

Consultation response

Department for Education - Reforming Key Stage 4 Qualifications

UCAS' mission is to help learners make informed higher education (HE) choices that best suit their aspirations and abilities and maximise their opportunity for success, and to benefit our members through the provision of shared services. UCAS provides information and advice; course information; entry requirements; and application services to around 500,000 UK applicants to over 320 UK higher education providers each year. These applicants make over 2 million applications to HE courses. Our services support applications for full-time HNCs, HNDs and foundation degrees as well as undergraduate and some postgraduate degrees.

UCAS welcomes the opportunity to respond to the consultation on the reform of GCSE qualifications. We recognise that this consultation relates to GCSE reform in England and are also mindful of other similar reviews which are being undertaken by the devolved nations, such as the Welsh 14-19 qualification review, which may face similar challenges. Implementation of any changes to Key Stage 4 needs to take into consideration the cross border flow of English students and the impact that any changes will have on HEIs across the UK.

Progression from GCSE to A level is one of the most well established progression pathways in secondary education in England today. Any reform of Key Stage 4 needs to take place hand-in-hand with the reform of A levels. The risks associated with undertaking reform of A levels without alignment of reform at Key Stage 4 (both GCSE and vocational qualifications) could be significant.

The purpose of GCSEs and other Key Stage 4 qualifications is to prepare candidates for a wide range of post-16 options, including employment, worked based learning and progression to Level 3 study. Throughout the consultation document there are a number of references regarding the importance of GCSEs to higher education. UCAS recognises that GCSEs are being increasingly used as one of a number of data and information sources admissions departments use to distinguish between applicants. Practice includes the use of GCSE achievement as a tool to distinguish between applicants of a similar Level 3 achievement profile and to provide useful information regarding an individual's Level 2 breadth of study, with particular value being placed on the core subjects of English, mathematics and the sciences¹.

HE involvement in development

We note that the Department for Education is expecting Awarding Organisations to work directly with HEIs and learned societies in the development of these new Key Stage 4 qualifications, however little detail has been given on how this is to be achieved. We recognise the importance of ensuring clear progression routes from Key Stage 4 into Level 3 and onto higher education and endorse the proposed increased involvement of

¹ Qualifications Information Review: Findings and Recommendations.

higher education in the development of qualifications. However, as we outlined in our response to the Ofqual consultation on A level reform, there are concerns with the level of involvement that would be required. We would like to see more information on the planned implementation of these qualifications and to understand more about the proposed involvement in Key Stage 4 qualification development.

It is likely that that HE involvement in the development of English Baccalaureate Certificates will be less than it will be in A levels for two reasons. Firstly, there is a concern that the increased involvement in A level development that has been proposed will create a significant amount of work for the HE sector. Involvement in the development of Key Stage 4 qualifications would only add to this work. Secondly, GCSEs have a wide range of purposes and provide a number of different pathways. To reflect this, the development of Key Stage 4 qualifications should be a collaboration across all stakeholders who have an interest in these qualifications, of which HE could potentially be one.

Other subjects (4.7)

UCAS would be interested in further information regarding the plans for other subjects. We would also be interested in how these proposals will sit with those recommendations made by the Wolf review. There is a risk that the reform of Key Stage 4 qualifications could occur in isolation and therefore create greater disparity between the English Baccalaureate Certificate and vocational pathways. This will also need to be a consideration in the forthcoming consultation on school accountability.

Title (Section 4.8 and 4.9)

UCAS agree with the Department for Education that qualifications studied must be well understood and have currency with schools, employers, further and higher education and must be easily recognisable to a range of audiences. Due to the significant changes proposed to Key Stage 4 qualifications, UCAS supports the rebranding of the qualification to allow stakeholders to distinguish between the different qualifications.

However, any rebranding of qualifications will bring with it a period of unfamiliarity and will require an extensive communications plan to ensure that all stakeholders are aware of these changes and what they represent. UCAS would be happy to work with the Department for Education in communicating the new qualifications to our member institutions and registered schools.

Assessed 100% by examination, or minimising reliance on internal assessment (Section 5.9 and 5.10)

Whatever assessment methodology is used needs to test the full range of skills and abilities that a candidate may have. The many stakeholders with a direct interest in the English Baccalaureate Certificates will have various requirements from these qualifications and this should be reflected in the assessment techniques used.

Size requirement for syllabus (Section 5.13)

The UCAS Qualifications Information Review highlighted that there is considerable concern from the HE sector with regards to the reliability of the use of guided learning hours (GLH) as an indicator of qualification size. We would urge that a measure of qualification size that is comparable to other measures of size, such as the Scottish measure of notional learning time is used for all English qualifications. A consistent, UK wide assessment of size would be of value to a wider range of stakeholders, including our members.

We are aware of the forthcoming Ofqual consultation on new criteria for GLH and would expect that the relevant findings from the Ofqual consultation are applied to the reform of GCSEs and other Key Stage 4 qualifications.

Lower attainers and equalities (Section 6)

UCAS would welcome further information on the perceived currency of the Statement of Achievement and how the Department for Education intends to ensure that they are consistent in quality and approach.

UCAS has concerns regarding the proposed awarding of a Statement of Achievement for those candidates who do not sit the English Baccalaureate Certificate examination. Although we agree that the current system provides these candidates with little information regarding the skills and aptitudes they possess, the specific awarding of the Statement of Achievement to these learners may have a negative impact and inadvertently create a two tier classification of learners.

A way to overcome this issue could be to issue all candidates with a statement of achievement. In addition, information that contextualises an individual candidate's achievement is likely to be of value to all.

Implementation (Section 7)

The UCAS response to the Ofqual consultation in relation to A level reform outlined a number of concerns regarding the implementation of the revised qualification. A number of those concerns apply to the proposals made in relation to Key Stage 4 qualifications.

The proposals made in the consultation document state that first teaching of the English, mathematics and sciences English Baccalaureate Certificates will occur in September 2015. The timelines proposed suggests that schools "will have more than 18 months to prepare for the first teaching of the new qualifications".

The timelines proposed will present challenges in relation to information, advice and guidance. The introduction of new qualifications will bring with it added complexities in communicating the changes to students and parents of an already complex system at a time when other qualification reform is already occurring. The complexities of this are heightened by the potential phased introduction of different English Baccalaureate Certificates subjects. It is essential that all stakeholders are fully aware of which qualifications have been reformed or are in the process of being reformed.

The issue of a phased introduction of English Baccalaureate subjects raises the possibility of a multiplicity of Key Stage 4 qualifications being available at the same time. Learners, parents, schools, colleges, HEIs and employers must be able to distinguish between them easily and understand why and how these qualifications may differ.

UCAS uses various channels to reach each audience by using social media, printed publications, events and e-newsletters (for example over 650,000 applicants, 100,000 pre-applicants, 12,000 parents and 4,000 advisers receive a monthly newsletter). With key changes in policy, UCAS works with its stakeholders to ensure that audiences are fully aware of the changes. For example, UCAS was part of the Independent Taskforce on Student Finance, helping to fund and resource the initiative and highlighting changes to student finance arrangements to students, parents and advisers through the channels mentioned above. UCAS would be happy to discuss with the Department for Education ways in which we can support the communication of these reforms.

We note that the proposals made by the Department for Education are only applicable to English students. Therefore, there is a possibility that existing GCSEs may continue in their current guise in Wales and Northern Ireland or may face changes specific to these countries following the outcomes of their own qualification reviews. If there is greater divergence in the qualifications offered in the devolved nations more information will be required to ensure all stakeholders are able to understand these changes.

There are considerable risks associated with the overly-rapid development of high stakes qualifications. There are well documented lessons regarding unintended consequences associated with rushed qualification reform, with the 14-19 Diploma, Curriculum 2000, various mathematics qualifications and GCSE science being well-known examples.

Due to the significant changes to specification, structure, assessment and grading proposed we believe that the new qualifications should be piloted. Piloting would allow for any problems, issues or unintended consequences be identified without threat to the full cohort. It would also allow for additional time to develop support materials and information, advice and guidance for stakeholders.

Other comments

UCAS is keen to receive verified Key Stage 4 qualification results via our Awarding Body Linkage (ABL) process. This would enable us to provide a more streamlined service to applicants whose offers are dependent on GCSE grades. A large number of applicants who are still awaiting a confirmation decisions in September are in that position due to pending GCSE result validation. We would look to work with the Awarding Organisations who secure the EBC contracts to facilitate this.

We hope that our above comments have been of use to the Department for Education and would happily elaborate on any points if required.

UCAS