



Department
for Education

Consultation Response Form

Consultation closing date: 20 November 2013

Your comments must reach us by that date

16-19 Accountability Consultation

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

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

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

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

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

Please tick if you want us to keep your response confidential.	<input type="checkbox"/>
Reason for confidentiality:	

Name: Professor Adam McBride, Chair of Council	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): THE MATHEMATICAL ASSOCIATION	
Address: 259 London Road, Leicester LE2 3BE	

If your enquiry 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.

Please mark the box that best describes you as a respondent.

<input type="checkbox"/> School	<input type="checkbox"/> College	<input checked="" type="checkbox"/> Representative bodies
<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Young Person	<input type="checkbox"/> Awarding Organisation
<input type="checkbox"/> Headteacher/Principal	<input type="checkbox"/> Governor/Governing Body	<input type="checkbox"/> Union
<input type="checkbox"/> Other		

Please Specify:

This response is a joint response from:

the four organisations represented on the Chartered Mathematics Teacher Registration Authority:

- The Association of Teachers of Mathematics,
- The Institute of Mathematics and its Applications,
- The Mathematical Association and
- The National Association for Numeracy and Mathematics in Colleges;

and the National Association of Mathematics Advisers.

Proposals for Publication of Data

1 Do you agree that in future only high value level 2 substantial vocational qualifications which meet pre-defined characteristics should be recognised in the Top Line performance measures for 16-19 year olds?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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Comments:

There is a risk in doing this that the curriculum for 16-19 year olds will be narrowed, which could lead to disaffection and disengagement. As the age for compulsory participation in education or training is raised, any move in this direction must ensure that the breadth of offer is maintained.

2 Should employer recognition, grading and external assessment or moderation be required characteristics for substantial level 2 vocational qualifications in the same way as they are for Technical Level qualifications at level 3?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

The contribution of employers to vocational qualifications improves their status and credibility. It also helps to ensure the qualifications are suitable and relevant. However the extent to which employers are involved must be proportionate and manageable.

3 Do you agree that awarding organisations need a two year grace period to redevelop current qualifications to meet the characteristics required? This is the same time period that was given for the redevelopment of Technical Level qualifications at level 3.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:
The required characteristics need to be made available at the earliest opportunity to allow for the careful redevelopment of current qualifications. Also, should the need arise, the characteristics can be revised if it transpires that they are unworkable in practice. Ideally these characteristics should start from what the majority of well-regarded level 2 vocational qualifications already do.

4 What do you think this category of vocational qualifications should be called and how do you think it should be defined?

Comments:
These qualifications should be called 'Technical level qualifications at level 2' to link them clearly with their level 3 counterparts.

5 What are your views on the necessity, benefits and implications for students and providers of a best 3 A levels measure?

Comments:

The best 3 A levels measure will discourage provision of a broad and balanced level 3 academic programme. It is likely to reduce numbers taking a fourth A (or AS) level and the Extended Project, as providers seek to maximise this top line performance measure.

As Further Mathematics is almost always taken as a fourth subject, there is very high risk that provision will be reduced and numbers taking the subject will fall. Once this happens (or is in prospect), higher education institutions will become less able and ready to ask for Further Mathematics in offers (because of competition and widening participation considerations) which will only serve to exacerbate the situation.

Governments have recognised the need to increase and widen participation in Further Mathematics through their support for first the Further Mathematics Network and subsequently the Further Mathematics Support Programme. The great successes achieved and the investments made are at severe risk of being undermined by this measure.

There will also be a reduction in the availability of other four-subject A-level combinations involving mathematics (such as mathematics with three sciences) which are attractive to high-achieving students.

The lack of recognition in the measure of a fourth subject studied to AS level will discourage providers from offering AS Mathematics as a course in its own right. Currently approximately 150 000 students take AS Mathematics with around 90 000 of these continuing to a full A level. There is a risk that the 3 best A levels measure will mean that there will not be provision for the 60 000 students who currently only study mathematics to AS level. This would be a most undesirable outcome, particularly as the new smaller qualifications being developed for level 3 mathematics are designed for students who “do not want to take AS or A level”. Furthermore it is unclear that the new additional measure will be sufficient to secure widespread provision of these new courses.

The Extended Project has provided a means of enriching the post-16 curriculum. Given the introduction of the TechBacc which includes completion of an Extended Project and an approved mathematics qualification, it seems quite possible that students who complete a TechBacc will have a superior curriculum experience which will better prepare them for further study than those following an academic route.

The 3 best A levels measure has the potential to lead to this country having a future workforce which is less well educated mathematically than at present with consequent damage to the country's economy.

6 Do you agree that the measures set out in annexes A and B should be the top line and additional data published for students studying at levels one, two and three?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

The level and amount of detail seems excessive and potentially confusing. As already mentioned some of the measures could result in distorting the curriculum available and reduced opportunities to study mathematics (and, for some, those opportunities that remain would provide less depth of study of mathematics than heretofore).

The dangers of the best 3 A levels measure have been discussed in detail in answer to Question 5. Its foreseeable effect on the provision and uptake of fourth subjects, with the reduction and narrowing of participation in Further Mathematics that would seem inevitable, is a cause for considerable alarm.

As the approved level 3 mathematics qualification measure is only an additional measure of uncertain prominence, one cannot be confident that it will lead to provision of the new mathematics qualifications or (in particular) provision for those who wish to take GCE Mathematics to just AS level. It should not be relied upon as the sole or principal driver for ensuring provision and participation.

Given the small number of students working at level 1 with many providers it does not seem helpful to report data in this way as one or two students could have a very large impact on the measure for a given provider. In particular, this will make it difficult to interpret changes in the performance of providers from year to year.

7 Do you agree that we should explore how to report the achievement of students at level 2 and 3 taking work-based training (including Apprenticeships) with independent training providers in performance tables?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

Accountability measures which ensure high-quality provision and worthwhile outcomes for all students, wherever they are based, are potentially desirable. In particular all work-based training needs to develop both employer-specific qualities and skills alongside generic transferable skills; however, the former will make valid comparison very difficult. Further, there is a risk that accountability measures could act as a perverse incentive since rank-ordering providers may lead to them chasing league table position at the expense of pursuing high quality tailored provision.

8 What are the issues to consider in reporting the achievement of students in work-based training and in setting minimum standards for these providers?

Comments:

High quality provision should both develop employer-specific qualities and skills, and generic transferable skills which enable career progression either with the employer or elsewhere. Any accountability measures must focus on the quality of provision and not result in a race between providers to be 'at the top of the league table'. Therefore, any measures need to take account of the prior achievements of students so that there is no incentive to cherry-pick those students who are most certain to meet a threshold standard. Also, as there is likely to be a very wide range of effective provision it will be difficult to make valid comparisons.

Minimum Standards

9 Do you agree that minimum standards at level 2 should be based on an attainment and completion measure for those taking substantial vocational qualifications?

Yes

No

Not Sure

Comments:

The need for a 'minimum standard' has not been established. Although such a standard might help in identifying some inadequate provision, it risks being arbitrary and may well prove unhelpful. In particular, it could well lead to the gaming of the system and concentration on borderline candidates which has become prevalent pre-16 and which the government in its new performance measures for Key Stage 4 is seeking to bring to an end. A minimum standard which was sufficiently multi-faceted to prevent this yet sufficiently simple to be understood by all stakeholders is unlikely to be found.

10 Do you agree that we should not penalise providers if students leave their course to take up an Apprenticeship, Supported Internship or Traineeship?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

There is a strong risk that penalising providers when students leave a course, for any reason, is likely to reduce opportunities for young people as providers will be less willing to take risks, particularly when it comes to recruitment. This is likely to have most impact on vulnerable or disadvantaged youngsters whose education may already have been disrupted. It would be wrong to penalise providers who seek to engage with those hard-to-reach and hard-to-serve young people.

There will be circumstances where it may be in the student's interest to leave a course before completion, as could be the case in the examples given in the question, and providers should not be penalised for supporting the student in that transition. (There is a risk of abuse of this provision by providers, who could use it to eliminate without penalty students who it becomes clear are unlikely to be successful. To reduce this risk, consideration should be given to a minimum period the ex-student must remain in the Apprenticeship, Supported Internship or Traineeship.)

Whilst the provision proposed in this question is a step in the right direction, it does not go far enough to mitigate negative effects which simple retention-based measures can have on the overall public good.

11 Do you agree that the level 3 minimum standards at 16-19 should be based on progress for academic and Applied General qualifications and on attainment and completion for Technical level qualifications?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:
The proposals are overly complex and likely to lead to a narrowing of the curriculum and reduced access for all learners. The concerns at level 2 expressed earlier also apply here.

12 Do you agree that we should extend the reporting of the attainment of low, middle and high attainers to the 16-19 performance tables?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:
It is not clear how these categories would be determined, but again it seems overly complex and unnecessary. Providers could be encouraged to provide information for prospective students and their families about how students from a variety of different backgrounds following different types of courses fare.

13 What categories of destination should we include when reporting the destination of students with learning difficulties and disabilities?

Comments:

This does not seem an appropriate thing to do. However, providers could be encouraged to use examples of destinations in their information for prospective students.

14 What other data could be published to create the right incentives for post 16 providers to ensure the best progress and attainment for all their students, including enabling those with learning difficulties and disabilities to prepare for adult life?

Comments:

Individual providers need to be encouraged to provide information that enables students (and, where appropriate, their carers) to make informed choices about possible courses. It is unlikely that such information is susceptible to description in a statutory list, especially as what is appropriate will differ in different contexts; it is best monitored as part of any inspection process.

15 Do you think the HE model of 'MOOCs' could work in a 16-19 environment?

Yes

No

Not Sure

Comments:

The inclusion of online elements in courses for 16-19 year olds has huge potential but it should be as elements of blended courses which also contain face-to-face sessions with tutors and peers and online personal tutoring. The Further Mathematics Support Programme, which enables access to high quality resources whilst providing tuition and peer support in the home institution, has been highly successful. There is also some evidence that 16-19 year olds can complete some specially-tailored HE courses successfully, for example Open University courses within its Young Learner programme; the students have support from a tutor and the opportunity to work with peers, alongside the use of the wide range of blended learning materials from the OU. It is worth noting that the OU provision is costly. The development of such approaches for other courses should be investigated. However, neither of these courses are MOOCs. Colleges simply making their courses available online is unlikely to be appropriate for 16-19 education.

Although the advent of MOOCs has created great interest and they have shown impressive levels of self-selected participation, it is too soon to rely on them as a principal means of delivery. Indeed, the evolution that is beginning to be seen in their nature and role, suggests that their future role will be as an element of provision in courses rather than entire provision, becoming part of that blended provision exemplified above. For a course to lead to effective and efficient learning, one would expect to see opportunities for interaction, collaboration and application, along with the provision of individual support to learners.

16 If the assessments could be proven to be robust and to meet other key quality criteria, how do you think we could recognise accredited online courses in the accountability system?

Comments:

If the qualifications towards which the courses lead have the status of level 2 and 3 qualifications accredited by Ofqual, there is no reason why they should not have the same status in performance measures as other qualifications of similar demand and volume. Indeed, online courses (or courses with online elements) might well lead to existing qualifications, with existing forms of assessment.

If assessment is to be online then there are many practical problems to be overcome before one could be confident of assessment which is valid (especially if assessment is to be solely online), rigorous and manageable for large-scale qualifications. Among the challenges that arise are the following. How could large numbers in centres be assessed simultaneously? How would one ensure that devices could not access external help? If assessment is to take place over a longer time window, how would parity of difficulty be achieved in the questions? (This last is fairly easy to achieve where questions are procedural but less so in problem-solving and evaluative questions.)

17 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:

We would have appreciated the opportunity to comment on principles as well as details.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.	X
E-mail addresses for acknowledgement: Kerry Belcher (ATM, admin@atm.org.uk), David Youdan (IMA, David.Youdan@ima.org.uk), Marcia Murray (MA, senioradministrator@m-a.org.uk), Lesley Way (NANAMIC, ways2teach@ntlworld.com), Beck Boater (NAMA, admin@nama.org.uk)	

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?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed 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 November 2013

Send by post to:
Andrew Taylor
Inspections and Accountability Team
Level 2
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: 1619accountability.CONULTATION@education.gsi.gov.uk