

# **Developing New AS Qualifications and A levels for First Teaching in 2016 – Part 1**

## **A Regulatory Impact Assessment**



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## **Introduction**

GCSEs, AS qualifications and A levels are being reformed. We are introducing regulatory requirements to achieve comparability for similar qualifications in the assessment arrangements across the exam boards. We regulate how these arrangements are implemented to secure standards over time.

This regulatory impact assessment (RIA) considers the impact of the new assessment arrangements compared with the pre-reform assessment arrangements for the following qualifications:

**AS and A level:** ancient languages; maths; further maths; geography; modern foreign languages;

A further report covering the following qualifications will be published in early 2015:

**GCSE:** art and design; computer science; dance; music; physical education.

**AS and A level:** dance; music; physical education

Previously we have set out our principles for assessment arrangements for all general qualifications. We have considered whether it is appropriate to implement these changes, against a comparator of continuing the status quo.

## **Changes to the assessment arrangements**

### **Non-exam assessment**

We have revised the percentage of non-exam assessment in each qualification in line with our principles that non-exam assessment should only be used when there is not a valid way of assessing through examination, and, in most circumstances, the percentage of marks which are attributed through non-exam assessment should be the same across all exam boards. This resulted in the changes set out in table 1 below.

### **Assessment objectives**

We have revised assessment objectives for each subject. The changes are made on a subject-specific basis, and largely represent realigning assessment objectives with the changes made to the specification's content by the Department for Education (DfE).

Additionally, we propose to move from a situation where an assessment objective could make up a wide range of the marks for a subject, to where it must make up the percentage set out by us. This means that, historically, awarding organisations could have a very different weighting between assessment objectives for the same

qualification. The new system will reduce the differences between specifications for the same subject.

### **Introduction of speaking assessments in some AS qualifications and A levels in modern foreign languages**

Additionally, we will be using the same set of assessment arrangements across all modern language AS qualifications and A levels. This means that speaking assessments will be introduced to some languages.

Subject	AS qualification		A level	
	Current weighting of non-exam assessment	Proposed weighting of non-exam assessment	Current weighting of non-exam assessment	Proposed weighting of non-exam assessment
Ancient languages	None	None	None	None
Geography	None	None	None	20%
Mathematics	0–20% <sup>1</sup>	None	0–20% <sup>1</sup>	None
Further mathematics	0–20% <sup>1</sup>	None	0–20% <sup>1</sup>	None
Modern foreign languages	30–40% <sup>2</sup>	30%	30–40% <sup>2</sup>	30%

Table 1

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<sup>1</sup> Although up to 20 per cent of non-exam assessment can be used for A level maths and further maths, only two qualifications include any non-exam assessment and a maximum of 10 per cent of non-exam assessment is seen in these qualifications.

<sup>2</sup> The current subject content for modern foreign languages expects students to demonstrate speaking and/or listening skills. There is, however, a provision for these requirements not to be applied to particular languages. Where this occurs, the amount of non-exam assessment in these qualifications is lower.

## **Assessing costs and benefits of the changes to assessment arrangements**

### **Non-exam assessment**

#### **Qualifications where the percentage of non-exam assessment is decreasing<sup>3</sup>**

- Mathematics AS and A level
- Further mathematics AS and A level
- Modern foreign languages AS and A level

In total this makes up around 210,000 AS entries and 125,000 A level entries annually.<sup>4</sup>

Whilst we have set out the reductions in weightings in non-exam assessment, we have not prescribed what this means for the future number or size of non-exam assessments or the length (or number) of examination papers.

For maths and further maths AS qualifications and A levels, where non-exam assessment will be completely removed, exam boards who currently offer non-exam assessment will no longer have to write the assessment task, or moderate it, thus reducing their workload and costs. For other subjects, it is possible that awarding organisations will continue to set a similar number of tasks, which will create the same workload and costs.

The exam boards will set the length of exam papers based on their assessment strategies. It is possible that, for some subjects, increasing the proportion of exam-based marks will mean increasing exam time. This would have cost implications for exam boards, as they incur the cost of preparing longer or additional papers, as well as the additional costs of marking them.

It is difficult to tell the net impact of a reduced percentage in non-exam assessment on exam boards, without being sure of the impact on overall length and mix of assessment. It seems likely that when exam boards set their assessment strategies they will consider manageability and costs alongside standards to deliver valid assessments.

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<sup>3</sup> This includes subjects where there will be a fall from the largest proportion of non-exam assessments awarding organisations are currently able to offer.

<sup>4</sup> Based on 2013 entries

For schools, a reduction in the number or size of the non-exam assessments should reduce the time spent by teachers preparing students for the assessment, and marking the assessments. It's possible that the teacher will use this time to undertake other tasks, including preparing students for exams.

The principal driver and main benefit of reducing the proportion of non-exam assessments is to improve the validity of the qualifications by ensuring that the nature of the assessment is appropriate to the skills, knowledge and understanding being assessed.

### **Qualifications where non-exam assessment is being reintroduced**

We are reintroducing non-exam assessment in geography A level. Discussions with stakeholders show that some key skills in this subject cannot be validly assessed by examination.

Exam boards could also face increased costs, as they are required to develop the task and then moderate the non-exam assessment which has been marked by teachers.

As with those subjects where we have reduced the proportion of non-exam assessment, increasing the proportion of non-exam assessment may affect examination time. If exam time was decreased there would be financial savings for exam boards, as costs of marking and writing the exam papers fall. Without knowing whether exam time will change as a result of an increase in the proportion of non-exam assessment, it is not possible to say whether this change will be a net cost or saving for the exam boards.

For schools and colleges there are likely to be increased costs if they do not currently carry out fieldwork-type activities. When we initially consulted on this change in 2013, focus groups suggested that many schools continued with fieldwork activities that they expect to be similar to the new non-exam assessment tasks. This means that for some schools there will be little extra cost. For schools where there are currently no fieldwork activities, there could be increased costs as students may need to be taken off site. Whilst there could be low-cost options for fieldwork (such as going to a site of interest within walking distance), teaching cover will still need to be provided if teachers cannot schedule the trip in standard lessons. Additionally, teachers will have to mark the assessments ahead of moderation, meaning that there is an increased pressure on their time.

### **Making assessment more similar across exam boards**

We have moved from a situation where exam boards could, in many cases, choose the weighting of assessment objectives and non-exam assessment from a range, to one where each specification would be expected to have the same weighting. This will have benefits as it means that the assessment arrangements are more similar

across exam boards, so wider users of qualifications can be confident that the same qualification is of a comparable standard, no matter which exam board or specification was used.

## **Introduction of speaking assessments to modern foreign languages**

In our consultation we proposed that all modern foreign language A levels should have the same non-exam assessment requirements. This means that all modern foreign language subjects would have a spoken assessment. Currently, the spoken element is assessed some modern foreign languages subjects, but there is no such assessment in 12 other languages. The number of entries for each modern foreign language A levels, along with current speaking assessment arrangements is shown in table 2 below.

Language	A level Entries (2013)	Current speaking assessment
Arabic	527	No
Bengali	69	No
Chinese	3,199	Yes
Modern Greek	174	No
Dutch	171	No
French	10,249	Yes
German	4,201	Yes
Gujarati	24	No
Italian	816	Yes
Japanese	301	No
Modern Hebrew	44	No
Persian	249	No
Polish	1,140	No
Portuguese	415	No
Punjabi	227	No
Russian	1,158	Yes
Spanish	6,625	Yes
Turkish	545	No
Urdu	600	Yes

*Table 2: Number of entries in A level modern foreign languages*

The introduction of a speaking assessment will introduce costs to the system. Some schools and colleges will decide not to enter candidates for these subjects. If there is expected to be a significant reduction in the number of entries, it may contribute to exam boards' decision about which subjects they redevelop and continue to provide to schools and colleges.



In most schools and colleges where these languages are offered it is expected that the additional cost of the speaking assessment per candidate will be small. However, for schools and colleges where either the languages are not taught or there is no member of staff with the right skills to carry out the assessment, costs will be significantly higher.

We have estimated the total cost of introducing this proposal as around £170,000 based on increased costs of marking the assessments, costs to schools and colleges where candidates have to be assessed at a different location, and a reduction in total candidate numbers. A full breakdown is provided in table 7.

Our estimates are based on a number of assumptions. In particular, we had to use assumptions to estimate the potential fall in candidates. Because of this we have carried out sensitivity analysis to consider what the impact would be if the number of candidates did not change. In this scenario, the overall cost would be lower, at around £150,000.

These costs should be weighed against the benefits of improved comparability between modern foreign languages. Employers and universities will be able to easily understand the skills and capabilities of an applicant or student with modern foreign language qualifications, as well as have greater confidence that standards are comparable across subjects.

The final sections of this RIA set out how we reach these estimates, and provide subject level information on the modelled impact on numbers and cost implications.

### **Schools' and colleges' response to introducing speaking assessments**

The impact of introducing a speaking assessment will vary across schools and colleges according to different factors. Schools and colleges with a member of staff who speaks the language are just as likely to enter students for the qualification. However, some schools and colleges will not be able to undertake the assessment validly. This could be because their students are not taught the language or because the language teacher is not able to carry out the speaking assessment.

Where a school or college does not have an appropriate member of staff to carry out the assessment there are a number of options available, including:

- (a) Candidates take the assessment at another school as a host school.
- (b) The assessment is carried out by an external examiner.
- (c) Students are no longer entered for the qualification.

## **Assessing the impact on entry numbers**

We have used evidence from similar subjects which already have speaking assessments to estimate the change in entry numbers of introducing speaking assessments. For the purposes of this impact assessment we have assumed that in the future, students without a teacher who is able to undertake the assessment, would only complete the full A level, and would not be entered for a standalone AS qualification.

There are currently speaking assessments in Urdu and Russian, which had 600 and 1,158 entries (respectively) in 2013. These subjects are only currently offered by Pearson. For students entering these qualifications without a teacher able to conduct an assessment there is an option to take the assessment at another school or college or Pearson's London Oral Centre.<sup>5</sup> We have used the distribution of candidates in Urdu and Russian to estimate future entries and the proportions that might need to travel to an exam board-operated centre in the other 12 languages.<sup>6</sup>

The distribution of candidates per school or college across the lower volume modern foreign language subjects shows that Urdu and Russian currently have one of the lowest percentages of single candidate schools and colleges.<sup>7</sup>

Language	Current speaking assessment	% of entries from single candidate schools and colleges (2013)
Arabic	No	30%
Bengali	No	36%
Chinese	Yes	9%
Modern Greek	No	51%
Dutch	No	74%
French	Yes	21%
German	Yes	31%
Gujarati	No	67%
Italian	Yes	28%

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<sup>5</sup> Pearson currently offer an option for candidates to travel to a Pearson site, in London, to undertake their speaking assessment. Pearson call this the London Centre Orals. Elsewhere in this document we have referred to exam board-operated centres, which we have used as a generic term to describe any similar service which was run by the exam boards.

<sup>6</sup> Exam boards will need to invest to provide this option. This will be a factor in whether exam boards decide to continue to offer these subjects. The cost of this is not included in this impact assessment.

<sup>7</sup> Chinese has a lower percentage still. However the number of candidates is significantly different from that of the 12 subjects where speaking assessments will be introduced, so it is more likely that the future distribution of the candidates will be closer to Urdu or Russian.

Japanese	No	44%
Modern Hebrew	No	25%
Persian	No	46%
Polish	No	25%
Portuguese	No	35%
Punjabi	No	33%
Russian	Yes	20%
Spanish	Yes	25%
Turkish	No	23%
Urdu	Yes	20%

*Table 3: Percentage of entries from single candidate schools and colleges in A level modern foreign languages*

There could be many reasons for Russian and Urdu having a small proportion of single candidate schools and colleges. However, it seems likely that one of the main reasons would be that schools and colleges with only one candidate, who would have to go off site to take a speaking assessment, would be put off entering the candidate for the qualification.

If we adjust the distribution of the 12 languages currently without a spoken assessment to have a more similar distribution of candidates to Russian and Urdu, entries will fall. Table 4 shows the reduction in candidate numbers if, like Russian and Urdu, the current entrants from schools and colleges with more than one candidate made up 80 per cent of all entrants.

Subjects	Adjusted entries	Change in number of entries
Arabic	463	-65
Bengali	55	-14
Modern Greek	106	-68
Dutch	56	-115
Gujarati	10	-14
Japanese	211	-90
Modern Hebrew	41	-3
Persian	169	-80
Polish	1,070	-70
Portuguese	339	-76
Panjabi	190	-37
Turkish	525	-20

*Table 4*

These numbers represent an estimate of what the impact of introducing a speaking assessment might be on the number of entrants for each subject. The underlying assumption is that it will be schools and colleges who just enter one candidate who

will be most strongly affected by the introduction of speaking assessments in these subjects. We have used these estimates to develop the overall cost. Because of the uncertainties surrounding these estimates, we have also considered a scenario where there is no change in entry numbers.

### **Number of candidates using an exam board-operated centre**

Data from Pearson shows the number of candidates who used their London Oral Centre in 2014. Table 5 shows the candidates who used the centre, expressed as a percentage of all entries, and as a percentage of candidates who are the only candidate in their school or college.

Pearson's London Oral Centre	Russian	Urdu
Total number of candidates (a)	1,158	600
Number of schools and colleges entering only one candidate (b)	231	117
Number of A level candidates using Pearson's London Oral Centre (c)	71	17
Percentage of all candidates using Pearson's London Oral Centre (c/a)	6%	3%

*Table 5*

The data shows that a higher proportion of candidates use the Russian service compared with the Urdu service. There is no strong evidence to suggest whether Russian or Urdu is the more typical subject, therefore we use the data from Urdu to represent a low scenario, and from Russian to represent a high scenario for the number of candidates which may need to have their speaking assessment at an exam board-operated centre.

		Adjusted number of entries	Estimates of number using exam board-operated centre	
			Low	High
Arabic	Pearson	463	13	28
Bengali	AQA	55	2	3
Modern Greek	Pearson	106	3	7
Dutch	OCR	56	2	3
Gujarati	OCR	10	0	1
Japanese	Pearson	211	6	13
Modern Hebrew	AQA	41	1	3
Persian	OCR	169	5	10
Polish	AQA	1,070	30	66
Portuguese	OCR	339	10	21

Punjabi	AQA	190	5	12
Turkish	OCR	525	15	32

*Table 6*

The graph below shows, based on the candidates who entered A level in 2013, the potential distribution of candidates that, if speaking assessments were introduced would:

- have their speaking assessment carried out by their own teacher or a host school or college;
- use an exam board-operated centre; or
- no longer be entered for the qualification.

The number of candidates who would use an exam board-operated centre is the midpoint of the high and low scenarios shown in Figure 1.

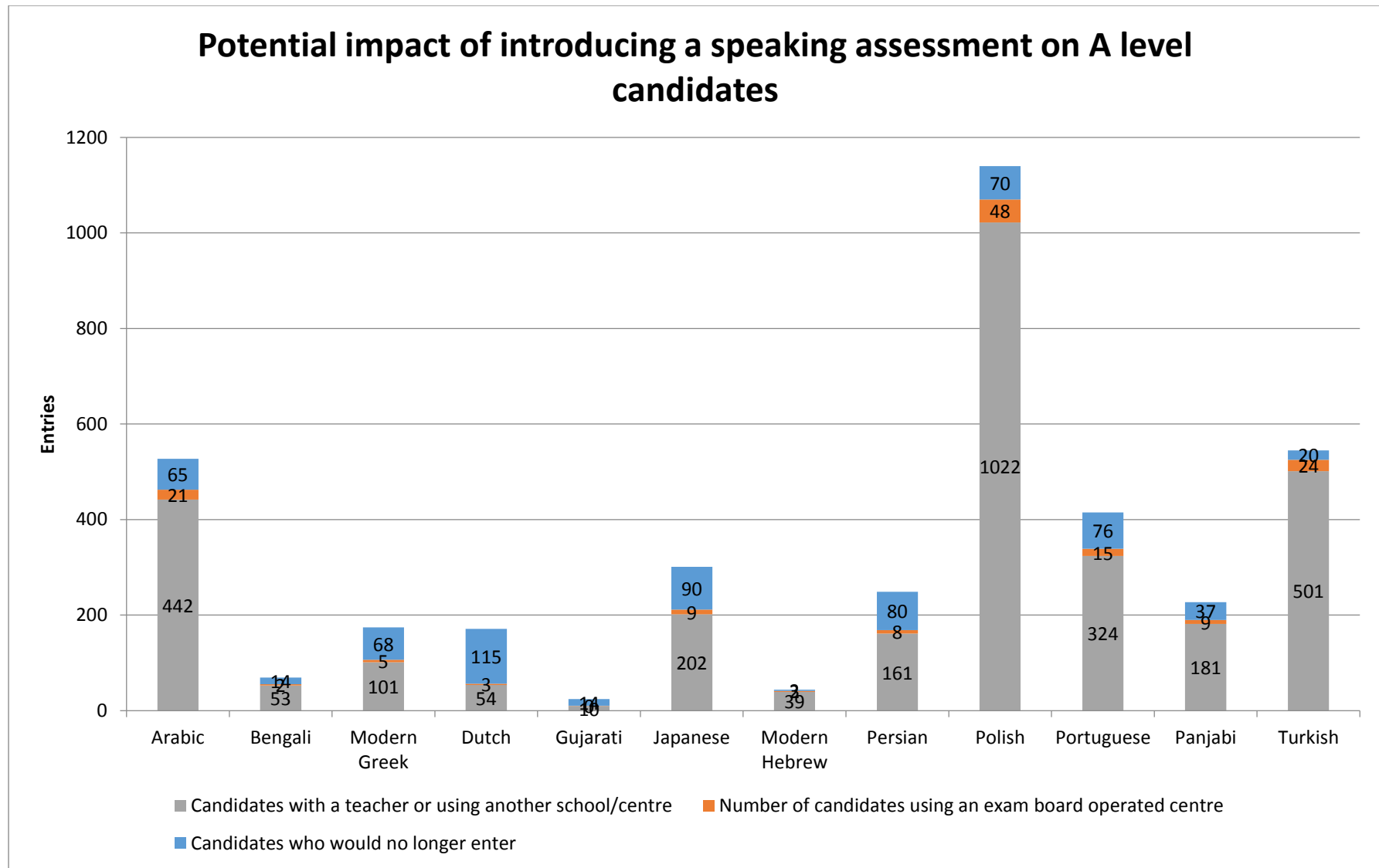


Figure 1

### **Costs of introducing speaking assessments**

For schools where a member of staff is able to conduct the assessment, they need time taken out of their working day to do this. Because the students are likely to be in year 12 or 13, and generally a small number of pupils need to be examined, it is assumed that no cover will be required whilst the teacher carries out the assessment. This implies no extra cost incurred to the school; however, teachers may have less time to prepare their lessons or continue with other activities.

These assessments would be recorded and sent to exam boards for marking. We do not specify to exam boards how long these assessments will be. Based on previous AS and A level assessments, which were generally 8 to 10 minutes each, we have assumed that the A level assessment will be 16 to 20 minutes, with an average of 18 minutes. If the marker listens to each assessment on average one and a half times, then it would take around 27 minutes to mark the assessment. There may be additional administration that the marker will do, and we have assumed this will be three minutes per assessment. This brings the total time to mark each assessment to around 30 minutes. If markers are paid £20 per hour, the additional cost of marking the A level assessment will be £10 per student. The AS assessment is expected to be shorter, taking around half the time of the A level assessment to mark. This would result in an increase in costs of around £5 per AS candidate. These additional costs could be passed on to the school.

There are likely to be additional costs to the exam boards of setting the assessment and hiring markers. For some languages this may be more significant as the cost of finding staff with the right skills could be difficult where there are few teaching staff in these subjects. These costs are not considered here.

Some schools and colleges will not have teachers who are able to undertake the assessment. This could be because their students are not taught the language, or because the language teacher does not have the necessary skills to carry out the assessment.

Where a school or college does not have an appropriate member of staff to carry out the assessment there are three options available:

- (a) Use another school or college.
- (b) Use an external examiner.
- (c) Students no longer enter for the qualification.

All these options are costly, and so those candidates without a teacher are more likely to enter only the A level (and not the AS qualification). Therefore the costs described immediately above represent only the costs of taking the A level speaking assessment.

### **Option (a) Use another school or college**

Where a student has to travel to another school or college, the student's school or college is likely to have to provide a teaching assistant to accompany the candidate there. Teaching assistants earn in the region of £8.80 per hour.<sup>8</sup> Including employers' National Insurance contributions and other expenses takes the cost to the school to £10 per hour. Assuming the journey time to and from the other school or college and the assessment takes two hours, this would cost £20. There will additionally be a cost of transport which is not estimated here, but could be highly variable. The exam board will still incur marking costs, which we estimated above to be in the region of £10 per assessment. Therefore using another school or college is likely to be around £30 per candidate, excluding transport costs. We have not included external charges by the other school or college for candidate speaking assessments.

### **Option (b) Use an external examiner**

The current situation is that the exam boards will only send an external examiner out to schools and colleges if there are a minimum number of candidates who will be assessed. Pearson, who currently operate speaking assessment in Russian and Urdu A levels, where there are a smaller number of candidates, do not offer the facility for an external examiner to visit schools, only for candidates to come to the external examiner in their London oral centre. We have assumed therefore that for lesser-taught languages if speaking assessment is to be introduced the other exam boards will operate a similar approach.

Pearson currently charges £25 per speaking assessment. To complete the full A level, two assessments must be taken costing £50 in total. Candidates, along with a teaching assistant will have to travel to the exam board-operated centre. Using an average cost of train travel at 23.6p per mile,<sup>9</sup> combined with data from Pearson on distance travelled by candidates<sup>10</sup> and including an extra return travel ticket for each school or college (to represent the teaching assistant travelling with the candidates)

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<sup>8</sup> This figure is based on the median hourly pay for teaching assistants in the 2014 Annual Survey of Hours and Earnings (provisional).

<sup>9</sup> This number was developed by dividing the costs of running the railways minus subsidies, by the number of passenger miles. It implicitly assumes that on average train operating companies break even. It also does not take into account that a significant proportion of journeys take place in London where per mile costs may be higher, especially for short journeys. For these reasons the estimate is low. This is counteracted by the fact that students generally pay lower than average fares for public transport, which may put the per mile estimate in the appropriate price bracket.

<sup>10</sup> Pearson provided school and college postcodes. Public transport distances were then calculated using Google maps.



this gives a per candidate travel cost of £52 for Russian. This means a school or college with one candidate would be paying in the region of £180 to enter their one candidate for the speaking assessment. We have assumed that the costs for candidates in subjects where we are introducing a speaking assessment, will be similar to that for candidates for Russian, where there is already a speaking assessment.

### **Option (c) Students no longer take the qualification**

If a student no longer enters the qualification this will lead to cost savings for the school, and a loss in revenue for the exam board. It will also mean that the student will no longer gain that specific qualification, and the benefits which go with it. Currently those students value the benefits at least as much as the qualification fee, so it is assumed that the loss in benefits to the student is of a similar value to the entry fee.

Additionally, if a student no longer enters a qualification, it will lead to entries falling further for the awarding organisations and revenues dropping in these subjects, potentially making them uneconomic. This could have a significant negative impact, if exam boards reduce the number of qualifications they offer.

### **Aggregating the costs**

Taking our estimates of the change in entry numbers and the proportion of students who would use an exam board-operated centre together with the cost per candidate estimated immediately above, we can make an assessment of the total cost of the decision to introduce speaking assessments. Additionally we have estimated the proportion of students who would have an assessment in their own school, and those who would travel to another school or college, based on a scenario where schools and colleges with only one, two or three candidates would use another school or college to take their assessment. We have assumed that in schools and colleges with four or more candidates, the candidates would be assessed in their own school or college, by their teacher. We have also assumed that the number of candidates taking the AS qualification as a freestanding qualification will be equal to the current number who do not continue to A level, and they will all take their speaking assessments in their own school or college.

Subject	loss in fees (EBs) <sup>1112</sup>	Cost of assessments at exam board-operated centres	Cost of assessments at another school or college	Costs for assessments at own school or college (A level)	Costs for assessments at own school or college (AS)	Total
Arabic	£6,200	£3,700	£6,500	£2,200	£2,100	£20,800
Bengali	£1,200	£400	£900	£200	£300	£3,100
Modern Greek	£6,500	£900	£2,000	£300	£1,000	£10,700
Dutch <sup>13</sup>	£9,700	£9,400	£-	£-	£600	£19,700
Gujarati <sup>14</sup>	£1,200	£1,800	£-	£-	£200	£3,100
Japanese	£8,600	£1,700	£4,000	£700	£800	£15,800
Modern Hebrew	£200	£300	£500	£200	£200	£1,400
Persian	£6,800	£1,400	£3,200	£500	£300	£12,100
Polish	£6,200	£8,600	£15,200	£5,200	£3,000	£38,200
Portuguese	£6,400	£2,700	£5,600	£1,400	£1,100	£17,200
Panjabi	£3,300	£1,500	£2,900	£900	£1,000	£9,500
Turkish	£1,700	£4,200	£5,600	£3,200	£1,300	£16,000

Table 7

This breakdown is represented in figure 2 below.

<sup>11</sup> 2014–15 fees.

<sup>12</sup> This figure also represents the reduction in fees for schools and colleges, and the estimated loss in benefit of no longer gaining these qualifications.

<sup>13</sup> For Dutch there was only one school or college with four or more candidates; we have assumed that those with one, two or three candidates would use the exam board-operated centre.

<sup>14</sup> For Gujarati there were no schools or colleges with four or more candidates, so we have assumed all candidates entering would use an exam board-operated centre for the speaking assessment.

## **Sensitivity analysis**

We recognise the sensitivity of our results to a number of assumptions. We have run an alternative scenario, where there is no change in candidate numbers, to show the impact on costs. These results are shown in table 8. The cost is lower as there is no reduction in fees, but instead more students will be paying increased assessment costs.

	Cost
Loss in fees (EBs)	£ -
Cost of assessments at exam board operated centres	£ 64,200
Cost of assessments at another school or college	£ 61,300
Costs for assessments at own school or college (A level)	£ 14,900
Costs for assessments at own school or college (AS)	£ 11,800
Total costs	£ 152,100

Table 8

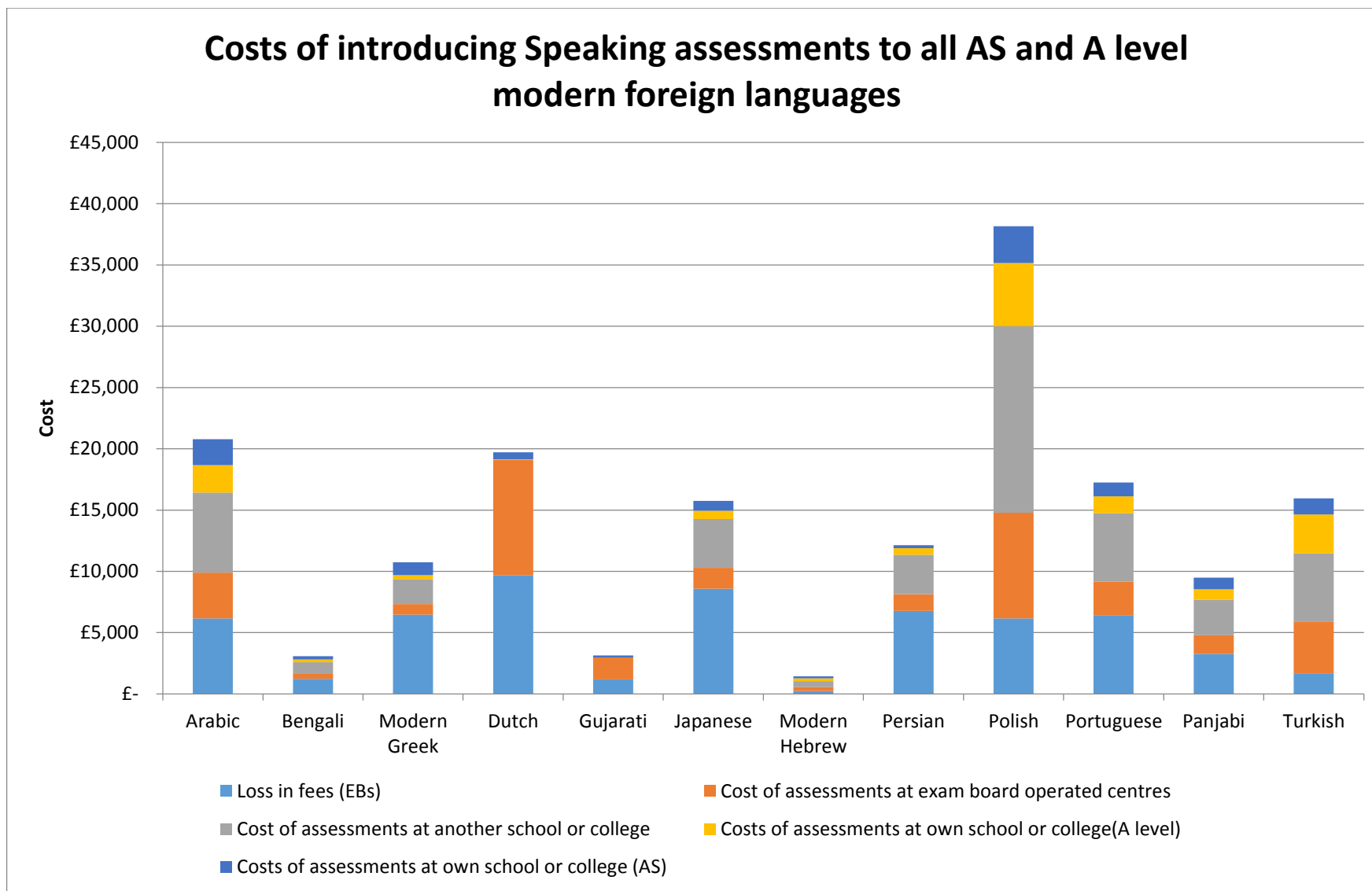


Figure 2

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