



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.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

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

Reason for confidentiality:

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Name	Dr Rita Gardner CBE
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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

Please Specify:

The Learned Society and Professional Body for Geography

The Royal Geographical Society (with IBG) is the learned society and professional body for geography and welcomes the opportunity to respond to this Review of Key Stage 4 Qualifications. The Society maintains a strong overview of the discipline, its position and its practice in schools, higher education, fieldwork and the workplace, including the professional accreditation Chartered Geographer. We advise on and support its advancement, promotion, dissemination and practice in these realms and within wider public engagement and policy. We have 16,000 members and Fellows and our work, as a charity, reaches several million people each year.

The Society works on a face-to-face basis with teachers and pupils from more than 50% of English secondary schools and our online educational resources receive 400,000+ 'user sessions' annually. For schools we provide online support and resources, CPD training and networks, the professional accreditation (C.Geog. Teacher), support for fieldwork, and the Geography Ambassador programme which promotes the relevance of geography to further study and careers.

Title

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

X Agree

☐

Disagree

☐

Not sure

Comments:

It is appropriate to signal a change from the existing GCSEs to the new qualifications.

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

X Agree

☐

Disagree

☐

Not sure

Comments:

The proposed change to English Baccalaureate Certificates provides clarity in relation to the new examination courses for the EBC subjects.

It also creates a clearer definition of the family of core academic subjects within the English Baccalaureate.

This should enhance public and employer understanding of the EBacc and the value and contribution of the different EBC subjects within it.

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

Comments:

N/A

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

Comments:

In signalling a break with the current GCSEs there may be the case for a new grading structure.

However, the Society would strongly argue for the retention of an A* (or similarly titled) grade so that the exceptional performance of the most able candidates can be fully recognised.

In addition, the grading structure for EBC's should clearly identify what grades constitute a pass (and higher) or a fail.

The Society would expect a successful EBC in geography to provide stretch and challenge to pupils and that those achieving a pass are able to demonstrate secure knowledge and understanding of a significant range of geographical locations, features and processes.

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

☐ Other

Comments:

There should be a common grading structure for all EBCs to provide absolute consistency across the EBC subjects.

It would be unhelpful for public and employer confidence if different structures were to be allowed within different EBC subjects.

Asking such audiences to make sense of different 'types' of grades awarded across different subjects will only lead to confusion. It should not be the job of a parent or employer to work out the differences between a 'distinction or pass' in one subject and the grades 'A*' or 'C' in another.

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

☐ No

☐ Not Sure

Comments:

The Society believes tiering is unhelpful and has the potential to limit pupils' aspirations and achievement.

EBC examinations should not be tiered, should cover the ability range and not 'cap' the potential of students.

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

X Yes

☐

No

☐

Not Sure

Comments:

With an ending to tiering new EBC examinations should also consider the following:

Use of multiple choice questions:

Within geography the Society believes that there is the opportunity for EBC examinations to include an appropriate percentage of multiple choice questions (no more than 15% of the overall examination assessment) to help assess a pupils' understanding of the range of the content.

Extended writing:

There should also be a degree of consistency of approach in demand *across* comparable subjects in relation to the balance of assessment and range of questions. For example, the Society is concerned about the relative lack of opportunities for more extended writing (short essay) answers in current geography GCSEs, especially when compared to history. In current history GCSEs it is not uncommon to see '10 mark' essay questions. However, mark schemes for geography tend to be more limited at the 5-6 mark questions, with less common higher mark questions. We strongly support the inclusion of extended writing in geography.

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?

X All

☐

sciences

☐

languages

☐

English

☐

History

☐

None

☐

mathematics

☐

geography

Comments:

The Society believes that *all* EBC subjects should be assessed through 100% externally marked examinations. This would provide parity of assessment and esteem across the EBC family of subjects.

It would be inappropriate to provide for internal assessment, such as controlled assessment, within one or more EBC subject and not the others. This situation would open up the potential for some subjects to be accused of undue 'coaching or teaching to the test', whilst others were fully externally assessed.

Far better to have a consistent and transparent approach to all through 100% external assessment.

In relation to internal assessment The Society would want to note the negative impact that Controlled Assessment has had on geography GCSE. For full details please see www.rgs.org/controlledassessment.

We particularly note feedback from geography teachers in high performing independent schools who have switched from GCSE to iGCSE; because the latter courses *do not* include Controlled Assessment. These teachers have cited the negative impact of Controlled Assessment as the specific reason for switching specification.

Geographical Fieldwork

While we support a move to 100% external assessment, the EBC for geography **must** include an unambiguous requirement for pupils to undertake geographical fieldwork as part of their studies. This fieldwork should provide pupils with a 'real-world' understanding of physical and human geography and the interaction between the two and **should be examined**.

The Society recognises that it is for schools to decide how best to run and deliver geographical fieldwork in terms of location, duration and focus.

However, we do not believe that geographical fieldwork based on an allocation of 'one day per year' (which is common in many schools) is sufficient in achieving the ambition and rigour of the new EBC for geography.

The Society would **not** support a new EBC in geography which did not contain a specific and robust requirement for, and examination of, geographical fieldwork.

Opportunities to assess pupils' learning through fieldwork (which previously had been assessed largely through controlled assessment) are discussed in 7 b) below.

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?

Comments:

In GCSE geography pupils' geographical fieldwork is currently internally assessed through controlled assessment.

The Society **strongly** supports the reintroduction of 'course work' for A Level geography.

However, we do not believe it is necessary to retain internal assessment for an EBC in geography.

However, this raises the issue of how can an EBC assess the learning that pupils gain through geographical fieldwork.

The Society proposes that this could be achieved through 100% external assessment in the following ways:

1. The introduction of a geographical fieldwork and skills examination.

This paper should include map work, data handling, interpretation of information presented through Geographical Information Systems (GIS) and the application of techniques, insights and approaches that can only be learnt through geographical fieldwork.

2. Providing added weighting for pupils' answers that incorporate the use of case studies that pupils have encountered through their fieldwork.

This approach could be specifically highlighted in the introductions to relevant examination questions which would be set to assess a pupil's understanding of physical, human and integrated geography.

A useful model here is the introduction of Spelling, Punctuation and Grammar which accounts for 5% of the current qualifications in geography and is tested within identified questions.

The Society would particularly welcome assessment which presents (and rewards) opportunities for pupils to demonstrate their learning through fieldwork within identified questions. We feel this suggestion would work particularly well if greater opportunities were provided for more extended writing within geography exams.

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 curriculum time

☐ Greater curriculum emphasis

☐ Other

Comments:

The expectation should be that an EBC takes the same amount of curriculum time as current GCSEs

The Society is unequivocal in its support for the EBacc which identifies an academic core of subjects that should be studied to 16 and we agree with the current range and balance of subjects.

However, outside this academic core, there should also be appropriate opportunities for pupils to study other subject areas. The danger of increasing time dedicated to a either subset or to all EBCs is that this would have the potential to crowd out other subjects from the KS4 curriculum which would be undesirable in terms of breadth and range of study.

In addition, we note that a move to 100% external examination, and loss of Controlled Assessment, will 'free up' significant amounts of lesson time for the EBC which can and should be (re)dedicated to teaching.

Geography teachers have reported to the Society that Controlled Assessment has reduced their teaching time by at least 10 hours (and in extremis up to one half terms worth of lessons). The Society also notes that Ofqual has reported that 24% of geography teachers identified the loss of teaching time as the biggest problem with controlled assessment (Evaluation of the Introduction of Controlled Assessment, Ofqual 2011)

Examination aids

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

Comments:

Examinations in geography should include the use of

- Maps at different scales
- Aerial and satellite imagery
- A wide range of geographical data, including that presented through the use of GIS, and statistical summary data.

The Society believes that by the end of KS4 pupils should be able to demonstrate high level locational knowledge and we do not believe it is necessary to provide pupils with an examination atlas'. However, examinations may require pupils to select, use and comment on information presented in extracts from atlases.

Subject suites

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

X Yes

☐

No

☐

Not Sure

Comments:

The Society can see no good reason to change the current range of EBacc subjects which provide a quality range of robust academic study up to the age of 16.

We are concerned however at school timetabling that often restricts pupils' choice to studying either geography or history and not both. This is further encouraged by the EBacc requiring one or other (but not both) of these two complementary and different subjects.

The EBacc subjects present the necessary academic underpinning to a pupil's further study at A Level. More specifically they provide coherent academic pathways which lead onto the preferred 'facilitating subjects' at A Level subjects which have been identified by the Russell Group of Universities and to a wide range of rigorous degree level and employment opportunities.

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

☐

Yes

☐

No

X Not Sure

Comments:

There is sufficient science currently required within the E-Bacc.

We have no strong views as to how that is best organised but we would be very concerned if more curriculum time were to be given over to science when history and geography are limited to one 'option'.

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?

Comments:

EBCs will need to be able to demonstrate high levels of coverage of key knowledge, understanding and skills within each respective subject, as well as a sound knowledge of certain areas in depth.

There should be sufficient and complementary levels of demand and stretch within the different subjects, which should in turn be comparable to the levels found in other international high performing jurisdictions.

It is important at this stage that young people can begin to undertake higher order skills to support their subject-based knowledge and understanding. These include effective research on their own; select and apply knowledge and understanding; analyse and interpret data; understand cause and consequence; and critically evaluate different information sources.

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

Comments:

Alongside the specific EBCs in English and mathematics, opportunities should also be taken to strengthen the use of English and mathematics in other relevant EBC subjects.

In geography the Society would welcome both more extended writing and clearer specification and higher demands in relation to the use of mathematical and data analytical techniques, including data handling and mapping in GIS, descriptive statistics (inferential at A level), and data interpretation.

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?

Comments:

The Society believes that a requirement should be placed on Awarding Organisations to engage in effective consultation and collaboration with an EBC subject's Learned Society as these bodies have responsibility for the discipline and ready access to the breadth of subject expertise in universities. This would help ensure that an Awarding Organisation understands a subject within its full 'disciplinary context', has access to up to date subject knowledge, and is not solely reliant for subject feedback from teachers.

Awarding Organisations have not always engaged effectively with their Learned Bodies and they have, at times, missed out on the expertise that could have been provided to them. Further, Awarding Organisations should provide resources to support this work, rather than (has often been the case) expecting such expertise to be provided pro-bono.

14 b) Prevented from offering?

Comments:

The Society believes there should be a clear separation between an Awarding Body and the development of text books, online resources and other materials teachers may use.

There is a significant potential for the curriculum to become narrowed, and an undue focus on 'cherry picked' case-studies, when texts or other materials are endorsed, branded or otherwise associated with an Awarding Body's particular course. Further, the practice of examiners writing such materials (and being identified as such) should be prevented. Similarly, Awarding Bodies should encourage teachers to undertake subject-based CPD that is not simply limited to the examination specification. This will become even more important when only one Awarding Body offers any particular EBC specification.

The Society would not wish to see such activities continue within the development of the EBCs. We believe that the EBC franchise process should explicitly prevent:

1. An awarding body endorsing or being associated with a particular text, online resources or materials,
2. 'Their' examiners undertaking commercial writing (or similar) work linked to the development of materials the new EBCs.
3. 'Teaching to the test' CPD courses that are highly examination specific.

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

Comments:

The Society welcomes the removal of modular courses and controlled assessment for EBC. This will reduce a significant burden on schools in the administration of EBCs.

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?

Comments:

No comment made

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

Comments:

No comment made

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

Comments:

No comment made

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

Comments:

No comment made

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

Comments:

All six EBC subjects should be ready for first teaching from 2015. There is nothing to be gained by phasing the implementation of the new EBCs.

A phased programme will create comparability issues for pupils receiving new EBCs in English, mathematics and science and the old GCSE in MFL and geography or history. This would be a very unwelcome situation and it would be far better to implement all the EBC subjects in one phase.

The Society believes that subject content and criteria for geography could be developed in an expeditious way that would allow EBC geography to be implemented concurrently with English, mathematics and science.

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

The key is in teachers being well led and well prepared, and in the recognition by school leaders of the importance of subject-based CPD training. To achieve that:

1. The Society would recommend that the Awarding Bodies include proposals for how they might support the roll out of successful EBC with teachers and schools.
2. Resources and CPD will be essential in supporting teacher implementation, but these must show a plurality of approaches to the curriculum and not just one. However, the Society does not believe it is appropriate for Awarding Bodies to run CPD courses or develop online or printed support materials on 'their' EBCs. Instead the Society would be interested to see how Awarding Bodies and/or the DfE might develop partnerships with Learned Societies which in turn can provide support for teachers, and facilitate the engagement of teachers with relevant new knowledge emanating from the universities. Learned Societies bring a disciplinary subject rigour and whole subject framework to teachers. This helps to ensure that their subject knowledge is current and refreshed; that the teaching community is committed to broadening pupils' learning not narrowing down onto selected case studies; and that learning is provided within a sound subject-based context.
3. The expertise, impartiality and independence of the Learned Societies should be used also to stimulate and provide clear subject leadership to the (necessary) development of teachers thinking their way into how they will teach KS4. We would wish to use the opportunity of the

new EBCs to stimulate all teachers rather than see some take a route of least resistance through the new specifications.

4. Further training for teachers in leading and supporting fieldwork will be also essential in geography. (The RGS-IBG is currently seeking funding for a new project to meet that specific need.)
5. The Society would also wish to see schools prioritise the development of their KS4 curriculum within their school departmental plans as part of the lead up to implementation in 2015. This could be well supported with CPD and curriculum planning discussions, for example for geography, through the RGS-IBG local networks of teachers led by a Chartered Geographer teacher.

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

Comments:

Latterly geography teachers have responded positively to the need to redevelop their courses to take account of new linear GCSEs, SPAG and the review of content in GCSE geography in the summer of 2012. In supporting teachers with these changes the Society has provided a range of successful, and well attended, CPD, online materials and other support.

With appropriate support, we believe that the geography community could respond to the new courses within a 12 month period. However if that support and professional development, provided independently from the Awarding Bodies, is either not available or not supported by school leaders then teachers will struggle regardless of the time frame.

Languages

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

☐

Yes

☐

No

☐

Not Sure

Comments:

No comment made

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

☐

Yes

☐

No

☐

Not Sure

Comments:

No comment made

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 Baccalaureate Certificates?

☐

Yes

☐

No

☐

Not Sure

Comments:

No comment made

Post-16

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

☒ Yes☐

No

☐

Not Sure

Comments:

Yes.

We cannot have a mixed market of qualifications with different qualifications being offered by schools and post 16 institutions.

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

Comments:

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?

X Agree

☐

Disagree

☐

Not sure

Comments:

Five years is an appropriate period.

A number of teachers have raised the issue of whether the iGCSEs/Certificates will continue to be available as courses and also if they would feature as 'equivalents' to the EBCs within the performance tables.

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.).

Comments:

It is a helpful and straightforward consultation.

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
East Lane Runcorn
WA7 2GJ

Send by e-mail to: KS4QualReform.CONULTATION@education.gsi.gov.uk