

Consultation Unit (Confidence in Standards)  
Area 1A, Castle View House  
Runcorn, Cheshire  
WA7 2GJ

Dear Sir/Madam,

This covering letter accompanies Cambridge Assessment's response to the Government's consultation on *Confidence in Standards* – and forms an integral part of that response. It covers those sections of the document for which there are no numbered questions and for which it is inappropriate to use the broader Question 20.

Cambridge Assessment is the brand name of the University of Cambridge Local Examinations Syndicate, a department of the University of Cambridge and a not-for-profit organisation. Its examinations are valued and recognised by universities, employers, government agencies, immigration authorities, professional bodies and education providers around the world.

As Europe's largest assessment agency, Cambridge Assessment plays a leading role in developing and delivering assessment across the globe, by offering qualifications through three examination boards:

- OCR, one of the three UK-wide awarding bodies, designs, produces and assesses qualifications including GCSEs, A Levels and a wide range of vocational qualifications to learners of all ages through 13,000 schools, colleges and other institutions;
- University of Cambridge International Examinations (CIE) offers qualifications including International GCSEs, A and AS Levels and business qualifications in disciplines such as ICT, management and office administration skills. CIE advises and works with a number of governments on education issues.
- University of Cambridge English for Speakers of Other Languages (Cambridge ESOL) exams are the world's leading certificates for English language learners. Over 1.5 million people in 135 countries sit them every year.

We are also taking the lead in Higher Education admissions through the development and administration of university entrance tests. Our researchers pioneer the latest techniques, evaluate current assessments and explore the possibilities that new technologies offer. Our Network helps professionals in assessment increase their knowledge and expertise by providing a programme of continuing professional development in assessment and related issues.

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Cambridge Assessment has revenues of over £200 million, employs 1,400 staff around the world and uses the services of over 30,000 examiners each year.

Cambridge Assessment fully agrees with the Government on the role of qualifications as set out in Chapter 1. Most importantly, a qualification serves as a confirmation - and recognition - of achievement. For that confirmation to mean anything, qualifications must have value and recognition. That is, they must have currency. Important measures of success are that there is general trust in the system and that qualifications are valued by HE institutions and employers for recruitment and selection purposes. Cambridge Assessment is celebrating its 150<sup>th</sup> year of producing quality assessments with national and international currency that are valued throughout the world. Most of these qualifications predate the UK Government's direct involvement in qualifications and their use above and beyond that of recognising individuals' achievements.

Cambridge Assessment congratulates the Secretaries of State for recognising part of the case for change. However, it is our view that the challenge is greater than one of simple perception as laid out in 1.29.

It is true that QCA polling has established that confidence in the system among teachers and students has improved over the past few years. However, this is against a longer term background decline in confidence amongst the political class (elected politicians and political influencers) and in the media. It is probable that this attitude among opinion leaders has led to a decline in the general public's confidence in the system – especially amongst those without children preparing for public examinations. For example, a 2005 ICM poll for Reform found that nearly half the public think A Levels have become easier over the last ten to fifteen years.

The reasons for such real lack of confidence – as opposed to the perceptual challenges - are complex but some indicators are clear:

The last decade has seen: the introduction of C2K, major revisions to GCSE, the change of GNVQ to AVCE, the change of Core Skills to Key Skills to Functional Skills, changes in A level to introduce “stretch and challenge” and to reduce A level units from six to four, and the development and launch of Diplomas, originally planned in thirteen occupationally linked areas, now also in humanities, language and science.

This is important because continual change creates confusion and erodes confidence.

At the same time there has been a major investment in technology which has seen examinations move away from an environment of being almost exclusively paper-based to one where electronic marking is more or less general practice and where a number of high stakes assessments are now being offered online.

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In addition, although the whole issue of standards over time is notoriously complex and technically challenging, looking at subjects like maths or science where direct comparisons can be easier to make it is hard not to be troubled by some of the work done by the CEM Centre at Durham - using standard test items over a number of years and correlating these to A level results. Similarly troubling are comments such as those of Professor Sir Peter Williams, Chair of the Advisory Committee on Mathematics and Education who, in summer 2007, said "Over twenty or thirty years, I don't think there is any doubt whatsoever that absolute A-level standards have fallen. They have edged south, continuously over a long period of time. I think all university academics and a good proportion of sixth-form teachers would agree with my assertion."

Much of the responsibility for this lies in the failure of the QCA to deliver on its regulatory remit. It has seldom been active in leading debate or conducting research. Despite being a cornerstone of its regulatory purpose, the QCA has significantly scaled down its comparability programme. Standards over time studies have decayed into comparisons of specifications rather than sensitive and detailed reporting of essential issues. It is a serious matter that the methodology employed by the QCA in both comparability studies and retention & archiving of scripts is insufficiently sensitive to detect movement in standards.

Cambridge Assessment welcomes the proposed separation of the regulatory arm from the delivery and development arm of the QCA. We believe that the inability of the QCA to focus on its regulatory remit stems from its tendency to be too easily deflected from that core purpose by other programmes of work, which while perhaps important and high profile, have not contributed to promoting confidence in standards. The logic of separation must be followed through, however, or the policy objectives laid out in 2.2 will not be achieved.

The new regulator needs to have a very clear focus. Its primary purposes must be:

1. To maintain the standards and therefore the value of qualifications and confidence in the integrity of the system.
2. To ensure administrative competence and fairness by awarding organisations.
3. To ensure system resilience.

All other purposes and activities will be a distraction from the performance of these key tasks.

The production of the overarching policy outlined in *Confidence in Standards* demonstrates that the Secretaries of State have been listening to the education and assessment community. We applaud this and trust that it signals a new era of dialogue between that world-leading community and Government. The creation of the right sort of regulator should enable us to achieve the objective of improving education for all.

Yours faithfully,



Simon Lebus  
Chief Executive