

# **Consultation on regulating Advanced Extension Awards**



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## About this consultation

Advanced Extension Awards (AEAs) are qualifications taken alongside A levels, designed to stretch and challenge the most able students. Our rules permit AEAs in any subject, but there is currently only one available (in mathematics). Around 700 school-age students take this qualification each year. Some universities use it to inform entry decisions.

A levels in England are being reformed, with most new A levels now being taught. These changes mean we also need to alter some of our rules for AEAs; this consultation sets out our proposed changes.

## Summary of our proposals

### Maintaining comparability with previous qualifications

We continue to require AEAs to:

- be accessible to students who have taken an A level in the corresponding subject, without requiring any further study or learning
- be more demanding than the corresponding A level, requiring students to demonstrate a greater depth of understanding
- have two passing grades – Merit and Distinction

### Reflecting A level reforms

- We only permit AEAs in subjects where there is at least one A level offered in England
- We require all future AEAs to be based on the Department for Education's subject content for the corresponding A level
- We also require AEAs to reflect the assessment objectives we have set for the corresponding A level, but with a greater emphasis on the skills of analysis and evaluation
- We require AEAs to use exam assessment, with non-exam assessment only permitted in subjects where we consider it appropriate. In such cases, we would set regulations to specify the amount and form of any non-exam assessment.

### Securing standards

Our rules for setting grade boundaries in AEAs require exam boards to use the same principles we have adopted for reformed A levels. This will mean exam boards will need to have regard to an appropriate range of evidence when setting grade boundaries.

## Your views

We seek your views on both our proposals, and on the detailed drafting of our rules and guidance that implement them.

We also welcome your views on our assessment of the likely impact of our proposals. This includes whether there are any impacts we have overlooked, and any steps we could take to mitigate such impacts.

## How to respond

The closing date for responses to this consultation is **Wednesday 7 March 2018 at 17:00**.

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

Please respond to this consultation in one of three ways:

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

## How we will use your response

- Your response will be used to help us shape our policies and regulatory activity.
- After the consultation ends, we will publish a summary of responses received.

We will not include your personal details in any published list of respondents, although we may quote from your response anonymously.

## Our proposals

### Maintaining comparability with previous qualifications

The AEA has been available since 2001. It is well-understood by those who teach and use it.

Our current rules for AEAs mean that both current and historic qualifications share a number of characteristics:

- they are accessible to students who have taken any A level specification in the corresponding subject, without requiring any further study or learning;
- they are more demanding than the corresponding A level, requiring students to demonstrate a greater depth of understanding; and
- they have two passing grades (Merit and Distinction).

These are all important and useful characteristics of the current qualifications. Making significant changes to any of them would make comparisons between future and current AEAs less meaningful. We do not think this is desirable.

To maintain comparability with previous qualifications, we are proposing to set requirements which, as far as possible, preserve these characteristics for future AEAs.

#### Our proposals – maintaining comparability with previous qualifications

We continue to require AEAs to:

- be accessible to students who have taken an A level in the corresponding subject, without requiring any further study or learning
- be more demanding than the corresponding A level, requiring students to demonstrate a greater depth of understanding
- have two passing grades – Merit and Distinction.

### Reflecting A level reform

#### Availability of qualifications

As part of the reforms to A levels, we have limited the subjects in which exam boards can develop an A level. Exam boards can only develop an A level in a subject for which we have set rules (including rules that specify the subject content).

As AEAs are designed to stretch the most able students in an A level subject, it would not make sense to permit exam boards to develop an AEA in a subject where there was no corresponding A level.

So we are proposing to introduce a rule that restricts AEs to subjects where at least one A level is available in England.

### **Subject content**

An essential part of the reforms to A levels in England was the introduction of prescribed [subject content](#) for each subject, produced by the Department for Education. All reformed A levels offered in England must be based on such content.

Our current rules for AEs require them to be based on the legacy [GCE subject criteria](#) for the corresponding subject.

Clearly, this rule is no longer fit for purpose. If retained, it would mean that AEs would no longer have the same content as the corresponding A level, and would not be accessible to future A level students without additional teaching or learning.

AEs will only be accessible to all A level students in England if they are based on the Department for Education's prescribed subject content, as this is the common content that underpins all reformed A levels.

To ensure our expectations are as clear as possible, we are therefore proposing to introduce a rule that requires AEs to be based on the Department for Education's subject content for an A level in the corresponding subject.

This rule may mean that some AEs are slightly less accessible to students taking A levels that are only available in Wales and Northern Ireland. This is because, in some subjects, curriculum requirements are no longer exactly the same in all three countries.

Differences in the subject content between the three countries vary by subject, although often are relatively minor. In practice, we would expect AEs designed against the Department for Education's subject content to be accessible to A level students in Wales and Northern Ireland. However, our rules will not require exam boards to ensure or demonstrate that this is the case.

We anticipate exam boards will continue to offer the same AEA qualification in all three countries wherever this is possible. If differences between curriculum requirements mean this is not possible, our rules will not prevent exam boards from offering a different AEA in Wales and/or Northern Ireland. Of course, we would not regulate any such qualifications, but they could be regulated by Qualifications Wales and/or CCEA (the regulators in Wales and Northern Ireland, respectively).

### **Assessment objectives**

All reformed A levels must also comply with our assessment objectives, which set out the skills and abilities that must be tested in each qualification, and their relative weightings.

As with the Department for Education's subject content, we think future AEs will also need to reflect the assessment objectives we have set for the corresponding A level.

Our current rules for AEs also require them to be more demanding than the corresponding A level – including by requiring:

the use of the skills of critical analysis, evaluation and synthesis

The assessment objectives we have set for reformed A levels already include analysis and evaluation. As a result, we think this requirement needs reframing to reflect the changes to A levels.

We are proposing that future AEs must (as part of ensuring an overall higher level of demand) place a greater emphasis on the skills of analysis and evaluation than the corresponding A level.

### **Approach to assessment**

Our current rules for AEs require them to use 100% external assessment (unless another approach has been agreed in advance with the relevant regulators).

Our view is that this approach is no longer appropriate. Qualifications should use whichever method of assessment is most valid. While using only external assessment might be appropriate in some subjects, it might not be the best approach in all subjects.

While externally-set exams are likely to be the most appropriate assessment method in mathematics, we do not want to put in place rules which would prevent exam boards from adopting the most valid approach to assessment in other subjects.

For reformed A levels, we chose to set rules that specify exam assessment as the default approach, but allowed us to permit non-exam assessment in individual subjects.

We think a similar approach is the most appropriate for future AEs. This would mean that mathematics, the only subject for which there is currently an AE, would continue to use only externally-set exams. It would also permit a degree of flexibility should exam boards choose to offer AEs in other subjects in the future.

This approach would require us to explicitly permit non-exam assessment in individual subjects. It would not mean that AEs would have to use non-exam assessment where the corresponding A level does. Instead, we would take any decisions about non-exam assessment in an AE by considering the approach proposed to that particular subject. We think this is an important safeguard, as it allows us to consider whether non-exam assessment is warranted, and whether any additional rules are needed to support it, before any AEs including non-exam assessment can be offered.

We are therefore proposing to update our rules for assessment in AEAs to reflect the approach we have taken for A levels – requiring only exam assessment, except in subjects where we have permitted non-exam assessment.

### Our proposals – reflecting A level reforms

- We only permit AEAs in subjects where there is at least one A level offered in England
- We require all future AEAs to be based on the DfE's subject content for the corresponding A level
- We also require AEAs to reflect the assessment objectives we have set for the corresponding A level, but with a greater emphasis on the skills of analysis and evaluation
- In line with reformed A levels, we require AEAs to use only exam assessment, except where we permit non-exam assessment in a specific subject. In such cases, we would set regulations to specify the amount and form of any non-exam assessment.

### Securing standards

Our current rules for AEAs require grading arrangements to ensure that:

the grades awarded match the performance-level descriptions in the relevant regulators' test specifications

This requirement is not workable for future AEAs. The changes to A level content mean that existing test specifications will no longer provide a useful reference point. It would also not align with the approach we take to setting and maintaining standards in A level qualifications, which we think is also the most reliable approach to setting standards in future AEAs.

That would mean exam boards would need to have regard to an appropriate range of evidence when setting grade boundaries, which must include evidence of:

- the level of demand (difficulty) of the assessments;
- performance of a representative sample of students in the assessments;
- students' prior attainment; and
- the performance of previous years' students.

Exam boards would also need to retain a record of the evidence they used when setting grade boundaries, and their reasons for using that evidence.



These requirements are supported by guidance, which would include examples of the types of evidence exam boards would need to consider.

### **Our proposals – securing standards**

Our rules for setting grade boundaries in AEs require exam boards to use the same principles we have adopted for reformed A levels. This will mean exam boards will need to have regard to an appropriate range of evidence when setting grade boundaries.

### **Our proposed rules and guidance**

Appendix 1 sets out proposed rules and guidance for AEs that reflect our consultation proposals. These show how we would implement these proposals in practice.

## **Impact of our proposals**

Our proposed changes are designed to enable exam boards to continue offering AEAs where users need and value these qualifications, in particular by facilitating changes to reflect reform of A levels.

In the main, our proposed new rules simply reflect existing provisions, updated where necessary in the light of A level reforms.

The only new provisions are our requirements and guidance for setting standards in AEAs. These simply codify existing practice, so we do not expect them to have a material impact.

We are also proposing to set an explicit rule that restricts AEAs to subjects where A levels are offered in England. AEAs are already required to be more demanding than the corresponding A level, so our view is that this is not a new requirement, but simply a clearer statement of an existing implicit rule.

We have not identified any other impacts (either on students who share protected characteristics or more widely) which would result from our proposed changes.

‘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 1 – Our proposed new Conditions, requirements and guidance

### Qualification level Conditions

#### Condition AEA1 Subjects for advanced extension awards

AEA1.1 An awarding organisation may only make available an advanced extension award in a subject for which:

- (a) Ofqual has set and published GCE Subject Level Conditions; and
- (b) there is at least one GCE A level qualification available to Learners in England.

#### Condition AEA2 Content requirements

AEA2.1 An awarding organisation must ensure that each advanced extension award which it makes available is accessible to any Learner who has studied any GCE A level qualification offered in England in the corresponding subject, without them undertaking additional study or learning.

AEA2.2 In particular, an awarding organisation must ensure that each advanced extension award which it makes available is based on:

- (a) the subject content<sup>1</sup> published by the Department for Education for a GCE A level qualification in the corresponding subject; and
- (b) the requirements relating to the objectives to be met by any assessment for a GCE A level qualification in the corresponding subject.

#### Condition AEA3 Specified levels of attainment

AEA3.1 An awarding organisation must ensure that the specification for each advanced extension award which it makes available or proposes to make available sets out specified levels of attainment which comply with any requirements which may be published by Ofqual and revised from time to time.

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<sup>1</sup> [www.gov.uk/government/collections/gce-as-and-a-level-subject-content](http://www.gov.uk/government/collections/gce-as-and-a-level-subject-content)

**Condition AEA4 Assessment by Examination**

- AEA4.1 An awarding organisation must ensure that every assessment for an advanced extension award which it makes available is an Assessment by Examination.
- AEA4.2 Condition AEA4.1 does not apply in respect of an advanced extension award where an AEA Subject Level Condition states that its application is excluded in respect of that qualification.

**Condition AEA5 Level of Demand**

- AEA5.1 An awarding organisation must take all reasonable steps to ensure that the Level of Demand for each advanced extension award which it makes available is higher than a GCE A level qualification in the same subject, in particular by:
- (a) requiring Learners to demonstrate a greater depth of understanding; and
  - (b) placing greater emphasis on the skills of analysis and evaluation.

**Condition AEA6 Standard setting**

- AEA6.1 In respect of each advanced extension award which it makes available, an awarding organisation must comply with any requirements, and have regard to any guidance, which may be published by Ofqual and revised from time to time in relation to –
- (a) the promotion of consistency between the measurement of Learners' levels of attainment in that qualification and similar qualifications made available by other awarding organisations, and
  - (b) the setting of specified levels of attainment.
- AEA6.2 In setting the specified levels of attainment for an advanced extension award which it makes available, an awarding organisation must have regard to an appropriate range of qualitative and quantitative evidence.
- AEA6.3 In respect of each advanced extension award which it makes available, the range of evidence to which an awarding organisation has regard for the purposes of Condition AEA6.2 will only be appropriate if it includes evidence of –

- (a) the Level of Demand of the assessments for that qualification,
- (b) the level of attainment demonstrated in those assessments by an appropriately representative sample of Learners taking that qualification,
- (c) the level of attainment demonstrated by Learners taking that qualification in a –
  - (i) prior assessment (which was not for that qualification), whether or not that assessment was for a regulated qualification, or
  - (ii) prior qualification, whether or not that qualification was a regulated qualification, and
- (d) following the first year in which the qualification is awarded, the level of attainment demonstrated by Learners who have previously been awarded the qualification.

AEA6.4 An awarding organisation must maintain a record of –

- (a) the evidence to which it has had regard in setting the specified levels of attainment for each advanced extension award which it makes available, and
- (b) its rationale for the selection of and weight given to that evidence.

### **Condition AEA7 Interpretation and Definitions**

AEA7.1 The rules of interpretation and definitions outlined in General Condition J1 shall apply to the AEA Qualification Level Conditions, and to any AEA Subject Level Conditions.

AEA7.2 Except in the circumstances described in Condition AEA7.3, the requirements imposed by the AEA Qualification Level Conditions and any AEA Subject Level Conditions apply in addition to each other and to the requirements imposed by the General Conditions of Recognition.

AEA7.3 To the extent that there is any inconsistency between –

- (a) a requirement of an AEA Subject Level Condition and a requirement of either an AEA Qualification Level Condition or a General Condition of Recognition, such that an awarding

organisation could not comply with both such requirements, the awarding organisation must comply with the requirement of the AEA Subject Level Condition and is not obliged to comply with the requirement of the other Condition, or

- (b) a requirement of an AEA Qualification Level Condition and a requirement of a General Condition of Recognition, such that an awarding organisation could not comply with both such requirements, the awarding organisation must comply with the requirement of the AEA Qualification Level Condition and is not obliged to comply with the requirement of the General Condition of Recognition.

AEA7.4 In these Conditions the following words shall have the meaning given to them below (and cognate expressions should be construed accordingly) –

#### **AEA Qualification Level Condition**

A Condition of Recognition that applies to all advanced extension awards, except where a AEA Subject Level Condition states that its application is excluded in respect of a specific subject, and which uses the numbering format 'AEAn.n', where 'n' denotes a number.

#### **AEA Subject Level Condition**

A Condition of Recognition that applies to an advanced extension award in a specific subject only and which uses the numbering format 'AEA(x)n.n', where 'x' denotes a particular subject and 'n' denotes a number.

#### **Assessment by Examination**

An assessment which is –

- (a) set by an awarding organisation,
- (b) designed to be taken simultaneously by all relevant Learners at a time determined by the awarding organisation, and
- (c) taken under conditions specified by the awarding organisation (including conditions relating to the supervision of Learners during the assessment and the duration of the assessment).

## **GCE Subject Level Condition**

A Condition of Recognition that applies to a GCE qualification in a specific subject only and which uses the numbering format 'GCE(x)n.n', where 'x' denotes a particular subject and 'n' denotes a number.

## **Requirements in relation to the specified levels of attainment for advanced extension awards**

### **Specified levels of attainment**

Condition AEA3.1 allows us to specify requirements in relation to specified levels of attainment for advanced extension awards.

We set out below our requirements for the purposes of Condition AEA3.1.

In relation to each advanced extension award which it makes available, an awarding organisation must ensure that –

- (a) the specified levels of attainment are Merit and Distinction;
- (b) a Learner who does not meet the criteria to be awarded either specified level of attainment is issued a result of 'Unclassified' or U.

### **Requirements for setting specified levels of attainment for advanced extension awards**

Condition AEA6.1(b) allows us to specify requirements and guidance in relation to the setting of specified levels of attainment for advanced extension awards.

We set out below our general requirements for the purposes of Condition AEA6.1(b). We may publish additional specific requirements from time to time, including in relation to the setting of particular specified levels of attainment.

For ease of reference, the specified levels of attainment used in AEAs are referred to below as 'grades'.

An awarding organisation must set the following grade boundaries for each Component:

- (a) Merit / U
- (b) Distinction / Merit

In doing this, the awarding organisation must have regard to achieving suitable qualification level outcomes.

An awarding organisation must set qualification grade boundaries for each advanced extension award as a whole as follows:

- (a) the boundary mark for each Component is scaled as necessary to reflect the intended weighting of that Component as detailed in the specification.
- (b) the resulting scaled Component boundary marks are added and the result is rounded to the nearest whole number (0.5 is rounded up).

In setting these qualification grade boundaries, an awarding organisation must:

- (a) in the first year in which an advanced extension award is awarded<sup>2</sup>, comply with any specific requirements that Ofqual may set<sup>3</sup>,
- (b) in compliance with Condition H3.1, in the second and subsequent years of awarding, set each grade boundary so as to ensure consistency with the standard set for the same grade boundary in the first year in which the qualification is awarded, and
- (c) without prejudice to the requirements in paragraphs (a) and (b) above, have regard to achieving suitable qualification level outcomes.

### **Guidance on standard setting for AEA6**

Condition AEA6.1(b) allows us to specify requirements and guidance in relation to the setting of specified levels of attainment for advanced extension awards.

We set out below our guidance for the purposes of Condition AEA6.1(b).

Condition AEA6.2 states that in setting the specified levels of attainment for an advanced extension award which it makes available, an awarding organisation must have regard to an appropriate range of qualitative and quantitative evidence.

Condition AEA6.3 states that such evidence will only be appropriate if it includes evidence of –

- (a) the Level of Demand of the assessments for that qualification,

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<sup>2</sup> For the purposes of these requirements, the reference to the first year in which an advanced extension award is awarded means the first year in which an advanced extension award in the same subject is awarded by any awarding organisation. It does not mean the first year in which each particular awarding organisation awards an advanced extension award in that subject. Where an awarding organisation (A) first awards an advanced extension award in a subject and an advanced extension award in the same subject has already been awarded by another awarding organisation (B), awarding organisation A must follow the process described in the section on setting grade boundaries from the second year of award onwards.

<sup>3</sup> For clarity, this is without prejudice to the obligation under Condition AEA6.1 for an awarding organisation to comply with any additional requirements set by Ofqual in relation to subsequent years.



- (b) the level of attainment demonstrated in those assessments by an appropriately representative sample of Learners taking that qualification,
  - (c) the level of attainment demonstrated by Learners taking that qualification in –
    - (i) a prior assessment (which was not for that qualification), whether or not that assessment was for a regulated qualification, or
    - (ii) a prior qualification, whether or not that qualification was a regulated qualification,
- and
- (d) the level of attainment demonstrated by Learners who have previously been awarded the qualification.

Examples of the evidence that may be used by an awarding organisation in setting the specified levels of attainment for an advanced extension award which it makes available may include –

- question papers/tasks and final mark schemes,
- senior Assessor input into decisions, for example comments on how the assessments have worked and recommendations for the setting of specified levels of attainment,
- technical information about how the assessments have functioned, for example mark distributions, mean marks, standard deviations, item-level statistics,
- samples of current Learners' work selected from a range of Centres and assessed/Moderated by Assessors/moderators whose work is known to be reliable,
- details of changes in entry patterns and choices of options,
- archive Learners' work exemplifying specified levels of attainment in previous assessment series for the qualification, together with the relevant question papers/tasks and mark schemes,
- any inter-awarding organisation screening data for advanced extension awards,
- pertinent material deemed to be of equivalent standard from similar qualifications or other relevant qualifications,
- information on Learners' performance in previous assessment series, and
- marking guides for assessments where the evidence is of an ephemeral nature.

In determining whether it has sufficient evidence of the level of attainment demonstrated in the assessments for an advanced extension award by an appropriate percentage of the Learners taking that qualification, an awarding organisation should consider whether the marks on its system reflect –

- all possible routes through the qualification, and
- a representative proportion of Learners' marks for the qualification.

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