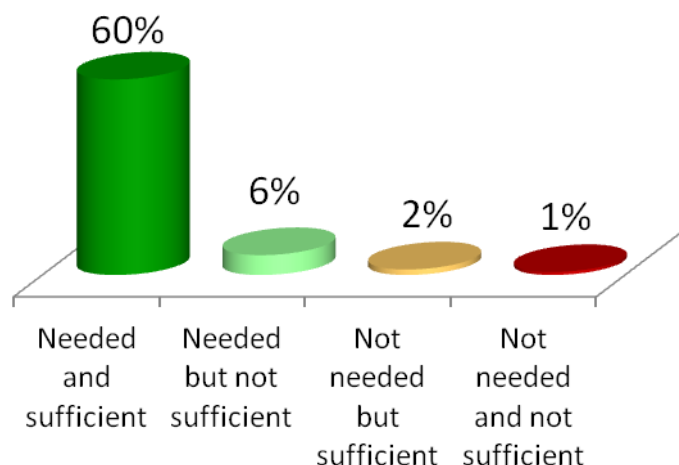


Figure 23: Stakeholder views on Condition 6 (%)

#### 4.11.2 Qualitative responses

There was very little further comment on this condition. One exam board considered that Condition 6 could be subsumed under the general validity condition.

### 4.12 Assessment requirements

#### 4.12.1 Quantitative questionnaire responses

The questionnaire asked respondents whether the rules outlined in Condition 7 – that A levels should include at least 60% external assessment for each assessment element, and that they should have comparable assessment requirements to similar GCE qualifications made available by other exam boards – were (a) needed (n=848) and (b) sufficient (n=834). Figure 24 summarises the responses to this question, showing that 50% of respondents felt that the rules outlined in Condition 7 were needed and sufficient, while one-tenth felt that the rules in Condition 7 were needed but not sufficient. There was no significant stakeholder pattern.

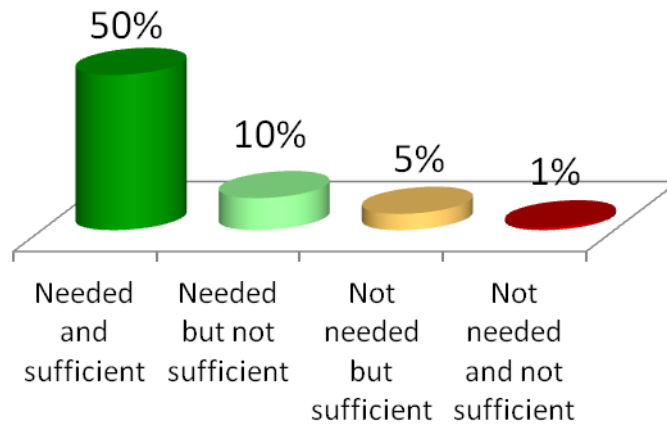


Figure 24: Stakeholder views on Condition 7 (%)

### 4.13 External assessment and synoptic assessment

#### 4.13.1 Quantitative questionnaire responses

The questionnaire asked stakeholders for their views on the following statements:

- I believe that a minimum of 60 per cent external assessment is the correct proportion for most subjects
- I believe that the weighting of synoptic assessment should be flexible.

Stakeholder responses to these statements are summarised in Figure 25, which shows broad but not universal support for the two statements (n=867 and n=870 respectively).

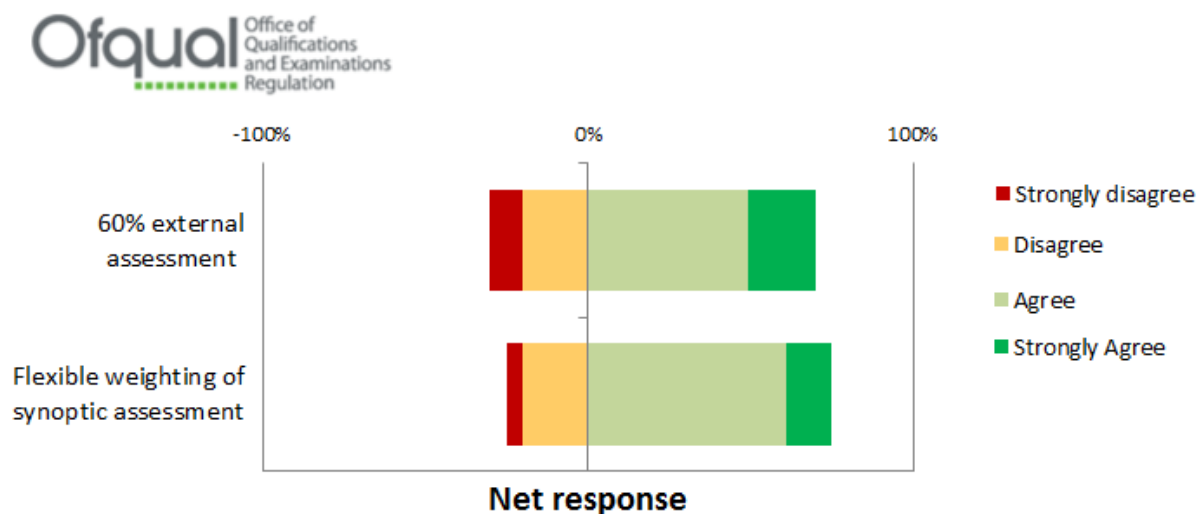


Figure 25: Stakeholder responses to statements about 60% external assessment and flexible weighting of synoptic assessment (%)

### 4.13.2 Qualitative responses

The majority of participants felt that, to ensure public confidence in the A level and maintain rigour in assessment, 60% should be the minimum external assessment requirement. Many stakeholders suggested a higher proportion of external assessment for some subjects. Some subject-specific responses welcomed the opportunity for coursework to be included.

## 4.14 Qualification support

### 4.14.1 Quantitative questionnaire responses

Figure 26 summarises stakeholder responses to questions about the support universities should provide for new A levels (Condition 8). The figure shows broad support for the idea that universities should provide the required engagement (n=869) and that this would produce qualifications that allowed progression to HE (n=871), but in each case a proportion of respondents disagreed or strongly disagreed (see the qualitative responses for more detail).

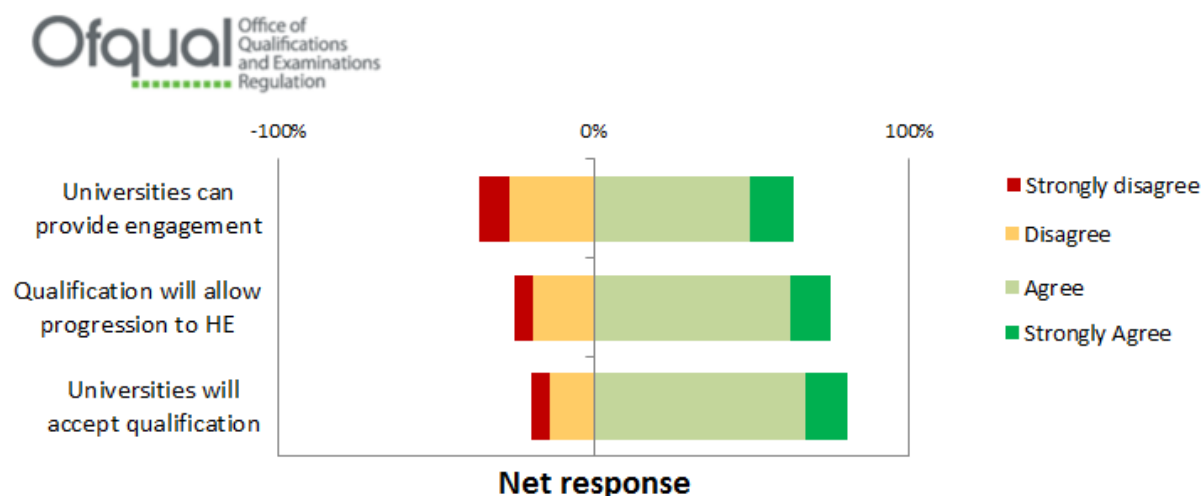


Figure 26: Stakeholder responses to questions about universities' support and engagement (%)

Respondents also strongly supported the idea of engaging with schools, colleges and employers – with 90% in favour of this proposition and less than 5% against it (n=846).

There was fairly strong support for allowing exceptions to Condition 8, with more than 60% agreeing or strongly agreeing, and 12% disagreeing or strongly disagreeing (n=842). Figure 27 shows the proportion of these responses and breaks down respondents who disagreed or strongly disagreed (12%) by stakeholder group.

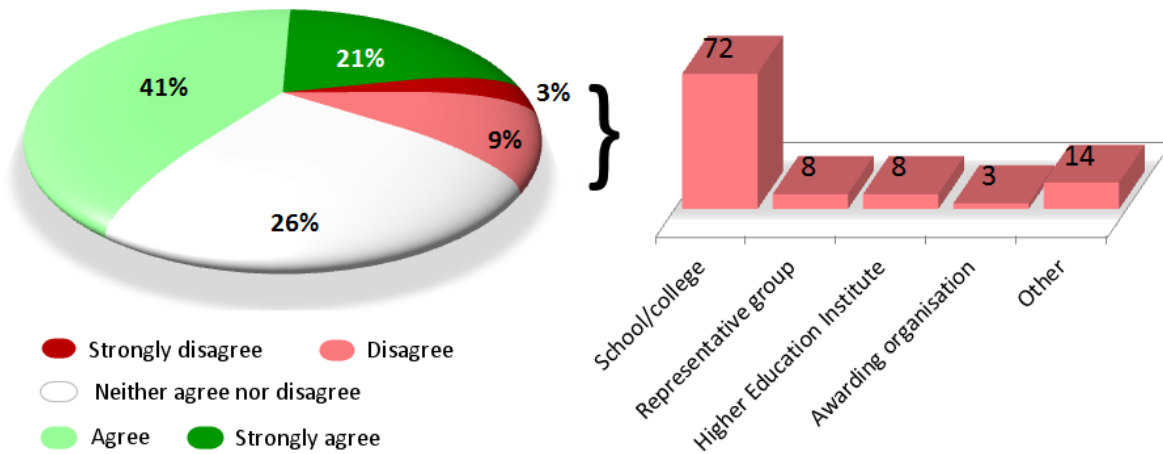


Figure 27: Stakeholder responses to the statement ‘Exceptions to Condition 8 should be allowed in relation to the support secured for an A level’ (n=842)

#### 4.14.2 Qualitative responses

There was an overall sense among HEI representative groups and individual HEIs that it would not be advisable or operationally feasible for the sector to take on the ‘ownership of the exams’, particularly in terms of formally endorsing all A levels, as currently proposed in the consultation. They expressed concern that the proposal for the evidence to be required from exam boards could result in very different specifications for the same subject, and that it therefore remained unclear how HEIs might be able to select students according to ability and knowledge.

Several HEI representative groups and related learned societies felt it important to include learned societies in A level development on an equal footing with HEIs, and that schools and colleges, and, where appropriate, employers, should have a role in the process. Among the reasons offered for this position were: learned societies offered appropriate expertise; that universities liaised extensively with, and academic staff were represented on, learned societies; and that learned society involvement would aid the recognition of the wider applications of A levels.

The HE sector acknowledged that exam boards, and not universities, were the primary experts in assessment. That said, although universities do not generally have technical assessment expertise, several HE representative groups suggested that their members would like to be able to provide some input in this area, rather than being left solely to determine subject content.

Several HEI representative groups noted that the resource implications of the suggested level of HEI involvement would need to be addressed if it was going to be viable to increase the level of institutions' and individual academics' engagement. Some suggested that one way of addressing concerns about the level of resources required to support A level reform would be to have a single group of representatives from across the HE sector help to develop agreed core content for each A level subject.

There was strong support among HEI representative groups for the principle that the qualifications system should facilitate equality of access for students to the full range of universities. A majority of the groups, however, considered it essential that the full range of HEIs be engaged – and not merely the so-called 'leading research institutions' – to reflect their differing requirements.

The HEI sector's responses to Condition 8 largely reflect what has already been reported under the general principles and Condition 1. Other stakeholders expressed concern about the narrowness of the range of universities and HE contexts proposed in the consultation document. Many participants felt strongly that other stakeholders should be involved, although others warned that the primary purpose of A levels must be prioritised to avoid the development of a committee that might expect too much of a single qualification.

## **4.15 Maintaining standards**

### **4.15.1 Quantitative questionnaire responses**

There was fairly strong support for the view that the review arrangements detailed in the consultation document were sufficient and appropriate to secure standards, with just under two-thirds of respondents (65%) agreeing or strongly agreeing with the proposition and just under one-sixth (15%) disagreeing or strongly disagreeing (n=855). Figure 28 shows the proportion of these responses and breaks down the responses of those who disagreed or strongly disagreed (15%) according to stakeholder group.

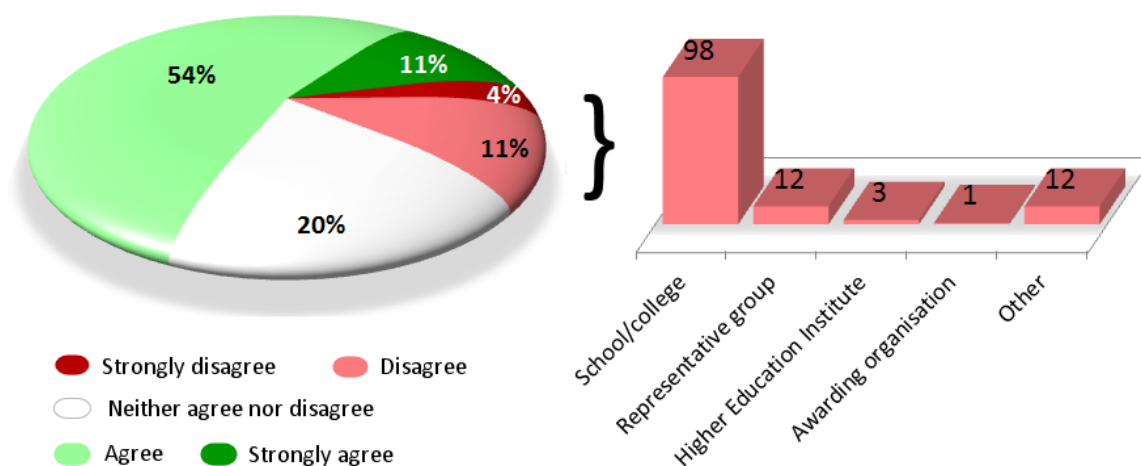


Figure 28: Stakeholder responses to the statement 'The review arrangements detailed in the consultation document are sufficient and appropriate to secure standards' (n=855)

#### 4.15.2 Qualitative responses

Of only a small number of free-text responses on this section of the consultation, one was that any recalibrations made in grading must be very clear and public so that the value of a grade from one year to the next is known.

There was some questioning from a few participants of Ofqual’s decision not to enforce comparability between subjects (§ 80), on the basis that A levels should be broadly comparable. Other participants welcomed the statement, believing that enforcing comparability would lead to unhelpful changes to A levels in some subjects.

### 4.16 Implementation

#### 4.16.1 Quantitative questionnaire responses

Stakeholders provided strong support for the idea that all A levels should be reviewed by 2018 (n=872), and moderately strong support for a staged approach to the reform of A levels (n=873) (see Figure 29).

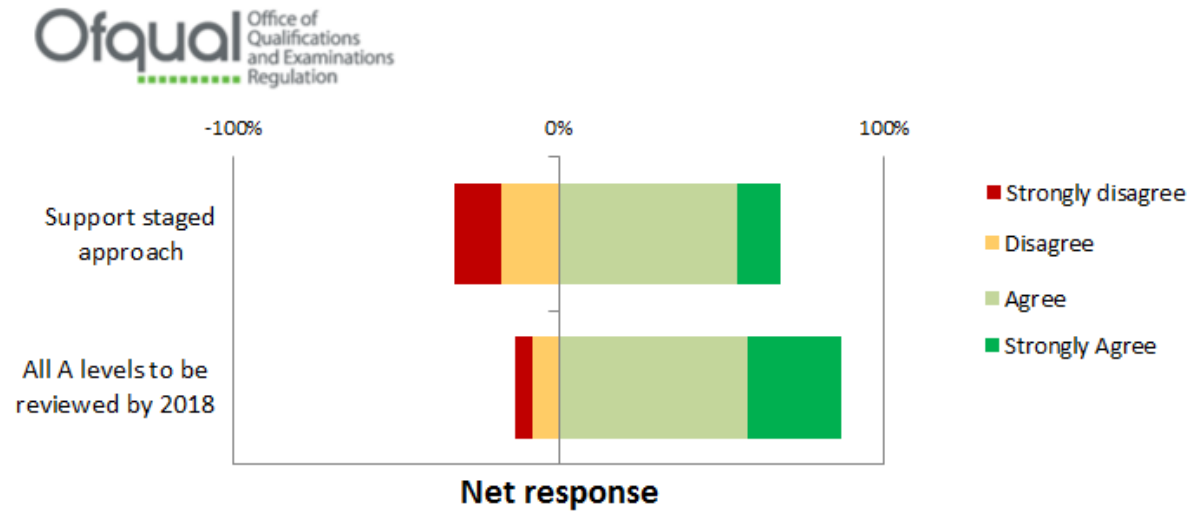


Figure 29: Stakeholder responses to the idea of a staged approach to A level reform and the review of all A levels by 2018 (%)

Respondents were also asked to give their priorities for the first A levels to be reformed in 2014, choosing from a pre-determined list of subjects and subject combinations, with 1 being their first choice and 6 their least preferred. Responses showed no strong consensus. The subject group physics, chemistry and biology received the highest aggregate priority from respondents, followed by mathematics, and then English literature. The aggregate rankings across all the subjects/subject groups are shown in Figure 30 (the bigger the column, the higher the preference expressed, aggregated across all stakeholders.)

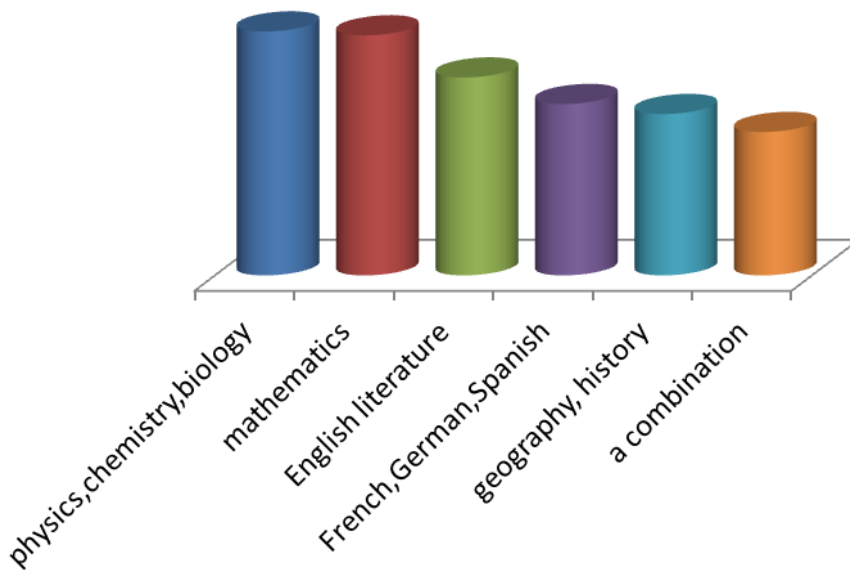
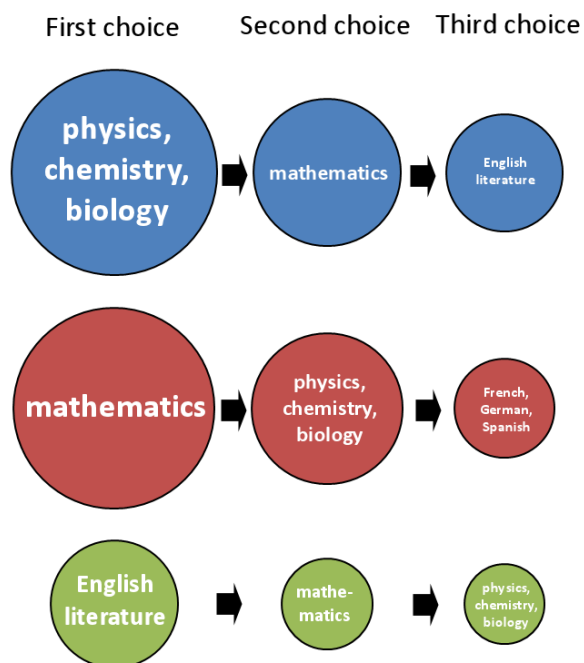


Figure 30: Stakeholders' views on the priority A level subjects/subject groups for implementation in 2014

Figure 31 shows the most popular second and third choices for each of the top three preferences (physics, chemistry and biology; mathematics; English literature). Among respondents who selected physics, chemistry and biology as their first choice, for example, mathematics was the most popular second choice, and English literature the most popular third choice. (The size of the circle in the figure indicates the relative support for that option.)



**Figure 31: Most popular second and third choices for each of the top three preferences for the priority A level subjects/subject groups for implementation in 2014** Qualitative responses

Although there was moderately strong support across all stakeholder groups for a staged approach to the reform of A levels (with the strongest support coming from schools and colleges), the picture that emerged from the qualitative data was rather different.

The majority of participants in the consultation event focus groups were seriously concerned about the lead-in time and felt that 2014 was too soon to implement any reform effectively.

The majority were not in favour of a staged approach for two main reasons: they worried that there might be transitional issues affecting the short-term take-up of subjects that had been changed; and there were also concerns that stakeholders might not understand A levels if there were two types of 'A level' running concurrently during a prolonged implementation phase.



Some groups thought that the content rewrite was not the main issue with current A levels, even if it was the big implementation challenge. The main issue, and one in which HEIs were felt to have limited expertise, was adjusting the assessment arrangements.

The STEM community, strongly represented in the consultation, made a call for mathematics to be considered a special case, citing as reasons: the modular structure of mathematics; the need for optional routes; the relationship with A level further mathematics; and the threat to participation in mathematics if the modular approach was to be removed. Stakeholders felt that any changes to the mathematics A level could not be rushed. In a similar way, stakeholders felt that the way in which science subjects are interrelated, with each other and with mathematics, means that time should be allowed to develop them in relation to each other and in parallel with mathematics.

*There are serious risks to rushing the development of new A levels, particularly for science subjects. The individual science subjects are interconnected, with concepts and skills spanning subjects. As such, the new qualifications will need to align across subjects but also with mathematics, which acts as a tool and a language for science. For these reasons, it is important that the core science subjects – biology, chemistry and physics – are developed in parallel with mathematics. (Representative organisation)*

## Appendix 1 – Proposed general conditions of recognition for GCE qualifications included in the consultation

### Condition 1 – Objective

## An awarding organisation must ensure that each GCE qualification which it makes available or proposes to make available:

- *Defines and assesses achievement of the knowledge, skills and understanding which will be needed for Learners planning to progress to undergraduate study at a UK higher education institution, particularly (although not only) to study the subject concerned;*
- *Sets out a robust and internationally comparable post-16 academic course of study to support that knowledge, skills and understanding;*
- *Permits UK universities to accurately identify the level of attainment of Learners.*

*It should also:*

- *Provide a basis for school and college accountability measures at age 18.*
- *Provide a benchmark of academic ability for employers.*

### Condition 2 – Size and grading

## An awarding organisation must ensure that each GCE qualification which it makes available or proposes to make available:

- *assigns 360 hours of guided learning;*
- *has specified levels of attainment on a scale of A\*,<sup>20</sup> A, B, C, D, E (U – unclassified – identifies Learner performance below the minimum specified level of attainment for the qualification);*
- *publishes clear, minimum expectations of the performance of Learners to achieve Grade A and Grade E<sup>21</sup>.*

### Condition 3

---

<sup>20</sup> An A\* grade is awarded to students who achieve a grade A overall at A level and also achieve 90 per cent or more on the uniform mark scale across their A2 units.

<sup>21</sup> Grade A and Grade E are traditionally set out as they define performance at the top and bottom of the grading scale. In the interests of consistency, A\* is not currently set out - as it does not apply at AS.

For **Option 1** and **Option 2**, where the A level is a linear two year course of study (whether or not we retained the AS as a standalone qualification) we propose the following condition<sup>22</sup> setting out the minimum structures that should apply to all A levels:

### **Condition 3 – Qualification structure and availability of assessments**

*## An awarding organisation must ensure that each GCE qualification which it makes available or proposes to make available:*

- *will only be assessed once a year, during the summer term;*
- *will have no more than three assessment components<sup>23</sup>.*

For **Option 3** - if we retain the current AS/A2 structure and introduce our other proposals (as outlined in paragraphs 48 – 53) we would propose the following condition<sup>14</sup>:

### **Condition 3 – Qualification structure and availability of assessments**

*## An awarding organisation must ensure that each GCE qualification which it makes available or proposes to make available:*

- *will only be assessed once a year, during the summer term;*
- *will require Learners to be assessed by means of two assessment elements, each of which will have a total weight of 50 per cent of the GCE:*
  - *one at AS (the expected level of attainment to be demonstrated by Learners completing the first year of a two-year course of study);*
  - *one at A2 (the expected level of attainment to be demonstrated by Learners completing the second year of a two-year course of study);*
- *will have no more than three assessment components<sup>15</sup>;*
- *will offer the AS assessment element as a qualification in its own right;*
- *will permit Learners to resit the AS and/or A2 once only, and, in doing so:*
  - *will require they resit all the externally assessed components of the AS and/or A2;*

<sup>22</sup> See Section 4 for how and when we may grant exceptions to this condition.

<sup>23</sup> An assessment component is a discrete assessable element within a qualification that is not itself formally reported. See GCSE, GCE, Principal Learning and Project Code of Practice (Ofqual, 2011).

- *will allow that they carry forward a mark for any internally assessed component from a previous examination series;*
- *will count the highest mark of any assessment component towards that Learner's qualification.*

#### **Condition 4 – Variety of question types**

*## An awarding organisation must ensure that each GCE qualification which it makes available or proposes to make available:*

- *uses a variety of appropriate question types, including questions that require responses to be produced through extended writing (including essay questions);*
- *uses multiple choice, single and/or low mark tariff questions only where they are a valid form of assessment and do not outweigh the proportion of marks derived from other forms of assessment.*

#### **Condition 5 – Synoptic assessment**

*## An awarding organisation must ensure that the assessment for each element of each GCE qualification which it makes available or proposes to make available:*

- *requires Learners to demonstrate their ability to draw together different areas of knowledge, skills and/or understanding learned from various parts of the course of study.*

#### **Condition 6 – Purpose of assessment**

*## An awarding organisation must ensure that each GCE qualification which it makes available or proposes to make available:*

- *makes clear the purpose of the assessment and sets out the balance between knowledge of the subject and application of skills, identifying the requirements for research, analysis, interpretation and evaluation to be achieved within each element and across the qualification as a whole.*

#### **Condition 7 – Assessment requirements**

*## An awarding organisation must ensure that each GCE qualification which it makes available or proposes to make available:*

- *includes at least 60 per cent external assessment for each assessment element;*

- *has comparable assessment requirements to similar GCE qualifications made available by other awarding organisations.*

### **Condition 8 – Evidence of support**

*## An awarding organisation must be able to demonstrate, through the publication of formal evidence, that for each GCE qualification which it makes available or proposes to make available it:*

- *has had significant and relevant subject engagement in the content and design from Higher Education and learned societies;*
- *has the support\* of at least 20 UK universities, at least 12 of which are respected in the specific field of study and/or from those deemed to be leading research institutions; and*
- *has been developed in consultation with schools and/or colleges to ensure that the qualification is manageable for successful delivery and, where appropriate, in consultation with employers.*

*\* This support must indicate that those universities:*

- *endorse the qualification, in particular its content, as suitable for progression to UK Higher Education courses in that subject or related subjects; and*
- *are satisfied that the qualification should present no barriers to equal access for students to the full range of universities.*

*## An awarding organisation must ensure that the specification for the qualification sets out those higher education institutions who have been involved in its development and those who have formally supported it.*

### **Condition 9 – Exceptions**

*## An awarding organisation seeking any exception to these General Conditions of Recognition for GCE qualifications must agree these with the Regulator prior to submission and provide:*

- *a rationale for each instance of exception, accompanied by evidence of support from relevant universities; and*
- *details of how comparability and consistency in assessment will be achieved within a subject.*

*## An awarding organisation seeking any exception to the Condition of support for GCE qualifications must demonstrate:*

- that the qualification is specialised and there is limited expertise at university department level or limited requirement for university entry;*
- that those universities that have departments with sufficient expertise do support it; and*
- that other universities support it in principle even if they do not specifically require it for entry.*

## **Appendix 2 - Ofqual consultation document**

[www.ofqual.gov.uk/files/2012-06-18-a-level-reform-consultation.pdf](http://www.ofqual.gov.uk/files/2012-06-18-a-level-reform-consultation.pdf)

## Appendix 3 – Equality analysis document

### Phase 1 equality analysis screen

Name of the policy being screened	<i>A Level Reform Consultation</i>
Team conducting the screen	Reform Team
Names and roles of officers completing the screen (indicate the lead officer)	Ian Dexter – Reform Coordinator (lead officer) Bernadette Smith – Qualifications Policy Manager Emma Ramsey – Reform Manager Janet Holloway – Head of Reform
Is this policy contracted out or completely developed/ implemented by the Office of Qualifications and Examinations Regulation (Ofqual), including Northern Ireland?	We will implement the final agreed recommendations once the Department for Education (DfE) has stated formal agreement on policy position.
Does this policy have relevance to the Northern Ireland equality duties, or is it solely relevant to England?	A levels are regulated separately in Northern Ireland by the Council for the Curriculum, Examinations and Assessment (CCEA) and will not be part of these proposed amendments. However, we will inform the CCEA of our decisions on reform, appropriately.
If the policy has relevance to the Northern Ireland equality duties, please explain how.	No direct relevance, but the regulator in Northern Ireland will be kept informed about developments and reforms in England.
Date screen completed	1st June 2012



## Relevance to the equality duties

	Key questions	Notes
1.1	Is this a new policy or a review of an existing one? If this is an existing policy, please state why it is being screened for equality analysis.	This is a new policy that will require our implementation.
1.2	What is the main purpose of the policy, and why is it being developed?	Our priorities for consulting on changes to A levels are as follows: <ul style="list-style-type: none"> <li>• To improve A levels so that, subject by subject, they are fit for purpose, promoting coherence (for example between the syllabus, teaching and testing), and to increase their validity</li> <li>• To secure (and, where necessary, recalibrate) the standards of qualifications and promote confidence in them</li> <li>• To secure a healthy, robust and efficient qualifications system in which the higher education sector, working with exam boards, is meaningfully engaged and takes a leading role in the development work; this will permit government and us to step back from the process while ensuring that the qualifications meet our regulatory requirements.</li> </ul>
1.3	How does the implementation of this policy pay due regard to the public-sector equality duties in England and Northern Ireland to eliminate discrimination, harassment and victimisation?	The intention to potentially involve the higher education sector in the design of A level subject matter is intended to increase the currency of the qualification and to build further confidence in it as an entry method to university. Changes to the design of A levels will aim to improve the life chances of learners taking them, enabling learners to maximise their choices and possibilities, whether they choose to leave education at 18 or move on to further study. This will help to eliminate discrimination, harassment

		<p>and victimisation, as learners holding A levels will be guaranteed a high standard of education, together with effective recognition of their achievements.</p> <p>We propose to ask a specific, equality-based question in our detailed consultation questionnaire that will outline our commitment to equality considerations within any changes to A levels. This will offer groups an opportunity to provide a firm input to the process and outline specific requirements that could be problematic to certain protected characteristics.</p> <p>We note that our proposals regarding the elimination of modular assessments, following the input from respondents to recent research, may have a potential impact on learners. In particular, we recognise that a single high-stakes examination system may not be suitable for all candidates. But we must balance the requirements of users of these qualifications (such as universities) and their practical requirements against the potential difficulties experienced by some learners. Any issues noted will continue to be monitored over the life of the final, agreed implementation proposal.</p>
1.4	How does the implementation of this policy pay due regard to the public-sector equality duties in England and Northern Ireland to advance equality of opportunity?	<p>Involving universities in the design and development of A levels will secure standards and promote confidence that the assessments assure progression to higher education. All learners who choose to work for A level subjects will benefit from holding university assurance of the standard of study and materials across a suite of these qualifications. Effective buy-in from higher education stakeholders will demonstrate confidence in A levels as a measure of academic ability and allow them to continue to be benchmark qualifications that ensure equality in assessing a large number of future prospects. The additional involvement of a diverse range of</p>

		<p>subject groups, teacher groups and learned societies in A level development will help to integrate A levels into university-access pathways in a way that does not compromise or promote any single approach.</p> <p>In paragraph 43 of the <i>A level Reform Consultation</i> document we note that A levels: "... must... ensure that students have acquired any specific skills and knowledge that they need in order to embark on their chosen degree course". (Ofqual, June 2012)</p> <p>In paragraph 42 we note that standards in A levels may require recalibration, if evidence is found that: "... they are substantially out of line with significant similar qualifications taken abroad". (Ofqual, June 2012)</p> <p>Our definition of a strong learner is based on someone who can demonstrate a mastery of the specific skills and knowledge referred to, and the understanding that this person will be able to match the skills and abilities of learners in other countries with comparable qualifications. This definition does not mean we will not recognise that other qualities are important to success at university, in conjunction with a demonstration of academic skill.</p> <p>Our proposal to continue to require awarding organisations to provide synoptic assessment elements in A level examinations will help to promote inclusivity through a broad approach to learning that equally rewards different areas of knowledge effectively.</p>
1.5	How does the implementation of this policy pay due regard to the public-sector equality duties in England and	The implementation of an increase in the involvement of the higher education sector in A levels should ensure that learners taking the qualifications have a greater assurance that their studies will be widely recognised and held in high

	Northern Ireland to foster good community relations?	public regard. Content that is set and agreed by partnerships drawn from across the university sector will be of equal benefit to all communities, and learners choosing to take A levels can look to pursue high-value qualifications that will help them to progress. Obtaining these qualifications will enable learners to access the equality of opportunity to achieve at university level, and the continuing high value of the qualifications will help to ensure on-going equality of access as well as securing standards at the pre-university stage.
1.6	What research or other information have you drawn on during this screening process?	<ul style="list-style-type: none"> <li>• <i>Fit for Purpose? The view of the higher education sector, teachers and employers on the suitability of A levels</i> (Ipsos MORI/Ofqual, March 2012)</li> <li>• <i>International Comparisons in Senior Secondary Assessment</i> (Ofqual, May 2012)</li> <li>• <i>General Conditions of Recognition</i> (Ofqual, May 2012)</li> <li>• <i>A level Reform Consultation</i> (Ofqual, June 2012)</li> <li>• Reports from external equality consultancies with a background in public-sector analysis and research that have carried out detailed work for us on previous occasions.</li> </ul>
1.7	Do you have sufficient information to answer 1.3 to 1.5 fully?	Yes
1.8	Are we working in partnership with other organisations to implement/deliver this policy/function?	No – potential delivery of this policy will lie wholly with us.
1.9	Does this policy require a full impact analysis? If you can give evidence that the	No full impact analysis is expected to be carried out on this consultation at this stage. Following reference to a full set of responses, we will revisit

	policy is not relevant to the equality duties set out in 1.3 to 1.6, and also that no adverse impact towards any protected characteristic has been discovered that cannot be justified, then a full impact analysis is not necessary.	noted equality issues and produce an appropriate action plan.
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Protected characteristics in sections 1.3 to 1.5 include:

- Race
- Sex
- Disability
- Religion and belief
- Age
- Sexual orientation
- Gender reassignment
- Pregnancy and maternity.

Northern Ireland has three extra protected characteristics, these are:

- Political opinion
- People with dependants
- Marital status.

## **Deciding not to continue to the full equality analysis**

If you have decided that the policy, practice or procedure being screened has no impact towards the protected characteristics and positively promotes the protected equality duties, then you do not have to continue with the process of carrying out the full equality analysis. Please submit any evidence for your decision with the submission of the signatory forms.

### **Notes:**

- If you are unsure of any aspect of this equality analysis process, you can seek guidance from the Diversity & Inclusion Manager.
- Once the equality analysis screening template form has been completed, please ensure that all enclosures are attached; the form should be signed and dated. Ensure that it is signed off by your head of service. Keep a copy for your records and send a copy to the Diversity & Inclusion Manager.

Signed  
Lead officer.....

Print name.....

Date.....

Signed off  
Head of service.....

Print name.....

Date.....

This completed equality analysis screening template form might be placed on our website or otherwise made available to the general public or other stakeholders.



## Appendix 4 – Data sources

Responses to the consultation were accepted in a range of formats: questionnaire, letter and email. These were completed online, sent electronically or were postal submissions – for details, see Table 1.

**Table 1: Data generated by the consultation**

Delivery method	Data type	
	A. Quantitative + qualitative	B. Qualitative only
Postal	13	Letters 5
Electronic (email)	115 <sup>24</sup>	Letter/email-only responses 43 <sup>25</sup> Responses following questionnaire format 6
Online	763	
<b>TOTAL</b>	<b>891</b>	<b>54</b>

As with any online questionnaire, a number of respondents started but did not complete it. Ofqual added the following instruction at the beginning of the questionnaire: ‘Please be aware that your response will not be considered if you do not complete the respondent details section at the end of this survey.’ The details asked for were: name, organisation, email address, and nation.<sup>26</sup> This information was required for two purposes: (a) to ensure that the response was genuine and (b) to help identify the views of different stakeholder groups in the data analysis. Only responses that included answers to these four mandatory questions were deemed complete and included in the analysis; other responses were deemed partial and anonymous<sup>27</sup>. In total, there were 763 completed responses and 1,725

<sup>24</sup> 11 of the 115 respondents sent a range of additional supporting materials.

<sup>25</sup> Almost half of the letter-only responses were from representative organisations or special interest groups.

<sup>26</sup> 28 of the questionnaire responses that were not completed online did not identify nation.

<sup>27</sup> With such a large number of partial and anonymous responses, there may be concern that the removal of these responses from the analysis would result in important information being lost from the evaluation of the data. Because of this, the partial and anonymous responses were inspected in detail to determine whether or not this was the case. The analysis showed that of the 1,725 partial and anonymous responses, 983 (57%) had answered none of the 36 objective questions (i.e. yes/no questions, Likert-style questions) and 1,555 (90%) had answered fewer than 5. Only 70 of the partial and anonymous responses had answered more than 20 of the 36 objective questions. Of these, it is impossible to determine why the questionnaire was not completed and also whether the questionnaire was then re-attempted by the

partial and anonymous responses to the questionnaire online. In total, 891 completed questionnaires (including those received by email or on paper) have been included in the analysis, together with 54 other responses to the online consultation submitted in different formats.

A total of 167 participants from a range of stakeholder groups attended one of seven consultation events held between July and September 2012 (Table 2).

**Table 2: Consultation event participants by stakeholder group**

Stakeholder group	Number of participants
School/College	56
Representative group/Interest group	45
Higher education institution	28
Exam board	13
Government body/organisation	12
Other (including general public)	10
Training provider	2
Employer	1
Student/Learner	0
Parent/Carer	0
<b>TOTAL</b>	<b>167</b>

same person and completed. As such, it is not possible to determine whether any of these partial and anonymous responses are in fact included in the completed responses anyway.

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

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