I am responding to the consultation as the Director of the Royal Geographical Society (with IBG), on behalf of the Society as its formal response.

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The Royal Geographical Society (with IBG) is the UK learned society and professional body for geography and geographers. The Society maintains a strong overview of the discipline, its standing and practice in schools, higher education, and the workplace, including professional accreditation. We advise on, and support the advancement of, geography; the dissemination of geographical knowledge to the public, policy makers and other specialist audiences including teachers, scholars, and those involved in expeditions and fieldwork; and training and professional development for practising geographers. We have 16,000 members and Fellows and our work currently reaches more than three million people per year. Each year the Society works with teachers and pupils from about 50% of English secondary schools and our online educational resources receive 1 million+ ‘user sessions’ annually.

This consultation response is not confidential and an official response on behalf of the RGS-IBG.

Pleased do contact the Society if you would like any further details about our views and work.

In overview, the Society welcomes the proposals to **discontinue** the following courses:

**Humanities GCSE**
The Society believes students are better served by studying a full GCSE course in either history or geography (or both) from the recently revised GCSEs. This is for reasons of rigour, depth, challenge and clear subject-based learning focused on enabling subjects.

**Environmental Science, and Environmental and Land Based Science GCSEs**
The Society believes students would be better served studying both the revised GCSEs science course and the revised GCSE geography course, both of which embed environmental topics approached from different, complementary perspectives.
Geography GCSE has always had an important and distinctive contribution to environmental learning, and this has been strengthened with the recent introduction of the following content.

- New and required content at GCSE, that more fully embraces environmental geography. This now includes (1) global ecosystems; (2) resource management and biodiversity; (3) changing weather and climate; (4) geomorphic processes and landscape.
- The strengthening of quantitative and statistical skills in geography.
- A greater focus, based on sound knowledge and understanding, on the multi-faceted nature of ‘human-environment’ relationships and interactions.
- And the requirement for different approaches to fieldwork undertaken in at least two contrasting environments. Fieldwork overall should include exploration of physical and human processes and the interactions between them and should involve the collection of primary physical and human data. The physical processes are, by their nature, environmental.

We see little point, given the above and the relevant (and overlapping) environmental aspects included within science, to continue with the Environmental Science and Environmental and Land Based Science GCSEs. Our views are further strengthened by the small uptake in these GCSEs.

**Environmental Studies at AS and A2**
The Society believes students would be better served studying new A Levels selected from relevant single sciences and the new A Level Geography course, all of which are identified (in contrast to Environmental Studies) as enabling subjects at A Level and which contain significant amounts of relevant (and overlapping) environmental science/studies content.

For example, the proposals (currently under consultation) for subject content for A Level Geography (which the Society welcomes and has contributed to as a member of the ALCAB subject content review panel for geography) identifies two new core units and greater experience of geographical fieldwork, also as a core element. Both are highly relevant to students with an interest in environmental science. The new core (compulsory) requirements include study of The Water and Carbon Cycles, and Landscape Systems. In addition there is a requirement for (assessed) geographical fieldwork in order for students to “demonstrate knowledge and understanding of practical field methodologies appropriate to the investigation of core human and physical processes including the measurement of physical processes.” There is also an explicit requirement in the draft proposals for the Awarding Organisations to develop, as part of their optional content, topics that examine, rigorously, human/environment interactions.

The small uptake of environmental studies at A and AS level reinforces our view. The Society holds the view that environmental science / studies is best placed at university level, drawing on a good grounding in science and geography at A Level.

**Responses to specific questions**
(Note: we have used bold font purely to differentiate responses from the questions)

1. To what extent do you agree or disagree with the following statement? Core content – common content across all exam boards offering a qualification – will help make sure qualifications are fit for purpose.
Strongly Agree

2. To what extent do you agree or disagree with the following statement? Core content – common content across all exam boards offering a qualification – will help make sure qualifications are comparable across exam boards.

Strongly Agree

3. To what extent do you agree or disagree with the following statement? Core content – common content across all exam boards offering a qualification – will help make sure qualifications are comparable over time.

Strongly Agree

4. To what extent do you agree or disagree with the following statement? Core content – common content across all exam boards offering a qualification – will help make it easier for users to understand the qualification.

Strongly Agree

5. We propose to set up a regulatory framework to let exam boards develop core subject content. To what extent do you agree or disagree with our proposal?

Strongly Disagree.

The Society notes that OFQUAL does not, and is currently not planning to develop, subject content expertise.

This expertise already exists in a well-developed form outside of the regulatory framework, that is, within the work of the respective Learned Societies. It is these bodies, many established by Royal Charter, that act as a focus for disciplinary expertise and excellence; supporting the development of new subject knowledge within their respective communities. In spanning a discipline’s place in schools, Higher Education and research, many of the professional and Learned Societies are uniquely placed to best understand, identify and develop up to date proposals for core knowledge within their respective subject discipline. The Society’s very productive work with DfE on the reform of the National Curriculum and GCSE geography and as part of the ALCAB geography content review panel, illustrates how such expertise can be brought to bear to help identify and agree subject content.

The proposal to ‘hand over’ the responsibility for developing core subject content to the Awarding Bodies is a retrograde step and leads them to be both poacher and gamekeeper in-terms of what content they see fit to include in examination courses which they then provide. They have too many vested, and conflicting, interests to undertake the development of core subject content, and it is often difficult for them to be appropriately up to date in subject areas.

For example, the draft proposals produced in 2013 by the Awarding Bodies for Geography A Level were simply not fit for purpose, as was recognized by the DfE in putting in place a major review of geography. We have no confidence that this would not be repeated under the current proposals for developing core content.

The Society does not support this proposal in principle. Nor, separately, do we support the undemanding requirements in practice for Awarding Bodies to undertake wider consultation, namely that Ofqual:
“Will require exam boards to give subject associations and other key stakeholders such as teachers, employers, and higher education and further education representatives the opportunity to engage with core content development so they can be sure the new qualifications are fit for purpose.”

6. If you disagree with our proposal, are there other options we have not considered?

Yes, there are other options that are workable and that draw, independently and effectively, on the discipline’s expertise.

Other models could include, for example:
- A Learned Society being asked to convene and chair, on behalf of the wider group of Awarding Bodies, a small working group of key experts (spanning schools, HE and the professions) to review and advise on core content.
- Learned Societies being formally asked to provide a final review and advice and comment on the subject content proposals by Awarding Bodies, before presentation for formal approval to Ofqual.
- A Learned Society taking a formal role within the Ofqual regulatory processes which approves the final submission of core content for a subject.

7. To what extent do you agree or disagree that exam boards should consult with stakeholders and take their views into account when developing core content for all reformed GCSE, AS and A level qualifications?

Strongly agree

The Society believes that relevant Learned Societies (and the subject experts within their communities) should have a direct role in the development and approval of core content.

8. We have identified key stakeholder groups that need to be consulted in core content development (subject associations, teachers, employers, higher and further education, relevant equality groups). To what extent do you agree or disagree with our proposal that exam boards should include these groups when developing core content?

Strongly agree to the stakeholder requirement – but note that we disagree in principle with the proposed role for Awarding Bodies.

However we note that Learned Societies are not mentioned specifically and they should be included by name in the list. Learned Societies, professional bodies and subject associations are different and fulfil distinctive functions - referring to them collectively as subject associations can be very confusing to everyone. Learned Societies exist to advance their disciplines and have subject knowledge at their heart.

The Society is concerned that key expertise in subject content, such as that which is found within the Learned Societies, may be seen as just ‘one of many’ sources of advice, comment and input that an Awarding Bodies might consult with. It should be a requirement that the Learned Societies are a key stakeholder and must be included.

We are also concerned that the inclusion of those groups does not equate with the Awarding Bodies acting on their advice. Would the Awarding Bodies be obliged to consider and act on the views that might be presented to them?

9. Are there other stakeholder you believe should be consulted
The direct involvement of Learned Societies in identifying core content for identified subject disciplines and ensuring that a new GCSE or A Level is ‘fit for purpose’ should be a required element of any new regulatory framework.

10. To what extent do you agree or disagree that the benefit of having additional (to those already being reformed) GCSE, AS and A level subjects is worth any additional costs incurred by exam boards in developing core content (common content across all exam boards offering a qualification)?

No particular view

11. To what extent do you agree or disagree that we should develop principles to determine in advance which remaining or new subject areas can be developed as GCSE, AS or A level qualifications?

Strongly agree

12. Please indicate the extent to which you agree or disagree with each statement below:

   Current GCSEs/AS/A levels cannot always be easily distinguished from others with a similar title.
   
   Agree

   Subjects that can be easily distinguished will help make it easier for users* to understand the different qualifications available.
   
   Agree

   GCSE/AS/A level subjects should be easily distinguished from other GCSE/AS/A level subjects.
   
   Agree

   GCSE/AS/A level subjects should only be developed if they meet the specific qualification purpose.
   
   Strongly Agree

   The performance of students taking GCSE/AS/A levels in any subject should be able to be differentiated against the full grade range using the relevant grading scale.
   
   Agree

   GCSE/AS/A level subjects should be set at a level of demand consistent with that of reformed qualifications
   
   Strongly Agree

   GCSE/AS/A level subjects should be capable of being validly assessed (mainly by exam assessment, except for those essential skills that can't be assessed by an examinations
   
   Agree.
Note: the Society strongly support the welcome proposal that geographical fieldwork be assessed through non-examination assessment and constitute 20% of the final marks for the new geography A Levels.

13. Do you think that requiring the last award of all unreformed GCSE qualifications by 2018 is appropriate?

Agree

14. Do you think that requiring the last award of all unreformed A level qualifications by 2018 is appropriate?

Agree

15. Do you think that requiring the last award of all unreformed AS qualifications by 2018 is appropriate?

Agree

16. To what extent do you agree or disagree that we should start to apply our principles, to discontinue similar or overlapping qualifications alongside the current reforms?

Strongly Agree

17. Referring to the full list of qualifications we are proposing to discontinue as subjects are reformed, listed in appendix B, are there any other qualifications that should be included in the process?

No

18. Do any of the similar or overlapping qualifications we have proposed in appendix B serve a very distinct purpose from the reformed subjects?

No

19. Are there any potential equality impacts of our proposals for the next stage of GCSE, AS and A level reform that we have not identified?

No

20. Are there any additional steps we could take to mitigate any negative impacts of the proposals in this document on persons who share a protected characteristic?

No

21. Have you any other comments on the impacts of the proposals in this document on persons who share a protected characteristic?

No

22. Are there any potential regulatory impacts of the proposals in this document that we have not identified?

No