

Questions for Ofqual

Introduction

This document is the written part of MEI's response to the Ofqual consultation entitled "Regulating for confidence in standards". It consists of a number of questions which we believe Ofqual needs to answer to ensure the quality of its work and confidence in it. The questions are grouped under the 5 standards objectives which are written into Ofqual's statutory remit.

1. Qualifications

The qualifications standards objective is to secure that regulated qualifications:

- (a) give a reliable indication of knowledge, skills and understanding, and*
- (b) indicate a consistent level of attainment (including over time) between comparable regulated qualifications.*

- 1.1 How many mathematicians does Ofqual plan to deploy to monitor the testing of "knowledge, skills and understanding" in the various mathematics examinations and the levels of attainment corresponding to the different grades awarded ?
- 1.2 How frequently does Ofqual plan to scrutinise each mathematics qualification ?
- 1.3 A criticism of the assessment of many current mathematics qualifications is that while it is reliable (different markers obtain the same marks), it is not valid because it does not cover all the specified requirements. What steps does Ofqual intend to take to rectify this situation ?
- 1.4 To what extent does Ofqual believe that it is possible to monitor achievement by using statistics ?
- 1.5 How does Ofqual intend to ensure comparability between qualifications at the same level in different subjects ?
- 1.6 What does Ofqual intend to do to adjust qualifications in subjects that are currently harder (or easier) than others at the same level ?
- 1.7 Does Ofqual accept differences in the natures of subjects mean that the same regulations are not always appropriate across all subjects ?

2. Assessment

The assessment standards objective is to promote the development and implementation of regulated assessment arrangements which:

- (a) give a reliable indication of achievement, and*
- (b) indicate a consistent level of attainment (over time) between comparable assessments.*

- 2.1 In relation to regulated qualifications, Ofqual has the responsibility to monitor and also has sanctions which it can impose on awarding organisations. In relation to national curriculum and EYFS assessments, Ofqual has the responsibility to monitor but it does not appear that there are any corresponding sanctions. If monitoring reveals problems with NC and EYFS assessments, how will these problems be solved ?
- 2.2 Does Ofqual believe that reliability and consistency in national assessments is sufficient to ensure public confidence in them ?

3. Public confidence

The public confidence objective is to promote public confidence in regulated qualifications and regulated assessment arrangements.

- 3.1 The consultation document talks about “a shift in the focus of regulation from individual qualifications to the organisations that award or authenticate them”. Is this compatible with maintaining confidence in the standard of qualifications ?
- 3.2 Does Ofqual agree that an awarding body has a conflict of interests between maintaining the standards of qualifications and competing for market share ?
- 3.3 To what extent does Ofqual believe that its national role requires its relationship with the awarding bodies to be based on institutional mistrust ?
- 3.4 Should the names of Ofqual’s subject experts be in the public domain ?
- 3.5 Should advice given by Ofqual’s subject experts be placed in the public domain ?
- 3.6 What are Ofqual’s views on the relationships between awarding bodies and publishing companies ?
- 3.7 What are Ofqual’s views on advertising textbooks as having been written by the Chief or Principal Examiner ?
- 3.8 How does Ofqual plan to gain the confidence of the subject communities, including that for mathematics ?
- 3.9 Should there be an independent ombudsman to whom individuals and organisations can appeal over decisions by Ofqual ?

4. Awareness

The awareness objective is to promote awareness and understanding of:

- (a) *the range of regulated qualifications,*
- (b) *the benefits of regulated qualifications to learners, employers and institutions within the higher education sector, and*
- (c) *the benefits of recognition to bodies awarding or authenticating qualifications.*

- 4.1 How will Ofqual ensure that the range of available qualifications is at all times fit for purpose ?
- 4.2 How does Ofqual intend to ensure that qualifications and their assessment promote good learning ?
- 4.3 How does Ofqual intend to ensure that it encourages curriculum development and does not stifle innovation ?
- 4.4 How does Ofqual plan to involve subject communities in curriculum and qualification development, including those independent bodies which, particularly in STEM subjects, have a strong tradition in these activities ?
- 4.5 Given the importance of curriculum development, will Ofqual be considering requiring awarding bodies to take on specifications that have come from their subject communities ?
- 4.6 In recent years several valuable mathematics specifications have been discontinued because they no longer met the regulatory requirements of the day. How will Ofqual ensure that this does not happen in the future ?

5. Efficiency

The efficiency objective is to secure that regulated qualifications are provided efficiently and in particular that any relevant sums payable to a body awarding or authenticating a qualification in respect of which the body is recognised represent value for money.

- 5.1 What mechanism will Ofqual use to ensure that qualifications which are fee-capped are not then withdrawn by awarding organisations for being uneconomic ?
- 5.2 What measures is Ofqual planning to take to ensure that awarding bodies invest sufficient money in their procedures to ensure the quality of the reported outcomes ?