

# **A level and AS Geography**

## Consultation on Conditions and Guidance



February 2015

Ofqual/15/5614

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## **About this consultation**

We are seeking views on the regulatory requirements we propose to put in place for new A levels and AS qualifications in geography. These new qualifications are due to be taught in England from September 2016.

We do not repeat the policy proposals for this qualification on which we consulted during 2014 or the options we considered when we did so. You can find the outcome of that consultation on our website,<sup>1</sup> along with a summary of the responses to the consultations and our equality and regulatory impact assessments.

Further information about the reform of GCSEs, AS and A levels can be found at: [www.gov.uk/government/publications/get-the-facts-gcse-and-a-level-reform](http://www.gov.uk/government/publications/get-the-facts-gcse-and-a-level-reform).

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<sup>1</sup> [www.gov.uk/government/consultations/gcses-as-and-a-levels-reform-of-subjects-for-september-2016](http://www.gov.uk/government/consultations/gcses-as-and-a-levels-reform-of-subjects-for-september-2016)

### **Summary of our proposals – AS and A level geography**

- New A levels and AS qualifications in geography must comply with the Department for Education's subject content requirements and with our assessment objectives.
- AS specifications will require students to conduct two days of fieldwork. A level specifications will require students to conduct four days of fieldwork.
- Schools will submit a fieldwork statement confirming that each learner has completed the required fieldwork. Awarding organisations will treat non-submission of the fieldwork statement as malpractice and/or maladministration.
- In line with our previous decisions:
  - new AS qualifications in geography will be assessed solely by examinations, set and marked by the awarding organisation;
  - new A levels in geography will have 20 per cent of the marks allocated to non-exam assessment, with the remaining 80 per cent of the marks allocated to examinations, set and marked by the awarding organisation.
- The non-exam assessment will be allocated to the independent investigation required by the subject content document. The independent investigation will be based on a single question or issue defined and developed by the student to address aims, questions and/or hypotheses relating to any of the core or non-core content.
- Awarding organisations will mark the non-exam assessment.

## **How to respond to this consultation**

The closing date for responses to this consultation is **10th March 2015**.

You can respond to this consultation in one of three ways:

- Complete the online response at: <http://surveys.ofqual.gov.uk/s3/as-and-a-level-geography-conditions-and-guidance>.
- Email your response to [consultations@ofqual.gov.uk](mailto:consultations@ofqual.gov.uk) – please include the consultation title (AS and A level Geography Technical Consultation) 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 Geography Technical Consultation, Ofqual, Spring Place, Herald Avenue, Coventry, CV5 6UB.

### **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 the 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 10th March 2015.

## **Conditions of Recognition**

Awarding organisations 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 awarding organisation that breaches or is likely to breach a Condition.

There are three sets of Conditions that will apply to new AS qualifications and A levels (together ‘the Conditions’):

- (i) the published *General Conditions of Recognition*<sup>2</sup> that apply to all regulated qualifications;
- (ii) the published *GCE Qualification Level Conditions and Requirements*;<sup>3</sup>
- (iii) GCE Subject Level Conditions that apply to a GCE in a specific subject.

The way the Conditions of Recognition work alongside our other regulatory tools is set out in Appendix A.

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<sup>2</sup> [www.gov.uk/government/publications/general-conditions-of-recognition](http://www.gov.uk/government/publications/general-conditions-of-recognition)

<sup>3</sup> [www.gov.uk/government/publications/gce-qualification-level-conditions-and-requirements](http://www.gov.uk/government/publications/gce-qualification-level-conditions-and-requirements)

# **1. Draft GCE Subject Level Conditions and Guidance for geography**

## **Content requirements in geography**

1.1 The Department for Education has published the new content for AS qualifications and A levels in geography. New AS qualifications and A levels in geography must comply with the requirements of that document,<sup>4</sup> and with our assessment objectives

1.2 To bring this about, we propose to introduce the following Condition:

<b>Condition</b>	<b>Compliance with content requirements</b>
<b>GCE(Geography)1</b>	
<b>GCE(Geography)1.1</b>	<p><b>In respect of each GCE Qualification in Geography which it makes available, or proposes to make available, an awarding organisation must –</b></p> <ul style="list-style-type: none"><li><b>(a) comply with the requirements relating to that qualification set out in the document published by the Secretary of State entitled ‘Geography GCE AS and A Level subject content’,<sup>5</sup> document reference DFE-00693-2014,</b></li><li><b>(b) have regard to any recommendations or guidelines relating to that qualification set out in that document, and</b></li><li><b>(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.</b></li></ul>
<b>GCE(Geography)1.2</b>	<p><b>In respect of each GCE Qualification in Geography which it makes available, or proposes to make available, an awarding organisation must comply with any requirements, and have regard to any guidance, relating to the objectives to be met by any assessment for that qualification which may be published by Ofqual and revised from time to time.</b></p>

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<sup>4</sup> [www.gov.uk/government/publications/gce-as-and-a-level-geography](http://www.gov.uk/government/publications/gce-as-and-a-level-geography)

<sup>5</sup> [www.gov.uk/government/publications/gce-as-and-a-level-geography](http://www.gov.uk/government/publications/gce-as-and-a-level-geography)

- 1.3 We have not produced any guidance on the subject content for A level and AS qualifications in geography, but this Condition will keep open the option of doing so in the future.

### **Assessment requirements**

- 1.4 A levels in geography are to be assessed through a mixture of assessment by examination and non-exam assessment. We have already consulted on and announced our decision<sup>6</sup> in relation to the percentage of marks for A level qualifications in geography that should be assessed through non-exam assessment (20 per cent).
- 1.5 We propose to publish additional requirements and guidance (see below) on the assessment of geography. To give effect to these, we propose to introduce the following Condition:

<b>Condition</b>	<b>Assessment</b>
<b>GCE(Geography)2</b>	
<b>GCE(Geography)2.1</b>	<b>Condition GCE4.1 does not apply to any GCE A level qualification in Geography which an awarding organisation makes available or proposes to make available.</b>
<b>GCE(Geography)2.2</b>	<b>In respect of the total marks available for a GCE A level qualification in Geography which it makes available, an awarding organisation must ensure that –</b>  <b>(a) 80 per cent of those marks are made available through Assessments by Examination, and</b>  <b>(b) 20 per cent of those marks are made available through assessments that are not Assessments by Examination.</b>
<b>GCE(Geography)2.3</b>	<b>An awarding organisation must ensure that in respect of each assessment for a GCE A level qualification in Geography which it makes available which is not an Assessment by Examination it complies with any requirements, and has regard to any guidance, which may be published by Ofqual and revised from time to time.</b>

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<sup>6</sup> [www.gov.uk/government/consultations/gcses-as-and-a-levels-reform-of-subjects-for-september-2016](http://www.gov.uk/government/consultations/gcses-as-and-a-levels-reform-of-subjects-for-september-2016)



1.6 Condition GCE(Geography)2.3 allows us to specify requirements and guidance in relation to assessments which are not Assessments by Examination for GCE A level qualifications in geography.

1.7 In June 2013, we published the outcome of our *Review of Controlled Assessment in GCSEs*.<sup>7</sup> In that document, we set out the principles we would use for reformed GCSE qualifications to determine where we should use alternative assessment for elements that cannot be assessed by written exams. We have subsequently chosen to use the same principles for non-exam assessment in A levels and AS qualifications. Of particular relevance to this consultation are the following:

- Non-exam assessment arrangements, including the weighting assigned to any non-exam assessment, should be designed to fit the requirements of the subject.
- Controls should be used to ensure that we can be confident that what is assessed is what was intended to be assessed.
- Where non-exam assessment contributes to the overall grade, we will require exam boards to put in place robust arrangements to make sure the marks are valid and reliable.

1.8 For each subject where there is non-exam assessment, we have considered carefully the controls we can put in place to ensure that non-exam assessment is valid and reliable. Our starting point is that we should put in place appropriate controls to secure the reliability and validity of the assessment. Those controls might concern the setting, conduct and/or marking of the non-exam assessment.

1.9 In the particular case of A level geography, paragraph 27 of the Subject Document states that each A level in geography must 'ensure that each student undertakes one independent investigation that involves, but need not be restricted to, fieldwork.' The subject content document also requires that the Learner must base his or her independent investigation on a question or issue defined and developed by the Learner him or herself.

1.10 Given these requirements, our view is that regulatory controls around the setting of the non-exam assessment task in A level geography would

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[http://webarchive.nationalarchives.gov.uk/20141110161323/http://ofqual.gov.uk/ofdoc\\_categories/regulations-and-guidance/gcses-a-to-g/gcse-controlled-assessment-regulations-gcses-a-to-g/](http://webarchive.nationalarchives.gov.uk/20141110161323/http://ofqual.gov.uk/ofdoc_categories/regulations-and-guidance/gcses-a-to-g/gcse-controlled-assessment-regulations-gcses-a-to-g/)

unacceptably compromise the curriculum aims. So we are proposing that we should not introduce any such controls.

- 1.11 We also considered whether to specify that the non-exam assessment should be conducted under controlled conditions. Our view is that specifying that all work should be completed in a classroom under controlled conditions would make the task artificial. The nature of geographical fieldwork means that students need to be allowed to spend time outside the classroom working on their project. We are therefore not proposing that the task should be completed under controlled conditions. However, we do think that awarding organisations should put in place appropriate safeguards to ensure the work is the student's own.
- 1.12 Since we cannot put in place strong controls around the setting and conduct of the non-exam assessment in A level geography, we have paid particular attention to the controls around its marking.
- 1.13 Non-exam assessment can be marked either by the awarding organisation (external marking), or by teachers within their own schools (internal marking). External marking is usually more reliable than internal marking as it uses a smaller number of markers making it easier for awarding organisations to ensure marking is consistent.
- 1.14 We recognise that for A level geography there may be particular challenges for external marking. Awarding organisations have raised concerns about their ability to recruit sufficient markers, and the logistical complexity associated with marking a large number of pieces of project work. We recognise these concerns, but – at this time – we do not think awarding organisations have provided evidence that the difficulties of them marking the non-exam assessment in A level geography would outweigh the benefits.
- 1.15 Given that the non-exam assessment in A level geography is worth 20 per cent of the overall qualification, we propose that the non-exam assessment should be marked by the awarding organisations. Nevertheless, we stand ready to review this proposal in the light of evidence that the issues associated with the external marking of A level geography projects are insurmountable and that appropriate controls to secure the quality of internal marking could be put in place.
- 1.16 We set out our draft requirements for the purposes of Condition GCE(Geography)2.3 below:

## **Requirements in relation to assessments for GCE Qualifications in Geography**

Condition GCE(Geography)2.3 allows us to specify requirements and guidance in relation to assessments which are not Assessments by Examination for GCE A level qualifications in Geography.

We set out our requirements for the purposes of Condition GCE(Geography)2.3 below.

### **Non-examination assessment**

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

The subject content for GCE Qualifications in Geography is set out in the Department for Education's *Geography GCE AS and A Level subject content*, document reference DFE-00693-2014 (the 'Content Document').

Paragraph 27 of the Subject Document states that each GCE A level in Geography must

‘ensure that each student undertakes one independent investigation that involves, but need not be restricted to, fieldwork.’

An awarding organisation must ensure that each assessment which is not an Assessment by Examination requires each Learner to undertake a single independent investigation based on a question or issue defined and developed by the Learner him or herself.

### **Marking of assessments**

An awarding organisation must ensure that the evidence generated by each Learner in each assessment for a GCE Qualification in Geography which it makes available is marked by that awarding organisation or a person connected to that awarding organisation.

## **Fieldwork statements**

1.4 The subject content document<sup>8</sup> specifies that AS and A levels in geography must require students to undertake at least two days of fieldwork at AS, and

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<sup>8</sup> [www.gov.uk/government/publications/gce-as-and-a-level-geography](http://www.gov.uk/government/publications/gce-as-and-a-level-geography)

four days of fieldwork for A level. It further states that “Awarding Organisations must require evidence of this fieldwork in the form of a written statement from Centres.”

1.5 We therefore propose to introduce the following Condition relating to fieldwork statements:

<b>Condition</b>	<b>Fieldwork statements</b>
<b>GCE(Geography)3</b>	
<b>GCE(Geography)3.1</b>	<p><b>In respect of each assessment cycle for a GCE Qualification in Geography which it makes available, an awarding organisation must –</b></p> <p><b>(a) require each Centre to provide a fieldwork statement to the awarding organisation,</b></p> <p><b>(b) treat any failure by a Centre to provide a fieldwork statement to the awarding organisation in a timely manner as malpractice and/or maladministration (under General Condition A8 (<i>Malpractice and maladministration</i>)).</b></p>
<b>GCE(Geography)3.2</b>	<p><b>For the purposes of this condition –</b></p> <p><b>(a) a ‘fieldwork statement’ is a true and accurate written statement made by a Centre to an awarding organisation which confirms that each Learner to which that Centre has delivered the assessments to be taken in a particular assessment cycle for a GCE Qualification in Geography which the awarding organisation makes available has undertaken geographical fieldwork, and</b></p> <p><b>(b) ‘geographical fieldwork’ is fieldwork which meets the requirements set out in paragraphs 21 to 23, as relevant, of the document published by the Secretary of State entitled ‘Geography GCE AS and A Level subject content’, document reference DFE-00693-2014.<sup>9</sup></b></p>

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<sup>9</sup> [www.gov.uk/government/publications/gce-as-and-a-level-geography](http://www.gov.uk/government/publications/gce-as-and-a-level-geography)

## Assessment objectives

1.6 We have previously consulted on and announced our decisions on assessment objectives in A levels and AS qualifications in geography. The final assessment objectives are repeated below for completeness.

	Objective	Weighting (A level)	Weighting (AS)
<b>AO1</b>	Demonstrate knowledge and understanding of places, environments, concepts, processes, interactions and change, at a variety of scales.	30%–40%	30%–40%
<b>AO2</b>	Apply knowledge and understanding in different contexts to analyse, interpret and evaluate geographical information and issues.	30%–40%	30%–40%
<b>AO3</b>	Use a variety of relevant quantitative, qualitative and fieldwork skills to: <ul style="list-style-type: none"> <li>■ investigate geographical questions and issues,</li> <li>■ interpret, analyse and evaluate data and evidence,</li> <li>■ construct arguments and draw conclusions.</li> </ul>	20%–30%	20–30%

## Guidance on assessment objectives

1.7 This draft 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;
- 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.

1.8 In line with the obligations set out in Condition GCE(Geography)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.

1.9 The draft guidance on assessment objectives is set out below.

AO1: Demonstrate knowledge and understanding of places, environments, concepts, processes, interactions and change, at a variety of scales			30%–40% (A level) 30%–40% (AS)
Strands	Elements	Coverage	Interpretations and definitions
n/a	This AO is a single element.	<ul style="list-style-type: none"> <li>■ Full coverage in each set of assessments (but not in every assessment).</li> <li>■ No more than 10% of the marks for AO1 to be made available through questions/tasks targeting recall of information in isolation.</li> </ul>	<ul style="list-style-type: none"> <li>■ <b>Places, environments, concepts, processes, interactions and change</b> are aspects of subject content. Awarding organisations should explain their approach to targeting them in their assessment strategies.</li> <li>■ <b>Scales</b> relate to places, environments, concepts, processes, interactions and change. There is not a specific defined set of scales, but they should range, as appropriate, from local to global in each set of assessments.</li> <li>■ We do not expect every set of assessments to cover each aspect of subject content across all scales, or every aspect of subject content at the same scale.</li> </ul>

AO2: Apply knowledge and understanding in different contexts to analyse, interpret and evaluate geographical information and issues			30%–40% (A level) 30%–40% (AS)
Strands	Elements	Coverage	Interpretations and definitions
n/a	1a – Apply knowledge and understanding in different contexts to analyse geographical information and issues.	Full coverage in each set of assessments (but not in every assessment).	<ul style="list-style-type: none"> <li>■ <b>Different contexts</b> relates to situations and sets of circumstances or combinations of these. This will include a context or more than one context not in the specification.</li> <li>■ <b>Analyse</b> means finding connections and causes and/or effects as well as deconstructing concepts, information and/or issues.</li> <li>■ <b>Interpret</b> means ascribing meaning.</li> <li>■ <b>Evaluate</b> means appraising and judging utility (that is, usefulness, particularly with respect to suitability for a particular function) and validity, synthesising information, and coming to rational conclusions that are evidence-based.</li> <li>■ <b>Geographical information and issues</b> are aspects of subject content. Awarding organisations should explain their approach to targeting them in their assessment strategy.</li> <li>■ The emphasis here is on application. For each set of assessments, this should involve the Learner working with their knowledge and understanding as well as showing critical thinking skills, by:                             <ul style="list-style-type: none"> <li>□ relating them to novel situations that are not clearly indicated in the specification;</li> <li>□ developing further material that is covered in the specification; or</li> <li>□ making links between such types of material, which are not signalled in the specification.</li> </ul> </li> </ul>
	1b – Apply knowledge and understanding in different contexts to interpret geographical information and issues.		
	1c – Apply knowledge and understanding in different contexts to evaluate geographical information and issues.		



AO3: Use a variety of relevant quantitative, qualitative and fieldwork skills to			20%–30% (A level) 20%–30% (AS)
<ul style="list-style-type: none"> <li>■ investigate geographical questions and issues</li> <li>■ interpret, analyse and evaluate data and evidence</li> <li>■ construct arguments and draw conclusions</li> </ul>			
Strands	Elements	Coverage	Interpretations and definitions
1 – investigate geographical questions and issues.	This strand is a single element.	<ul style="list-style-type: none"> <li>■ Full coverage of the three strands in each set of assessments (but not every assessment).</li> <li>■ Reasonable coverage of geographical questions and geographical issues in each set of assessments (but not every assessment).</li> </ul>	<ul style="list-style-type: none"> <li>■ The emphasis in this assessment objective should be on the use of geographical skills – these can be overarching methods and/or specific techniques.</li> <li>■ <b>Interpret, analyse and evaluate</b> are intrinsically linked in this assessment objective; taken together they mean to critically investigate.</li> <li>■ In this assessment objective, <b>data and resources evidence</b> means stimulus materials collected by, or provided for, the Learner.</li> <li>■ There are a number of ways in which arguments and conclusions can be communicated. This may include written responses or data responses.</li> </ul>
2 – interpret, analyse and evaluate data and evidence.	This strand is a single element.		
3 – construct arguments and draw conclusions.	This strand is a single element.		

## **2. Equality impact analysis**

### **Ofqual's role, objectives and duties**

- 2.1 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 AS qualifications and A levels**

- 2.2 We have considered the potential impact on students who share protected characteristics<sup>10</sup> of the application of the principles and features that will apply to all new A level and AS qualifications. Our equality impact analyses for our earlier consultations on A level and AS qualification<sup>11</sup> reform are therefore of interest and we encourage you to read them.
- 2.3 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 are relevant to AS and A level geography.
- 2.4 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.
- 2.5 Awarding organisations are required to consider the accessibility of their qualifications at the design stage and to remove any unjustifiable barriers.

### **Assessment arrangements**

- 2.6 We have not identified any additional negative impacts on students who share protected characteristics which would result from our proposed approach to implementing assessment arrangements in AS and A level geography.
- 2.7 Any issues concerning the proposed content will be considered by the Department for Education, who have published their own Equalities Impact Analysis on their subject content proposals.<sup>12</sup>

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<sup>10</sup> 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.

<sup>11</sup> [www.gov.uk/government/publications/gce-as-and-a-levels-reformed-content](http://www.gov.uk/government/publications/gce-as-and-a-levels-reformed-content)

<sup>12</sup> [www.gov.uk/government/publications/a-level-subject-content-equality-impact-assessment](http://www.gov.uk/government/publications/a-level-subject-content-equality-impact-assessment)

### **3. 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 views'...')

Official response (Please answer the question 'Type of responding organisation')

**If you ticked 'Personal views' which of the following are you?**

Student

Parent or carer

Teacher (but responding in a personal capacity)

Other, including general public (Please state below)

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**If you ticked "Official response from an organisation/group", 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)
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**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: \_\_\_\_\_

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

Our newsletter or another one of our communications

Our website

Internet search

Other

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**May we contact you for further information?**

Yes    No

## **Questions**

### **Question 1**

**Do you have any comments on the draft Conditions for new A levels and AS qualifications in geography?**

**Yes**                       **No**

**If yes, please provide them here:**

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### **Question 2**

**Do you have any comments on the draft assessment requirements for new A levels and AS qualifications in geography?**

**Yes**                       **No**

**If yes, please provide them here:**

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**Question 3**

**Do you have any comments on the draft Guidance on assessment objectives for new A levels and AS qualifications in geography?**

Yes                       No

**If yes, please provide them here:**

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**Question 4**

**We have not identified any ways in which the proposed requirements for new A levels and AS qualifications in geography would impact (positively or negatively) on persons who share a protected characteristic. Are there any potential impacts we have not identified? If so, what are they?**

Yes                       No

**If yes, please provide them here:**

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**Question 5**

**Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic? If so, please comment on the additional steps we could take to mitigate negative impacts.**

Yes                       No

**If yes, please provide them here:**

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**Question 6**

**Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?**

Yes                       No

**If yes, please provide them here:**

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## Appendix A: Regulatory tools

### Comparability and innovation

Awarding organisations 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. Awarding organisations must, however, make sure that the levels of attainment indicated by their qualifications are comparable to those of other awarding organisations' versions of the qualifications. The awarding organisations 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 A levels and AS qualifications before they can be made available, by applying an accreditation requirement to the qualifications, and we oversee the awarding of A levels and AS qualifications.

We do not wish to close down opportunities for awarding organisations 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 awarding organisations to distinguish their qualifications from others and stop choice for schools or colleges. On the other hand, if awarding organisations 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 awarding organisations that provide them. The main regulatory tools we use for the qualifications in this consultation are explained below.

### Conditions of Recognition

Awarding organisations 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 awarding organisation that breaches or is likely to breach a Condition.

There are three sets of Conditions that will apply to new A levels and AS qualifications (together 'the Conditions'):

- (i) the published *General Conditions of Recognition*<sup>13</sup> that apply to all regulated qualifications;

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<sup>13</sup> [www.gov.uk/government/publications/general-conditions-of-recognition](http://www.gov.uk/government/publications/general-conditions-of-recognition)

- (ii) *GCE Qualification Level Conditions and Requirements*<sup>14</sup> that apply to all new A levels and AS qualifications;
- (i) GCE Subject Level Conditions that apply to all new A levels and AS qualifications in a specific subject – we are consulting now on draft GCE Subject Level Conditions for geography.

## **Regulatory documents**

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

We are proposing to introduce regulatory documents for A levels and AS qualifications in geography covering the assessment requirements for the subject. The requirements will have effect as if they were part of a Condition. The requirements are in a stand-alone section of the Conditions document, simply because they are technical and detailed so they sit better as separate to, rather than within, the Condition itself.

## **Statutory guidance**

We publish Guidance to help awarding organisations identify the types of behaviour or practices they could use to meet a Condition. Awarding organisations 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 awarding organisation that decides to take a different approach to that set out in 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 A levels and AS qualifications in geography.

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<sup>14</sup> [www.gov.uk/government/publications/gce-qualification-level-conditions-and-requirements](http://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
  - (ii) a consistent level of attainment (but not over time) between qualifications we regulate and comparable qualifications (including those awarded outside of 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.<sup>15</sup> 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 GCSE, A level and AS 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.

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<sup>15</sup> 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.

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