

# Consultation on changes to Ofqual's regulatory framework for national assessments

## How to respond to this consultation

The closing date for responses is **20 December 2017 at 23:45**.

You can answer as many of the consultation questions as you like. You do not have to answer all of the questions, unless you wish to do so.

Please respond to this consultation in one of three ways:

- complete the online response (click 'Respond online' on the [consultation homepage](#)).
- complete this response form and email your response to [consultations@ofqual.gov.uk](mailto:consultations@ofqual.gov.uk). Please include the consultation title (Reforming functional skills qualifications in English and maths) in the subject line of the email and make clear who you are and in what capacity you are responding.
- Post your response to: Reforming functional skills consultation, Ofqual, Spring Place, Herald Avenue, Coventry, CV5 6UB, making clear who you are and in what capacity you are responding.
- **We can only consider your response if you fill in the 'About you' section at the end of the document.**

## How we will use your response

- Your response will be used to help us shape our policies and regulatory activity.
- After the consultation ends, we will publish a summary of responses received.
- We will not include your personal details in any published list of respondents, although we may quote from your response anonymously.

## **Sharing your response**

If you respond on behalf of an organisation, we will list your organisation's name and may publish your response in full unless you tell us not to. If you want any part of your response to stay confidential, you should explain why you believe the information you have given is confidential. If you check the box below, we will not include your details in any list of people or organisations that responded to the consultation.

**I want part of my organisation's response to remain confidential.**

Please explain which sections of your response you want kept confidential, and why:

Members of the public are entitled to ask for information we hold under information access law (such as the Freedom of Information Act 2000). We may have to disclose information covered by these laws. On these rare occasions, we will usually anonymise responses, or ask for consent from those who have responded, but we cannot guarantee confidentiality.

## **Contacting you**

Ofqual may sometimes follow-up responses received. If you are happy to be contacted about your response, please complete your details below.

**Telephone number: 07912 999 108**

**Email: [suepope@atm.org.uk](mailto:suepope@atm.org.uk)**

## **Consultation questions**

**Question 1:** Do you have any comments on Part 1 of our proposed framework (National assessments and responsible bodies)?

In the introduction, it is inappropriate to refer to 'SATs' in an official document, England has National Curriculum Tests. Recommend deleting "(some of which are also known as 'SATs')" (line 3).

**Question 2:** Do you have any comments on our approach to regulating national assessments as set out in Part 2, Sections B and C of our proposed framework?

The description of the process of regulation seems appropriate. However, taking an 'outcomes-focused' approach means that when policy changes are made that risk valid assessment, nothing will be done until after the changes are implemented. Ofqual should be pro-active in assessing the potential impact of policy changes and informing policy makers.

It is worth noting that changes at GCSE from alphabetical grades to numerical grades included maintenance of national standards by ensuring the proportion achieving the new grade 4 and above and new grade 7 and above was pegged to the proportion achieving grade C and above, and grade A and above previously. This was in order to minimise disruption to national standards, student achievement and school accountability. No such standards maintenance was put in place for KS2 assessment, despite the use of these outcomes for school accountability. Ofqual should champion the cause of national standards, protecting learners and schools from the (unintended) consequences of rapid education policy reform.

**Question 3:** Do you have any comments on our proposed approach to setting out in advance our key areas of focus each year?

The danger of setting out key areas of focus each year is that Ofqual may lack the flexibility to respond to issues as they arise. For example, how is Ofqual responding to DfE's proposal to introduce a 'times table check' in Year 4?

It is essential that Ofqual has a generic brief that allows it to address issues as they arise (e.g. relating to new policy development or emerging issues from live assessments) as well as ongoing key areas of focus.

**Question 4:** Do you have any other comments on Part 2 of our proposed framework (Ofqual's role)?

Ofqual needs to be pro-active in responding to policy proposals and addressing concerns about national assessments. These require pro-active engagement with stakeholders, including subject specialist communities.

**Question 5:** Do you have any comments on our proposed approach to remove prescriptive requirements from our framework and instead focus more on outcomes?

The danger of moving to an outcomes focused approach, is that the design of national assessments will not be subject to adequate scrutiny. Ensuring that the syllabus/specification/test framework is compatible with valid, reliable, manageable, comparable assessments that minimise bias, should help to reduce the risk of poor outcomes. It would also mean that Ofqual would need to be pro-active in assessing National Curriculum policy proposals, to ensure that valid assessment is possible. We would urge reconsideration of this proposal.

**Question 6:** Do you have any comments on any aspect of the changes described above?

Ofqual needs to be pro-active in assessing the likely impact of proposed policy changes on national standards and be open in its advice to government.

**Question 7:** Do you have any other comments on Part 3 of our proposed framework (Expectations of responsible bodies)?

These seem reasonable.

**Question 8:** Do you have any comments about the clarity, language or structure of the proposed new regulatory framework for national assessments?

Ofqual is a body and as such should refer to itself as 'it' as opposed to 'we/us'. The language in the proposed regulatory framework is extremely awkward in this regard.

**Question 9:** Do you have any comments on our proposal that the new regulatory framework for national assessments should take effect from the date it is published, anticipated in Spring 2018?

This seems very soon, given the significance of the proposed changes, particularly the shift to an 'outcomes based' approach.

**Question 10:** Do you have any other comments on any aspect of our proposed new regulatory framework for national assessments?

No

**Question 11:** We have not identified any ways in which the proposed framework will unduly increase the regulatory impact of our proposals. Do you have any comments on this assessment?

Ofqual needs to be more pro-active in this area and it would be good to see greater regulation of national assessments.

**Question 12:** Are there any additional steps we could take to reduce the regulatory impact of our proposals?

No

**Question 13:** Are there any costs or benefits associated with our proposals which we have not identified?

No

**Question 14:** We have not identified any ways in our proposed changes to the framework would impact (positively or negatively) on people who share a protected characteristic<sup>1</sup>. Are there any potential impacts we have not identified?

Students from groups who do less well in national assessments (e.g. FSM, certain ethnic groups) are at a particular disadvantage if Ofqual does not insist on maintenance of national standards during significant curriculum changes.

**Question 15:** Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on people who share a protected characteristic?

Ofqual needs to be more pro-active in assessing the likely impact of policy changes on national standards and public confidence in national assessments.

**Question 16:** Do you have any other comments on the impacts of the proposals on people who share a protected characteristic?

No

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<sup>1</sup> 'Protected characteristic' is defined in the Equality Act 2010. Here, it means disability, racial group, age, religion or belief, pregnancy or maternity, sex, sexual orientation and gender reassignment.

## About you

To evaluate responses properly, we need to know in what capacity you are responding to the consultation. We will only consider your response if you complete the following section. Questions marked with a \* are required.

**Name** \*: Sue Pope

**Organisation (if applicable):** Meeting of Mathematics Subject Associations (MMSA), a Special Interest Group of The Joint Mathematical Council of the United Kingdom\*, whereby the five classroom facing Mathematics Subject Associations (the Association of Mathematics Education Teachers (AMET), the Association of Teachers of Mathematics (ATM), the National Association for Mathematics and Numeracy in Colleges (NANAMIC), the National Association of Mathematics Advisers (NAMA) and the Mathematical Association (MA)) meet termly to collaborate and discuss issues of shared concern.

\*The Joint Mathematical Council of the United Kingdom is a Charitable Incorporated Organisation, registered with the Charity Commission for England and Wales, Registered Charity Number: 1171223; Registered Office: De Morgan House, 57-58 Russell Square, London, WC1B 4HS.

**Position (if applicable):** Hon Sec

**Is this a personal response or an official response on behalf of your organisation? \***

Personal response (please answer the question 'If you ticked 'Personal response'')

Official response (please answer the question 'If you ticked 'Official response'')

**If you ticked 'Personal response', which of the following are you? \***

Student

Parent or carer

Teacher (but responding in a personal capacity)

Other, including general public (please state below)

**If you ticked 'Official response', which of the following are you? \***

- Awarding organisation
- Local authority
- School or college (please answer the question 'School or college type' below)
- Academy chain
- Private training provider
- University or other higher education institution
- Employer
- Other representative or interest group (please answer the question 'Type of representative group or interest group' below)

**School or college type**

- Comprehensive or non-selective academy
- State selective or selective academy
- Independent
- Special school
- Further education college
- Sixth form college
- Other (please state below)

**Type of representative group or interest group**

- Group of awarding organisations
- Union
- Employer or business representative group
- Subject association or learned society: Meeting of Mathematics Subject Associations (MMSA), a Special Interest Group of The Joint Mathematical Council of the United Kingdom\*, whereby the five classroom facing Mathematics Subject Associations (the Association of Mathematics Education Teachers (AMET), the Association of Teachers of Mathematics (ATM), the National Association for

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- Equality organisation or group
- School, college or teacher representative group
- Other (please state below)

**Nation\***

- England
- Wales
- Northern Ireland
- Scotland
- Other EU country: \_\_\_\_\_
- Non-EU country: \_\_\_\_\_

**How did you find out about this consultation?**

- Ofqual's newsletter
- Ofqual's social media channels
- Other social media channels
- Ofqual's website
- Internet search
- Other: \_It was very difficult to find out about this consultation\_\_