

## A BETTER APPROACH TO HIGHER EDUCATION / EXAM BOARD INTERACTION FOR POST-16 QUALIFICATIONS

### A POLICY PAPER

#### 1. Introduction

Cambridge Assessment supports the comment in the Government's White Paper *'The Importance of Teaching - the Schools White Paper'* that "A levels are a crucial way that universities select candidates for their courses, so it is important that these qualifications meet the needs of higher education institutions." We agree that Higher Education (HE) should have a greater role in the design of post-16 qualifications in the UK. We have concerns that over recent decades the 'users' of qualifications, i.e. HE and employers, have become divorced from the 'producers' of qualifications, i.e. exam boards.

In order to find ways to reintroduce a discussion between HE and exam boards, Cambridge Assessment launched a policy consultation asking for feedback from Higher Education Institutions (HEIs) on a strategy for real engagement. We also held a number of colloquia with subject specialists at the University of Cambridge to illuminate our thinking.

The following outlines Cambridge Assessment's policy recommendations to take forward the Government's commitment in this area. The policy prescriptions arise from a combination of extensive internal discussion and the responses received throughout the consultation process.

#### 2. Why there is a problem

Over the past forty years, the 'producers' of qualifications, exam boards, have become ever more concerned with technical accuracy while 'users' of qualifications, including HE and employers, have had a number of other issues to preoccupy them. As a consequence, the British state has taken an ever-increasing role in mediating between HE, subject communities, learned societies, employers, teachers and those developing qualifications. The state's greater role in defining the content of syllabuses and the way in which they are examined has led to a kind of divorce between the users and the producers of qualifications. Qualification producers have continued to carry out their task with increasing accuracy but lack of direct contact with users has meant the purpose of qualifications has sometimes been overlooked.

The bulk of this paper addresses the challenges arising from the HE side of the equation. This is not to say that exam boards have none. All exam boards have, to varying degrees, some form of

HE input. Cambridge Assessment being owned by the University may, perhaps, enable it to be better placed than others. Its UK arm OCR already involves around 80 HE practitioners as examiners, qualification designers, on quality assurance committees and so forth and has recently set up practical HE discussion forums. Its international arm University of Cambridge International Examinations worked closely with HE to produce the new Cambridge Pre-U qualification.

The principal challenge to exam boards is an attitudinal one. It involves boards taking responsibility for active engagement; not merely supplying a seat at the table for HE should it wish to attend (as they do now) but to set out deliberately to involve HE in the very bones of post-16 qualifications. It is pleasing to report that the major exam boards are already moving in this direction, some more rapidly than others, but all heading to the same destination. Hence the focus of this paper.

### **3. A future model**

Taking forward a new model for the development of post-16 qualifications needs to consider how the standard of these qualifications can best be maintained. We agree that there is a role for a regulator to protect qualification standards and to ensure their currency endures. However, we also believe that it is possible to build better mechanisms of interaction between HE and exam boards by moving away from an overly centralised and regulatory approach, where those with expertise in subject knowledge and pedagogy have not previously been able to have a major input.

In the past, an unhelpful part of the process has been the frequency of 'whole suite' qualification 'accreditation cycles', driven by regulatory pressures rather than subject and pedagogical changes. This has meant that the practice has been to change all A levels in all subjects at exactly the same time. As different subjects change at different speeds, there is a good case for changing an A level only when the subject community feels change is needed.

This process has reduced the likelihood of quality engagement between HE and exam boards. There was widespread agreement from HE that (a) the frequency of the cycle had been unhelpful and (b) that exam boards needed to be given the opportunity to consult more widely, at infrequent qualification starting points, rather than having to continually amend syllabuses to comply with small regulatory changes.

Ofqual has already committed itself to a different model of regulation in which it accredits exam boards, rather than individual qualifications. The system therefore appears to be moving in a direction similar to the future model we set out below. The natural finishing point of Ofqual's new regulatory approach is that if HE sets the content, skills and standard of an A level and it is produced by an exam board which has been recognised by Ofqual at that high level, there should be no need for the regulator to then accredit that A level. If a particular A level was deemed to be a risk, for the purposes of reassurance, it might be thought that Ofqual should have a kind of 'veto' power of accreditation. In such situations it would naturally have to show evidence to back up its decision not to accredit an A level which had already been approved by a large part of the HE community.

In summary, the model that we proposed in our consultation paper consisted of the following parts:

- **Higher education needs to take the major role in specifying the 'content' criteria of qualifications**

Under our proposed model, subject professionals take the major role in determining the knowledge, skills and understanding they expect of a candidate in a subject. Those professionals have a direct interest in preserving the currency of the qualification for their subject and this model gives them a way to uphold that currency.

We also suggested that Government and HE should make clear that the primary purpose of A levels is for HE entry in order to send signals to the exam-taking cohort as to which qualifications are worth taking and that HE is prepared to take a major role in preserving the currency of the qualifications used for entry to it.

- **Exam boards need to agree between themselves on ‘design’ criteria of qualifications**  
Assessment expertise is primarily located within exam boards. Under our proposed model design criteria are therefore best developed by assessment experts working in close consultation with HE, the teaching community, and the subject community. This allows the preferences of the various communities to be taken into account set against the practicalities of assessment practice.

Different subjects may well choose a different qualification structure and a different assessment that suits the needs and requirements of their subject. Given that HE would be the guarantor of the standard, there is no need for a regulator to insist on similarities between approaches to different subjects.

- **‘Communities of interest’ – need to be set up around each qualification**  
Our model also proposes that ‘communities of interest’ should be set up around each qualification – enabling the standards of each qualification to be maintained over time by all those with a direct interest in them.

These would bring together subject communities, learned societies, HE, schools and colleges, teachers, and exam boards to share a particular view of what constitutes the standard in relation to a subject. They work together to own the standard and protect it on a day to day basis against the vagaries of pedagogical or political fashion. This is the way in which the IGCSE, the IB and the Cambridge Pre-U manage standards – without the agency of the state. The maintenance of a post-16 qualification such as A level would therefore be undertaken by communities of interest that include HE.

#### **4. Responses**

The response from our consultation to the idea of HE taking a major role in specifying the content criteria of qualifications was generally positive. There was agreement that this level of involvement in the development of qualifications for HE entry would ensure that students were better prepared for university, as well as giving HE a greater understanding during the admissions process and inform their own undergraduate curriculum.

In terms of the purpose of A levels, some responses to our consultation pointed out that A levels are not limited to preparing young people for HE and that a wider group of stakeholders therefore need to be consulted. However others suggested that “in intending that they fulfil other purposes (e.g. as a toll for direct entry to the world of work or as a method purely to reward achievement to date), their focus in preparing for HE study has been diluted, to the detriment of students.”

We agree that the purpose of A levels as it currently stands is diverse, but we argue that this is part of the problem. We recommend that clarity should be restored as to the function of A levels and that this involves HE taking a major role in their development. We also believe that if A levels meet the requirements of HE, they will also be right for general societal use. Employers will not necessarily be interested in the subject content of an A level in the same way that HE will be, but the fact that they meet the demands of HE will provide an assurance about the level of thinking required to do well in them.

Several consultation responses agreed that exam boards had built up considerable expertise in qualification design which academics lack and are therefore best placed to produce qualifications and the associated assessments. However, some consultation responses suggested that problems have arisen in the past not only from HE having no say over the ‘content’ criteria, but also having no say over the ‘design’ criteria. These suggested that there may be a role for HE in the design of

qualifications, as well as their content. We agree that the preferences of HE should be taken heavily into account in the design process but that the expertise of exam boards should be the driver of this part of the process.

Many responses to our consultation welcomed the idea of communities of interest, but there were a number of practical questions raised in terms of their operation. In particular, some raised questions around the extent to which there are existing networks or communities which would already constitute these communities of interest. One concern raised in responses from learned societies and subject associations was that the proposals for communities of interest were too dependent on individuals as opposed to bodies or societies. These responses drew our attention to the role that learned societies might have to play. We acknowledge and appreciate the links that some learned societies have across HE and in schools and colleges. We think learned societies have an important role to play in this process, particularly through their ability to broker between different HE institutions. We acknowledge one of the responses that “Learned Societies integrate the views of a range of HEIs, offering a broad and balanced response, whilst also ensuring that Awarding Organisations do not have to develop multiple contacts with multiple HEIs.”

However it is our view that they are not the only, or best, mechanism of engagement. It needs to be kept in mind that learned societies vary significantly depending on the subject in question. In addition, learned societies by their nature represent a wider set of subject representatives and it is partly this wider focus which has led us to the situation in which we are today where the users of A levels, HE, do not get a say in their development. Indeed, some verbal responses from HE representatives expressed scepticism as to whether the learned societies to which they themselves belonged could properly represent HE of itself. If we are to accept the premise that HE should be the main determinant of A levels, then we need to go back to their needs, rather than the desires of the academic subject more generally.

Others made suggestions about how communities of interest might work practically. One suggestion, which we think has great merit, was that each should consist of a standing committee as well as a wider network of interested parties, meeting as required in conference. The standing committee itself might consist of a combination of representatives made up of relevant learned societies, subject associations, subject specific HE practitioners, exam boards and specific co-opted individuals (some by invitation but with individuals free to apply for co-option, possibly with the support of their HEIs).

Some raised concerns that the communities might be unworkable if prolonged involvement of HE staff was required. One response said “We would consider releasing staff to participate in subject reviews but would be unlikely to be able to make a long term commitment to a project such as this. Staff may be available if the community was ‘virtual’, but research and teaching commitments may make anything more difficult to sustain.” Others, although taking a similar approach, gave constructive suggestions that attendance of HE would be most useful at the syllabus and design phases of a qualification and during annual post-exam session reviews but less so at administrative and technical phases. It was suggested that in terms of saving time and costs, there needed to be a clear distinction between sessions that looked at standards and qualification development, where the involvement of HE would be key, and those looking at administrative issues, where its involvement would not be so crucial.

Our consultation with HEIs highlighted a number of principles that we believe need to be taken into account by all those involved in policy formulation around exam board/HE engagement:

- **Be clear about the level of commitment**

Questions were raised about whether the involvement of HE would be a case of occasional consultation or a permanent commitment. Occasional consultation already exists through exam boards and Ofqual – it is not working. Real engagement requires a higher level of commitment, albeit not permanent. Clarity is therefore required as to the depth of commitment and length of time required of HE.

- **Be clear about the type of commitment**  
It was also stressed that it is important to be clear about exactly what would be expected of HE representatives. It was suggested that it will be necessary to focus on asking academics to carry out specific tasks rather than involve large numbers in consultative forums which are not as effective.
- **Provide support to universities**  
It was stressed that it will be necessary to find a framework to encourage universities to support academics who engage in qualification development – for example, paying a university so they allow their academics to use their time this way and that the university is also able to benefit.
- **Make it attractive to academics**  
It was suggested that engagement opportunities need to be competitive in order to enhance the status of this kind of work and not merely be the last issue in the ‘in-tray’ requiring an academic’s attention. Involvement of this type should bring career progression, prestige and, possibly, additional remuneration.

Cambridge Assessment therefore suggests HE will have its greatest role at the beginning of the process when broad principles are being drawn up. HE will have a major role in determining what the content and structure of the syllabus would look like at subject level. It will also have a significant role, as part of broader group of teachers, subject associations and exam boards in what will be assessed and how it could be assessed. Following the development of the qualification, HE should also have a role to play in terms of reviewing syllabuses and sample assessment materials – providing it with a chance to review the qualification before it is finalised. Finally, there ought to be scope, along the lines of universities’ own external examiner system, for Higher Education subject representatives to be involved in a ‘Post Examinations Review’ – an annual review of each year’s exam series. The purpose of this would be to examine whether the standard has been maintained across all versions of the syllabus.

Thus, there would be two or three intensive periods of involvement from HE representatives at the initial stage of qualification development, rather than a permanent involvement throughout the entire process. This might involve up to a dozen HE subject specialists helping exam boards develop broad principles, with additional representatives involved in the review processes mentioned above. Assuming exam boards were to work collaboratively, this would lead to a number of representatives from HE helping to develop principles and criteria with perhaps a large scale web based consultation for each subject. We believe that web based options for consultation could allow for a wider input and reach of engagement. The fact that HE representatives had helped in the development should militate against a replication of the current ‘tick-box’ response to such consultations.

## **5. Mechanisms to encourage engagement**

It is our view that the call for greater engagement between HE and exam boards should be supported by proper institutional support arrangements. Given the responses we have received about the obstacles to those in HE engaging in qualification development, we believe that these institutional arrangements will be necessary to ensure that quality engagement takes place.

As a result of our own expertise in engaging with HE, together with soundings taken from various institutions having a bearing on HE and the feedback from our consultation responses, we outline below some mechanisms the Government may want to consider as it develops this policy further.

### **5.1 Quality Assurance Agency for Higher Education (QAA)**

In our initial consultation paper, we suggested that the QAA could include engagement with an exam board as a criterion for defining a quality HEI or could refer to the need to take note of the incoming knowledge and skills of students when designing a course.

In response to our consultation, some concerns were raised about the prospect of more criteria being added by the QAA. Some particularly research orientated institutions pointed out they need to ensure that staff are focused on research and publication without reference to the quality of the incoming undergraduate intake.

There were also some concerns about making cooperation with an exam board a requirement as this suggested more state regulation over the freedom of HEIs. Some suggested that including engagement with exam boards should be a good practice principle rather than a fixed criterion. Conversely, others suggested that our proposals around the QAA had the most practical potential and that we should look further at the mechanisms offered by the QAA given that it is in the process of updating its academic infrastructure. It is our contention that mere 'good practice' rather than anything more instructional would not have the same impact.

One area that could be used to deliver institutional change is the QAA's subject benchmark statements, which are a reference point for HEIs to design their own awards. At present some of the subject benchmarks refer to pre-HE qualifications, but this does not currently occur in all subject areas. We would recommend that the subject benchmarks should provide an opportunity for subject specialists to provide guidance on what might be needed for a pre-HE qualification to prepare for entrance into this subject area at degree level.

Another area relates to the QAA Codes of Practice, including its Code of Practice on Programme Design, on Assessment, and on Teaching and Learning. We would suggest that in the revision of the Codes of Practice on Programme Design, in particular, engagement with exam boards regarding A levels should be seen as good practice to inform the development of degree level programmes.

## **5.2 Financial incentives**

We initially suggested that a small funding stream will need to be made available in order that universities can allow staff adequate time to engage in this process, thereby ensuring 'quality' rather than 'tick box' engagement. Although exam boards are prepared to commit funds to encourage HE engagement as a 'pull' factor, it is probable that HE will only really react to a 'push' factor in terms of funding streams deriving from the state in some form.

There was strong agreement from the responses to our consultation that without some kind of financial incentive, engagement will indeed be tick box, short lived and would not attract the best staff. Responses referred to the demands on academics' time and the serious obstacles in getting academics involved in 'low status', non research activity.

Many responses agreed that the creation of a pool of resource would be necessary to buy out lecturers' time during a period of secondment, when academics are seconded to exam boards during the early stages of the development process. It was suggested by some that academics would only be encouraged to engage in activity at 'full economic cost'.

Among the responses we received was a suggestion that a precedent for incentivising wider engagement existed in the Research Councils' current model by which they insist that a small proportion of each grant should go towards public understanding.

Two potential funding streams can be derived from this suggestion.

The first relates to Research Councils in that they could direct that part of the public understanding monies should be spent on exam board engagement in order to ensure that the general field in which the research took place and for which the funds were granted was better understood by potential undergraduates through the medium of post-16 study.

The second relates to HEFCE. In a similar way to Research Councils, HEFCE could direct that a small proportion of the funds it delivered must be reserved for engagement with exam boards. Alternatively one suggestion was that the Higher Education Innovation Fund, the 'third leg' of HEFCE, might perform this function, given that this process would be new to HE.

One of our initial proposals was that HEFCE might inherit some of the money saved from the abolition of the QCDA for funding HE's engagement with exam boards. However the suggestion that this new role should be funded from that previously allocated to curriculum development via quangos such as QCDA, was generally more popular among respondents than the idea of funding this activity through the HE budget – and this would be our preferred option.

Given our strictures on the accreditation cycle above, and assuming regulatory changes that place HE in the driving seat, no more than 5-10 A levels would be in development in any two year period. Calculations of the time needed by HE representatives indicate that this policy would probably need a pot of an additional £10 million per year to be bid for by the HE sector.

### **5.3 Research Excellence Framework (REF)**

We suggested in our initial consultation that the impact criteria of the REF could also provide a helpful lever. Our suggestion was that there is a case to be made that disseminating knowledge to the next level down of the education system has as much impact as some other REF criteria. Clearly, it would not rate as importantly as the publication of a serious piece of work in a peer-reviewed journal but is of great importance to the long-term health of HE and, therefore, the nation.

The bulk of responses to this recommendation suggested that this approach was not likely to be successful in the short term. These responses stressed that the current REF system does not appear to add value or allow space for academics to be recognised for teaching and learning. It was pointed out the current impact criteria of the REF require a specification of the research to which the impact applies. Indeed, academic impact, no matter how real or even if based on a lifetime of research does not matter to the REF unless it is linked to specific piece of research by that specific academic. The impact academics can provide for qualification development will probably not be derived specifically from their own research and it therefore follows that it will have no recognition within the REF.

Whilst we accept that under its current definition the REF is perhaps not the instrument to encourage HE engagement with qualifications at present, we found some respondents that agreed with us that, for the next REF review, the Government should look at widening the interpretation of the REF's impact criteria.

### **5.4 HE Academy**

Our initial proposals suggested that the HE Academy could usefully turn its mind as to how it might provide a service both to HE and wider education by providing structures and resources to encourage engagement.

In general, most of the responses we received were sceptical about the ability of the HE Academy to achieve this aim. Some suggested that in principle this might be useful and that they would welcome the idea of an enhanced role for the HE Academy as a form of 'honest broker' but that directives from the HE Academy at present do not have the force comparable to that of the REF. One suggestion was that the HE Academy serves the role of initiating engagement with HE representatives.

## **6. Regulatory outcome**

Naturally, following the re-engagement of HE with exam boards in the creation of post-16 qualifications, the role of the regulator should change substantially. Its task will be to hold parties to the agreements they have made with each other, acting as a 'referee'. It will no longer instruct but use its expertise to monitor the standard on behalf of the user (HE), and the ultimate paymaster (the state), ensuring neither grade inflation nor grade deflation takes place.

This new model enables Ofqual to fulfil its role of regulating standards through the recognition of exam boards working in partnership with HE. It therefore acknowledges Ofqual's statutory standards objective whilst freeing exam boards and HEIs to work together flexibly and innovatively to produce A levels that do what they need to do. Finally we would add that, because it will have more than one 'master' (HE and the state), its responsibility to Parliament should remain and, if anything, be enhanced thus allowing MPs to scrutinise the process in an open and accountable way.

## **7. Conclusion**

These proposals would put universities back in the driving seat of devising the academic content of post-16 examinations. This would ensure that A Levels:

- Deliver university ready students
- Reduce the need for 'remedial' classes in HE
- Keep pace with subject development
- Maintain standards

We have looked at the underlying principles that guided the creation of successful post-16 qualifications in the past, viewed them through the lens of decades of expertise and experience and factored in advances in technology and subject disciplines (including in the discipline of assessment itself). We believe we have produced a policy for the creation and maintenance of A level standards for the 21<sup>st</sup> century.