

AS and A Level Archaeology

Consultation on Conditions and guidance

February 2016

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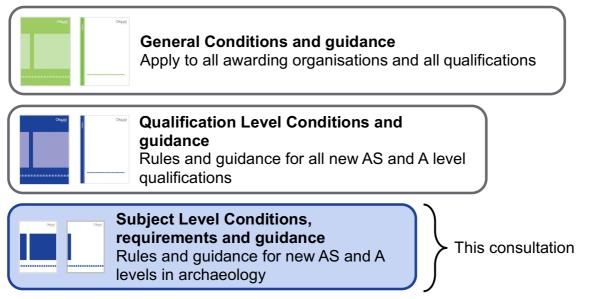
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1. Introduction

- 1.1 As most readers will know, changes are being made to GCSEs, AS and A levels taken by students in England. New AS and A level qualifications in Archaeology will be taught in schools from September 2017.
- 1.2 Following an earlier consultation,¹ the Department for Education (DfE) has published the subject content² for AS and A level Archaeology.
- 1.3 Following our own consultation on assessment arrangements for these subjects, we have confirmed³ that new AS and A levels in Archaeology will be assessed through 20 percent non-exam assessment and 80 percent assessment by examination.
- 1.4 We also confirmed the assessment objectives for AS and A level Archaeology.

Scope of this consultation



- 1.5 This consultation builds on our and DfE's earlier decisions. It seeks views on the subject-specific rules and guidance we should put in place for AS and A level Archaeology.
- 1.6 As explained in Appendix A, and illustrated in the figure above, these new rules and guidance will sit alongside our existing rules and guidance for

¹ <u>www.gov.uk/government/consultations/further-gcse-and-a-level-content-for-teaching-from-september-</u> 2017

² www.gov.uk/government/publications/gce-as-and-a-level-archaeology

³ www.gov.uk/government/consultations/developing-new-gcses-as-and-a-levels-for-first-teaching-in-2017

- all qualifications,⁴
- all new AS and A level qualifications.⁵
- 1.7 This document sets out, and seeks views on:
 - our proposed approach to regulating new AS and A levels in Archaeology; and
 - the subject-specific Conditions, requirements and guidance we propose to introduce to implement that approach.

⁴ www.gov.uk/guidance/awarding-organisations-understanding-our-regulatory-

requirements#requirements-for-all-awarding-organisations-and-all-regulated-qualifications ⁵ www.gov.uk/government/collections/new-a-level-and-as-level-qualifications-requirements-andguidance

How to respond to this consultation

The closing date for responses is 6 March 2016.

Please respond to this consultation in one of three ways:

- Complete the online response at https://www.surveygizmo.com/s3/2588195/as-and-a-level-reform-regulations-for-archaeology
- Complete the consultation questions at the end of this document and email your response to <u>consultations@ofqual.gov.uk</u>. Please include the consultation title (AS and A Level Archaeology Consultation 2016) in the subject line of the email and make clear who you are and in what capacity you are responding
- Post your response to: AS and A Level Archaeology Consultation 2016, Ofqual, Spring Place, Herald Avenue, Coventry, CV5 6UB, making clear who you are and in what capacity you are responding

Evaluating the responses

To evaluate responses properly, we need to know who is responding to the consultation and in what capacity. We will therefore only consider your response if you complete the information page.

Any personal data (such as your name, address and any other identifying information) will be processed in accordance with the Data Protection Act 1998 and our standard terms and conditions.

We will publish our evaluation of responses. Please note that we may publish all or part of your response unless you tell us (in your answer to the confidentiality question) that you want us to treat your response as confidential. If you tell us you wish your response to be treated as confidential, we will not include your details in any published list of respondents, although we may quote from your response anonymously.

Please respond by 6 March 2016.

2. Regulating AS and A level Archaeology

Compliance with subject content and assessment objectives

- 2.1 As we explained in paragraph 1.2, DfE has published the subject content for new AS and A levels in archaeology.⁶
- 2.2 One of the ways we ensure new AS and A levels are comparable across exam boards is by requiring them to be in line with the relevant subject content and our assessment objectives.
- 2.3 The approach we have taken in every other new GCSE, AS and A level qualification is to introduce subject-specific Conditions which:
 - require exam boards to comply with the requirements of the subject content (and have regard to any guidance within the subject content); and
 - require exam boards to comply with our assessment objectives (and have regard to our guidance on those assessment objectives).
- 2.4 In all other subjects this Condition includes a provision which requires exam boards to interpret the subject content in line with any rules we set and to have regard to any guidance we publish. Although we do not always specify how the subject content should be interpreted, we think it is important for us to be able to do so when there is a good reason for that (for example, if a different interpretation could compromise qualification standards or comparability).
- 2.5 We see no reason to take a different approach for archaeology. We are therefore proposing that we should introduce a Condition which requires exam boards to:
 - comply with the requirements (and have regard to any guidance) set out in the subject content – this includes requirements and guidance in the proposed new appendices;
 - comply with any requirements (and have regard to any guidance) we publish on interpreting the subject content; and
 - comply with our assessment objectives (and have regard to our guidance on those assessment objectives).

⁶ www.gov.uk/government/publications/gce-as-and-a-level-archaeology

Question 1: To what extent do you agree or disagree that we should introduce a Condition which requires exam boards to comply with the relevant subject content and assessment objectives?

Guidance on assessment objectives

- 2.6 For all other new GCSE, AS and A level qualifications, we have published guidance which explains how exam boards should interpret our assessment objectives. This is designed to ensure exam boards have a common understanding of – and take a consistent approach to targeting – the different assessment objectives.
- 2.7 We are proposing we should introduce similar guidance for AS and A level archaeology.

Question 2: To what extent do you agree or disagree that we should introduce guidance which clarifies how exam boards should interpret our assessment objectives?

Non-exam assessment in A level archaeology

- 2.8 As we have explained in previous consultations⁷, it is generally more difficult to ensure reliability in non-exam assessments. As a result, we have only permitted non-exam assessment in subjects where part of the subject content cannot be validly assessed through an exam.
- 2.9 Because it is more difficult to ensure reliability in non-exam assessments, we aim to ensure that exam boards take as consistent an approach as possible to non-exam assessment. This includes where appropriate specifying:
 - what should be assessed (for example, the relevant parts of the subject content and/or assessment objectives); and
 - how that should be assessed (for example, the tasks students should carry out, and how those tasks should be set and marked).
- 2.10 In A level archaeology, we have identified elements of the subject content which cannot be validly assessed by an exam, specifically the requirement that students "undertake an individual archaeological investigation that is independently researched". That is why we have previously decided that in A

⁷See, for example,

http://webarchive.nationalarchives.gov.uk/20141031163546/http://comment.ofqual.gov.uk/gcse-reform-june-2013/

level archaeology 20 per cent of marks allocated should be to non-exam assessment.

2.11 To implement these decisions, we are proposing to introduce a subject-specific Condition for A level archaeology. This Condition will permit non-exam assessment, specify the appropriate proportion of exam- and non-exam assessment, and allow us to set more detailed rules and guidance on non-exam assessment.

Question 3: To what extent do you agree or disagree that we should introduce a Condition for A level archaeology which permits non-exam assessment, specifies the proportion of exam and non-exam assessment, and allows us to set more detailed rules and guidance on non-exam assessment?

2.12 In line with our overall approach to non-exam assessment, we are also proposing to set more detailed rules for non-exam assessment in each subject. We discuss these separately below.

Non-exam assessment tasks

2.13 The subject content requires A level archaeology students to -

undertake an individual archaeological investigation that is independently researched and that interacts with the archaeological record, drawing on the knowledge, understanding and skills outlined above.

- 2.14 The subject content goes on to set out a range of skills that students are expected to demonstrate as part of the archaeological investigation.
- 2.15 It is this part of the subject content which cannot be assessed validly through exams. We have included additional strands within our assessment objectives for A level which specifically relate to the archaeological investigation:
 - Within AO2, we have included the strand "Apply archaeological skills and methods, using archaeological terminology and conventions, to interpret primary archaeological material and data"; and
 - Within AO3, we have included the strand "Analyse and evaluate primary archaeological material and data".
- 2.16 The archaeological investigation involves both application of skills and methods, and analysis and evaluation. However, it is clear from the subject content that the emphasis should be more on analysis and evaluation than on application of skills

and methods. To ensure this happens consistently, both between different exam boards and over time, we believe we should specify the how the marks for nonexam assessment should be allocated between the assessment objectives.

- 2.17 So, we are proposing to set rules which require all the marks for the non-exam assessment to be allocated to either AO2 or AO3, with:
 - at least half (10 per cent of total marks) allocated to AO3, and
 - at least a quarter (5 per cent of total marks) allocated to AO2.

Question 4: To what extent do you agree or disagree with our proposed approach to allocating non-exam assessment marks to assessment objectives in AS and A level archaeology?

Setting non-examination assessment

- 2.18 Our proposed rules for setting non-exam assessment tasks in A level archaeology reflect the subject content requirements set out in paragraphs 2.13-2.14 above. We propose that students must be required to complete a single task, which meets the detailed requirements specified in the subject content.
- 2.19 The detail of what an individual student investigates will depend, at least in part, on the archaeological sites or evidence they are able to work on. We therefore think there is an argument to allow schools to determine the detail of students' non-exam assessment tasks.
- 2.20 As a result, we are proposing to set rules which permit exam boards or schools (or a mixture of the two) to set non-exam assessment tasks in A level archaeology.
- 2.21 These different approaches to task setting have different strengths and weaknesses, and different associated risks. Whichever approach they take, our *General Conditions of Recognition* require exam boards to identify, manage and mitigate the associated risks. We are therefore proposing that exam boards must set out in their assessment strategies how they have addressed the particular risks associated with their chosen approach to setting non-exam assessment tasks in A level archaeology.

Question 5: To what extent do you agree or disagree with our proposed approach to task setting in non-examination assessment for A level archaeology?

Authentication and marking of non-examination assessment

- 2.22 Whenever non-exam assessment is used, it creates particular challenges for exam boards around authentication and marking of students' work. Some of these arise because non-exam assessment takes place over an extended period of time, which makes it harder for teachers to be sure that students have not received help with their work. Others arise because students need to perform tasks which it would be impractical for exam boards to observe directly.
- 2.23 It is exam boards' responsibility to ensure they put in place appropriate arrangements which enable them to authenticate students' work. This is required by our *General Conditions of Recognition*, but we have put in place additional safeguards in some other subjects. We think these general obligations are sufficient for A level archaeology, and are not proposing to introduce additional, subject-specific, rules around authentication.
- 2.24 When marking non-exam assessment in A level archaeology, the main challenges which arise are:
 - ensuring there is sufficient evidence to judge whether (and how well) students have demonstrated the required knowledge, skills and understanding; and
 - ensuring marking of non-exam assessment is both sufficiently reliable and manageable for exam boards.
- 2.25 Our view is that some of the knowledge, skills and understanding which students need to demonstrate through the non-exam assessment can be assessed directly through a report written by the student which sets out the findings from their investigation. But other knowledge, skills and understanding (particularly those which require direct interaction with the archaeological record) cannot be assessed in this way.
- 2.26 We are therefore proposing to set rules which ensure that non-exam assessment tasks require each student to produce:
 - a written report setting out the findings of their investigation; and
 - any additional evidence that is needed to assess how well the student has met the assessment criteria for the non-exam assessment.
- 2.27 We have deliberately chosen not to specify the form which this additional evidence must take. This will allow the exam boards to develop approaches which are appropriate to the subject content, suit their approach to assessment and meet the needs of schools.

- 2.28 For marking of the non-exam assessment, there are arguments in favour of both exam board marking and marking by teachers (which is then moderated by the exam board). Exam board marking can be more reliable, but teachers can have a better understanding of the archaeological context in which the investigation was carried out.
- 2.29 We are proposing to allow non-exam assessment in other subjects such as engineering and design and technology to be marked by teachers within schools (and moderated by exam boards), by the exam boards themselves, or by a combination of the two.
- 2.30 Because these different approaches have different strengths and weaknesses, an exam board offering A level archaeology will need to recognise and mitigate the risks associated with its chosen approach. Indeed, our *General Conditions of Recognition* require them to do so. We are therefore proposing that exam boards must set out in their assessment strategies how they have managed the particular risks associated with their chosen approach to marking non-exam assessment in A level archaeology.

Question 6: To what extent do you agree or disagree with our proposed approach to authentication and marking of non-examination assessment for A level archaeology?

3. Our proposed Conditions and guidance

3.1 As set out above, we are proposing to introduce subject-specific Conditions, requirements and guidance to implement the proposals in this consultation. We set out our proposed Conditions, requirements and guidance below.

Proposed Conditions and requirements for AS and A level archaeology

- 3.2 We are proposing to introduce the following Conditions and requirements which will apply to all new AS and A level qualifications in archaeology:
 - a Condition covering compliance with subject content and assessment objectives;
 - a further condition which permits non-exam assessment at A level, specifies the percentage of exam and non-exam assessment, and allows us to set more detailed rules and guidance for non-exam assessment;
 - our assessment objectives; and
 - our non-exam assessment rules.

Condition GCE(Archaeology)1	Compliance with content requirements
GCE(Archaeology)1.1	 In respect of each GCE Qualification in Archaeology which it makes available, or proposes to make available, an awarding organisation must – (a) comply with the requirements relating to that qualification set out in the document published by the Secretary of State entitled 'Archaeology GCE AS and A level subject content'⁸, document reference DFE-00035-2016, (b) have regard to any recommendations or guidelines relating to that qualification set out in that document, and (c) interpret that document in accordance with any requirements, and having regard to any guidance, which may be published by Ofqual and revised from time to time.

⁸ www.gov.uk/government/publications/gce-as-and-a-level-archaeology

GCE(Archaeology)1.2	In respect of each GCE Qu which it makes available, o available, an awarding orga any requirements, and hav relating to the objectives to assessment for that qualified published by Ofqual and re	or proposes to anisation mus re regard to an be met by ar cation which r	make st comply with ny guidance, ny may be	
Condition GCE(Archaeology)2	Archaeology			
GCE(Archaeology)2.1	Condition GCE4.1 does not apply to qualification in Archaeology which a makes available or proposes to make	in awarding o		
GCE(Archaeology)2.2	In respect of the total marks availab qualification in Archaeology which it awarding organisation must ensure (a) 80 per cent of those marks are Assessments by Examination, a	makes availa that – made availabl	able, an	
	(b) 20 per cent of those marks are a assessments that are not Asses		•	
GCE(Archaeology)2.3 An awarding organisation must ensure that in respect of each assessment for a GCE A level qualification in Archaeology which it makes available it complies with any requirements, and has regard to any guidance, which may be published by Ofqual and revised from time to time.			haeology uirements,	
Assessment object	ctives – GCE Qualifications ir	n Archaeolo	ogy	
Condition GCE (Archaeology)1.2 allows us to specify requirements relating to the objectives to be met by any assessment for GCE Qualifications in Archaeology.				
of Condition GCE(Arch requirements in relatio	The assessment objectives set out below constitute requirements for the purposes of Condition GCE(Archaeology)1.2. Awarding organisations must comply with these requirements in relation to all AS and A level Qualifications/GCSE Qualifications in Archaeology they make available.			
Objective		Weighting (A level)	Weighting (AS)	

A01	Demonstrate knowledge and understanding of archaeological skills, methods, themes, issues and contexts.	25-35%	25-35%
AO2 (A level)	 Apply archaeological skills and methods, using archaeological terminology and conventions, to – interpret primary archaeological material and data interpret secondary archaeological material and data 	30-40%	n/a
AO2 (AS)	Apply archaeological skills and methods using archaeological terminology and conventions, to interpret secondary archaeological material and data.	n/a	30-40%
AO3 (A level)	 Analyse and evaluate – primary archaeological material and data secondary archaeological material and data archaeological interpretations archaeological themes, issues and contexts 	35-45%	n/a
AO3 (AS)	 Analyse and evaluate – secondary archaeological material and data archaeological interpretations archaeological themes, issues and contexts 	n/a	25-35%

Assessment Requirements – GCE Qualifications in Archaeology

Condition GCE(Archaeology)2.3 allows us to specify requirements in relation to assessments for GCE A level qualifications in Archaeology.

We set out below our requirements for the purposes of Condition GCE(Archaeology)2.3. Awarding organisations must comply with these requirements in relation to all GCE A level qualifications in Archaeology they make available.

Non-examination assessment

Condition GCE(Archaeology)2.2(b) states that an awarding organisation must ensure that, of the total marks available for a GCE A level qualification in Archaeology, 20 per cent of those marks shall be made available through assessments which are not Assessments by Examination. In respect of that 20 per cent, an awarding organisation must ensure that -

- (a) no marks are made available through tasks that assess assessment objective AO1,
- (b) at least 5 per cent of the total marks for the qualification are made available through tasks that assess assessment objective AO2, and
- (c) at least 10 per cent of the total marks for the qualification are made available through tasks that assess assessment objective AO3.

The subject content for GCE Qualifications in Archaeology is set out in the Secretary of State's *Archaeology GCE AS and A Level subject content*, document reference DFE-00035-2016 (the 'Content Document').

Paragraph 17 of the Content Document states that each GCE A level qualification in Archaeology must –

require that students undertake an individual archaeological investigation that is independently researched and that interacts with the archaeological record, drawing on the knowledge, understanding and skills outlined above.

In respect of the assessments which are not Assessments by Examination, an awarding organisation must ensure that each Learner is required to complete a single task which requires the Learner to –

- (a) undertake an archaeological investigation which meets the requirements specified in paragraph 17 of the Content Document, and
- (b) produce the following evidence -
 - (i) a written report setting out the findings of his or her investigation, and
 - (ii) such additional evidence as is necessary to enable the consideration of that Learner's level of attainment in respect of all of the relevant criteria against which Learners' performance in that assessment will be differentiated.

Setting of non-examination assessment

An assessment for a GCE A level qualification in Archaeology which is not an Assessment by Examination may be set –

(a) by the awarding organisation, or

(b) by a Centre.

In any event, the awarding organisation must demonstrate to Ofqual's satisfaction in its assessment strategy that it has –

- (a) taken all reasonable steps to identify the risk of any Adverse Effect which may result from its approach to setting the assessment, and
- (b) where such a risk is identified, taken all reasonable steps to prevent that Adverse Effect or, where it cannot be prevented, to mitigate that Adverse Effect.

Marking of non-examination assessment

Evidence generated by a Learner in an assessment for a GCE A level qualification in Archaeology which is not an Assessment by Examination may be marked –

- (a) by the awarding organisation or a person connected to the awarding organisation
- (b) by a Centre, or
- (c) through a combination of (a) and (b).

In any event, the awarding organisation must demonstrate to Ofqual's satisfaction in its assessment strategy that -

- (a) it has taken all reasonable steps to identify the risk of any Adverse Effect which may result from its approach to marking the assessments (and to moderation where appropriate), and
- (b) where such a risk is identified, it has taken all reasonable steps to prevent that Adverse Effect or, where it cannot be prevented, to mitigate that Adverse Effect.

Proposed guidance for AS and A level archaeology

3.3 We are proposing to introduce guidance on assessment objectives which will apply to all new AS and A level qualifications in archaeology.

Guidance on assessment objectives for GCE Qualifications in

Condition GCE(Archaeology)1.2 allows us to specify requirements and guidance relating to assessment objectives for GCE Qualifications in Archaeology.

We published our requirements in relation to assessment objectives in *GCE Subject Level Conditions and Requirements for Archaeology*, and reproduce them in the table below.

	Objective	Weighting (A level)	Weighting (AS)
A01	Demonstrate knowledge and understanding of archaeological skills, methods, themes, issues and contexts.	25-35%	25-35%
AO2 (A level)	 Apply archaeological skills and methods, using archaeological terminology and conventions, to – interpret primary archaeological material and data interpret secondary archaeological material and data 	30-40%	n/a
AO2 (AS)	Apply archaeological skills and methods using archaeological terminology and conventions, to interpret secondary archaeological material and data.	n/a	30-40%
AO3 (A level)	 Analyse and evaluate – primary archaeological material and data secondary archaeological material and data archaeological interpretations archaeological themes, issues and contexts 	35-45%	n/a
AO3 (AS)	 Analyse and evaluate – secondary archaeological material and data archaeological interpretations archaeological themes, issues and contexts 	n/a	25-35%

We set out below our guidance for the purposes of Condition GCE(Archaeology)1.2. This guidance explains how we expect awarding organisations to interpret these assessment objectives in terms of:

- the different 'strands' within each of the assessment objectives;
- the discrete 'elements' within each assessment objective and its strands which questions and tasks could target and/or seek to credit – our expectation is that every question/task should target or seek to credit at least one of these elements, and may target or seek to credit multiple elements across one or more assessment objectives;
- the coverage expectations, such as in relation to the different elements within each assessment objective and how those elements should be sampled over time; and

 the key areas of emphasis in each assessment objective and the particular meaning for the subject of any key terms and phrases used; defined terms are shown in bold text, followed by their definitions.

In line with the obligations set out in Condition GCE(Archaeology)1.2, we expect awarding organisations to be able to demonstrate how they have had regard to this guidance. For example, an awarding organisation could map how it has regard to the guidance as it:

- develops its sample assessment materials;
- delivers the qualification;
- develops and applies its approach to sampling the elements into which the assessment objectives are divided; and
- monitors the qualification to make sure it addresses all elements appropriately.

AO1: Demonstrate knowledge and understanding of archaeological skills, methods, themes issues and contexts.			25-35% (A level) 25%- 35%(AS)
Strands	Elements	Coverage	Interpretation and definitions
n/a	 1a - Demonstrate knowledge of archaeological skills and methods 1b - Demonstrate understanding of archaeological skills and methods 1c - Demonstrate knowledge of archaeological themes, issues and contexts 1d - Demonstrate understanding of archaeological themes, issues and contexts 	 Full coverage in each set of assessments⁹ (but not in every assessment). A reasonable balance between the elements within this assessment objective. Awarding organisations should justify the balance between elements in their assessment strategies. No more than 10% of the total marks for the qualification should reward demonstrating knowledge in isolation.¹⁰ 	 Both here and in AO2, archaeological skills and methods are aspects of subject content. Awarding organisations should set out their approach to targeting them in their assessment strategies. They include the range of sources and techniques used by archaeologists to investigate the archaeological record. Key themes/ ideas and archaeological contexts are aspects of subject content. Awarding organisations should set out their approach to targeting them in their assessment strategies.

⁹ For the purposes of this guidance, a 'set of assessments' means the assessments to be taken by a particular Learner for a GCE Qualification in archaeology. For clarity, the assessments taken by Learners may vary, depending on any possible routes through the qualification.
¹⁰ Marks which 'reward demonstrating knowledge in isolation' means any mark awarded solely for recalling facts or other knowledge that is part of the specification. It does not include marks awarded for selecting appropriate knowledge (for example, to evidence an argument), or for applying knowledge to a particular context.

AO2 (A level): Apply archaeological skills and methods, using archaeological terminology and conventions, to – interpret primary archaeological material and data interpret secondary archaeological material and data			30-40% (A level) n/a (AS)
Strands	Elements	Coverage	Interpretation and definitions
 1 – Apply archaeological skills and methods, using archaeological terminology and conventions, to interpret primary archaeological material and data 2 – Apply archaeological skills and methods, using archaeological terminology and conventions, to interpret secondary archaeological material and data 	This strand is a single element This strand is a single element	 Full coverage in each set of assessments (but not in every assessment). A reasonable balance between the strands within this assessment objective. Awarding organisations should justify the balance between strands in their assessment strategies. 	 See guidance in relation to AO1 for the definition of archaeological skills and methods. As in AO1, awarding organisations should set out their approach to targeting them in their assessment strategies. Primary archaeological data is a collection of original data by Learners requiring them to interact with the archaeological record. Secondary archaeological data is information which has already been collected and is available from other sources.

AO2 (AS): Apply archaeological skills and methods using archaeological terminology and conventions, to interpret secondary archaeological material and data.			n/a (A level) 30%-40%(AS)
Strands	Elements	Coverage	Interpretation and definitions
n/a	This assessment objective is a single element	 Full coverage in each set of assessments (but not in every assessment). 	 See guidance in relation to AO1 for the definition of archaeological skills and methods. As in AO1, awarding organisations should set out their approach to targeting them in their assessment strategies. Secondary archaeological data is information which has already been collected and is available from other sources.

 AO3 (A level): Analyse and evaluate – primary archaeological material and data secondary archaeological material and data archaeological interpretations archaeological themes, issues and contexts 			35-45% (A level) n/a (AS)
Strands	Elements	Coverage	Interpretation and definitions
1 – Analyse and evaluate primary archaeological material and data	 1a – Analyse primary archaeological material and data 1b – Evaluate primary archaeological material and data 	 Full coverage in each set of assessments (but not in every assessment). A reasonable 	 Analyse means deconstructing ideas and/or information and/or evidence to find connections and provide logical chains of reasoning Evaluate means appraising and/or synthesising ideas and/or information and/or evidence
2 – Analyse and evaluate secondary archaeological material and data	 2a – Analyse secondary archaeological material and data 2b – Evaluate secondary archaeological material and data 	balance between the strands within this assessment objective, and between the elements within	 Primary archaeological data is a collection of original data by Learners requiring them to interact with the archaeological record. Secondary archaeological data is information which has already been collected and is available from other sources.
3 – Analyse and evaluate archaeological interpretations	 3a – Analyse archaeological interpretations 3b – Evaluate archaeological interpretations 	 each strand. Awarding organisations should justify the 	 Archaeological interpretations are reconstructions of the past which have been created based on data analysis and which attempt to explain the meaning of the data.
4 – Analyse and evaluate archaeological themes, issues and contexts	4a – Analyse archaeological themes, issues and contexts 4b - Evaluate archaeological themes, issues and contexts	balance between strands and elements in their assessment strategies.	 Archaeological themes, issues and contexts are aspects of subject content. Awarding organisations should set out their approach to targeting them in their assessment strategies.

 AO3 (AS): Analyse and evaluate – secondary archaeological material and data archaeological interpretations archaeological themes, issues and contexts 			n/a (A level) 25-35% (AS)
Strands	Elements	Coverage	Interpretation and definitions
 1 – Analyse and evaluate secondary archaeological material and data 2 – Analyse and evaluate archaeological interpretations 	 1a – Analyse secondary archaeological material and data 1b – Evaluate secondary archaeological material and data 2a – Analyse archaeological interpretations 2b – Evaluate archaeological interpretations 	 Full coverage in each set of assessments (but not in every assessment). A reasonable balance between the strands within this assessment objective, and between the elements within each strand. 	 Analyse means deconstructing ideas and/or information and/or evidence to find connections and provide logical chains of reasoning. Evaluate means appraising and/or synthesising ideas and/or information and/or evidence Secondary archaeological data is information which has already been collected and is available from other sources. Archaeological interpretations are reconstructions of the past which have been created based on data analysis and which
3 – Analyse and evaluate archaeological themes, issues and contexts	3a – Analyse archaeological themes, issues and contexts 3b - Evaluate archaeological themes, issues and contexts	 Awarding organisations should justify the balance between strands and elements in their assessment strategies. 	 attempt to explain the meaning of the data. Archaeological themes, issues and contexts are aspects of subject content. Awarding organisations should set out their approach to targeting them in their assessment strategies.

Questions on proposed Conditions, requirements and guidance

Question 6: Do you have any comments on our proposed Conditions and requirements for AS and A level archaeology?

Question 7: Do you have any comments on our proposed guidance for AS and A level archaeology?

4. Equality impact analysis

Ofqual's role, objectives and duties

4.1 We are subject to the public sector equality duty. We have set out in Appendix B how this duty interacts with our statutory objectives and other duties.

Equality impact analysis relating to proposed changes to GCSE, AS and A level archaeology

- 4.2 We have considered the potential impact on students who share protected characteristics¹¹ of the application of the principles and features that will apply to all new GCSE, AS and A level qualifications. Our equality impact analyses for our earlier consultations on GCSE,¹² AS and A level reform¹³ are therefore of interest and we encourage you to read them.
- 4.3 Issues concerning the proposed subject content have been considered by DfE, who have published their own Equalities Impact Analysis on their subject content proposals.¹⁴
- 4.4 We have also previously considered the potential impact on students who share protected characteristics of our decisions on assessment arrangements for this subject.¹⁵
- 4.5 We do not repeat here all of the evidence we have considered, as this can be found in our earlier reports. We focus instead on the specific issues that arise from the new proposals in this consultation, and from the way in which we are implementing our previous policy decisions.
- 4.6 We have not identified any additional negative impacts on students who share protected characteristics which would result from the proposals in this

¹¹ For the purposes of the public sector equality duty, the protected characteristics are disability, racial group, age, religion or belief, pregnancy or maternity, sex, sexual orientation, gender reassignment.

¹² <u>http://webarchive.nationalarchives.gov.uk/20141031163546/http://comment.ofqual.gov.uk/gcse-reform-june-2013/category/8-equality-impact-analysis/</u>

¹³ <u>http://webarchive.nationalarchives.gov.uk/20141031163546/http://www.ofqual.gov.uk/files/2012-06-18-equality-analysis-of-the-a-level-reform-consultation.pdf</u>

¹⁴ www.gov.uk/government/consultations/further-gcse-and-a-level-content-for-teaching-fromseptember-2017

¹⁵ www.gov.uk/government/consultations/developing-new-gcses-as-and-a-levels-for-first-teaching-in-2017

consultation (beyond those that we and DfE have already identified in our earlier reports).

- 4.7 During this consultation, we will continue to seek and consider evidence and feedback to our proposals that might help us identify any potential subject-specific impacts on students who share a protected characteristic.
- 4.8 Exam boards are required to consider the accessibility of their qualifications at the design stage and to remove any unjustifiable barriers.

Question 8: We have not identified any ways in which the proposals for AS and A level archaeology would impact (positively or negatively) on persons who share a protected characteristic.¹⁶ Are there any potential impacts we have not identified?

Question 9: Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

Question 10: Do you have any other comments on the impacts of the proposals on students who share a protected characteristic?

¹⁶ '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.

Appendix A: Regulatory tools

Comparability and innovation

Exam boards operate in a market. They can design and deliver their qualifications in different ways, within the parameters we set. This provides some choice to schools or colleges, which is one of the benefits of a qualifications market. Exam boards must, however, make sure that the levels of attainment indicated by their qualifications are comparable to those of other exam boards' versions of the qualifications. The exam boards cooperate in a range of ways to make sure that the standards of their respective qualifications are comparable. To make sure standards are maintained and comparability is secured, we review AS and A level qualifications before they can be made available, by applying an accreditation requirement to the qualifications, and we oversee the awarding of AS and A level qualifications.

We do not wish to close down opportunities for exam boards to design and deliver their qualifications in different ways. Indeed, we have a statutory duty to have regard to the desirability of facilitating innovation in connection with the provision of regulated qualifications and a statutory objective with regard to the efficiency with which the qualifications market works. If we adopt a regulatory approach in which all aspects of a qualification are very tightly defined, we could effectively remove scope for exam boards to distinguish their qualifications from others and stop choice for schools or colleges. On the other hand, if exam boards have too much scope to vary their approach their qualifications might not be comparable.

In striking a balance, we use a range of tools to regulate qualifications and the exam boards that provide them. The main regulatory tools we use for the qualifications in this consultation are explained below.

Conditions of Recognition

Exam boards must comply at all times with our Conditions of Recognition. These are the main regulatory rules that we use. We can take regulatory action against an exam board that breaches or is likely to breach a Condition.

There are three sets of Conditions that will apply to new AS and A level qualifications:

(i) the published *General Conditions of Recognition*¹⁷ that apply to all regulated qualifications;

¹⁷ www.gov.uk/government/publications/general-conditions-of-recognition

- (ii) GCE Qualification Level Conditions and Requirements¹⁸ that apply to all new AS and A level qualifications;
- (iii) GCE Subject Level Conditions that apply to new AS and A level qualifications in a specific subject. We are consulting now on draft GCE Subject Level Conditions for archaeology.

Regulatory documents

In some Conditions we refer to published regulatory requirements. We publish these in regulatory documents. The Conditions require exam boards to comply with such documents.

We are proposing to introduce the following regulatory documents, which cover our requirements for non-exam assessment at A level.

The requirements will have effect as if they were part of a Condition. The requirements will be set out in a stand-alone section of the Conditions document, simply because they are technical and detailed so they sit better as separate from, rather than within, the Condition itself.

Statutory guidance

We publish guidance to help exam boards identify the types of behaviour or practices they could use to meet a Condition. Exam boards must have regard to such guidance, but they do not have to follow this guidance in the same way that they must comply with the Conditions; they are free to meet the outcomes of the Conditions in their own ways. An exam board that decides to take a different approach to that set out in our guidance must still be able to show that it is meeting the Condition or Conditions to which the guidance relates.

We are consulting now on draft guidance for new AS and A levels in archaeology.

¹⁸ www.gov.uk/government/publications/gce-qualification-level-conditions-and-requirements

Appendix B: Ofqual's role, objectives and duties

Our statutory objectives include the qualifications standards objective, which is to secure that the qualifications we regulate:

- (a) give a reliable indication of knowledge, skills and understanding; and
- (b) indicate:
 - (i) a consistent level of attainment (including over time) between comparable regulated qualifications; and
 - a consistent level of attainment (but not over time) between qualifications we regulate and comparable qualifications (including those awarded outside the UK) that we do not regulate.

We must therefore regulate so that qualifications properly differentiate between students who have demonstrated that they have the knowledge, skills and understanding required to attain the qualification and those who have not.

We also have a duty under the Apprenticeship, Skills, Children and Learning Act 2009 to have regard to the reasonable requirements of relevant students, including those with special educational needs and disabilities, of employers and of the higher education sector, and to aspects of government policy when so directed by the Secretary of State.

As a public body, we are subject to the public sector equality duty.¹⁹ This duty requires us to have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The exam boards that design, deliver and award AS and A level qualifications are required by the Equality Act, among other things, to make reasonable adjustments for disabled people taking their qualifications, except where we have specified that such adjustments should not be made.

¹⁹ Equality Act 2010, section 149.

When we decide whether such adjustments should not be made, we must have regard to:

- (a) the need to minimise the extent to which disabled persons are disadvantaged in attaining the qualification because of their disabilities;
- (b) the need to secure that the qualification gives a reliable indication of the knowledge, skills and understanding of a person upon whom it is conferred;
- (c) the need to maintain public confidence in the qualification.

Legislation therefore sets out a framework within which we must operate. We are subject to a number of duties and we must aim to achieve a number of objectives. These different duties and objectives can, from time to time, conflict with each other. For example, if we regulate to secure that a qualification gives a reliable indication of a student's knowledge, skills and understanding, a student who has not been able to demonstrate the required knowledge, skills and/or understanding will not be awarded the qualification. A person may find it more difficult, or impossible, to demonstrate the required knowledge, skills and/or understanding because they have a protected characteristic. This could put them at a disadvantage relative to others who have been awarded the qualification. It is not always possible for us to regulate so that we can both secure that qualifications give a reliable indication of knowledge, skills and understanding and advance equality between people who share a protected characteristic and those who do not. We must review all the available evidence and actively consider all the available options before coming to a final, rational decision.

Qualifications cannot be used to mitigate inequalities or unfairness in the education system or in society more widely than might affect, for example, students' preparedness to take the qualification and the assessments within it. While a wide range of factors can have an impact on a student's ability to achieve a particular mark in an assessment, our influence is limited to the way the qualification is designed and assessed.

We require the exam boards to design qualifications to give a reliable indication of the knowledge, skills and understanding of those on whom they are conferred. We also require the exam boards to avoid, where possible, features of a qualification that could, without justification, make a qualification more difficult for a student to achieve because they have a particular protected characteristic. We require exam boards to monitor whether any features of their qualifications have this effect.

In setting the overall framework within which exam boards will design, assess and award the reformed GCSE, A level and AS qualifications, we want to understand the possible impacts of the proposals on persons who share a protected characteristic.

The protected characteristics under the Equality Act 2010 are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnerships;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

It should be noted that with respect to the public sector equality duty under section 149 of the 2010 Act, we are not required to have due regard to impacts on those who are married or in a civil partnership.

Responding to the consultation

Your details

To evaluate responses properly, we need to know who is responding to the consultation and in what capacity. We will therefore only consider your response if you complete the following information section.

We will publish our evaluation of responses. Please note that we may publish all or part of your response unless you tell us (in your answer to the confidentiality question) that you want us to treat your response as confidential. If you tell us you wish your response to be treated as confidential, we will not include your details in any published list of respondents, although we may quote from your response anonymously.

Please answer all questions marked with a star*

Name*

Position*

Organisation name (if applicable)*

Address

Email

Telephone

Would you like us to treat your response as confidential?*

If you answer yes, we will not include your details in any list of people or organisations that responded to the consultation.

() Yes () No

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", please respond accordingly:

Type of responding organisation*

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

Ofqual 2016

How did you find out about this consultation?

- () Our newsletter or another one of our communications
- () Our website
- () Internet search
- () Other

May we contact you for further information?

() Yes () No

Questions

Question 1: To what extent do you agree or disagree that we should introduce a Condition which requires exam boards to comply with the relevant subject content and assessment objectives?

()	Strongly	agree
---	---	----------	-------

- () Agree
- () Neither agree nor disagree
- () Disagree
- () Strongly disagree

Please explain your reasons:

.....

.....

Question 2: To what extent do you agree or disagree that we should introduce guidance which clarifies how exam boards should interpret our assessment objectives?

() Strongly agree

() Agree

() Neither agree nor disagree

- () Disagree
- () Strongly disagree

Please explain your reasons:

.....

Question 3: To what extent do you agree or disagree that we should introduce a Condition which permits non-exam assessment, specifies the proportion of exam and non-exam assessment, and allows us to set more detailed rules and guidance on non-exam, assessment?

() Strongly agree

- () Agree
- () Neither agree nor disagree
- () Disagree
- () Strongly disagree

Please explain your reasons:

.....

.....

Question 4: To what extent do you agree or disagree with our proposed approach to setting non-exam assessment for A level archaeology?

- () Strongly agree
- () Agree
- () Neither agree nor disagree
- () Disagree
- () Strongly disagree

Please explain your reasons:

.....

Question 5: To what extent do you agree or disagree with our proposed approach to marking non-exam assessment for A level archaeology?

- () Strongly agree
- () Agree
- () Neither agree nor disagree
- () Disagree
- () Strongly disagree

Please explain your reasons:

.....

Question 6: Do you have any comments on our proposed Conditions and requirements for AS and A level archaeology?

() Yes () No

Question 7: Do you have any comments on our proposed guidance for AS and A level archaeology?

() Yes () No

 Question 8: We have not identified any ways in which the proposals for AS and A level archaeology would impact (positively or negatively) on persons who share a protected characteristic.²⁰ Are there any potential impacts we have not identified?

() Yes () No Question 9: Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

() Yes () No

Question 10: Do you have any other comments on the impacts of the proposals on students who share a protected characteristic?

() Yes () No

²⁰ '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.

Accessibility of our consultations

We are looking at how we provide accessible versions of our consultations and would appreciate it if you could spare a few moments to answer the following questions. Your answers to these questions will not be considered as part of the consultation and will not be released to any third parties.

We want to write clearly, directly and put the reader first. Overall, do you think we have got this right in this consultation?

() Yes () No

Do you have any comments or suggestions about the style of writing?

() Yes () No

Do you have any special requirements to enable you to read our consultations? (for example, screen reader, large text, and so on)

() Yes () No

Which of the following do you currently use to access our consultation documents? (select all that apply)

- () Screen reader / text-to-speech software
- () Braille reader
- () Screen magnifier
- () Speech-to-text software
- () Motor assistance (blow-suck tube, mouth stick, and so on)
- () Other

Which of the following document formats would meet your needs for accessing our consultations? (select all that apply)

- () A standard PDF
- () Accessible web pages
- () Large-type PDF (16 point text)
- () Large-type Word document (16 point text)
- () eBook (Kindle, iBooks, or similar format)
- () Braille document
- () Spoken document
- () Other

How many of our consultations have you read in the last 12 months?

- ()1
- ()2
- ()3
- ()4
- ()5

() More than 5

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Spring Place Coventry Business Park Herald Avenue Coventry CV5 6UB

Telephone0300 303 3344Textphone0300 303 3345Helpline0300 303 3346

2nd Floor Glendinning House 6 Murray Street Belfast BT1 6DN