

A Level Reform Consultation



June 2012

Ofqual/12/5176

Contents

Foreword by the Chief Regulator.....	3
Section 1 Background and purpose.....	6
About Ofqual.....	6
About this consultation.....	7
Background and context.....	8
What will happen next?.....	11
Publication of responses.....	11
Section 2 What we hope to achieve.....	12
Section 3 Design rules.....	14
The purpose of A levels.....	14
A level design.....	20
Qualification support.....	22
Section 4 Exceptions.....	26
Section 5 Making sure standards are right year on year.....	28
Section 6 Implementation.....	30
Consultation Questions.....	33
Questions on Section 1: Background and purpose.....	33
Questions on Section 2: What we hope to achieve.....	34
Questions on Section 3: Design rules - The purpose of A levels.....	36
Questions on Section 3: Design rules - Size and grading.....	36
Questions on Section 3: Design rules - A level design.....	42
Questions on Section 3: Design rules - Qualification support.....	46
Questions on Section 4: Exceptions.....	50

Questions on Section 5: Making sure standards are right year on year	51
Questions on Section 6: Implementation.....	52
General questions	53

Foreword by the Chief Regulator

I am delighted to present the consultation by the Office of Qualifications and Examinations Regulation (Ofqual) on the proposed new arrangements for A levels in England.

There is a wide choice of qualifications for people aged 16-18. But A levels remain a very popular option, taken by a quarter of a million students each year. We know that employers value them and that they are a key qualification for many students planning to go to university. We want A levels to be the best possible preparation for students' futures. They need to be able to hit the ground running when they go on to the next stage of their lives. A levels are therefore one of the most important qualifications that we regulate.

Like all qualifications, A levels need to be kept under regular review to make sure that they continue to meet the needs of their users. Most current A levels were first taught four years ago and it is time to start considering what the next generation of A levels should look like. Although A levels are widely valued, we know that many people think that there are some aspects of them that need improving, especially in some subjects. In addition, the government has said that it wants to see universities and learned societies fully involved in the development of the new A levels, and we welcome that. Following the recent closure of the Qualifications and Curriculum Development Agency (QCDA), the responsibility for developing core A level content – which would have fallen to QCDA – will need to sit elsewhere in future.

We have recently published two important pieces of research on A levels: one on the views of universities, teachers and employers in England¹, and one comparing standards of A levels to similar qualifications taken in other countries². These studies have helped to inform the proposals that we set out in this document.

We have proposed draft purposes for A levels. Our research suggests that there is currently a lack of clarity about what A levels are for, so we think it is helpful to articulate the primary purposes of the qualification. We are interested to know to what extent you agree.

We have proposed changes to the structure of A level assessment. We want to make sure that assessments can be developed that are appropriate for the subject, rather

¹ *Fit for Purpose? The view of the higher education sector, teachers and employers on the suitability of A levels*, April 2012 - www.ofqual.gov.uk/files/2012-04-03-fit-for-purpose-a-levels.pdf

² *International Comparisons in Senior Secondary Assessment*, May 2012 - www.ofqual.gov.uk/files/2012-05-10-icossa-summary-report.pdf

than imposing a single approach on all A levels. But we do think that there needs to be a broadly similar approach in the assessment structure so that we can make sure that standards are comparable and A levels are widely understood, and to help schools and colleges in their management of their sixth form provision. For all A levels, we propose to end January assessments, and to allow only one resit opportunity; we think that this will rebalance the emphasis of A levels onto the learning rather than the assessment. All papers would therefore be taken in the summer.

There are different views about whether the AS/A2 structure should be retained. We remain neutral on this issue. We know that some stakeholders from higher education and teaching do support the AS qualification being kept. They believe that it increases the breadth of the curriculum, supports transition from study at Key Stage 4 and keeps open the further study options for students. We also know that some stakeholders from these same groups do not support the AS qualification being kept. They believe that the AS qualification has a negative impact on teaching time, limits synoptic learning and results in students focusing on examinations at the expense of the pursuit of wider interests such as sport, drama and volunteering. Given this range of views we have proposed three options for the future structure of A levels and we would welcome your feedback on them.

We want to encourage and promote genuine university buy-in to the A level proposals that come forward from exam boards, particularly in relation to the content of the qualifications. It is not for us to decide how universities and exam boards should work together, but we want to make sure that our arrangements for sign-off allow us to be confident that there has been sufficient engagement, without imposing unnecessary burden on universities in the development process. We also think that schools and colleges will need to be engaged in the development of A levels to ensure they can be turned into high quality teaching programmes.

We will manage the roll out of the reform programme carefully over the coming years; experience has shown that rushing qualifications reform is highly risky. For A level courses starting from September 2013, we propose to change the assessment structure for all A levels, to reduce the number of assessments and resits. Full revisions would be rolled out over the following few years, on a subject-by-subject basis. We are seeking views on which subjects we should prioritise first for full revision – for example, those with an already established stakeholder base or those where there is most concern about the current versions. We hope that for some subjects, new content can be identified and new A levels of sufficiently high quality can be developed in time for first teaching in September 2014. Those involved can learn from this experience, so that high quality A levels in other subjects can be introduced in the following years.

We propose that by 2018 – a decade after they were introduced – all current A levels will have been approved for continued use, replaced or stopped. It may be that there is insufficient demand from universities for A levels in some subjects, in which case those subjects will be withdrawn. It may also be that some universities decide that they want to see development of A levels in new subjects, and this should be allowed to happen. Provided that universities are signed up, it will not be for us to decide which subjects are appropriate in A levels.

Whatever your interest or involvement in A levels, we want to hear your views. I would encourage you to take the time to respond to this consultation, and I look forward to hearing from you.

A handwritten signature in black ink, appearing to read 'Glenys Stacey', with a stylized, cursive script.

Glenys Stacey
Chief Regulator, Ofqual

Section 1 Background and purpose

About Ofqual

1. We regulate all academic and vocational qualifications in England, together with vocational qualifications in Northern Ireland, where those qualifications are provided by a body that is recognised by us to provide them. Each recognised body is known as an ‘awarding organisation’ (or ‘exam board’), and each qualification that it offers for which it is recognised is known as a ‘regulated qualification’.
2. We are a statutory body, created by the Apprenticeships, Skills, Children and Learning Act 2009, as amended by the Education Act 2011. The Acts set out the legal framework within which we operate, give us certain duties, give us powers to take specific forms of regulatory action, and define the objectives that we must seek to achieve when we exercise those powers.
3. We regulate to secure standards of, and public confidence in, regulated qualifications. We also regulate to secure efficiency in the provision of regulated qualifications and to raise awareness of the range and benefits of regulated qualifications to students, employers and higher education institutions.
4. Our priorities for A levels are as follows:
 - 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 validity³
 - to secure (and where necessary recalibrate⁴) the standards of qualifications, and promote confidence in them
 - 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

³ ‘The extent to which evidence and theory support the interpretation that the assessment outcomes meet their intended uses.’ - *General Conditions of Recognition* (Ofqual, May 2012).

www.ofqual.gov.uk/downloads/category/123-criteria-general-conditions?download=1395%3Ageneral-conditions-of-recognition-may-2012

⁴ Our new international objective means that we need to consider resetting the standards of qualifications if we have evidence that they are substantially out of line with significant similar qualifications taken abroad.

permit government and us to step back from the process while ensuring that the qualifications meet our regulatory requirements.

About this consultation

5. This consultation considers proposals for the reform of A levels in England. Where we refer to 'A levels', we mean A levels offered in England and therefore regulated by us. References to 'government' and 'ministers' mean 'Westminster government' and 'Westminster ministers'. In Wales, the Welsh Government is currently undertaking a review of 14–19 qualifications, after which it will outline its view on the long-term reform of A levels. In Northern Ireland, the Minister for Education has indicated that he will want to talk to a wide range of relevant stakeholders before deciding on any proposed changes to A levels and their appropriateness for students there.
6. A levels were last revised in 2008, and it is now time to review them once more. We have carried out independent research to identify what improvements may be needed. In the White Paper *The Importance of Teaching*⁵, government also asked us to consider how to involve universities and learned societies in the future development of A levels.
7. We set out in this consultation how we plan to reform A levels to reflect the findings of our national and international research.^{6,7}
8. We think that this means that those in higher education and learned societies should be more involved in deciding the detailed subject content of A levels, and government is of the same view. By giving these stakeholders a greater say in the content and design of A levels, we expect that most of our research findings about A level content will be largely addressed. We also know that there are more general concerns about A level assessment, and we have some proposals to review and develop assessment in all subjects to improve validity.
9. Through this consultation we are seeking views from higher education, employers, learned societies, colleges, schools and others so that A levels are the best that they can be. We will be seeking assurance that each of the exam

⁵ *The Importance of Teaching*, (Department for Education, November 2010)
www.education.gov.uk/publications/eOrderingDownload/CM-7980.pdf

⁶ *Fit for Purpose? The view of the higher education sector, teachers and employers on the suitability of A levels*, (Ofqual, April 2012) - www.ofqual.gov.uk/files/2012-04-03-fit-for-purpose-a-levels.pdf.

⁷ *International Comparisons in Senior Secondary Assessment*, (Ofqual, May 2012) - www.ofqual.gov.uk/files/2012-05-10-icossa-summary-report.pdf

boards is appropriately resourced and prepared to carry out these reforms, and that universities are prepared and able to play their part.

Background and context

10. We regulate A level qualifications that are offered in England; the Welsh Government regulates A level qualifications in Wales, and the Council for the Curriculum, Examinations and Assessment (CCEA) regulates them in Northern Ireland. We share information with the other regulators, and work together when it is appropriate for us to do so.
11. There are currently five exam boards that are recognised to design, deliver and award A level qualifications in England, Wales and Northern Ireland. In principle, all universities in all three countries, and Scotland, regard A levels in a consistent way, whichever exam board specification has been followed. This consultation covers England only, but we see the benefits of having the same A levels offered in different parts of the UK, and we will continue to discuss with the various regulators and governments whether and how this might be achieved.
12. We have carried out international research and we have found that A levels perform well against their international equivalents (the main assessments offered for progression to higher education in other education systems). The research did, however, highlight several areas for consideration in future A level design. Some of these relate to content, and we will be asking exam boards and universities to consider these when they are reviewing those subjects. However, this research also suggested some structural improvements, which we will consider in this consultation:
 - **Breadth versus depth** – Many systems have a baccalaureate- or diploma-style assessment system, including the study of a number of subject areas that are not required as part of A levels. We are not proposing any significant move to such a structure as part of this consultation. However, the issue of breadth is important in considering whether to retain the AS qualification – see below.
 - **Independent study** – The inclusion of independent research, projects and extended essays to bring additional depth to subject expertise.
 - **Multiple choice** – Multiple choice questions, when used appropriately, can test large amounts of content and assess skills that can be difficult to test by other means.
13. In order to find out what UK universities, learned societies, employers and schools think of the current A levels, we also commissioned Ipsos MORI to

gather their views. It was found that A levels were seen as fit for purpose but, like the international research, these participants identified similar improvements that could be made:

- greater clarity over the core knowledge required in some subjects
 - improved skills in researching, problem solving, analysis and critical reflection
 - a reduction in modularisation
 - a reduction in the number of resits
 - better discrimination between the most able candidates applying for oversubscribed undergraduate degree courses.
14. We believe that these stakeholders are integral to any development of revised A levels, to ensure that the future qualifications provide students with the right tools to progress successfully to higher education or employment, and so that universities and employers are satisfied with the candidates that they receive.
 15. One feature of academic education for 16–19-year-olds is that the curriculum is defined by the qualification. The reason for having A levels is not, in the end, the assessment and the certificate, but rather the learning that leads to them. In order to truly influence standards, we need to try to find ways to improve the quality of learning, not just the preparation for assessment. Schools and colleges will therefore have a key role turning the qualifications into high quality teaching programmes.
 16. In the autumn 2010 White Paper, ministers set out their policy intention that universities and learned societies should be fully involved in the development of A levels. We have a duty to have regard to government policy, and because of the important role that A levels play in the education system, it is right that ministers should have a view on how A levels should be developed. This is especially true now with regard to the curriculum aspects of the qualification, following the closure of QCDA, as we do not have responsibility for this area.
 17. We look to the Department for Education or the Department for Business, Innovation and Skills, if necessary, to help to facilitate the engagement of universities and learned societies in A level development. In this consultation we set out the evidence that we will need, in the absence of subject criteria, to assure us that sufficient higher education engagement has taken place.
 18. Currently, all exam boards must meet our general conditions of recognition, but we also set specific requirements relating to A levels. All A levels must be

accredited – they are checked by us before they are offered – and exam boards offering A levels must follow our on-going standard setting requirements.

19. At present, A level qualifications have to meet a range of regulatory requirements covering both structure and content. The detailed requirements are currently contained in various documents:
 - *General Conditions of Recognition*
 - *GCE Qualification Criteria*
 - *GCE Subject Criteria* (which include requirements about content)
 - any additional regulatory documents, e.g. *Regulations for the Quality of Written Communication*.
20. Qualification and subject criteria have been produced using a similar approach for the last two decades. These documents have, in the main, been inherited by us from our predecessor organisation the Qualifications and Curriculum Authority (QCA). Therefore they reflect the regulatory and qualification development roles that QCA had.
21. We want to enable exam boards, in collaboration with universities (and, where universities deem it appropriate, learned societies), to deliver A level qualifications that provide a course of study to prepare students to progress to further study or into work. We should also be able to continue to secure standards within a particular subject.
22. We propose to reduce the regulatory burden by keeping the design rules for A levels to a minimum. We have some general requirements that already apply to all qualifications. However, we will gradually remove the regulations that currently apply to A levels, and will not set particular conditions relating to A levels except where we need to in order to secure the validity of the qualifications. We will also no longer have any subject-specific requirements: where new subject content is required, it will be developed by exam boards in discussion with universities.
23. We will set rules to ensure that the A level title has a consistent meaning that is easily understood by its users. We are proposing to set some common features regarding size, broad level of demand, grading scale and overarching assessment requirements to secure comparability of demand between A levels in the same subject.
24. The nine conditions that we are proposing are set out within this consultation. These will replace the numerous regulations currently in place. However, the

wording of these draft conditions should be considered illustrative, and we will finalise the precise wording in the light of responses to this consultation.

What will happen next?

25. This consultation will run for twelve weeks, closing on 11th September 2012, and we will also hold a series of stakeholder events during that period. The responses to this consultation will be independently evaluated and the evaluation published.
26. We will be publishing our equality analysis alongside this consultation and will be conducting an impact assessment as part of the consultation. We would welcome any views that you may have on these areas.
27. We will also talk with the exam boards about:
 - the process to support the changes identified above
 - the evidence that we expect them to provide to demonstrate the stakeholder engagement that they have had in the development of their qualifications.
28. Following a review of the responses to the consultation, we will publish the additional general conditions that will apply to A level qualifications.

Publication of responses

29. We may publish or share with others some or all of the responses to this consultation. If you do not want your response to this consultation published, you must state clearly that your response is confidential to us.

Section 2 What we hope to achieve

30. We want to adapt our regulatory approach to strengthen university involvement and to allow universities to determine subject content. However, we need to retain the ability to secure standards, by ensuring that assessments are appropriate, setting some ground rules for what it means to be an A level, and monitoring the on-going setting of standards.
31. The standard of a qualification is a complex concept, but it amounts to three main things: the subject content must be sufficiently demanding; the quality and structure of the assessment must be sufficiently demanding and appropriate for the qualification; and the grading must be set so that those who achieve the grades have achieved the expected level of performance.
32. In the past, the content of the majority of A levels was set by QCA through subject criteria; without these, the development role will be more substantial. If universities or learned societies take on this role, A level development across subjects may not be consistent, and the resulting A levels could be distinctly different for different subjects, reflecting the needs of particular subject communities.
33. The quality of a qualification can be measured in various ways; for us, the key measure is validity – that is, the extent to which the qualification gives a true measure of learning. We want to regulate in ways that improve the validity of qualifications while avoiding unnecessary bureaucracy. We want to allow flexibility in assessment to support improved teaching and learning. As we regulate, we need to understand and respect the needs of those who use qualifications, and we need to regulate in a focused and efficient way, avoiding imposing undue burdens on the system.
34. In doing so, we hope to achieve the following:
 - **Equality of access for students to the full range of universities** – It is important that all A level specifications in a subject allow students equal access to courses at all universities. Undoubtedly, for many courses in many universities, some A level subjects will be considered essential and others will be considered inappropriate, and universities must continue to be solely responsible for their admissions decisions. However, we have an obligation to secure public confidence in regulated qualifications and assessments, and it benefits no one if universities feel that they have to distinguish between different versions of the same A levels from different exam boards: it will be more work for universities, and will mean that some students end up with what some may regard as second-class

qualifications. We must ensure comparability of demand and content in different specifications in a subject.

- **Support for selection to universities** – It is important to have a common grading system for A levels so that they can be used in university selection procedures. This facilitates comparisons between candidates studying with different exam boards or following different subjects, thus simplifying selection decisions.
35. Our General Conditions of Recognition already demand some overarching requirements of all qualifications. For instance, they must be fit for purpose and manageable, and ensure comparability across optional routes in a specification and between exam boards where more than one exam board is offering the same qualification.
36. However, in order to meet these principles, we are proposing that we will need some additional design rules for A levels. We are therefore consulting on some new General Conditions of Recognition for GCE qualifications.

Section 3 Design rules

37. Both of our pieces of research have identified that overall, A levels are viewed positively and prepare most students for most undergraduate degrees. Employers also use A levels to select students because they have met what they consider to be the right level of academic achievement.
38. However, our national research also identified areas where changes could be made to enable greater discrimination between the most able candidates applying for oversubscribed undergraduate degree courses. This could include changes to some or all A levels that would improve the course of study and development of skills for students, such as:
- improved skills in researching, essay writing, problem solving, analysis and critical reflection
 - a reduction in modularisation
 - a reduction in the number of resits.
39. We expect that the content of future A levels will include and encourage appropriate opportunities for development of those skills identified above, but it will be for universities to determine where it is appropriate for them to be assessed.
40. Sufficient consistency in assessment (such as linear or modular structures, varying the number of units where modular, multiple choice or essay questions and coursework) is important to ensure validity and reliability. This will help to prevent a culture of teachers 'playing the system' when selecting which specification from which exam board to teach. However, we recognise the need to balance any benefits of consistency against the particular needs of specific subjects. This is reflected in our proposal in Section 4 to allow exceptions to the conditions.

The purpose of A levels

41. A levels were originally introduced to facilitate entry to higher education. However, as they have developed over time, they have established a role in the wider qualification framework to recognise achievement, ranging from the purely academic and theoretical learning through to the skills and knowledge associated with employment.
42. Strong support also remains for the existing A level design principle that the achievement required for an A level should remain the same from year to year and reflect comparable standards of attainment, irrespective of how many

students achieve the necessary standards. However, our new international objective means that we need to consider recalibrating the standards of qualifications if we have evidence in the future that they are substantially out of line with significant similar qualifications taken abroad.

43. In relation to university selection, A levels must constitute more than a simple means of ranking students to help university admissions authorities choose between applicants. They must also ensure that students have acquired any specific skills and knowledge that they need in order to embark on their chosen degree course or profession. This is far more of an issue in some subjects than others.
44. One of the messages from our national research is that there is not enough clarity about the purposes of A levels, which risks confusion and makes it harder to regulate effectively. However, people generally agree that the primary purposes of A levels are to prepare students for higher education and to enable students to be selected according to ability and understanding. Therefore in order for us to be able to regulate in a consistent manner, we will introduce a condition⁸ that sets out a primary purpose for all A levels. We propose that the following should apply:

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.*

⁸ See Section 4 for how and when we may grant exceptions to this condition.

45. It is important that unless there are good reasons for variation, all A levels should remain an equal size. This not only helps to ensure comparability but also means that qualifications are manageable – enabling schools and colleges to plan their provision and resources accordingly.
46. It is also important that a student’s level of attainment is easily identified and meaningful. This consultation provides an opportunity to revisit the grading structure of A levels. It may be that there are better ways to support university selection and to secure appropriate differentiation. It is likely that universities will have a view on this. It may also be appropriate for new A levels to be identified by a different grading system to prevent a two-tier system during the period of reform – avoiding any invalid comparison of students’ attainment from year to year, and making the system clear to all users.
47. We welcome your views on both these points. However, in the interim and with the current arrangements as a starting point, we propose the following condition⁹:

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*,¹⁰ 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 E¹¹.*
48. There are different views about whether we should retain the AS/A2 structure. Our research identified that the transition from GCSE to A level is a difficult one,

⁹ See Section 4 for how and when we may grant exceptions to this condition.

¹⁰ 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.

¹¹ 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.

and that starting with AS, which is less demanding than A2, allows students to make that transition more easily.

49. The AS, which is typically taken in year 12, can be used as a qualification in its own right or as the first half of a full A level. This allows for a broader curriculum in year 12, and allows students to come to an informed view about which subjects they wish to continue into the second year. This breadth of study was found to be an important feature of senior secondary level qualifications in our international research. Tomlinson¹² (Tomlinson, 2002) found that students in particular value the possibility of studying a broad range of subjects in their first year of A levels and achieving a recognised AS qualification at that point for those subjects that they do not pursue to full A level. The AS also helps to provide a focus for year 12 study. The evidence from the national report and elsewhere is that the AS is valued by some universities, while others have concerns.
50. Some concerns were expressed in the national research about the marks for AS and A2 being equally weighted in awarding the A level - despite AS content being less demanding than A2 content. This view is compounded by a student's opportunity to resit this element several times. However, this is a complex area; if we retain the current structure we need to balance the amount (volume) to be studied in the first half of a two-year course of study with the weighting (significance) that the assessment of this content is given in the final qualification. We are particularly interested in your views on this and whether the weighting (significance) given to the AS part of the course should be maintained at 50 per cent or altered, for example to 40 per cent.
51. Currently, both AS and A2 are split into modules (usually two each). There are concerns that this can make it harder for students to make connections between different topics within a subject. Evidence from the national research is that the modular structure creates significant problems in practice for both universities and teachers. We propose that all future A level qualifications are no longer split into modules.
52. We also propose to remove January assessments.
 - a. For two year linear A levels this would mean that assessments could only be taken at the end of the course and only in the summer.

¹² *Inquiry into A level standards* (Tomlinson, December 2002)

http://news.bbc.co.uk/1/shared/spl/hi/education/02/tomlinson_report/pdf/final_report.pdf

- b. If we retain the AS/A2 structure this would mean that assessments could be taken in the summer at the end of the first and the end of the second year of study. This will minimise resit opportunities. This means that in a traditional two-year course of study, students would have the opportunity to resit the AS exam only once, with no opportunity to resit the A2 element. If a student wished to resit their A2 element, this would have to take place in the following summer.
53. Our national research found that students do not always treat exams seriously if they know that they have the opportunity to resit. Currently, students who resit take the highest mark that they have achieved towards their final grade. Some teachers have suggested that students should have to take the mark achieved in their most recent exam even if it is worse than the previous one. This would allow students to rectify genuine underperformance but may remove the incentive to resit as a matter of course in the hope of getting a better mark, and put greater emphasis and focus on the first exam sitting. However, this could penalise students who are genuinely disadvantaged at their second attempt – through illness or circumstance – so we would propose retaining the current approach. With only one resit allowed, continuous resitting will be eliminated, so we think that it is reasonable to allow students to count the highest mark when they resit. We would welcome views on this.
54. In considering whether or not to retain the current AS/A2 structure we propose three options for consultation:
- Option 1. Removing the AS qualification – which would mean 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 standalone qualification but where the results do not contribute to the A level. This would mean 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 as outlined above;
55. 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 condition¹³ 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 components¹⁴.*

56. 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 condition¹⁴:

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 components¹⁵;*
- *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:*

¹³ See Section 4 for how and when we may grant exceptions to this condition.

¹⁴ 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 require they resit all the externally assessed components of the AS and/or A2;*
- *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.*

A level design

57. Minimum design rules will help to prevent perceptions that some specifications and/or exam boards are easier than others, and support our commitments to public confidence, standard setting and maintenance or recalibration of standards.
58. Without these rules, it would be almost impossible for us to secure the right standard and be confident that comparability of demand could be achieved across a subject. There would also be potential for candidates to be assessed in very different ways, with different outcomes and different levels of coverage of the subject material.
59. We already require exam boards to consider comparability in a subject even where the content is quite diverse – however, this is challenging, and we will therefore try to ensure some consistency in assessment. We will encourage exam boards to work together on assessment requirements within a subject even if they are developing diverse content.
60. We will expect all A levels to be of an appropriate level of demand, and will require broad consistency of assessment with other versions of the same subject, but we do not propose to enforce comparability between subjects.
61. It is important that assessment in each subject is valid and supports good teaching and learning. We know from our research into GCSE controlled assessment¹⁵ that internal assessment can present problems for schools in managing the practical arrangements and the impact this can have on teaching and learning. We want to ensure that the assessment of A levels is manageable for schools and colleges and that internal assessment is used only where it is

¹⁵ *Evaluation of the Introduction of Controlled Assessment* (Ofqual October 2011)

www.ofqual.gov.uk/downloads/category/136-other-research?download=1164%3Aevaluation-of-the-introduction-of-controlled-assessment

the most valid form of assessment for that subject and/or the skills that are being assessed. Therefore, we propose that all A levels should have a minimum of 60 per cent external assessment.

62. In line with our international research, we will want to encourage different types of assessment, including essay writing, research and multiple choice, where they are fit for purpose. The use of multiple choice questions in assessment is a commonly debated issue. There are divergent opinions on their validity for assessing different subjects, knowledge or skills. It is therefore important that universities and exam boards find the right balance in assessment between question types.
63. One of the key messages from our national report is that universities expressed concern over new undergraduates' abilities in academic skills, such as critical reflection, problem solving and the ability to study independently.
64. Therefore, in order to ensure equality of access for students entering higher education, and to enable the design of flexible but valid and reliable assessment models, we propose that the following conditions¹⁶ should be introduced:

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.*

¹⁶ See Section 4 for how and when we may grant exceptions to these conditions.

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.*

Qualification support

65. There will be no subject criteria setting out core content requirements in key A level subjects. As part of developing their A levels, exam boards will therefore need to consult on and develop the content of those A levels, ensuring that the content is appropriately demanding, enables the purposes of A levels to be met, enables standards to be secured across subjects, and can be taught and assessed in line with the design rules set out above.
66. This means that we expect exam boards to work with:
- universities and learned societies to develop content and assessment that will best equip students to progress to university;
 - schools and colleges to advise on the pedagogical and practical considerations needed to ensure that the proposed A levels can be taught effectively;
 - employers and/or employer groups, where appropriate, so that they can consider whether A levels can meet their particular requirements.
67. While exam boards do currently engage these stakeholders in the qualification design process, input varies considerably across organisations. It tends to involve consulting particular individuals during the development stage, with larger groups of higher education representatives, employers and teachers (e.g. strategic forum or subject communities) commenting on the final products. In

future, we will require evidence that this engagement has been more substantive, particularly because the lack of subject criteria even in key subjects will mean that more work will be needed to develop the detailed subject content.

68. Universities should be at the centre of A level reform. They should have a particular role in determining what should be taught and assessed in each subject (content) to give them confidence that young people have acquired the appropriate knowledge and skills required to access undergraduate courses in general or in particular subjects.
69. If universities are involved in this way, it should mean that students starting on an undergraduate course of study will be capable and ready for learning at the next level, reducing the need for resource-intensive supplementary teaching and provision of extra classes.
70. Provided that universities endorse these new qualifications, it will no longer be necessary for us to set out the content that should be covered. However, some or all universities might wish to specify a common core content to secure greater consistency of core knowledge between those doing different versions of each A level, and to make it easier to secure consistency of demand. We will not require such core content requirements to be met, but if such requirements have broad currency across the university community, then it will be difficult for exam boards to secure support if they do not meet them.
71. We will require each exam board to provide us with its own evidence of support and record of university engagement for each qualification. This will demonstrate to us that universities were meaningfully engaged in any development work and that they have validated the content and assessment.
72. Exam boards will need to work with universities to meet our requirements. Universities will be free to develop their own arrangements to provide that support, according to their needs and resources. For example, they could agree that the decision about whether to support a qualification could be informed by a recommendation from the relevant learned society, or a subgroup of universities.
73. Whatever process they choose to develop, we need assurances of an appropriate level of engagement and that, as far as is possible, all universities value all A levels equally. Therefore we propose that we will require two types of evidence:
 - a. First, we will require evidence that there has been general engagement at a subject level. The exam boards may set up or use existing subject groups, development committees or forums to inform the development of specifications (where no core content has been agreed).

- b. We will also require more formal sign-off from a number of respected universities who are willing for their institutions to publicly endorse a qualification. In his letter¹⁷ to us in March 2012, the Secretary of State suggested that these should be 'our best, research intensive universities such as those represented by the Russell Group'. It is difficult for us, and indeed the higher education sector, to identify definitively these universities, which may vary by subject. Therefore we will work with universities to decide who this should be. The details of this may depend on the evidence of engagement above, but we expect that these specific endorsements at institution level will be published in each exam board's specification.

74. Therefore we propose the following condition¹⁸ setting out the minimum evidence of support that we will need:

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*

¹⁷ Exchange of letters between Rt Hon Michael Gove MP, the Secretary of State for Education, and Glenys Stacey, Chief Regulator, Ofqual - <http://www.ofqual.gov.uk/news-and-announcements/83/889>

¹⁸ See Section 4 for how and when we may grant exceptions to this condition.

- *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.

Section 4 Exceptions

75. We know that some qualifications in particular subjects will not be able to meet these conditions. These could, for example, include qualifications:
- such as art and design – which may require a greater percentage of internal assessment as the most valid form of assessment.
 - such as mathematics – for which we will not require extended writing responses.
 - that are so specific in nature that only a small number of universities will be in a position to support them.
 - that do not lead to a specific course of study at university, but do enable students to expand their knowledge in a particular area of interest – e.g. critical thinking.
76. Therefore we are proposing to allow certain exceptions to the conditions. We will put in place some blanket exceptions for certain conditions; for example any requirement for extended writing questions in mathematics. Any other individual exceptions to the conditions will need to be agreed with us in advance and presented alongside detailed evidence. We will include conditions to set out our requirements for any exceptions:

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.*

Section 5 Making sure standards are right year on year

77. To secure qualification standards on an on-going basis – particularly with high-stakes, graded qualifications that are offered by many exam boards and taken by large numbers of students, as is the case with A levels – requires more than just the content and assessment design to be right. It also requires standards to be monitored and reviewed on an on-going basis.
78. In order for standards to be right each year, we need the following:
- The exams and other assessments must be right. When exam boards submit new qualifications to us for accreditation, they have to show us samples of the assessments that they propose to use. We need to be satisfied that they have robust controls in place so that the quality and standard of these assessments are in line with their proposals, and do not vary over time.
 - Schools and colleges must understand their role in delivering high quality assessments (e.g. ensuring that exam security requirements are met). Exam boards need to monitor that the requirements that they set for schools and colleges are being met.
 - High quality arrangements must be in place for marking. Exam boards need to make sure that they are recruiting good markers. They need to train them in assessment and in the requirements of the qualifications that they are marking. During the marking season, they need to have in place checks to make sure that markers' work is consistent and of high quality.
 - The grade boundaries must be consistent and maintain standards not only year on year but between exam boards. We intervene closely in the annual process to set A level grade boundaries. (We say more about our current approach to grade setting on our website¹⁹.)
 - Appeal arrangements must be robust.
79. We already set requirements that exam boards must meet in all these areas. For the new A levels, we will review how we should monitor that these requirements are being met.
80. In addition, we currently undertake regular reviews of standards over time, which compare qualifications in particular subjects from different years to decide

¹⁹ www.ofqual.gov.uk/files/2012-05-09-maintaining-standards-in-summer-2012.pdf

whether standards have been maintained. We will consider how these reviews should be conducted in future. In addition, for the new A levels we propose two additional reviews:

- An annual review of standards will be conducted by a new A level review board that we will convene, which will include university representatives and which will seek input from schools and colleges. This will consider and report each autumn on the evidence around A level standards in the previous summer's awards. It will provide a public statement of where things stand, and be an important indicator of where there are concerns that we need to address in future monitoring.
- There will be stock takes on comparability with international standards. We cannot check every year that standards in A levels match those overseas, but we will need to review and refresh every now and again the work that we published on international standards in May 2012.

81. The arrangements outlined here will enable us to secure A level standards. We will develop and publish more details of these arrangements following this consultation.

Section 6 Implementation

82. As regulator, we have responsibility for overseeing the implementation of the A level reforms. It is worth noting that the higher education sector is currently undergoing a significant period of change, in terms of both funding and the regulatory landscape. This may impact on the capacity and resources that institutions have available to commit to these reforms. Therefore we propose to roll out these reforms gradually, and suggest three main phases:
- For A level courses starting from September 2013, we would propose to make the changes to assessment structure set out above. These changes will not require any changes to the design of the qualifications; they will simply affect when assessments may be taken, and the rules around resits.
 - In September 2014, we would propose that new A levels in some priority subjects would be available for first teaching. This is a very tight timescale, given that new qualifications would ideally be in schools and colleges a year in advance of first teaching. But it may be possible in a number of priority subjects, and we would welcome views on what those subjects should be.
 - During the years 2015 to 2018, we would propose that new A levels in the remaining subjects would be evaluated and if necessary redeveloped and rolled out, learning from experience with the priority subjects.
83. The roll out of subjects from 2015 to 2018 will be coordinated by us on a subject-by-subject basis: we cannot have new and old versions of A levels in a particular subject being taught side by side. We will discuss with exam boards and universities how the process of prioritisation and coordinating development should work.
84. The last time that any existing A level courses could start would therefore be September 2018; any A levels that had not been reviewed and retained or redeveloped would no longer be available after that. Over the coming years, therefore, subject communities will need to consider what A levels they would like to continue to be available; this may also include subjects that are not currently offered.
85. Where subject communities review the existing A levels and come to a consensus that they continue to be fit for purpose without needing redevelopment, we will allow existing A levels to continue, provided that they meet our new requirements. We will consider with exam boards and universities how these arrangements should work.

86. It is possible that current GCSEs will need to be replaced within a relatively short timeframe, adding to the burden for students, schools and colleges. Our impact assessments (which we are conducting in parallel with this consultation) will consider the effect of the combination of these reforms. Given the potential scale and complexity of the changes that could be brought about through these reforms, adequate preparation time and available support will be more important than might have been the case otherwise.
87. Revising all A level subjects at once would place unacceptable pressure on the exam boards to develop a number of new specifications and sample assessments, alongside their other commitments. It would place an additional burden on schools and colleges, and it would also put strain on a new and untried system, as well as the universities playing a new and integral part in it.
88. There are already a number of regulations in place for the existing A level qualifications, and we must remove these regulations in order for new ones to be introduced. Taking all this into account, we think that it would be best to remove these regulations in a phased way to allow for the gradual introduction of the new A levels subject by subject. However, exam boards would be free to start their development in any subject at any stage throughout this period.
89. So that we can be confident that this reform is effective, we think that the reform of a limited range of priority subjects should be introduced first. We would welcome views on what these priority subjects should be. There is a case for focusing first on subjects where there is most concern about the current A levels. There is also a case for focusing on subjects where there are well established stakeholders to coordinate the work.
90. We think a good option would be to start with a selection from the following: chemistry, physics, biology, mathematics, English literature, geography, history, French, German and Spanish.
91. If we took a distinct suite of qualifications such as chemistry, physics and biology, or French, German and Spanish, it would provide a sound basis from which a development model could be devised and then adapted for other subjects. A levels in these subjects would be introduced in September 2014 only if high-quality A levels had been developed and accredited in good time to allow teachers to prepare. We would review progress regularly, and if necessary delay implementation.
92. Following a review of the reform's initial success in these subjects, we will then remove subject criteria and introduce new A levels in a systematic way. As set out above, we propose to set a deadline of September 2018 – when most

current A levels will be ten years old – for current qualifications to be reviewed or developed.

Consultation Questions

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

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

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

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

How to respond:

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

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

The British Humanist Association (BHA) is the national charity working on behalf of non-religious people who seek to live ethical and fulfilling lives on the basis of reason and humanity. The BHA is an active member of many organisations working in education. We also provide materials and advice to parents, governors, students, teachers and academics. We have made detailed responses to all recent reviews of the school curriculum, and submit memoranda of evidence to parliamentary select committees on a range of education issues.

We have been involved in policy development around Religious Education for over 60 years, and our response focuses on matters related to Religious Studies and Philosophy.

Note: We have only responded to questions 1, 2, 24, 28 and 38. Our responses are highlighted in red.

Questions on Section 1: Background and purpose

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

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

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

2. Do you have any comments or suggestions?

We do not believe that proper consideration has been given to the impact of religion or belief on subjects to which it relates. For example, on Religious Studies, it is important to ensure that a wide range of religions or beliefs continue to be taught about.

This point is made in more detail in our response to question 24.

Questions on Section 2: What we hope to achieve

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

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

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

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

Yes

No

Do you have any comments or suggestions?

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

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

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

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

Do you have any comments or suggestions?

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

The following questions refer to Section 3: Design rules

Condition 2 - Size and grading.

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

- Strongly agree

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

Do you have any comments or suggestions?

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

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

Do you have any comments or suggestions?

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

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

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

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

Do you have any comments or suggestions?

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

Condition 3 - Qualification structure and availability of assessments

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

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

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

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

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

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

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

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

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

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

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

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

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

- Strongly agree

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

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

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

I think that the weighting should be split as follows:

Do you have any further comments or suggestions?

Questions on Section 3: Design rules - A level design

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

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

Needed?

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

Sufficient?

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

Do you have any comments or suggestions?

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

Needed?

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

Sufficient?

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

Do you have any comments or suggestions?

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

Needed?

- Strongly agree

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

Sufficient?

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

Do you have any comments or suggestions?

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

Needed?

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree

Sufficient?

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

Do you have any comments or suggestions?

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

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

Do you have any comments or suggestions?

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

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

Do you have any comments or suggestions?

Questions on Section 3: Design rules - Qualification support

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

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

- Strongly agree
- Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Do you have any comments or suggestions?

Religious Education must aim for all young people to learn about and explore different religions or beliefs from an objective perspective and in a planned and coherent way. In the process, it should equip them with the attitudes, knowledge and skills to assess matters of religion or belief and ask the big questions.

We are concerned that currently, many Religious Studies and Philosophy syllabuses are not inclusive of non-religious beliefs such as humanism. Being inclusive of non-religious approaches is particularly important, with surveys consistently showing that a high proportion of young people are not religious. For example, the 2003 Citizenship Survey found 46% of 11-15 year olds not having a religion (44% were Christian);²⁰ while a 2004 Department for Education report found 65% of 12-19 year olds are not religious.²¹ It is vital that RE is as relevant to these pupils as it is to

²⁰ Christine Farmer, '2003 Home Office Citizenship Survey: Top-level findings from the Children's and Young People's Survey' (Home Office and Department for Education and Skills, 2005), p. 37:

<http://www.communities.gov.uk/documents/communities/pdf/452490.pdf>

²¹ Alison Park, Miranda Phillips and Mark Johnson, 'Young People in Britain: The Attitudes and Experiences of 12 to 19 Year Olds' (Department for Education and

religious pupils, and this means that it must be as inclusive of non-religious beliefs as of religious ones.

Given these facts, and being mindful of the need to promote equality and non-discrimination in this area, we also think that it is important that in qualifications that relate to matters of an equality strand (such as Religious Studies), exam boards developing should work with groups from across the equality strand, and for the religion or belief equality strand, this clearly must include non-religious groups such as humanists.

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

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

Yes

No

Do you have any comments or suggestions?

Skills, 2004), pp. 10-11:

<https://www.education.gov.uk/publications/eOrderingDownload/RR564.pdf.pdf>

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

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

Do you have any comments or suggestions?

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

- Yes
- No

If your answer is Yes, please give further details:

As per our response to question 24, we think it is important that in qualifications that relate to matters of an equality strand (such as Religious Studies), exam boards should work with groups from across the equality strand, and for the religion or belief equality strand, this will naturally include non-religious groups such as humanists.

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

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

Questions on Section 4: Exceptions

The following questions refer to Section 4: Exceptions.

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

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

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

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

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

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

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

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

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

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

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

Strongly disagree

Do you have any comments or suggestions?

Questions on Section 6: Implementation

The following questions refer to Section 6: Implementation.

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

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

_____physics, chemistry, biology

_____French, German and Spanish

_____mathematics

_____English literature

_____geography and history

_____a combination

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

General questions

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

We would like to see the inclusion of modules on Humanism in A Level syllabuses. It would not make sense to include Humanism in Religious Studies syllabuses while stopping short of including it in qualifications, as this would inevitably reduce the quality of its teaching and might even prevent it from being taught to many pupils from year ten onwards. Conversely, including humanism in RS would have a positive impact on the large proportion of pupils who are not religious in helping them to better understand their beliefs, and on others in helping them to understand the perspectives of their peers – as per our response to question 24.

OCR proposed to make this change at GCSE level in 2008, only to be blocked by the Qualification and Curriculums Authority because Humanism was not within QCA's recognised remit for the subject.²² The Department for Education supported the

²² BHA, 'Humanists take legal action on GCSE exclusion', 13 September 2008: <http://www.humanism.org.uk/news/view/121>

BHA's attempts to get this barrier lifted. However, since then the QCDA has been abolished and so this is no longer an obstacle. We would want to ensure that no similar obstacles are put in place.

Your details

Name*

Andrew Copson

Organisation*

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

School / College type

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

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

- Russell Group
- Million+
- 1994 Group
- University Alliance
- GuildHE
- UUK
- None of the above

Your role

Chief Executive

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

- Less than 50
- 50 to 249

250 or more

Representative group / interest group type

Learned Body / Subject expert group

Equalities group

Unions

Sector Skills Council (SSC)

QAA

UCAS

Other voluntary or community group

None of the above

Organisation name*

British Humanist Association

Nation*

England

Wales

Scotland

Northern Ireland

International

Email address*

andrew@humanism.org.uk

May we contact you for more information?

Yes

Would you like us to treat your response as confidential?

Yes

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

Yes

No

Do you have any comments or suggestions?

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

First published by the Office of Qualifications and Examinations Regulation in 2012

© Crown copyright 2012

You may re-use this publication (not including logos) free of charge in any format or medium, under the terms of the [Open Government Licence](#). To view this licence, visit [The National Archives](#); or write to the Information Policy Team, The National Archives, Kew, Richmond, Surrey, TW9 4DU; or email: psi@nationalarchives.gsi.gov.uk

This publication is also available on our website at www.ofqual.gov.uk

Any enquiries regarding this publication should be sent to us at:

Office of Qualifications and Examinations Regulation	
Spring Place	2nd Floor
Coventry Business Park	Glendinning House
Herald Avenue	6 Murray Street
Coventry CV5 6UB	Belfast BT1 6DN

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346