Department for Education

Consultation Response Form

Consultation closing date: 20 August 2013
Your comments must reach us by that date

Reformed GCSE subject content consultation

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Publication

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Name: Paul Steer	
Please tick if you are responding on behalf of your organisation.	Yes
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Information sharing

The Office of Qualifications and Examinations Regulation (Ofqual) is undertaking a parallel consultation on regulatory conditions for GCSEs. Please tell us if you or your organisation has responded or is intending to respond, to Ofqual's consultation:

Yes✓ ☐		

Please only respond to the next statement if you have ticked '*no*' or '*don't know'* above:

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If you have an enquiry which is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's 'Contact Us' page.

Questions 1-6 below ask you to give your views with reference to a specific subject suite:

1. *English,*
2. *Mathematics*
3. *Sciences*
4. *Geography*
5. *History*
6. *Modern and ancient languages.*

You do not need to give answers for all the subject suites - please answer only with respect to those subjects on which you have a particular view.

Please ensure that you answer questions 7-11 as well – we would like responses from everyone on those.

1. English, including English language and English literature

1a Do **the proposed subject content and assessment objectives** for English, which includes English language and English literature, cover the appropriate knowledge and understanding for GCSEs in these subjects?

☐ Yes	✓ No -insufficiently demanding	✓ No- overly demanding
☐ Not Sure		

The proposed curriculum narrows the field of study for English language. We are concerned that by only assessing unseen texts, those students not being entered for GCSE literature, will have limited opportunity to read whole texts. Although the criteria says 'students should have read high-quality, challenging texts from the 19th, 20th and 21st centuries' it is very likely students of language will only read extracts.

The prohibition of digital texts needs to be reviewed. Digital texts are what both adults in the working world and students of secondary and higher education read. At the very least, this point needs to be clarified. At the moment, we assume that 'digital texts' means multimodal texts. It is one thing to say that digital texts should not from part of the assessment, but there is no justification for excluding them from the curriculum. Additionally, it greatly restricts research possibilities and overall it narrows a student's experience of the subject. There are also limited options for creativity.

We do not think that the separation of reading comprehension and reading critically is necessary or helpful. This leads to prescriptive subject content and assessment objectives. Additionally, by GCSE level, all reading of language and literature should have a critical, interpretative element. Emphasising comprehension to such an extent seems like a retrograde step, and potentially reduces the challenge of GCSEs in English.

There are some errors in the way the scope for study in reading comprehension is

presented e.g. ‘supporting comprehension by commenting on the use of a wide vocabulary, knowledge of grammar..’, should surely focus on evaluating writers’ choices and uses of vocabulary and grammar

The spoken language criteria are in our view too narrow, too restrictive, and we are concerned about the impact on the curriculum of its removal from GCSE. We welcome that it has been reinstated (the previous confidential draft criteria removed S&L completely) but we are concerned that what is offered here concerns only presentation in formal settings. All of our research with employers and Higher Education shows that students’ success is linked to their participation in group work, discussion and other elements of speaking and listening that are not currently accounted for.

Changing speaking and listening to spoken language is a confusing and unhelpful shift. spoken language is understood by English teachers in schools and HE to be the academic study of language as it is spoken, whereas what is meant here is clearly speaking and listening skills.

We welcome the inclusion of literacy, and the fact that it is an integrated approach.

When it comes to the assessment objectives for English language, comprehension and critical reading should not be separated. Additionally, some details are odd e.g. ‘use the skills of description’ in AO2 seems have a writing focus, not a reading one. Some elements of reading that have been drawn together will be hard to assess together – e.g. AO1 ‘interpret, understand and summarise texts’.
Overall, the AOs need to be thoroughly reviewed, and we would strongly recommend that they are reviewed by subject experts, to ensure they are fit for purpose for the new assessments.

There is a clear distinction between language and literature qualifications and both should be compulsory. Without such a requirement there is a risk that Literature becomes seen as unimportant and/or elitist leading to a loss of cultural influences.
English literature has an overly prescriptive and extensive reading list. There is too much emphasis on pre-20th century texts, and the omission of world literature, as well as a lack of contemporary texts, leaves the subject content skewed and unbalanced. In addition, world literature forms part of the KS3 curriculum, so it makes little sense to remove that connection and progression from KS3 to GCSE.

While we are pleased to see that elements of comparison have been relaxed from the previous draft criteria, we think that comparing unseen with known texts would be more appropriate than comparing unseen texts. Comparing unseen texts is very challenging.

Some of the phrasing is a cause for concern. How is a student supposed to appreciate ‘depth and power’? How would this be assessed?

As with English language, we feel the exclusion of digital texts is misguided. Not only do students often now read primary texts digitally, but secondary critical texts, and wider research, would almost always be accessed in digital form.

As for language we are concerned that the number of requirements in some AOs (for

example AO2 bullet point 4) is very heavy, and likely to be unworkable in the assessments. There are also some apparent errors, e.g.: AO3 Writing – a 'literary style' is not appropriate for writing an essay about literature.

The problems we have identified and addressed are exemplified and compounded in the AOs. AO1 is not rewarded in terms of unseen texts, and its call for 'understanding of a word, phase or sentence' seems to show a narrowness of approach and would imply assessment via short answer questions instead of longer answer questions. Our overall impression is that the standard has been lowered in some AOs, and is excessive in others, and as with English language, we would recommend a thorough review by subject experts.

1b Is **the relative weighting of the assessment objectives** right for English, which includes English literature and English language?

☐	Yes	✓	No	☐	Not Sure

In English language, there is an unhelpful distinction between reading comprehension and critical reading. The balance between reading and writing should be 50/50, and it seems very surprising that it should be otherwise. Spoken language must be weighted in order to ensure it has status as an important part of the English curriculum and assessment. It seems that AO1 is designed for assessment of non-fiction texts, while AO2 seems designed for literary texts. This is problematic because it makes the Language GCSE seem like a lower standard rather than having parity with the literature. While 'functional' literacy skills are important, the GCSE language should have parity in demand and status with GCSE literature. If the aim is to raise the ability of students who study English, why demote the qualification rather than raise its status? This view of how literature and language sit together is potentially divisive, with literature becoming increasingly elite. Additionally, it is important that if we are promoting evaluating 'usefulness and relevance of information' as a skill in the real world, it is mostly done online.

1c Has the **right practical content** for English language been identified to allow students to gain the skills to progress in the subject, beyond the content which can be examined externally and reliably included in the GCSE grade?

☐	Yes	✓	No	☐	Not Sure

We are glad that spoken language has been reinstated as part of the program of study. However, spoken language is significantly undervalued and represents a very narrow view of what speaking and listening is. See above.

1d Do the proposed subject content and assessment objectives for English, which includes English literature and English language, **provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately**?

We are concerned about transition issues throughout secondary English as the Key Stage 3 curriculum, GCSE subject content and A Level criteria are not being re-designed with reference to each other. It is essential that the KS4 programme of study / subject content is developed with reference to the primary and Key Stage 3 curriculum to ensure coherent progression.

1e Will the proposed qualifications in English, which includes English language and English literature, **secure sound progression for the purposes of further academic and vocational study**?

☐ Yes	☐ No	☒ Not Sure

By removing speaking and listening and the study of spoken language from the GCSE, the progression to A Level English Language has been reduced.

It is important that in the teaching of English students have the opportunity to study spoken language and have the opportunity to read whole texts widely, complete research and this should be included in any English teaching and learning programme.

There is a distinct risk that literature becomes an elitist qualification taken by the few with consequent reduction in the numbers reading for Literature degrees at university. The exclusion of non-British sources narrows the subject significantly.

2 Mathematics

2a Do **the proposed subject content and assessment objectives** for mathematics cover the appropriate knowledge and understanding for GCSEs in this subject?

☑ Yes	☐ No -insufficiently demanding	☐ No- overly demanding
☐ Not Sure		

General points

The document has odd spacing throughout, inconsistent spelling (eg modelling and modeling in the Assessment Objectives) and poor syntax (eg Ratio 8).

There seems to be a considerable mismatch between the subject aims, the subject content and the assessment objectives eg a key aim is 'students should be aware that mathematics can be used to develop models…'. Nowhere in the subject content is there any hint that students should engage in modelling, yet AO3 demands high-level modelling skills.

The subject aims and subject content seem to be written from a different perspective than the assessment objectives.

The content appears to have been arranged for non-overlapping tiers or core plus extension model rather than overlapping tiers. Content that is exclusively demanded from "higher achieving students" is shown in bold yet there is no identification of the content that would constitute the proposed overlap between tiers.

The statistics content ignores applications of statistical techniques which would be expected in the world beyond school.

Although the use of a calculator is clearly required in order to test some of the content, there is no indication of the expected requirement for the proportion of calculator/non-calculator assessment.

AO2 and AO3 are likely to require language demands beyond those possessed by weaker students.

General comments on the subject content

The subject content as written would allow awarding organisations the space to develop qualifications. However this is not detailed enough to meet the requirements of teachers when looking at a GCSE specification to set the parameters of what should be taught. Presumably awarding organisations will be allowed to state in their specifications the limitations as to what should be taught and will be assessed. Teachers would certainly expect to know how much is expected in topics such as

- Rationalise denominators (Number 4)
- Algebraic fractions (Algebra 2)
- Completing the square (Algebra 20)

- Use iterative processes (Ratio 8)
- Circle theorems (Geometry 15)
- Interpret and express trigonometric relationships algebraically and geometrically (Geometry 16)
- Sine rule (Geometry 17)
- Interpret risk through assigning values to outcomes (Probability 10)
- Calculate lines of best fit (Statistics 5).

Comments on specific aspects of the subject content

Number

The number strand should set out the expectation that students at Level 2 can work with real numbers of any size in any form (integer, positive, negative, decimal, fraction, surd, pi) and understand the relationships between numbers, variables, the number line and so on (specifying aspects such as multiplicative relationships and tests for divisibility etc., additive and proportional relationships, and so on). Number theory is included as a section in the KS3 programme and should be developed further here.

- 1: Formal written methods are unnecessary and irrelevant in some cases in this list. Why would anyone want a formal method for dividing decimals? Using a calculator and estimating the size of the answer is much more sensible and useful. For some students multiplication using a grid method is much more meaningful, and therefore memorable, than a formal written method.

- 3: How much of this is a non-calculator topic?

- 4: How much is expected of 'rationalise denominators'? AS students find some of this hard.

- 8: Is this a safe definition of percentage?

- 9:Would much prefer 'interpret fractions and percentages as numbers and as operators' So, a fifth is a number on the number line as well as an operator (find a fifth of…), and understanding both is important.

Topics missing from Number

- Mental arithmetic
- Use of calculator. This needs to be learned, and this should be specifically stated. Different models work in different ways, some don't follow BIDMAS, using them efficiently is a high- level skill and there are common misconceptions, particularly around division and squaring. Then there is the wider issue, hinted at in Number 10, of when to use a calculator and how to use it sensibly.
- Students choosing appropriate accuracy rather than being told it (higher topic only); very helpful for A Level.
- The NC framework contains the following for KS3 Computing "Understand and use binary digits, such as to be able to convert between binary and decimal and perform simple binary addition". A statement on binary arithmetic should therefore

have gone into the maths KS3 framework but either way this creates a strong case for including it in the GCSE Maths content.

Algebra

- 2: Algebraic fractions need some limits. Expanding three or more binomials seems to be beyond what should be expected at this level and should appear in bold as should factorising quadratic expressions.

- 3: The distinction between argument and proof needs to be made absolutely clear if one is to be bold and the other not.

- 4: 'solve the formula' seems inappropriate, 'evaluate' might be better terminology.

- 5: Function notation is tricky, should be non-bold, as it may be needed for Algebra 7 (inverses of familiar one-to-one functions), though this needs clarification. It may be worthwhile if there is to be a little more on transformations of graphs eg graphs like $y = 4\sin(30x) + 5$ to model height of tide, but at the moment only $y = \sin x$ is to be drawn and only translations and reflections are to be sketched, apparently without the link to the equation of the graph.

- 7: Is the implication that the reciprocal and squaring functions are one-to-one, which is not true unless the domain is stated/restricted, i.e. for the reciprocal x cannot be zero and for squaring the domain must be restricted so that positive and negative x values are not both included.

- 9: Suggest 'apply and interpret $y = mx + c$ form'.

- 10: The statement 'Deduce and apply equivalence' is not clear in terms of expectations

- 11: Are the limitations in 11 (to reciprocal, exponential and trigonometric) meant to apply also in Algebra 10?

- 12: Presumably this means '... of the graph of a given function'?

- 15: Suggest 'linear, **quadratic** and other simple algebraic expressions' to allow sequences such as: $\frac{1}{4}, \frac{3}{9}, \frac{5}{16}, \frac{7}{25} \ldots$ to be included with expressions such as $\frac{2n-1}{n^2}$.

- 16: Should "deduce the sum of an arithmetic series" be in bold?

- 18: Has 'construct linear equations in one variable', which is fine, but contradicted by Ratio 3 where constructing an equation for quantities that vary in direct (and inverse) proportion is bold. Ratio 3 should be amended so that constructing equations for direct proportion is not bold.

- 19~~,~~: Suggest "identify and interpret gradients and intercepts of the graphs of linear

functions".

- 21: Do functions have intercepts? Not sure what interpreting the gradient of a quadratic function graphically (sic) means.

- 22:"trial and improvement" ought to be non-bold; it can be made 'easy' or 'hard' depending on the intention and is a useful skill in numerate subjects post-GCSE and in the workplace.

- 23:This could be made non-bold, since solving a quadratic by factorisation and rearranging algebraic formulae already are – so it would be possible to create a simple example of solving linear and quadratic simultaneous equations (where factorising was involved).

- 24: "…. in set notation…" seems strange here. Does it mean union and intersection to describe more precisely the solution sets to quadratic inequalities (they are not needed for probability according to formula sheet)? As in the KS3 programme, clarification that the required notation is, for open and closed intervals, $x \in (a,b)$ should be included.

- 25: Exponential and reciprocal graphs are in KS3, but in bold here. Perhaps this should not be in the KS3 PoS or Reciprocals should be non-bold throughout (as inverse proportion is, for example). Contextual graphs should have quadratics included and could also have trigonometric graphs included (e.g. tidal heights).

- 27:This statement will need to be consistent with the view, taken in Algebra 5 and Algebra 7, of whether function notation is bold or not. At the moment this is inconsistent with Algebra 5.

Topics missing from Algebra

- Specific mention of priority of operations in algebra – it is mentioned separately in the KS3 PoS.
- Function notation and transformations of graphs need looking at together. In particular which trigonometric graphs will be drawn.
- Interpreting graphs of real situations, which are not necessarily given algebraically, would be helpful. Eureka (bath level) graphs, graphs of a race and others in financial contexts, are the sort of thing that should be included. This kind of understanding, including an intuitive idea of what the gradient of a curve tells you in context, is important.

Ratio, proportion and rates of change

- 1: Sometimes in triangle work having 1: $\sqrt{2}$ is a useful ratio, as is 1:π in circle work.

- 3: Include 'proportional to square, cube and inverse square' here, in bold. This is not specifically taught in A Level maths, but is assumed at different places. Also,"construct" may not need to be bold; some examples of this will be accessible to all students.

- 4: Include ‘proportional to square, cube’ here, in bold.

- 5: Wording here is not helpful. KS3 PoS has it better. ‘apply compound units such as speed, …’

- 6: Does this include estimating the gradient using a tangent, or just understanding that “steeper equals faster growth”? This is a big idea, and could be badly taught. Much better to leave this to AS. Keep interpreting gradient of piece-wise linear graphs in kinematics and finance, and an intuitive idea of speed represented by steepness of (curved) distance-time graph. This seems to expect that the concept can be divorced from contexts, so is particularly hard and unnecessary.

- 7: “Repeated growth” is not bold here, but compound interest is bold, as is repeated percentage change, in Number 8. Consistency is required; we believe all such statements should not be bold. Understanding these ideas is crucial for basic financial literacy, amongst other things.

- 8: Strange syntax. Does it need a comma after ‘interest’? Compound interest is currently in bold. However, one of the most common misconceptions about credit cards and overdrafts is that simple interest is applied. This should be expected of all students to help them to learn how debts and savings accumulate through time.

- 9: “rates of change” should certainly be in bold or possibly omitted altogether.

Topics missing from Ratio, proportion and rates of change

- More work on proportionality. See 3 above.

<u>Geometry and measures</u>

- 2: Is it really the intention that students should ‘derive’ a formula to calculate the surface area and volume of a sphere? – Perfectly good ones already exist, students should know when and how to use them and the derivations are beyond GCSE. Certainly some of this content needs to be in bold as composite solids could include frustums. Cylinders and pyramids are included here, but not on the list of formulae, clarity over what should be applied and what should be derived is necessary.

- 4: Are ‘sketch’ and ‘describe’ the correct verbs for ‘points, lines, planes, vertices’ ?

- 5: should perpendicular (line segment) bisector be included in this list? In what way is ‘draw’ different from ‘construct using mathematical tools’? If the intention is that students should produce formal constructions it needs to say so explicitly.

- 6: In what way should students ‘construct’? Would ‘Draw accurately’ be a better descriptor of what is expected? Are plans, elevations, cross-sections, isometric and perspective drawings included?

- 9: What does ‘construct’ mean here? Why is this requirement limited to coordinate axes? Transformations in a tessellation, for example, would be just as valid.

- 12:This statement needs to be expanded to make it clear that students are required to prove that two triangles are congruent using the standard conditions, and understand the ambiguous ASS case.

- 15: There is an extensive list of theorems that could satisfy this requirement, some specification would seem appropriate particularly as the demand is to both 'apply' and also to 'prove'. The requirement to prove the circle theorems using other "axioms" makes the topic conceptually messy. We do support the idea of teaching these proofs in the classroom, which would give students a model of how a proof looks and works, but in an examination, it would be reduced to a memorisation of steps which is much less worthwhile.

- 17: Needs to be explicit about the distinction between trigonometry of angles less than 90, those in a right angled triangle and angles greater than 90, needed for the sine and cosine rules and for trigonometric graphs; the latter should be in bold. Expecting students to understand a proof of Pythagoras' theorem may equally be useful as it does not require all the supporting axioms that the circle theorems do. It is also one of the most powerful results used in secondary mathematics and it would consequently be a good vehicle to use to demonstrate the importance of proof.

- 20: Is this content limited to 2D? If not, then 3D should be in bold. Vector methods (construct geometric arguments and proofs) tend to be used in a disconnected "algebraic" sense at this level, manipulating symbols until the desired result is obtained. The sense that a vector represents a movement of a given direction and distance does not come through strongly enough when these proofs are the focus, and this can subsequently cause conceptual problems at A Level.

- 21: We welcome the inclusion of invariances of transformations but wonder what 'changes' mean in this context.

Topics missing from Geometry and measures

- Need to be clear about trigonometric ratios beyond 90 degrees, which are needed for sine and cosine rules and for trigonometric graphs.
- Definitions of transformations. The effect of transformations seems to be covered, but not the definitions eg that you need to state a centre, an angle and a direction to define a rotation. It is particularly important that invariance is included.

<u>Probability</u>

- 6: 'Sample spaces' is the language used in KS3 PoS rather than 'possibility spaces', should there be consistency?

- 7: Presumably '….including using tree diagrams….' Use 'understand' rather than 'know'.

- 9:Should this be in bold? The generality of the language suggests something well

beyond GCSE.

- 10: Very hard to know whether this is potentially a very big or a small topic. Further explanation would be useful.

Statistics

- 1: Two-way tables are a useful way of summarising collected data and should be included.

  2, 3, 4,:In non-bold text, no representations of grouped discrete data or continuous data are expected in 2 and 3, but they are in 4. It is also unclear whether the requirement to calculate a mean of grouped data lies within the requirements for all students.

- 3: In order to allow for other diagrams, replace "i.e." with "e.g." This statement should be non-bold as it should be covered by all students in some way.

- 5, In what way should lines of best fit be calculated? No formula is provided either to be memorised or to be provided in the formula list in Appendix A. If the intention is that students should work out the equation of a trend line drawn by eye it should be noted that finding the equation of a straight line from gradient plus point, or two points, is not explicitly mentioned elsewhere.

Topics missing from Statistics

- See comments above about real world contexts and problem-solving.
- It is reasonable that there should be strict limits on the type of diagrams that students should have to draw by hand, but they should equally be expected to interpret more sophisticated diagrams. Misleading diagrams should be included.
- Correlation and cause should be explicitly included in statistics 5; students will have met these ideas in year 9 geography, sometimes in a misleading way.

Assessment objectives

We generally support the intentions of these new assessment objectives. They attempt to set out how the assessment of the course will look in order to meet the stated aims of mathematical fluency, communication, reasoning and problem solving.

AO1 – This assessment objective is highly appropriate and, for the most part, clearly expressed. We question however the use of 'especially in relation to algebra and number' as this implies that less precision is acceptable in geometry and statistics.
Presumably the recall of mathematical knowledge includes the requirement to remember formulae? We would prefer to test students' ability to use these formulae, not just recall them and consequently would support the idea of providing formulae and expecting students to have a clear understanding of where and how to use them.

AO2 – We would prefer the wording to be changed from "reason and communicate … when developing a mathematical argument" to "reason and communicate mathematically." We feel that there is scope for clarification over the difference between reasoning explicitly in AO2 and implicitly in AO3. It is tricky to try to separate constructing arguments from

problem solving. There is a very large crossover here and the AOs may encourage an unnatural division between the two. It may be clearer to ensure that the focus of AO2 is on reasoning and communication and AO3 is on the heuristics of problem solving, finding an answer, strategic/investigative approaches, modelling a problem etc.

We find the mention of "correct grammar" within AO2 vague – surely the intention is simply to expect that students can communicate mathematical ideas accurately using appropriate terminology and representation (algebraic, graphical, symbolic, etc.).

Although we welcome the requirement to "construct substantial chains of reasoning …." The use of "… especially with algebra", which gives due emphasis to the manipulations required in higher level algebra, implies that reasoning in other aspects of mathematics is less important.

AO3 – We welcome the inclusion of problem solving skills within the subject criteria. However, we feel that this assessment objective would be clearer if references to "problems" themselves are removed or reduced, and the assessment objective re-worded to focus instead on the approaches and heuristics involved in tackling such problems. The term "non-routine" is too subjective and should be removed. Similarly "… not immediately evident" is not helpful. It asks the question 'how long should one wait for it to become evident?' and this poses significant issues when constructing time-bound written examinations.

"Solve real world modelling problems that are less well defined …." implies that all real world problems have specific solutions, which is not the case, and begs the question 'less well defined than what?'.

The phrases "….across content domains" and "….between different parts of mathematics" pose very similar concerns. We suggest altering the latter to "linking mathematical ideas," as often strategies may use more than one idea from the same content domain, eg two ideas from mensuration.

AO3 could be re-worded to read:
Apply mathematical knowledge and reasoning to

- devise and test strategies and potential solution pathways, revising them where appropriate
- use and apply concepts and procedures from within and across content domains
- make connections and link mathematical ideas
- solve real world tasks making assumptions and simplifications
- identify variables and construct relationships
- formulate, solve, interpret and check for reasonableness.

<u>Formulae</u>
It appears that students will be required to memorise 16 specific formulae yet will be given others. Some of the formulae to be remembered relate to content in bold text which is designated specifically for 'higher achieving' students and consequently the requirement on all students to remember these formulae appears misguided. We would prefer to test

students' ability to use these formulae, not just recall them and consequently would support the idea of providing formulae and expecting students to have a clear understanding of where and how to use them. Students at this level are better off working in broad conceptual terms with compound interest formula and the probability formulae, provision of these formulae is unnecessary.

2b Is **the relative weighting of the assessment objectives** right for mathematics?

☐	Yes	☐	No	☑	Not Sure

It is difficult to envisage how AO3 aspect might be taught/assessed without AO2, or indeed AO1, being an integral part of the work. To this extent, the requirement that at least 40% of the AO1 marks must be subsumed within AO2 and/or AO3 questions is reasonable but may not be necessary. The range attributed to the weightings for each assessment objective is appropriate.

One issue, which may fall under the regulator's remit rather than the scope of this consultation, is that the assessment objectives all need to be targeted by questions of different levels of mathematical demand, so that students of all abilities will tackle a range of question types. It should not be the case that AO1 tasks always use 'easier' mathematics and AO2 and AO3 tasks always use 'harder' mathematics or vice versa.

We are also unsure if the proportion of assessment with and without a calculator is to be specified (e.g. a range given) or if awarding bodies will be free to decide this.

Given that mathematics GCSE is likely to include tiers, which will each have differing grade ranges and differing content there may be a case to be made for the lower tier having different assessment objective weightings from the upper tier.

2c Has the right content for mathematics been identified for high achievers, **including those going on to study A levels** in science, technology, engineering and/or mathematics (STEM)?

☐	Yes	☐	No	☑	Not Sure

It is not possible to answer this satisfactorily until there is certainty about what the core content of the revised A Level Mathematics qualifications will include. The content specified for GCSE is sufficiently challenging for the majority.

Some of the content changes proposed for the GCSE may also help progression:

- Introduction of functions and pre-calculus is helpful
- Kinematics, however, is rather narrow in terms of progression. Linear programming would be a more widely applicable use of algebra and graphs (and also modelling)
- There are also some increases in algebraic demand, e.g. quadratic sequences and inequalities, expanding multiple binomials.

Given that the GCSE content described is appropriate there is a crucial decision which needs to be taken to aid progression to AS/A Level Maths:

AS/A Level Mathematics needs to continue to include what is currently "AS level material" within its revised assessment model. This is in order to continue to encourage the teaching and consolidation of this content in Y12, so that students can begin the A2 content from a stronger, and more even, starting point. In addition this will continue to make the assessment accessible to the D-E grade A Level candidates who currently get most of their uniform marks from C1 and C2.

2d Do the proposed subject content and assessment objectives for mathematics provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately**?

✓	Yes		No		Not Sure

We think that, for synopticity, the GCSE syllabus should state that the whole of the KS3 content is assumed knowledge at Level 2, and could be used/tested in questions set on the GCSE content. The aims and assessment objectives clearly progress from the skills developed in previous key stages, improving on levels of fluency, reasoning and so on, with one exception – the appropriate use of technology. The aims and assessment objectives in the GCSE should highlight the expectation that students who reach the required standard in GCSE Mathematics will be able to use a calculator effectively and in a more sophisticated way than in KS3.

The number strand should state the expectation that students can deal with real numbers of any size in any form (integer, positive, negative, decimal, fraction, surd, pi, etc.) and understand the relationships between numbers and variables (multiplicative/divisibility, additive, proportional relationships for example); careful comparison with the KS3 number section is needed. As calculating percentage changes multiplicatively is included at KS3, repeated percentage change and compound interest should not be bold in KS4.

Algebra seems pretty well developed from KS3. However, we are a little concerned that work on functions starts from scratch without foundation in KS3; schools will need to be made aware of this.

The graph work represents a reasonable step up from KS3. Velocity/time graphs will represent a challenge but provide a useful context for the highest-achieving students to investigate rates of change and the connection between a graph, its gradient and the area underneath it. Distance/time graphs are not explicitly mentioned in KS3 despite the explicit mention of velocity/time graph in the GCSE. In order to ensure that distance/time graphs are given sufficient treatment, they should also be added to the GCSE content.

Also in graphs, we would welcome the addition of basic linear programming as a specified item of content. As the criteria stand, students could be required to form their own inequalities from contextual information, draw and shade the graphs of these, and then interpret the solution set in the context of the original problem. Hence, so many of the 'ingredients' of linear programming are included that it should be stated explicitly to clarify this for teachers. Linear programming is also a very useful topic through which to test AO3 modelling skills.

In KS3 geometry, students are required to identify congruent triangles but this is not developed in the GCSE: it should require students to prove that two triangles are congruent using the standard congruency conditions, and know that two triangles which have common ASS may be different, or may be congruent. KS3 requires students to solve spatial problems on coordinate grids, but the GCSE is relatively lacking in coordinate geometry – for example the distance from a point to a line and dividing a line segment in a given ratio. There is little, if any, reference to technology eg manual constructions are listed but drawing packages are ignored.

Key Stage 3 includes aspects of modelling, the proposed content for GCSE does not.

2e Will the proposed qualifications in mathematics secure **sound progression for the purposes of further academic and vocational study**?

☑ Yes	☐ No	☐ Not Sure

It is not the case that the proposals themselves will 'secure' progression - high -quality teaching is a key factor. The treatment of statistics within these criteria is not amenable to the wider use of statistics in the 'real' world. The teaching of problem solving skills will likely require significant teaching input and consequently reduce the time available for covering content which is potentially extensive. It is vital that young people have a good understanding how to use calculators and technology in further study, their work and more generally as a crucial life skill. It is therefore somewhat surprising that there is no mention of calculator use in the aims, content or assessment objectives. This is in notable contrast to the KS3 programme which explicitly requires students to be able to use a calculator to be able to find solutions accurately and check them.

3 Science, including biology, chemistry, physics and combined science

3a Do **the proposed subject content and assessment objectives** for science, which includes biology, chemistry, physics and combined science, cover the appropriate knowledge and understanding for GCSEs in these subjects?

✓ Yes	No -insufficiently demanding	No- overly demanding
Not Sure		

For ease of use we have added reference numbers to all the draft criteria statements in the accompanying spreadsheet (OCR-consultation-criteria-feedback-v1) with detailed feedback across the criteria statements for each science. Some specific science examples are highlighted in the relevant sections below [3(a)–(f)] where appropriate but please also refer to our separate spreadsheet.

1. Assessment objectives

a) AO1

The final bullet (7. Working safely in a scientific context) overlaps with AO4 (3. Work with due regard for safety, managing risks).

b) AO2

AO2 is, we feel, an improvement over previous assessment objectives and will allow awarding organisations to more clearly distinguish between AO1 and AO2. There is a lot of content specified within the criteria for all of the sciences, which raises concerns around how workable teaching programmes could be developed to teach the content within the available time. Given the depth required by many of the criteria statements and the underpinning knowledge and understanding required, this approach may not leave a lot of time for developing AO3 and AO4 skills.

AO2 includes two references to 'verbal' rather than written form, we assume this is a typographical error rather than an expectation to assess verbal contributions from candidates?

1. Extract data relevant to a particular context from information presented in verbal, diagrammatic, graphical, symbolic or numerical form

9. Communicate scientific observations, ideas, arguments and conclusions logically, concisely in verbal, diagrammatic, graphical, numerical and symbolic form

We are concerned that inclusion of the statement:

6. Apply a knowledge of sampling techniques to ensure any samples collected are representative of the whole population

does not equally apply to all sciences, as it would have to in order to be a part of AO2, and potentially will lead to predictable questions if it has to be assessed every series. This may be a more appropriate statement to include as part of the content statements for the appropriate sciences.

c) AO4

See our feedback in Question 3b. The requirement to '…*report on*…' investigations does not seem to apply to AO4 as this is an indirect form of assessment,

5. Carry out and report on investigations or parts of investigations

2. Separate versus combined sciences

The extra content for separate sciences should ideally be an extension of the combined science content rather than 'nested' within content. Where content is nested, it is difficult to make the distinction between the two specifications, which is awkward for both teaching and assessment. For example, from Biology [1.3(a)]:

recognise *[describe] the function of stem cells in embryonic and adult animals and meristems in plants*

is both not helpful and somewhat confusing. Similarly from Physics [1.4(b)]:

explain that when energy is transferred by heating, the energy will inevitably end up being stored in a less useful, often unrecoverable, way ***after the process – because it is, in some sense, less concentrated, and similarly*** *explain that mechanical processes become wasteful when they cause a rise in temperature so dissipating energy in heating the surroundings, or when they do electrical work against resistance of connecting wires*

It is important that combined science is at exactly the same level of demand as each of the separate sciences (they are both GCSEs) which will be difficult to ensure if some of the more conceptually difficult aspects are removed. For example, from the maths requirements for biology [6.3(d)]:

understand and use inverse proportion, the inverse square law and light intensity in the context of factors affecting photosynthesis

This should surely be appropriate for combined science as well, so we question why this is in bold.

Chemistry has, in many instances, used discrete topics for the extra content for separate sciences. It is a lot easier to see how this could be incorporated into teaching models than for the approaches in biology and physics. For instance, Chemical and allied industries

[8.1(a)–(e)] is selected as a discrete topic for separate chemistry as is Causes of corrosion and their mitigation (8.6).

3. Command words

Incorporation of command words into the criteria is a departure from standard practices for England and runs a serious risk of limiting the assessment possibilities. This approach needs considering carefully in light of the DfE's published desire to develop assessments '…*requiring less predictable assessments and less scaffolding*…' (Letter from Michael Gove to Glenys Stacey, 6 February 2013).

If an approach for criteria development using command words is retained, care needs to be taken that the variety of command word usage reflects the proposed weightings across AO1 and AO2. Any use of the word 'State' for instance could only be assessed in an AO1 context. it also needs to be clear for awarding organisations whether there is any flexibility around command words, e.g. do the stated command words always have to be used in the specification of can learning outcomes that go beyond the criteria statements use a different command word.

Command words that make it hard to define what is to be assessed, e.g. 'Appreciate', and could leave assessments open to challenge from centres should not be used. We would strongly recommend that command words are not included in the criteria to allow greater flexibility and greater unpredictability in what can be assessed.

There is an imbalance in the use of command words across the different sciences, for example the use of 'explain' statements in physics compared to biology and chemistry. Several of the physics 'explain' statements are really calling for recall or application. The phrase is not used consistently across subjects – chemistry, for example, uses 'Explain ... in terms of ...' which if applied to the physics (and biology) would help to establish a consistent use of the term.

Also in relation to command words (and assessment objectives) we would strongly recommend that Ofqual and DfE have joint discussions over usage as this has been an area which has historically led to complications with accreditation.

4. Use of mathematics

To create a good assessment, freedom is needed to assess maths in appropriate contexts throughout the content rather than necessarily being restricted to where mathematical skills are currently cited within the draft criteria. We recommend that the guidance within the criteria should allow for mathematical skills to be assessed anywhere within the content if the context is appropriate. for instance, in biology [5.1(a)],

translate information between numerical and graphical forms

or biology [2.4(d)]

plot, draw and interpret appropriate graphs.

This could easily apply to many sections of the biology content and we would not wish the future assessment to be limited in this respect.

Similarly for chemistry, the **Use of mathematics** terms,

7.9(c) – *Change the subject of a mathematical equation*

and

7.9(d) – *Provide answers to an appropriate number of significant figures*

apply much more widely than the section in which they are cited and the criteria needs to be absolutely clear that assessment of the indicated mathematics is not restricted just to that section.

3b Is **the relative weighting of the assessment objectives** right for sciences, which includes biology, chemistry, physics and combined science?

✓	Yes		No		Not Sure

1. Weightings

AO2 is large, but it does now extend to a wide range of skills, particularly since it now includes the statement:

- *Communicate scientific observations, ideas and arguments and conclusions logically, concisely in verbal, diagrammatic, graphical, numerical and symbolic form*

which previously was mainly encompassed within AO1. The detailed representation of each AO is helpful, but we presume that every aspect of AO2 may not equally apply to all the sciences, for example:

- *apply a knowledge of sampling techniques to ensure any samples collected are representative of the whole population*

is appropriate for biology, but not physics (see Question 3a response). We also presume, that since the assessment is terminal, the AO targets apply to the specification as a whole, and that awarding organisations have the flexibility to decide how to weight these in any individual assessment unit.

Given the extensive requirements for AO3 we would recommend that the weighting here could be higher than 10% (possibly with a slight lowering of AO2 to compensate).

2. Combined versus separate sciences

The draft criteria and published AO weightings need to allow awarding organisations to develop four qualifications: combined science, chemistry, biology and physics. With no ranges allowed for weightings this is very difficult to deliver without unusual mark totals for assessments. Ranges have historically been given for each AO to allow workable assessment models to be developed across both routes and we would strongly recommend they are allowed within the draft criteria. The draft mathematics criteria includes a range of 5% which would be sufficient to allow workable assessment models to be developed for science.

3. AO4

We have concerns that the 10% weighting applied to the **direct** assessment of experimental skills and methods (AO4) may not provide reliable, discriminatory outcomes for this aspect, i.e. it is unlikely that there will be a significant differentiation across candidates for this component of the assessment.

Candidates will only perform well in AO3 if they are familiar with carrying out practical investigations and handling relevant apparatus safely. Precise requirements could be detailed within the specification. AO4 is essentially an implementing/manipulating skill and it will be very difficult to achieve significant differentiation across candidates. As stated in our meeting with the DfE on 26 March we consider that 100% external assessment is achievable for science. Based on the experience of Cambridge Assessment working on IGCSEs we believe this could be done in a way that would genuinely encourage the widest variety of practical experience and allow students to engage in frequent practical work, fostering their scientific curiosity by means of experiments, investigations and field work and developing their skills in the use of standard laboratory equipment and in handling data. The recent SCORE report on resourcing of practical science in schools has highlighted that despite a background of using assessment to try and drive practical work within centres, there has been a decline in practical science facilities in schools – clearly channels other than assessment need to be explored to drive best practice within centres.

We note that different approaches have been suggested for non-exam assessment in English (separate endorsed grade not counting towards the assessment) and geography (requirement for the head of centre to confirm that fieldwork has been carried out). If AO4 is to be retained we would strongly recommend that an approach similar to English (i.e. separate endorsement) will avoid the unintended consequences that the current arrangement could potentially lead to, viz a significant proportion of candidates receiving very high marks and AO4 essentially driving other aspects of the assessment. If this approach, separate endorsement, was taken, the 10% weighting for AO4 could be spread across AO3 and AO1 as appropriate.

Additionally, from discussions between Ofqual and awarding organisations on 29 July there are clearly significant concerns around how any approach to internal assessment can genuinely limit potential for malpractice and we would strongly recommend that any element of non-exam assessment in a high stakes qualification such as science should be avoided.

3c Has the right **practical content** for science been identified to allow students to gain the skills to progress in the subject?

☐	Yes	☐	No	✓	Not Sure

Whilst the draft content allows for the identification of a range of practical activities they are not fully identified within the criteria document itself and it is not clear what purpose the 'Working scientifically' section is intended to perform. Should all statements in sections 1 to 4 (Development of scientific thinking; Experimental skills and strategies; Analysis and evaluation; Units, symbols and nomenclature) be assessed in every series or is this guidance around how content should be taught? This aspect needs clarification to ensure consistency between awarding organisations.

There are a number of errors in the 'Working Scientifically' section:

- Incorrect units are shown in section 4: should be kJ and J;
- The 'Periodic Table' in section 1 is more logically relevant for just chemistry (rather than physics as well);

In the 'Units' section:

- The units for Dose Equivalent should be Sv, not SV.

Within section 4 of Working scientifically, it would be more useful to clarify that SI units and IUPAC nomenclature are used where appropriate. This widens assessment possibilities and allows for the reality that science does not always follow these conventions.

use SI units (e.g. kg, g, mg; km, m, mm; kj, j) and IUPAC chemical nomenclature where appropriate

To ensure comparability between awarding organisations we recommend that a list of the minimum practical skills for each science is defined.

3d Do the proposed subject content and assessment objectives for sciences, which includes biology, chemistry, physics and combined science, provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately**?

✓	Yes		No		Not Sure

Comments:

3e Will the proposed qualifications in sciences, which includes biology, chemistry, physics and combined science, secure **sound progression for the purposes of further academic and vocational study**?

✓	Yes		No		Not Sure

Work will need to be done on the GCE Biology criteria to make sure the material that is now being taught at GCSE is not repeated, but built upon.

3f **Will the combined science double award provide students with a sufficiently secure basis for progression** to A level study of each of biology, chemistry and physics?

☐	Yes	☐	No	✓	Not Sure

See comments in Question 3a. It is important that the sections in **bold** are recognised as purely extension material rather than conceptually more difficult material, otherwise the combined science specification will be seen as a 'poor cousin' to the separate sciences, and therefore judged as an inferior route for progression to A Level study. At present, a good proportion of the bold content represents more demanding material, so this aspect needs to be addressed.

Without clarification on how tiering will be resolved within the new GCSEs it is hard to answer this question. Several approaches are possible:

1 Content is the same for Higher and Foundation with the Higher tier involving more challenging questions of the same material. The draft criteria appear very challenging so it is hard to see that this option would be a realistic route to tiering.

2 The Foundation tier content is a sub-set of the Higher tier material (as in current GCSEs). In this case how will this be defined in the criteria? Will awarding organisations be asked to define this (as is done currently) or will DfE redraft the criteria with higher tier content identified (is there sufficient time for this approach)?.

3 The Foundation tier is completely different content. This option seriously restricts candidate choice and teaching approaches.

The approach to tiering needs to be clear before assessments can be developed. The tiering approach should also consider whether Appendix 1 of the criteria (Equations in physics) would allow for more equations to be supplied to Foundation tier candidates than currently specified.

Do any of the proposals have potential to have a **disproportionate impact, positive or negative, on specific pupil groups**, in particular the 'protected characteristic' groups? (The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation); if they have potential for an adverse impact, how can we reduce this?

	Yes - Positive impact		Yes - Negative impact		No
	Not Sure				

Have you any further comments?

We have added reference numbers to all the draft criteria statements in the accompanying spreadsheet (OCR-consultation-criteria-feedback-v1) with detailed feedback across the criteria statements for each science. Some specific science examples are highlighted in the relevant sections above [3(a)–(f)] where appropriate but please also refer to our separate spreadsheet for fuller feedback on the criteria. This feedback has been shared with Rebecca Rylatt at DfE.

4 Geography

4a Do **the proposed subject content and assessment objectives** for geography cover the appropriate knowledge and understanding for GCSEs in this subject?

☐ Yes	☐ No -insufficiently demanding	☐ No- overly demanding
☑ Not Sure		

We cannot see the point of having so much detail in the AOs. This is very different from other subjects e.g. history. It appears that much of what is in the AOs is actually specification content. It is unclear why the AOs have been changed so much – a clarification as to the intended purpose of this would be helpful.

The level of detail included is very prescriptive (for example to the point of stating how many case studies should be chosen) and thus it is difficult to understand how awarding organisations s will be able to offer GCSE specifications that have any variation. Having just two cases will tend to lead to predictability in assessment. In terms of OCR, our current specifications will not be able to be 'shoe-horned' to fit and it is hard to see how both specifications and the option of two different specifications could be possible.

The inclusion of 'e.g. and such as' statements are unhelpful Are they the only examples to be studied? Do the specified examples have to be included in the GCSE specification? Or are they the most important ones? The subject content would be clear enough without these.

The AOs contain reference to projecting into the future but this is not picked up e.g. in physical geography content, so this seems discontinuous.

AO2 specifies interrelationships but the content arrangement reinforces a separation between human and physical geography.

Terminology such as BRIC will quickly become outdated.

Whilst it is encouraging to see more emphasis on physical geography and inclusion of place and locational knowledge as has been recommended by HE and learned bodies, there are certain omissions from the current criteria. There is no direct reference to 'values' in the People and Environment section. There is no appreciation of the impact of climate change on the future, just how climate change has come about over the past two million years to the present day! There is no re-visiting of tectonics.

4b Is **the relative weighting of the assessment objectives** right for geography?

☐ Yes	☐ No	☑ Not Sure

There is an increased weighting towards knowledge rather than skills. However the skills taught by geography are highly transferable and are often the reason students study the subject at university. AO1 appears to have been split up to now create AO1(knowledge) and AO2 (understanding) – the minimum combined weighting of these is 40% - in the old criteria AO1 (Knowledge and understanding) had a maximum weighting of 40%. It is disappointing to see that the weighting on skills (new AO3) has been reduced to 20-30% from 30-40%. There is a danger that specifications could become very content heavy, and although knowledge is important, the skills should be of equal importance (particularly as these are the areas that learned bodies and HE have stressed are so important for students). Many of these skills are transferable and are essential for progression into employment and further education.

The ranges within the AOs are useful and give some flexibility in design of assessment. The range suggested for the weightings of 10% would be appropriate and would allow AOs some flexibility when designing specifications, but would guard against fundamental differences in the approaches taken to GCSEs in Geography.

The AO4 focus on application is useful, but it sounds as if this is restricted to certain types of questions. Is this correct? Clarification on this point would be useful.

The amount of text within each AO is over-complicated and potentially confusing.

4c We are working on options to ensure that fieldwork takes place. One option might be a letter, submitted to AOs and signed by the head teacher and head of geography, which states that fieldwork has taken place beyond the classroom and school grounds. Do you think this would be **an effective measure to demonstrate that fieldwork has taken place beyond the classroom and school grounds?**

☐	Yes	✓	No	☐	Not Sure

A letter would not ensure the right kind of/comparable fieldwork had taken place across centres. Schools with pressured curriculum time will inevitably squeeze fieldwork. The situation is open to malpractice. We should look at other ways of ensuring geography fieldwork is carried out as part of the teaching and learning programme

If concerns are that internal assessment has risks associated with issues of malpractice on the part of teachers, then these risks will surely remain if teachers are asked to sign a letter stating they have taken students out on fieldwork visits. It will provide no guarantee that this activity has taken place and does not assess the skills demonstrated by students while conducting fieldwork.

If assessment of fieldwork is to be conducted through an external examination it is difficult to see how this will be an effective method of assessment of these skills. As proved in the case of GCE Geography external examinations do not assess fieldwork skills effectively and have been heavily criticised by learned bodies, HE and Ofqual. External assessments at GCE level led to predictable questions on the fieldwork process and can reward well-rehearsed responses. Research assessments with pre-release were also found to assess knowledge and quality of written communication rather than geographical skills.

4d Do the proposed subject content and assessment objectives for geography provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately**?

☐	Yes	☐	No	✓	Not Sure

It would build on the draft criteria Key Stage 3 National Curriculum as Key Stage 3 does clearly outline knowledge of physical geography, human geography and the environment. Therefore the sections in the draft GCSE subject content do logically follow on and extend this knowledge and understanding.

The draft criteria does however only state 'building on key stage 3 knowledge' under one subheading 'Location Knowledge' so therefore without stating this for other content areas, full assurance cannot be guaranteed that knowledge learnt at earlier key stages will be built upon. Would suggest that it is made equally as explicit under the other sub-headings where progression was expected.

Why are there no plate tectonics at KS4? – This is an example of an important subject which could be re-visited to increase depth of understanding.

4e Will the proposed qualifications in geography secure **sound progression for the purposes of further academic and vocational study**?

☐	Yes	✓	No	☐	Not Sure

Progression to GCE will depend crucially on where the GCE criteria end up

Research has shown that many of the skills that are required for post-16 academic study and for employment are lacking in students, such as research skills, independent learning, problem solving, critical thinking and analysis. The study of geography is able to provide students with many of these skills if assessed in an appropriate way. Therefore the same concerns regarding the assessment of fieldwork exist in relation to this issue, that many skills that would be required for further academic study cannot be effectively assessed through an external examination. The reduced emphasis on skills will be hampering for vocational uses e.g. surveying.

Our own HE research has strongly advocated the need for geography students to undertake fieldwork and has highlighted that these skills cannot be appropriately assessed through an external examination. Therefore the draft criteria cannot guarantee a sound progression.

The lack of interaction between physical and human is an issue for further academic study and the workplace where this approach is highly valued.

5 History

5a Do **the proposed subject content and assessment objectives** for history cover the appropriate knowledge and understanding for GCSEs in this subject?

☐ Yes	☐ No -insufficiently demanding	☐ No- overly demanding
☑ Not Sure		

Overarching comments

The continued absence of a fixed body of content is welcome, while the requirements to study different periods and types of history as set out in the Scope of Study are both workable (ie theoretically appropriate to GCSE level, even though representing a significant change for teachers) and useful in terms of addressing current criticisms of GCSE History content. **However, greater clarity over what is meant by certain terms is essential.** Most importantly, what is meant by a **'substantial and coherent element of history'?** Some definition or guidelines will be necessary to allow development to proceed towards early accreditation and to ensure a level playing field.

Greater clarity over the permissible types of terminal assessment would also be useful. For example, an open-book exam would potentially give credibility and purpose to the 'Investigation' (if assessed), and may also bring into play an element of the criteria that is currently optional – the 'Study of the historical environment'.

The requirement to study substantial and coherent elements of British and non-British history from different periods will represent a significant departure from current practice for many teachers, and while we do not think it inappropriate, with the comparative/thematic study ensuring chronological range, careful consideration should be given to whether it is really necessary. Arguably, a more coherent course could be constructed through the study of chronologically parallel but geographically disparate topics.

Detailed comments

Subject aims and learning outcomes:

- While these are clear and well-expressed, not all are necessarily measurable learning outcomes (especially the final bullet point on identity). Simply using the heading Subject Aims might be preferable.

Scope of study:

- Clarification is needed over whether the 40% British minimum for the qualification as a whole is necessary (ie can the thematic study contribute to the 40%)?

- A definition or some guidelines as to what constitutes 'substantial and coherent' is very important. Separating out this bullet point to clarify the role of the Depth Study would be useful.
- Regarding the periods: 1700 is a very early start date for Modern. The late 18th century might be better, or include a fourth period – the twentieth century. At present the dates are possibly restrictive.
- The study of the 'historic environment' is a welcome optional inclusion, but linking it to the depth study may be problematic (links could be rather contrived, and the possibilities will vary, significantly by region). It might be a more valid element of the scope of study if it stand-alone.
- A comparative **or** thematic study is potentially awkward: these could look very different. However, we welcome the flexibility that this provides, but further definition of 'comparative' would be welcome. Is there flexibility to start this element of the course before 500? Older history – eg Stone Age, Roman, Greek, Egyptian is currently adds a useful perspective to many SHP thematic studies; will this still be permitted?

Historical knowledge, understanding and method

- These seem more like learning outcomes, but, if not described as such, it is not entirely clear what the purpose of this section is. There is some duplication of the aims.
- The second bullet point refers to 'framing historical questions', but without a controlled assessment\coursework element this aspect may be difficult to ensure.
- The third bullet point refers to understanding connections 'between local, regional, national and international history; between cultural, economic, social, political, religious and military history'. This would benefit from an 'as appropriate' or similar, as it is unlikely that a topic will encompass all of these aspects.

Assessment objectives

- There is a strong case for merging AO1 and AO2, as it is difficult to see how objective AO2 could be demonstrated without the knowledge required in AO1. Doing so would also allow clearer mark schemes.
- Under AO3, 'as part of an historical enquiry' possibly does not add anything, and could be confusing. The terminology used in the first bullet point could be improved, eg by adopting that suggested for A Level - 'a range of appropriate source material (primary and/or contemporary to the period).'
- It would be useful to know if open-book exams could be considered. This would make assessment of the study of the historic environment for example easier to design, and would aid assessment of AO3 generally.

5b Is the **relative weighting of the assessment objectives** right for history?

✓	Yes		No		Not Sure

It is good that much of original AO wording has been retained, and if there is to be no controlled assessment then the reduction in weighting for AO3 does seem sensible. However, given the aims and learning outcomes which are largely focused on outcomes that would develop out of the skills for A02 and A03, the weighting suggested for A01 (30-40%) is perhaps a little high when compared with that suggested for A03 (20-30%). It would be better to have them all at 30 – 40. Overall, though, they are in the right general area.

5c Should students be encouraged, as part of their GCSE history studies, to undertake **a historical investigation that gives them the opportunity to conduct independent research into a historical issue, event or process of their choosing resulting in an extended essay? If so, how can this be achieved best?**

	Yes		No	x	Not Sure

A significant concern here is that a non-assessed, merely completed, Investigation could be meaningless and would not develop the skills highly prized in further study/the workplace.

Could an open book examination be used based on the investigation candidates have undertaken?

The suggestion seems to be that the completion or otherwise of this would be included on the candidate's certificate but that it should not contribute to the grade that they get for history. However, it is not clear how this would work – how would awarding bodies ensure that candidates actually had completed the project? Also, how would it be decided whether or not the project had been completed to an acceptable level to count as being completed?

5d Do the proposed subject content and assessment objectives for history provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately**?

✓	Yes		No		Not Sure

Given that the proposal was that the content for the earlier key stages would be covered chronologically from Key Stage 1 onwards, it will not provide as much of a foundation for GCSE study of some periods as for others. Earlier historical periods for example will only have been covered at primary school and necessarily in less depth than more recent history which will have been covered at secondary school (assuming that the proposals for National Curriculum for history go forward as proposed). There may therefore be more background teaching covered for some of the periods specified for study than for others. The historical scope of the content will ensure that a chronological range of periods previously studied will be built upon, which is an improvement on the current criteria which allow a GCSE to focus on, for example, only the modern period. It is not representative however in that it effectively precludes the inclusion of anything prior to AD 500.

5e Will the proposed qualifications in history secure **sound progression for the purposes of further academic and vocational study**, including encouragement of the ability to conduct independent study in the subject?

✓	Yes		No		Not Sure

The proposal will offer a sound foundation for study of history and other subjects at GCE level.

6 Modern and ancient languages

6a Do **the proposed subject content and assessment objectives** for modern and ancient languages cover the appropriate knowledge and understanding for GCSEs in these subjects?

☐ Yes	☐ No -insufficiently demanding	☑ No- overly demanding
☐ Not Sure		

Modern languages

We welcome the opening up of content and the move away from set phrases and rote learning, and the move away from a topic -based approach. We note that current GCSE specifications include vocabulary lists which are not mentioned in the consultation document though inclusion of these would have implications for content and topic areas. However it must be stated from the outset that it looks as though the content has been deliberately drafted to present the highest level of challenge possible (because this seems to be desired), but with no reflection on what is realistically possible in respect of known and accepted language learning processes and the cognitive development of learners, and the improvements that have been achieved in language teaching and learning over the last 35 years. Equally, there seems to have been no attention given to what will constitute assessment after GCSE or to what has really been happening in terms of take up of languages over time in the national context. Also, no account seems to have been taken of the timelines of the reforms to KS2, KS3 and now GCSE. If this reformed GCSE is for first time assessment in 2018, then the students taking that assessment will not have done the necessary prior learning at KS2 and KS3 which this assessment expects.

In **Contexts and Purposes**:

- Bullet point 2 is too wide ranging in its expectations that students will be able to use language with a variety of different audiences, including for personal, academic and employment-related. Personal and employment-related are sufficiently demanding in themselves.
- The expectation that it will be possible to reproduce recorded materials from authentic sources appropriate to this level in an examination is unrealistic. Any materials reproduced for an examination are de facto not authentic because of the adjustments that have to be made to make them appropriate for this level. Understanding authentic source material is a high- level skill; such material does not feature in any current GCSE and GCE examinations and never has featured in any GCSE (or previous equivalent) examinations. This statement seems to take no account of the high level of skill required to be able to understand foreign language material from authentic sources and the media, nor the difficulty in making authentic source material suitable for this level. A better phrasing of this intention would be '… and recorded material **based** on authentic sources (including from the media) adapted for this level'.
- In bullet point 5, what is the specified number of broad themes? Is it referring to the themes indicated in the following list? If it is, there is no need for 'a specified number of'. Also, why are both 'international' and 'global' used? They are

synonymous.

- Bullet point 6: it will be very difficult, if not impossible to get common guidelines that state clearly and in a straight forward way for users, what the criteria will be that determine an abridged or adapted literary text. The examples of texts given are too wide in range and too overly-demanding. It's clear even now that there will be reluctance to use the full range given in examinations because of perceived inherent levels of difficulty in some of them. This needs serious reconsideration.

Scope of study
Listening

- Bullet point 2: it will be very difficult to get agreement on and, therefore, a usable definition of 'normal' speed, thus making it difficult to achieve comparability across examinations. This would be better stated as: 'follow and understand clearly articulated standard speech, in familiar language across a range of specified contexts'.
- Bullet point 4: see above in respect of the concerns about 'authentic material'. In addition, there is too much expected demand here because of 'complex language' and 'more abstract material' together. It needs to be clear that a GCSE in a modern language is assessing linguistic skills. The ability to understand complex language is a sufficient challenge in itself at this level; it does not need to be made even more challenging by expecting students to understand abstract material in the modern language. Also, 'a wide range of relevant contemporary and cultural themes' suggests something very different to what was indicated in Contexts and purposes BP5. This BP would be better expressed after 'complex language' as: 'in a range of specified contexts'.
- Bullet point 5: this seems to contradict BP2; ie 'adapted and abridged, as appropriate' could mean adapted in terms of speed, which would not then be 'normal speed'. Also, the skill of summarising is a high- level linguistic skill – it is not appropriate at this level, but more appropriate to A Level. In addition, it is challenging enough to expect students at this level to draw conclusions – to then have an expectation that they will also evaluate what they have heard is overly-demanding.

Speaking

- Bullet point 4: it should be noted that even with prior learning at KS2 and KS3, it is unrealistic to expect students to be able to speak **completely** spontaneously in response to unexpected situations. This does not work in current assessments and has never worked in previous assessments. The concept of 'spontaneous' needs to be seriously reconsidered; it is perpetually listed as an expectation but is rarely achieved, even at A Level, and this derives from how learners learn a language and how their cognitive facilities develop. There needs to be an acknowledgement of what is realistically possible at this level, not persistence of an unobtainable aim. If students are able to successfully interact and communicate in a modern language in a range of contexts in the range of expected themes, then this is significant achievement in itself. After GCSE there could be the beginnings of an expectation of spontaneous communication.
- Bullet point 7: this seems unnecessary and excessive in demand given the previous BPs. In any case it is not clear what is meant by 'make more creative and complex use of the language'.

Reading

- Bullet point 2: the phrase 'using high frequency language' makes the expectations of levels of understanding very clear; this should be stated in the **Listening** also.
- Bullet point 4: same comment as for the **Listening**.
- Bullet point 5: see previous comments about texts.
- Bullet point 6: this is overloaded with demand, ie 'summarise, draw inferences in context and recognise implicit meaning' and is in part repetition of the expectations of BP2 and BP4.
- Why not 5 bullet points as for **Listening**?

Writing

- Bullet point 6: see comments under BP7 in **Speaking.**
- Bullet point 7: this expectation is unrealistic and completely unnecessary, given the expectations of BP2, BP3, BP4 and BP5. It is as though this has been introduced to make a GCSE in a modern language more demanding, but without any consideration given to the skill level needed or even the known difficulties in assessing this skill gained from past assessment experience.

Rubrics

- The expectation about rubrics in the assessed language and rubrics in English does not make sense and is inconsistent. When rubrics are in English, there is clarity and the purpose of the task assessed is clear. If it is thought that English rubrics are necessary for tasks that focus on assessing the candidate's understanding of the use of the language (grammatical and lexical knowledge), why should this be different for tasks that focus on candidates' understanding of the language. It makes more sense for all rubrics to be in English. Further, there is a potential **inequality** across qualifications in different languages if some, ie Mandarin Chinese and Japanese are permitted to have all rubrics in English.
- Also there is inconsistency between the statement 'in tasks where the candidate is translating from the assessed language into English or from English into the assessed language' and BP7 in Writing: candidates are expected to 'translate sentences and short texts from English into the assessed language'.

<u>Ancient languages</u>

Subject aims and learning outcomes:

Some inconsistency between use of 'ancient' and 'classical'. It is not completely clear if this is intentional (i.e. some aspects where classical used only intended to apply to Latin and Greek, others where 'ancient' used to apply to Biblical Hebrew also), but it is confusing as it stands and needs further clarification.

Prior learning:

It will not be possible for any but an exceptional student to cover the material outlined in this document to GCSE standard within the guided learning hours for GCSE (unless these are very substantially increased from what they are at present) without prior learning. Either the criteria need to be made less demanding in scope or prior learning of the language being studied to National Curriculum level 3 needs to be specified as it is in the MFL criteria. As ancient languages are not part of the National Curriculum this would limit access to the majority of candidates, but at least the requirements would be transparent

and realistic.

Linguistic competence: knowledge and understanding of the language:

- First bullet – understand short and longer narrative passages of unseen confected or adapted ancient language, identifying the main message or central argument by answering a variety of comprehension questions in English

Reasonable enough though phrased rather oddly. Not convinced that every passage will have, for example, a central message or argument, nor that it would be helpful to be limited to choosing passages that did have. Further, this seems to me to be potentially less demanding than what candidates are required to do in the current GCSE where they are expected to be able to demonstrate understanding of the nuances of meaning and context in a passage, not just to identify the main thrust of what is being said. It would be preferable if it just said '… demonstrating understanding by answering a variety of comprehension questions in English.'

- Second bullet - recognise, recall and manipulate the relevant accidence and syntax prescribed in the specification independently and in context (the manipulation of language will be tested through the text of the prose and/or verse prescriptions) *and* - deploy knowledge of inflectional morphology and syntax by adapting phrases and short sentences to make new meaning

It is not clear why this specifies that this is to be tested through the prose and/or verse prescriptions – it could presumably also be tested at the same time as bullets three and five in this section. Also, grammar and syntax can be adequately assessed through translation and comprehension exercises from Latin to English and there is no need for this rather mechanical exercise of manipulation of sentences in the ancient language to create new meaning. Potential problems with the proposed approach are twofold; firstly it places the focus, even for Latin literature, on grammar and syntax rather than on literary appreciation and sophisticated understanding and analysis. Secondly, if a candidate had been rote learning grammar for years they could do this without any real understanding of the nuances of the meaning of the sentence being manipulated, and therefore it is not a higher order skill (though it is one which takes time to acquire) and therefore not of the same order as the literary analysis and appreciation of a passage or longer text. There is a concern therefore that this will disadvantage candidates where Latin is started later and advantage those who have been studying it for longer, while simultaneously failing to reward those with the more sophisticated and meaningful understanding of the language.

- Fourth bullet – identify and explain the derivation of English words from the ancient language, as appropriate

This is fine for Latin and Greek but not for Biblical Hebrew. If it is only intended to apply to classical languages this needs to be made clear.

- Fifth bullet – translate accurately into English an unseen passage of the ancient language adapted from an original source.

This is not a reasonable requirement at this level. It goes beyond what is currently expected at A Level (where there is the **option** to translate English sentences into the ancient language). In addition, it is not clear what 'accurately' means – does it just mean accurately in terms of the meaning of the English (in which case why the requirement to use an English adaption of an ancient source rather than any passage of English) or does it mean accurately in terms of as close as possible to the wording/style of the original (this is completely unrealistic at this level – candidates will not have the exposure to ancient literature to be able to do it in any sort of meaningful way). The use of an adapted passage would also be challenging in that it will be difficult to find a range of passages that include

the vocab, grammar etc. specified in the spec without loads of other vocab or grammar which would then have to be glossed.

It is not clear what weighting will be required for any of these aspects. Bullet 4 for example is not in itself objectionable, but if a significant element of the A01 marks had to consist of it then it would be, because it is far less important than the ability to read and comprehend a passage of the ancient language (bullet 1).

More generally, the criteria at present not only outline the content to be covered but how it is envisaged that this content will be assessed. This will limit the ability of awarding bodies to develop innovative qualifications, and risks assessments that do not assess the given content in the best or most appropriate manner.

Cultural competence: understanding of literature, society and values through analysis, evaluation and response:
On the whole this is fine for Latin and Greek but it is not clear how far the elements of cultural and historical context will be appropriate for Biblical Hebrew.

Overview
GCSE Latin is already extremely demanding. There is literary analysis which is demanding because of the difficulty of language and the concepts and ideas being explored in Latin literature, which is already grounded in an alien culture that candidates also need to understand to evaluate texts in a meaningful way. The questions that are set on these texts are also challenging (and in the case of longer answer questions not dissimilar from what is asked at AS and A2). Candidates are not permitted to use dictionaries, so there is already testing of grammar and vocab to a high level in the context of literature. In terms of the current testing of language this is also demanding, with an extensive list of grammar and syntax. There is also a requirement currently that candidates be able to translate appropriately for context, (ie not just know what the word means as a dictionary definition but what it means when used in a particular context and way). Increasing the demand further and moving the focus as these criteria do has the potential to kill the subject off in all but a minority of schools. Given the progress that has been made in widening access and increasing numbers studying these subjects in recent years, this seems a great shame.

6b Is **the relative weighting of the assessment objectives** right for modern and ancient languages?

✓	Yes (Modern languages)		No	✓	Not Sure (Ancient languages)

Modern languages

We would like clarification about the following "in AO2 and AO4 at least 10% of the marks must be allocated to knowledge and accurate grammar and structures …" is this 10% for each AO or 10% across both AOs?

Ancient languages

- The AOs appear to be expanded on in the sections on linguistic competence (A01) and cultural competence (AO2) in the scope of study – meaning basically that the AOs are only a summary of the definition of the subject content, rather than being skills based as AOs usually are for other subjects.
- The defined 50/50 weightings, rather than ranges as is normal in criteria, are potentially problematic. The note under the AOs states 'Equal weighting: linguistic competence and cultural competence are seen as interdependent, since to demonstrate the latter, candidates have to deploy their knowledge and understanding of morphology and syntax in context.' Which, if you were having only literature and language would work fine, but the content of the last two bullets under 'cultural competence' is not exclusively literature and so if these are covered it would not necessarily be possible to cover language at the same time. Equally, it is possible to assess linguistic content separately from cultural content, even if with literature it is not possible to assess cultural content (at least of texts in the ancient language) without linguistic competence.

6c Do the proposed subject content and assessment objectives for modern and ancient languages provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately**?

☐	Yes	✓	No	☐	Not Sure

Modern languages

There does seem to be a significant, and unrealistic, hike in demand between KS2 and KS3 and KS4. It would appear that criteria are based on the premise that learners will have had access to primary language learning in KS2 and its subsequent impact on KS3. However there are a significant number of issues around delivery of the statutory primary language entitlement and successful primary/secondary transition which are yet to be resolved and which will impact on learner progression. No account seems to have been taken of the timelines of the reforms to KS2, KS3 and now GCSE: students taking the reformed GCSE in 2018 will not have accessed the learning at KS2 and KS3. We believe this would significantly disadvantage the take-up of languages in schools at a time when languages are already a strategically vulnerable subject.

The expectations on translation are totally unrealistic between KS3 and KS4. At KS3 translate into and out of the modern language, and here for GCSE, translate into the modern language. No matter how laudable the aim, in reality to be successful in translation, students need to have high- level linguistic skills in both English and the modern language. The focus for a GCSE assessment of a modern language should be a test of understanding and using language to communicate in everyday contexts, not an academic exercise (which is what the training for translation inevitably ends up being).

The demand of the new criteria when referenced to the CEFR would appear to expect outcomes well above those required for a GCSE Higher Tier .For example:
(1) Draft GCSE MFL criteria - specifications in a modern language should enable students to:

- develop their ability to communicate coherently with native speakers in speech and writing, conveying what they want to say with increasing accuracy
- express and develop thoughts and ideas spontaneously and fluently

This would relate to CEFR Level B2 Vantage or upper intermediate (i.e. A2 level).

(2) Can interact with a degree of fluency and spontaneity that allows for regular interaction with native speakers.
CEFR Level C1 Effective Operational Proficiency or advanced (i.e. degree level)
Can express ideas fluently and spontaneously without much obvious searching for expressions.

Note: Expression of ideas only appears at C1 level, i.e. degree level – levels below focus exclusively on interaction.

(3) Draft GCSE MFL criteria:
GCSE specifications – contexts and purpose
Students will be expected to use language for a variety of purposes and with a variety of different audiences, including for personal, academic and employment-related use.

CEFR Level C1 Effective Operational Proficiency or advanced (i.e. degree level)
Can use language flexibly and effectively for social, academic and professional purposes.

(4) Draft GCSE MFL criteria - Writing
Make more independent, creative and complex use of the language, as appropriate, to note down key points, summarise information, express and justify individual thoughts and viewpoints, in order to interest, inform and convince.
CEFR Level C2 Mastery or proficiency (i.e. degree level)
Can summarise information from different spoken and written sources, reconstructing arguments and accounts in a coherent presentation.

- Some of the targeted skills are closer to what is expected at that level in GCSE English Language, i.e. for first language learners, for example:

(1) page 6 of GCSE MFL draft criteria, Reading: summarise, draw inferences in context and recognise implicit meaning.
GCSE English Language draft criteria page 5: Reading Critically – recognising and drawing inferences;

(2) page 6 of GCSE MFL draft criteria, Writing: communicate and interact effectively in writing for a variety of purposes across a range of specified contexts;… produce clear and coherent text of extended length to present facts and express ideas and opinions appropriately for different purposes and in different settings.
GCSE English Language draft criteria page 5, Writing: writing effectively for different purposes and audiences; … maintaining coherence and consistency across a text.

Ancient languages
Ancient languages are not part of the National Curriculum. These criteria might be achievable where someone had been studying the language from year 7. They will be extremely difficult where this is not the case.

6d Will the proposed qualifications in modern and ancient languages secure **sound progression for the purposes of further academic and vocational study**?

☐	Yes	✓	No	☐	Not Sure

Modern languages

Because we have the view that there is overload of demand at this level, we want to inevitably ask the question: 'What will be assessed at A level?' And yet, we are very aware that the A Level in modern languages has become almost an elitist subject, due precisely to the perceived high level of demand. If the increase in demand at this level, leads to a further increase in demand at A Level, then it is not unrealistic to be concerned that take up will decline even more. In respect of vocational study, the skills being proposed have an academic focus, not a vocational focus, and so do not in any way secure sound progression for vocational study.

Ancient languages

These criteria would lead to a GCSE of a significantly higher level of demand, at least in terms of the expectations in the ability to manipulate sentences in the ancient language and to translate from English to the ancient language, than the current AS qualification, and some aspects of the A Level . Unless the demand of these qualifications is also to be substantially increased (and they are already comparatively difficult against other A Levels) then the GCSE will not provide a good progression because it will be too hard. It will also provide poor progression in that fewer schools, (especially those where it is started later and studied only for the guided learning hours) will be able to prepare candidates for it and so there will not be the candidates to progress to further study.

Please answer all the remaining questions, which include questions on literacy, numeracy and impact on specific groups of students.

7 Does the English language content cover the **key elements of literacy needed for employment or further study**?

✓	Yes		No		Not Sure

We're pleased that it's embedded, and we agree with the increase to 20% for SPAG. The effective integration should ensure elements of literacy will be improved.

8 Does the mathematics content cover **the key elements of numeracy needed for employment or further study**?

✓	Yes		No		Not Sure

The number section is appropriate to cover the skills that most employers and further education establishments would require, coupled with the problem solving elements within the assessment objectives.

Possibly some form of specific reporting may be useful for moving on with regard to numeracy.

9 Do any of the proposals have potential to have a **disproportionate impact, positive or negative, on specific pupil groups**, in particular the 'protected characteristic' groups? (The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation); if they have potential for an adverse impact, how can we reduce this?

☐	Yes - Positive impact (English Language)	✓	Yes - Negative impact (Mathematics, English Literature, Ancient Languages)	☐	No

In **Mathematics** the inclusion of the requirement for candidates to: 'reason and communicate accurately, using appropriate terms and correct grammar…' will have a disproportionately negative impact on candidates with dyslexia, EAL, hearing impairment and any other condition which affects the use of written language. Many of the candidates affected will share the protected characteristic of disability. In the context of a mathematics assessment it is difficult to see how this barrier can be justified; whilst we can see how the use of 'appropriate terms' is necessary the inclusion of the assessment of 'correct grammar' is highly problematic as it is not intrinsic to the subject in question. Clearly, a candidate can be exceptional at mathematics but not have similarly strong linguistic skills; it could be deemed discriminatory if our AOs precluded such a candidate from accessing full marks. The only way to reduce the potential adverse impact is to remove the requirement for correct grammar in mathematics.

In **English** there are two positive and notable changes from the current assessment objectives. The first is the removal of the requirement for candidates to evaluate and explain the use of presentational features. This has always been a significant barrier for candidates who are either blind or visually impaired and it has been extremely difficult to justify as it is not intrinsic to the subject in question; its removal is welcome. Secondly, the decision that speaking and listening will not contribute to the final result awarded to the candidate will be welcomed by a range of candidates that share the protected characteristic of disability; some examples of candidates who have struggled with this in the past are those with hearing impairment, the deaf and elective mutes. However, the compulsory nature of A04 does create some complexity; if a disabled candidate cannot take part in a speaking assessment that is compulsory but this does not contribute to their final mark is there any need to 'penalise' the candidate in some other way or will it simply be accepted that they will not take part in a compulsory aspect of the course without this being known to future users of the ensuing certificate? The Ofqual consultation requests feedback on this issue and raises the possibility of exemptions and certificate indicators being used in these cases. However, a certificate indicator stating that something that has no bearing on the final result has not been completed due to a candidate's disability may well be interpreted as discriminatory.

In **English Literature** the removal of references to 'world literature' is likely to have a disproportionately negative impact on candidates who share the protected characteristics

of race and religion or belief. The inclusion of a range of texts representing a plurality of cultural experiences increases engagement with the curriculum for candidates from diverse backgrounds; a narrow focus on the English cannon is likely to alienate them.

In **Ancient Languages** the proposals are likely to have a disproportionately negative impact on those candidates who have not had the opportunity to study ancient languages from year 7 or primary school. This is due to the unreasonably increased level of challenge at GCSE which renders the qualification inaccessible to those who do not have prior learning from which to drawn on. Although these students do not belong to one of the protected characteristics groups we feel strongly that this change will have a damaging effect on access to classical subjects and reverses much of the positive work that has been done in this area over the last decade. These proposals return classics to a position where it is an elitist subject that can only be offered in some independent schools.

In **History** we are concerned about parity of opportunity in relation to historical investigation, as outlined in 5c.

10 Have you any further comments?

Comments:

11 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

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.	
E-mail address for acknowledgement:	

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents.

✓	Yes		No

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 on-line or 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 responses should be sent to the address shown below by 20 August 2013

Send by post to:
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