



Department
for Education

Reforming Key Stage 4 Qualifications

Consultation Response Form

The closing date is: 10 December 2012
Your comments must reach us by that date.

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Please tick if you want us to keep your response confidential.

Reason for confidentiality:

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If your enquiry is related to the policy content of the consultation you can contact The Department on:

Telephone: 0370 000 2288

e-mail: KS4QualReform.CONSULTATION@education.gsi.gov.uk

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Consultation Unit by e-mail:

consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please mark the box that best describes you as a respondent.

<input type="checkbox"/> School	<input type="checkbox"/> College	<input type="checkbox"/> Academy
<input type="checkbox"/> Higher Education Institute	<input type="checkbox"/> Further Education Institute	<input type="checkbox"/> Local Authority
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Parent	<input type="checkbox"/> Student
<input type="checkbox"/> Union	<input type="checkbox"/> Employer-Business Sector	<input type="checkbox"/> Governor
<input type="checkbox"/> HT/Teacher	<input type="checkbox"/> Awarding Organisations	X Other

Learned Society

Title

1 Do you agree that the new qualifications should not be called "GCSEs"?

Agree

Disagree

Not sure

We agree that, should a new qualification be developed, it should not be termed GCSEs. We are not, however, convinced that the case for a new qualification being needed has been made.

2 a) Do you agree that the new qualifications should be called English Baccalaureate Certificates?

Agree

X Disagree

Not sure

We do not, however, think that the new qualification(s) should be termed English Baccalaureate Certificate. Just as there is no short cut to a new world class qualification, there would be a problem with terming a new English examination an English Baccalaureate at 16 as it could be confused - certainly at an international level - with the International Baccalaureate (IB), which is completed at 18. (This is particularly an issue when there is no relationship between the EBC and the IB specified as yet.)

2 b) If not, what alternative title should be adopted?

The Society feels that this is outside the sphere of our professional and learned interest.

High expectation of performance and accurate grading

3 Do you agree with our expectations for grading structures, set out in paragraphs 5.4 to 5.5?

Agree

Disagree

X Not sure

The discussion in paragraphs 5.1-5.8 is unclear. We note the desire for a clear break in how grades are described so that there is no confusion between a grade awarded in respect of GCSEs and one awarded on the basis of EBCs. We also note the stated need to grade in a way which is different from GCSE, i.e. ideally not using a A*-G system, within which an A*-C denotes students' literacy and numeracy and preparedness to continue to further study (by performing beyond current Grade C). We further note reference to setting high expectations of performance and the need for more information on grades so that universities, FE and employers can differentiate between students, identifying the best candidates and understanding the performance of students with lower grades.

However, there is no discussion of how grade border lines are to be decided and the extent to which norm-referencing will apply in the new approach (see note below).

English language and comprehension and mathematics theory and application (including practical statistical ability) will be at the core of the proposed new EBC qualifications at 16. Therefore, the grading of students' understanding, knowledge and skills must be particularly clear in these subjects.

We believe that there is a need for clearer embedding of practical statistics

across the sciences and social sciences curricula. We therefore welcome an increased focus on what students know, understand and do in relation to statistics at comparable levels of performance in mathematics, as well as in each of the fellow ECB subjects of the sciences, history and geography.

There are many options for grading. These could include grades termed basic, intermediate and advanced level certificates to denote understanding, knowledge and application. Other possible approaches include descriptors, percentages, grade point averages across subjects, or a cumulative grade point average.

Here, we would wish to draw attention to a September 2012 report of the Teaching Statistics Trust, which refers to 'foundation', 'intermediate' and 'advanced' levels of statistical awareness, and the knowledge and understanding required to achieve each of these levels. These could very usefully inform the assessment of statistical literacy acquired, as part of the EBC assessment and grading process. See chapter VI, 'Benchmarks for Statistical Education', and particularly 'Diagram 1 Statistical Awareness for School Leavers', p. 45, 'Teaching Statistics in British Secondary Schools', Teaching Statistics Trust, September 2012.

Note on norm-referencing

As discussed in our accompanying letter, we note that there is some dispute among researchers as to whether, or the extent to which, 'grade inflation' has taken place. That said, we appreciate that, if there is a desire to recalibrate grading in order to halt a perceived drop in standards, norm-referencing could be an attractive approach.

However, if it is decided to norm-reference exam grades so that approximately the same numbers achieve each grade over time, this would superficially halt grade inflation, but only at the cost of no longer being able to decide whether there were any underlying trends over time that concern government. In addition, norm-referencing prevents a genuine improvement in educational standards being reflected in grades for students. It is based on the premise that the cohort as a whole is equally as good at mathematics (or whatever subject) every year. Alternatively, it can be part of a system where the purpose of the qualification is to identify the top n%. This is not appropriate at KS4, where, as identified by the Wolf report, having grade C in mathematics and English is important for students' future prospects.

In particular, there are other and arguably better ways to measure the way in which the education system as a whole and student achievement may be changing, even though there are considerable difficulties in interpretation. These would typically involve sample survey techniques, independently from the exam system.

In our view, a norm-referenced approach has some merits, notably simplicity, but the way in which it would operate would need to be carefully thought through, especially for small subject entries. There are many statistical issues involved, and the Royal Statistical Society would be happy

to assist with expert advice should the government choose to pursue this approach.

4 Do you believe that we should insist on a common grading structure for all English Baccalaureate Certificates or should we allow Awarding Organisations the freedom to innovate?

Common Grading Structure

Freedom to innovate

X Other

It is important that the grading structures for different EBCs are comparable – especially as it is intended that the vast majority of students will take these examinations. It is also important for students' abilities and level of achievement to be understood by FE/HE and employers, and consistent grading could be helpful here.

No tiering

5 Do you agree that it will be possible to end tiering for the full range of subjects that we will be creating new qualifications for?

Yes

X No

Not Sure

We support the aims behind the plan to end tiering, namely to ensure that the ambitions of students are not capped, that students are not demotivated, and that progression to post-16 study is not limited. It is far from clear, however, that tiering is the cause of these problems. Arguably, the problems associated with tiering – capping of grades and limiting of progression – are caused not by the exam system, but by students' ability. Changing the exam system will never change the ability of a particular student to proceed to an A level course. The exam system is devised to give the appropriate information about suitability to proceed post-16. Our answer to the preceding question (question 6) discusses other potential approaches to low attainment within the assessment system / curriculum.

Within mathematics, there is a wide range of abilities. While tiering may be unnecessary for some subjects because students with different levels of understanding can make some kind of response to the same question, this is not the case for mathematics. For example, following the move from 3 tiers to 2, MEI surveyed mathematics teachers and reported that the transition to A level had become more difficult (see 'The effects of 2-tier GCSE Mathematics on transition to AS and A Level', MEI, July 2009).

Without tiers, it will be impossible to cater for the spread of attainment in mathematics, and consequently most students will be faced with an assessment that is inappropriate for them: either too easy or too difficult. In order to move to one tier, either that tier would be easier than the current Higher tier, or the lowest grades will be awarded to students who have much less than 10% of the marks, or we do not have grades below D, and GCSE becomes unsuitable for a significant proportion of the cohort. Indeed, the one-size-fits-nearly-all design outlined is statistically flawed because it fails to take variability into account.

6 Are there particular approaches to examinations which might be needed to make this possible for some subjects?

Yes

No

Not Sure

Alongside academic ability, practical skills such as statistical skills should be paramount in any assessment of the skillset of 16-year old students, and increased value should be attached to those practical skills, and to ways in which they can support a student's further progression. We discuss below the question of the type of assessment best suited to statistics (see questions 7 and 9).

As discussed above, it must be recognised that there are many low-attaining learners in mathematics, often very low-attaining. The assessment of mathematics for the proposed EBC should highlight what these people have shown they can do, rather than emphasise where they have been unsuccessful. Rather, however, than being an argument for easy assessments, this is a question of 'positive achievement'.

Many low attainers within mathematics are those who have been 'turned off' by mathematics. It is unlikely that such learners will ever be enthused by mathematics for its own sake. Yet it is vital to try to reach them somehow, and the best hope for this is to show that mathematics (and in some ways particularly statistics) is in fact a useful and applied subject in ordinary life, in employment, in any further stages of education, and in studying other subjects. As well as being a challenge for teachers, this also requires a curriculum, and therefore assessment, that stresses the applied branches of the subject, including statistics. Part of this will be about using technology to make statistics accessible to a very wide range of abilities – and making it fun, exciting, and relevant.

It is crucial to look beyond tiering as being the major cause of low attainment, and to consider how both to engage a greater number of students in mathematics, and to ensure that students are equipped with the mathematical – and statistical – tools for everyday life. Assessment which emphasises the practical and applied aspects of mathematics, and of statistics within mathematics in particular, is likely to help increase both numeracy and statistical literacy.

Assessed 100% by examination, or minimising reliance on internal assessment

7 a) We intend that English Baccalaureate Certificates should be assessed 100% by externally marked examinations. Do you agree?

All

English

mathematics

sciences

history

geography

languages

X None

The Royal Statistical Society does not believe in teaching to the test, and is convinced that fully external assessment for all six EBC subjects would be a highly retrograde step. While there are difficulties in ensuring that coursework, project work and other internal assessments are equitably and efficiently conducted, their educational importance far outweighs such problems. Practically-based disciplines such as statistics, which occur in a number of the projected EBC suite of subjects, would suffer hugely from the elimination of assessments other than external examinations.

In addition, 'teaching to the test' can be easily avoided through having tests which are unusual, and which do not follow set patterns. It is this aspect of current assessment (at all levels) that contributes significantly to opinions by teachers as to which might be the 'best' specification to follow which will enable their students to obtain the best grades. Teachers in mathematics are often able to predict the content of examinations because of the uniformity.

We would wish to draw attention to the November 2012 CBI report, 'First Steps: a new approach for our schools', which makes clear that more rigorous written exams alone will do little to enable young people to have the skills, capability and attitude necessary to succeed in the modern workplace. Rather, they suggest that a focus be placed on Ofsted reports which assess both academic rigour, and the broader behaviours and attitudes that young people need and which businesses want.

More generally, subject experts are the best-placed people to decide on how the skills and knowledge in that subject are best assessed, rather than the government taking a prescriptive, one-size-fits-all approach to assessment across the entire suite of examinations and subjects.

(Note: we have marked 'none' above, but should subject experts in certain subjects determine that an entirely examination-based assessment is appropriate in that subject, then we would have no objection. This note notwithstanding, the Royal Statistical Society do not believe that an entirely examination-based approach to assessment is appropriate for testing knowledge and understanding of statistics.)

7 b) If not, which aspects of English, mathematics, the sciences, history, geography or language do you believe absolutely require internal assessment to fully demonstrate the skills required, and why?

It is not clear how students will be really able to show the breadth of their knowledge and independent thinking in statistics only through a test. Securing a real sense of a student's in-depth understanding and ability for future independent thinking around statistics can only be achieved by 'problem solving-focused examinations', for example, a project focus in an exam setting. It is not known how this could be achieved without some degree of part-preparation of a project before the examination, which is then completed in an exam setting in a given timeframe.

However, the Royal Statistical Society Centre for Statistical Education is developing an online system to create individualised real data, with associated meaningful problem-solving tasks (with solutions) for students (and their teachers) for subjects across the curriculum that use or produce data. This means every student in the country could be allocated individualised data and tasks for formative and summative problem solving-focused assessment in statistics.

Statistics (and to some extent other aspects of mathematics) is a subject which must be taught and learnt in a manner which is meaningful. A lack of coursework in mathematics and in subjects such as geography and the sciences runs counter to best practice in statistics teaching. Statistics is a practical, applied subject, and curriculum time devoted to the application of the subject should not be reduced. We would like to see statistics taught as a practical, applied subject, using the problem-solving approach. This helps learners to develop both transferable and statistical skills, which are required by industry, Government and HE (see for example the recommendations of the November 2012 CBI report, 'First Steps: a new approach for our schools').

There is also evidence that students respond to using real data in realistic situations that are of interest to them. These can be tested most successfully through some kind of extended project work. Such assessment methods do present difficulties in terms of the potential for parental and/or teacher assistance, but there are ways of testing whether it is the student's own work. There are also more inventive ways of examining – using technology with less time on calculation and more on explaining outcomes and linking back to problem formulation.

Size requirement for syllabus

8 Should our expectation be that English Baccalaureate Certificates take the same amount of curriculum time as the current GCSEs? Or should schools be expected to place greater curriculum emphasis on teaching the core subjects?

Same amount of

Greater curriculum

X Other

This question is unclear. Is the question suggesting that there is a core within the core, i.e. that English and mathematics, given the dual nature (theory and application) of both, are seen as bigger subjects? A more 'in-depth and broad understanding' of mathematics will require some additional time to teach and learn.

Or are the EBC subjects themselves seen as a core set of academic subjects valuable to the majority of students? If the latter, particularly given a deeper, broader approach applied to at least five subjects, it is unclear how there will be sufficient curriculum time to study other subjects as well.

It is unclear how such an approach would impact on subjects outside the designated suite of EBC subjects. Will subjects such as sociology only be studied post-16?

Examination aids

9 Which examinations aids do you consider necessary to allow students to fully demonstrate the knowledge and skills required?

It appears from the consultation document that there is consideration being given, among other things, to restricting the use of calculators in order to enable students to demonstrate higher knowledge of solving mathematics problems. Far from moving towards restriction of 'aids' such as calculators, we believe that examinations should reflect the technology and support that students will encounter in the real world of work and higher education. This implies, for example, allowing the controlled use of powerful computing facilities which can release students' creativities, especially in subjects such as statistics. Furthermore, the use of sophisticated calculators as well as computers for symbolic manipulation needs to be embraced within examinations.

Use of software is an aid to students' understanding of the reach and impact of statistics in the real world and to seeing beyond the 'process' aspect of statistics, enabling more time to be spent on more in-depth thinking around data and their interpretation.

One of the main purposes of statistical education is to equip students with a facility with the data and the tools they will encounter in the workplace, and so - in the 21st century - it is inconceivable that statistics should be taught and assessed without an increasing use of computers. For example, in New Zealand, the use of freely available software, such as iNZight, is leading the way in innovative approaches to enable students better to understand what statistics is for and about. To rule out the use of computers and statistical

software in assessment would be a retrograde step. Ultimately, as discussed above, subject experts are the best-placed people to decide on how the skills and knowledge in that subject are best assessed – which includes what examination ‘aids’ are appropriate – and the government should avoid taking a prescriptive approach.

Subject suites

10 Do you agree that these are appropriate subject suites? If not, what would you change?

Yes

No

Not Sure

From the Royal Statistical Society perspective, there are two key issues here. First, statistics needs to be seen as a cross-curricular subject, which requires co-ordination that is in danger of being lost with the single Awarding Organisation approach. Second, statistics needs to be a substantial element of the mathematics curriculum, since it is crucial that responsibility for teaching statistical tools and methods rests clearly in one particular area.

The January 2011 report ‘The Future of Statistics in Our Schools and Colleges’ (Porkess, Royal Statistical Society and The Actuarial Profession, January 2011) concluded that statistics ought to remain as part of the mathematics curriculum – with students’ learning reinforced in other subjects – on the basis of the national education system as it currently stands. It also warns, however, of the dangers that statistics will not be sufficiently valued by mathematicians and so come under pressure in terms of the time allocated to it. This happened in 2003-04, when the content of A level mathematics was being rewritten in the wake of Curriculum 2000. There were no cuts to the pure mathematics; instead, they fell entirely on the applied mathematics, with one complete module, typically statistics or mechanics, being removed. There is an on-going risk that the particular needs of statistics, both as a practice and as a cross-curricular subject, will not be acknowledged.

We agree that in each subject, students should cover the key knowledge they need by the age of 16, as if they were not to study the subject further. They should also study the matter they need for progression to higher levels of study in qualifications. Statistics, as a tool underpinning many disciplines, has particular relevance here. Statistics comprises the four essential problem solving activities: plan; collect; process; and discuss. To do all these requires a broad range of cognitive skills, more than just those required to ‘process’. ‘Guidelines for Assessment and Instruction in Statistics Education (GAISE) Report: A Pre-K-12 Curriculum Framework’ (American Statistical Association, 2007), for example, recommends teaching using this approach.

Consulting with the Royal Statistical Society’s subject experts, who

understand the role statistics play in each phase of education in a range of subjects, will be key. These experts also have an appreciation of the best qualifications overseas. The mathematics and statistics strand of the New Zealand curriculum is particularly relevant.

One particular concern we have is that statistics needs to be taught in many subjects in a co-ordinated way. Franchising different subjects to different Awarding Organisations with no overall control will present a very real risk that this does not happen. Whatever approach is taken to reforming examination boards, it is essential that the government takes steps to ensure co-ordination across the curriculum – something which is especially crucial in statistics. One option might be a new overarching EBC subject, 'statistical problem solving across the curriculum', which could form the glue to bind together data used and produced by all subjects.

We note that that bids will be invited for mathematics (pure and applied), alongside English and the sciences, first. We would hope to see a clear balance between pure and applied mathematics, and expect to see statistics as the main and explicit component of applied mathematics at this level. We also hope for statistics to be a key component of the 'optional additional mathematics' subjects that will 'fully test the most able', for which some awarding organisations will also bid. While such an advanced qualification is a useful additional option for high achievers, it is crucial also to consider the qualifications that would suit a broader range of students, including those who do not currently study mathematics beyond GCSE. The draft ACME proposal for new mathematical problem solving qualifications, which will necessarily have a substantial statistical component, will be useful in helping to inform the proposed new EBC qualifications.

N.B. While we welcome the commitment to working with subject matter specialists, educationalists and learned societies, and welcome a hands-off approach by government, we are rather astonished to see that a specific topic, for example, 'algebra', is singled out of as high priority.

11 Is there also a need for a combined science option covering elements of all three sciences?

Yes

No

X Not Sure

Whatever model is chosen for the teaching and assessment of the sciences, it is crucial that there is co-ordination across the curriculum to ensure that statistical techniques and applications are taught before they are required in the sciences, whether that takes place in the science curriculum or elsewhere.

Beyond that, the Society feels that this is outside the sphere of our professional and learned interest.

Track Record

12 What qualities should we look for in English Baccalaureate Certificates that will provide evidence that they will support students to be able to compete internationally?

We feel unable to respond, as the question is unclear. We would urge the government to note that, while there is much international practice that England could usefully learn from in the area of statistics curricula, it is crucial that it considers such evidence critically, since there are examples of both good and bad practice internationally.

Assurance of literacy and numeracy

13 Do you agree that we should place a particular emphasis on the successful English language and mathematics qualifications providing the best assurance of literacy and numeracy?

X Agree

Disagree

Not sure

Statistics bridges numeracy and problem solving skills, two areas of deficit which most concern employers. Their further views should be sought, especially if the aim is to restore their confidence and give them assurance that students will have achieved more than a current C grade at GCSE.

Statistical and problem-solving skills are amongst the quantitative skills most sought by higher education and the workplace. ACME's 'Mathematical Needs' research of June 2011 found that, currently, over 200,000 students each year enter higher education without the quantitative skills they need for seemingly 'non-mathematical' subjects. It will be incumbent on the proposed EBC qualifications to create a strong foundation for post-16 study that continues to incorporate quantitative studies for students of all subjects. It is also worth noting that Nuffield and ESRC have recently announced £15m funding for universities to bid to create Centres of Excellence in quantitative social science skills. This follows from the ESRC report into the quantitative skills gap that starts with school leavers.

We would urge, therefore, that the government recognise the need for students to become statistically literate, whether they frame this as an aspect of numeracy or as a goal in its own right. When statistics is taught as a way to solve problems, a broad range of cognitive skills are needed to properly solve those problems. For a full exposition of the Royal Statistical Society Centre for Statistical Education's views on this, see chapter VI, 'Benchmarks for Statistical Education', 'Teaching Statistics in British Secondary Schools', Teaching Statistics Trust, September 2012. In particular, see section 10 of that chapter (pp. 39-40) for a full exposition of the elements of statistical literacy. This includes an outline of the three categories of statistical understanding proposed for all school leavers: (i) what they should know about; (ii) what they should be able to identify and critically evaluate; and (iii) what they should be able to do.

Within the statistical elements of the proposed mathematics and other EBCs, design should be informed by subject specific experts and the Royal Statistical Society, alongside the Awarding Organisation(s). Irrespective of what model is chosen, these experts, together with the Royal Statistical Society, should play a key role in co-ordinating the teaching of statistics across subjects, since there is a real risk that, with the possibility of separate Awarding Organisations designing the statistical aspects of different subjects, this essential element of coordination may be lost. The Royal Statistical Society would be keen, as a learned society, to provide advice and assistance in ensuring that this occurs.

Above all, it is crucial that the idea of 'adding rigour' in mathematics should not be seen as somehow separate from, or at the expense of, statistics. The findings of 'Teaching Statistics in British Secondary Schools' suggest that statistics can be seen as a 'nuisance' topic within mathematics, and this attitude can be part of a self-perpetuating cycle. It is worth also consulting the January 2011 report, 'The Future of Statistics in Our Schools and Colleges', Porkess, Royal Statistical Society and The Actuarial Profession, January 2011, concerning the deficiencies in approach and content at KS3

and KS4. One means of ensuring that the statistics aspects of the mathematics course is taught with sufficient rigour is to ensure the presence in the mathematics department of each school of a statistics expert.

School and Post-16 institution Support

14 In order to allow effective teaching and administration of examinations, what support do you think Awarding Organisations should be:

a) Required to offer?

It is crucial that Awarding Organisations offer clear specifications, together with good curriculum development, informed by subject experts, including learned bodies such as the Royal Statistical Society. This should include the use of up-to-date assessment methods, appropriate for statistics (see discussion above, especially answers to questions 7 and 9). Trials of new assessments must be carried out rigorously; the Royal Statistical Society would be happy to advise here.

14 b) Prevented from offering?

15 How can Awarding Organisations eliminate any unnecessary burdens on schools and post-16 institutions relating to the administration of English Baccalaureate Certificates?

The Society feels that this is outside the sphere of our professional and learned interest.

Qualification supports progression of lower achievers

16 Which groups of students do you think would benefit from a "Statement of Achievement" provided by their school?

We are keen to support all students in the achievement of the highest standards.

We note that the vast majority of students will be entered for EBCs but, as is the case now, a small group of students will not be entered at 16, and these students instead provided with a 'Statement of Achievement' setting out their strengths and weaknesses in each subject. The proposal assumes that, by recognising students' progress, the Statement will be motivating. It also suggests that it will serve as an individual report for future schools/colleges that the student might attend, as it will describe what additional teaching and support individual students will still need to achieve an EBC, albeit at a later date.

We see the provision of confidential statements of achievement as very useful teaching tools for teachers to use to encourage students (indeed, they are something which we would expect schools to produce for all students in the circumstances described above).

However, we do not think that there is any need to formalise the Statement of Achievement other than for those leaving school completely (as a reference might be provided by an employer).

Statements of Achievement are intended to help students who do not otherwise secure, or have not yet secured, an EBC qualification. In practice,

however, for students who have failed an EBC, have not yet been entered for an EBC, and/or who are otherwise 'low achievers', any formalised Statement of Achievement reflects a two-layer structure that is markedly more discriminatory than GCSEs. It has the potential to, at best, be superfluous to those who will be resitting the EBC anyway, and, at worst, be a certificate of 'low achievement' for others.

We do, however, support the notion that a 'formative' record of achievement should be part of every pupil's learning as they move through school.

17 How should we ensure that all students who would benefit from a "Statement of Achievement" are provided with one?

See above

Equalities

18 a) Do you believe any of the proposals in this document have the potential to have a disproportionate impact, adverse or positive, on specific pupil groups?

Adverse impact

Positive impact

Both

No impact

The Society feels that this is outside the sphere of our professional and learned interest.

18 b) If they have potential for an adverse impact, how can we reduce this?

The Society feels that this is outside the sphere of our professional and learned interest.

Implementation

19 Should we introduce reformed qualifications in all six English Baccalaureate subjects for first teaching in secondary schools in 2015, or should we have a phased approach, with English, mathematics and sciences introduced first?

In all six subjects from 2015

Phased approach

Other

The time frame proposed is a very short time to prepare teachers and students for a major overhaul of this kind.

20 How best can we prepare schools for the transition to these reformed, more rigorous qualifications?

There is a need in both initial training and in the CPD of teachers for the inclusion of statistical training and the recognition of the importance of statistics. This is particularly true for teachers of mathematics, but also of those in other subjects where statistics will be involved, for example geography. The Royal Statistical Society and the Royal Statistical Society Centre for Statistical Education would be keen to play a supportive role in ensuring that this occurs, and in helping to bring to bear our expertise on questions of how statistics is taught, learnt and assessed.

21 How long will schools need to prepare to teach these reformed qualifications?

- Up to 12 months 12 - 18 months More than 18 months
 Other

2015 is too close in time for making the right decisions, both to enable the new examinations to be truly an improvement, but also to prepare teachers and schools. For the latter, it may even be necessary to adjust the range of teachers in a school, and this would take time.

Languages

22 Should all languages in which there is currently a GCSE be included in our competition?

Yes

No

X Not Sure

The Society feels that this is outside the sphere of our professional and learned interest.

23 Should the number of languages for which English Bacculaureate Certificates are identified be limited? If so, which languages should be included?

Yes

No

X Not Sure

The Society feels that this is outside the sphere of our professional and learned interest.

24 Given the potential number of new languages qualifications to be developed, should they be introduced to a later timescale than history and geography English Bacallaureate Certificates?

Yes

No

X Not Sure

The Society feels that this is outside the sphere of our professional and learned interest.

Post-16

25 Should we expect post-16 institutions to be ready to provide English Bacallaureate Certificates at the same time as secondary schools?

Yes

No

X Not Sure

The Society feels that this is outside the sphere of our professional and learned interest.

26 How best can we support post-16 institutions to prepare to provide English Baccalaureate Certificates?

It is essential to ensure that these institutions receive input from HE and employers in delivering their curriculum. In addition, there is a need for teacher CPD to be supported and facilitated, especially in light of changes to the curriculum.

Choosing the best qualification in each subject

27 Do you agree that five years is an appropriate period for the new qualifications to feature in the performance tables before the competition is rerun?

Agree

Disagree

Not sure

We have significant reservations about the way in which performance tables are produced and used.

Beyond that, the Society feels that this is outside the sphere of our professional and learned interest.

28 Please let us have your views on responding to this call for evidence (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

The response format is quite restrictive, hence our need to submit an additional response via an accompanying letter. This links to our concern that the consultation only partial: several key issues in the consultation paper have not been opened up in the consultation questions. We have addressed those issues in our accompanying letter.

Aside from these omissions, the format is convenient and easy to use.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply X

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes	<input type="checkbox"/>	No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed and emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, Tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 10 December 2012

Send by post to:

Public Communications Unit
Level 1 Area C
Castle View House
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