

GCSE Reform Consultation Questions

June 2013

Consultation Response from the Royal Geographical Society (with IBG)

August 2013

June 2013

Ofqual/13/5292

Annex 1: All questions

This consultation is about the regulatory aspects of proposed changes to GCSEs taken by students in England.

We would like to know your views on the proposals before we put in place regulatory requirements for reformed GCSEs.

We will publish the evaluation of responses to the consultation later this year. In order for us to evaluate responses properly, we need to understand who is responding and in what capacity. Therefore, however you respond, we will only be able to consider your responses to the consultation questions if you complete the information page.

Details on how to respond are given below.

Please note we may publish all or part of your response unless you tell us in your answer to the confidentiality question below that you want us to treat your response as confidential.

The Department for Education (DfE) is running a parallel consultation¹ on the content of the reformed GCSEs. If you have views on the draft content you should respond to the DfE's consultation. If you do include in your response to this Ofqual consultation comments that should have been directed to the DfE we may copy these to the DfE unless you state that your response is confidential.

The deadline for responses to this consultation is 17.00 on 3rd September 2013.

How to respond to this consultation

Please respond to the consultation questions using one of these methods.

Complete the online response form at http://comment.ofqual.gov.uk/gcse-reform-june-2013/category/respond/

Email your completed response document to consultations@ofqual.gov.uk – please include the consultation title in the subject line of the email and be clear who is responding and in what capacity.

Post your response to **GCSE Reform consultation – June 2013**, Ofqual, Spring Place, Coventry Business Park, Herald Avenue, Coventry, CV5 6UB.

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¹ https://www.gov.uk/government/consultations/gcse-subject-content-and-assessment-objectives

Information pages

About you*

Your details:

Name:	Dr Rita Gardner CBE
Position:	Director
Name of organisation or group	Royal Geographical Society (with IBG)
(if applicable):	
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Email:	Director@rgs.org
Telephone number:	020 7591 3004

	Would yo	ou like us to	treat your re	esponse as	confidential?*
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() Yes	(X) No
() 165	(∇) L

Are the views expressed on this consultation an official response from the organisation you represent or your personal view?*

- () Personal views
- (X) Official response from an organisation/group (complete the type of responding organisation)

If you ticked 'personal views', are you a ...

- () Student
- () Parent/carer
- () Teacher (but not responding on behalf of a school)
- () Other (including general public) (please state capacity) _____

If you ticked 'official response from an organisation or group', please respond accordingly,

Type of responding organisation*
() Awarding organisation for 14-19 general qualifications
() Awarding organisation for 14-19 vocational qualifications
() Awarding organisation for vocational and/or professional qualifications
() Awarding organisation for other kinds of qualifications
() School/college (please complete the next question)
() Private training provider
() Higher education institute
() Employer
() Government body/organisation (national and local)
(X) Other representative group/interest group (please skip to type of representative group/interest group)
School/college type
() Academy and/or free school
() Comprehensive
() State selective
() Independent
() Special school
() Further education
() Sixth form college
() None of the above (please state what)

Type of representative group/interest group () Group of awarding organisations () Union () Sector skills council () Academy chain () Employer/business representative group () Equality group () Other voluntary or community group (X) None of the above The Royal Geographical Society (with IBG) is the learned society and professional body for geography and geographers. The Society maintains a strong overview of the discipline, its position and its practice in schools, higher education, and the workplace, including professional accreditation. We advise on and support its advancement, dissemination and practice in these realms and within wider public engagement and policy. We have 17,000 members and Fellows and our work currently reaches more than three million people per year. Each year the Society works with teachers and pupils from about 50% of English secondary schools and our online educational resources receive c. 1 million 'user sessions' annually. Nation* (X) England () Wales () Scotland

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() Other EU country (please state which) _____

() Non-EU country (please state which)

() Northern Ireland

*Denotes mandatory fields

Consultation questions

Section 1 Scope, purpose and context of the consultation

- 1. The proposed primary purposes of the reformed GCSEs will be to provide evidence of students' achievements against demanding and fulfilling content and a strong foundation for further academic and vocational study and for employment. The reformed GCSEs should also provide a basis for schools to be held accountable for the performance of all their students. These proposed purposes are consistent with the purposes set out in the Secretary of State's letter². To what extent do you agree with these propositions?
 - (X) Strongly agree
 - () Agree
 - () Disagree
 - () Strongly disagree
 - () Don't know/no opinion
- 2. Do you have any comments to make on these propositions?

The Society would strongly argue for the continuation of the EBac as one of the measures by which schools report on their pupils' achievements and that the EBac should be on equal terms with the 'Best of Eight' measure. The introduction of the EBac has underpinned significant uplift in the numbers of pupils studying core academic subjects at GCSE, and this trend is welcomed by the Society.

Section 2 Key design features – tiering

- 3. To address concerns that tiering can limit students' ambitions we propose to apply the principle that qualifications should only be tiered if:
 - manageable assessments cannot be designed that would both allow students at the lower end of the ability range to demonstrate their knowledge, skills and understanding in a subject, and that would stretch the most able students; and
 - content that would be exclusive to the higher tier can be identified.

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² www.ofqual.gov.uk/files/2013-02-07-letter-from-michael-gove-reform-of-ks4-qualifications.pdf

To w	hat extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
lang	have applied this principle on tiering to the following subjects: English uage, English literature, mathematics, biology, chemistry, physics, double rd science, geography and history. As such:
4.	The reformed GCSE in mathematics should be tiered . To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
5.	The reformed GCSEs in science (biology, chemistry, physics and double award) should be tiered . To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
6.	The reformed GCSE in English language should be untiered . To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree

	(X) Don't know /no opinion
7.	The reformed GCSE in English literature should be untiered . To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
8.	The reformed GCSE Geography should be untiered . To what extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
9.	The reformed GCSE History should be untiered . To what extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
with	e: Because GCSE geography and history are recognised as humanities options in the EBac both subjects should be treated in a comparable way i.e. both should intiered examinations.
10.	Where tiering is used, which of the following models – adjacent levels, core and extension, overlapping tiers – would you prefer? Please rank the options in order of your preference (1–3).

() Adjacent levels

() Core and extension model

	() Overlapping tiers
	Why do you prefer the model you have ranked as 1?
11.	Do you have any additional comments to make on tiering?
Sec	tion 3: Key design features: assessment arrangements
12.	The default position should be that the reformed GCSEs are assessed by way of externally set and marked examinations, except where subject content cannot be validly assessed in this way. To what extent do you agree with this proposition?
	() Strongly agree
	(X) Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
13.	Where the final grade is based on externally set and marked exams only, there should be a minimum total exam time (the total time could be divided between different papers). To what extent do you agree with this proposition? See page 37.
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
14.	The proposal is for a minimum total exam time of 3.5 hours for subjects where the final grade is based on externally set and marked exams only. That is English language, English literature, mathematics, geography and history.
	Is 3.5 hours
	() Too much
	(X) About right

	() Too little
15.	For subjects in the first tranche, where there are other forms of assessment in addition to exams (biology, chemistry and physics) there should be a minimum number of hours of exam time (the total exam time could be divided between different papers). To what extent do you agree with this proposition? See page 37.
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know/ no opinion
16.	For subjects in the first tranche where there are other forms of assessment undertaken in addition to exams the proposal is for 3 hours as the appropriate minimum amount of exam time. See page 37.
	Is 3 hours
	() Too much
	(X) About right
	() Too little
17.	Reformed GCSEs will be linear; with all exams taken at the end of the course (non-exam assessments may be completed at different times). To what extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
18.	All reformed GCSEs will include an element of synoptic assessment. To what extent do you agree with this proposition?
	(X) Strongly agree

	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
	As a discipline geography spans the study of the social and physical sciences and at its heart provides a synoptic analysis and understanding of the world's people, place and environments. The assessment of GCSE geography should include an appropriate element of synoptic assessment.
19.	Externally set and marked assessments should normally only be taken at one point during the year – in May and June. To what extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
20.	An exception should be made to the provision that exams should only be taken in May and June, so that students may re-sit mathematics and English language in November. To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
21.	November re-sits should be restricted to students in Year 12 and above. To what extent do you agree with this proposition?
	() Strongly agree
	(X) Agree
	() Disagree

	() Don't know/no op	inion		
22	5 per cent of the ma	SEs in English literatur rks should be allocate rent GCSEs in these s ons?	ed to spelling, puncti	uation and
	() Strongly agree			
	(X) Agree			
	() Disagree			
	() Strongly disagree			
	() Don't know/no op	inion		
23		SEs in English langua punctuation and grar ?	•	
	() Strongly agree			
	(X) Agree			
	() Disagree			
	() Strongly disagree			
	() Don't know/no op	inion		
24	literature, geography And in English langu	If marks are to be allocated for spelling, punctuation and grammar in English literature, geography and history, are 5 per cent of the marks the right amount? And in English language are 20 per cent of the marks for spelling, punctuation and grammar the right amount? Please indicate by ticking one column per row.		
		Too much	About right	Too little
	English literature 5% is			

() Strongly disagree

Geography 5% is

English language

History 5% is

20% is

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25. Do you have any comments on the proposed assessment arrangements for the reformed GCSEs?

Additional Comments in relation the proposed assessment arrangements for Reformed GCSE geography:

- In its response to the DfE consultation on GCSE Subject Content and Assessment the Society highlighted the need for additional opportunities for extended writing in geography. The inclusion of more and longer 'essay based' questions in GCSE geography would be a welcome development and support the more accurate application of spelling, punctuation and grammar by pupils.
- The Society has also recommended that the mathematical and statistical elements of GCSE geography be made more explicit within the subject criteria. This would provide greater demand at GCSE and also consistency with how mathematical requirements are expressed within the proposed subject content for sciences.
- The Society welcomes the inclusion of a specific assessment weighting provided for the assessment of geographical fieldwork within the DfE's proposals for GCSE subject Content and Assessment Objectives (June 2013). This weighting corresponds to 15% of the overall marks. It provides for 5% of marks to be allocated to the assessment of fieldwork skills and 10% of marks to be allocated to the application of geographical knowledge to fieldwork context(s).

Section 4: Key design features: reporting student performance

26.	Student performance in the reformed GCSEs should be reported using grades
	(rather than marks, scaled scores or percentile scores). To what extent do you
	agree with this proposition?

() Strongly agree

(X) Agree

() Disagree

() Strongly disagree

() Don't know/no opinion

27.	If grades were not used, which of the alternatives would you prefer?
	(X) Marks
	() Scaled scores
	() Percentile scores
	() Other
28.	Grades could be used alongside marks, scaled scores or percentile scores. Would you like to see grades and more granularity of reporting as well?
	() Grades alone
	(X) Grades with marks
	() Grades with scaled scores
	() Grades with percentile scores
	() Other combination of approaches
	() Don't know/no opinion
29.	Eight grades would allow for sufficient differentiation of performance between students. To what extent do you agree with this proposition?
	() Strongly agree
	(X) Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
30.	The number of grades at the higher and middle performance range should be increased to allow for greater differentiation. To what extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion

31.	The number of grades at the lower end of the performance range should be reduced. To what extent do you agree with this proposition?
	() Strongly agree
	(X) Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
32.	Grades should be described using a new system to differentiate them from current GCSEs. To what extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
33.	Grades should be described using numbers. To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
34.	If grades are described using numbers, the highest numbered grade should signify the highest level of achievement. To what extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion

35. What information would students and users of qualifications find valuable in addition to the overall grade about students' performance?

The Society would welcome the publication of the overall distribution of grades in that subject for the yearly cohort as an additional contextual framework alongside a student's specific grade.

36. How would any additional information about students' performance be used by students and users of qualifications?

The provision of the additional information (outlined in 35 above) would provide the means to place a student's individual performance within the overall context of the results, by subject, for a particular year.

37.	If more detailed information about student performance in a subject was to be
	provided, it would result in significantly more assessment and higher costs.
	Would these greater resource implications be justified?

() Yes

() No

See 38, below

38. Do you have any other comments about reporting student performance?

The Society believes that the publication of the additional information proposed in 35. would represent only minimal or no additional costs to the Awarding Bodies. It is information that they are already required to collect.

Section 5: Full and short course GCSEs

39. The time it will typically take a student to complete a course of study for one of the reformed GCSEs should be the same as or similar to the time required for one of the current GCSEs (double award science will be the same as or similar to two current GCSEs). This means, as is the case with current GCSEs, that students would normally study reformed GCSEs over two years. To what extent do you agree with this proposition?

(X)	Strong	lγ	agree
\- ·/		• ,	

() Agree

() Disagree

() Strongly disagree

() Don't know/no opinion

Note: the Society has no 'in principle' objection to pupils studying a full GCSE course which has been compressed into one year of study. However, this is with the proviso that the teaching time has to be equivalent to the usual two full years of study.

However, the Society is concerned about early entry. The scale of this may be more of an issue for other subjects (such as English and mathematics), however, we note that the numbers of pupils taking GCSE geography aged 15 or under rose from 8,462 in 2012 to 11,105 in 2013.

The Society also notes with concern the marked difference in the grades awarded to pupils aged 15 and under, or aged 16 shows.

2013 results GCSE Geography, combined male and female entries, cumulative percentages by grade (JCQ 2013)

	A*	Α	В	С	D	Е	F	G	U
Aged 15 and under	5.9	18.8	35.9	59.3	77.9	89.1	95.2	98.6	100
Aged 16	8.5	23.5	47	74.8	91.2	97.1	99.2	99.8	100

The Society is concerned that 'early entry' in geography may be limiting the opportunity of younger pupils to reach their full potential in geography.

We would welcome further research into this area and guidance provided to schools about the potential impact of early entry on their pupils' performance.

Awarding organisations should be able to offer stand-alone short courses of the reformed GCSEs which will not contribute to a full GCSE. To what extent do you agree with this proposition?

- () Strongly agree
- () Agree
- () Disagree
- (X) Strongly disagree
- () Don't know/no opinion

The Society believes that it is more desirable for pupils to study a full GCSE course in geography, rather than a short course. The former clearly provides a broader and more comprehensive overview of this subject and also enables a pupil to count their full course geography GCSE against the EBac and 'Best of Eight'.

Section 6: Regulating the reformed GCSEs

40. Awarding organisations will be required to use and assess the subject content requirements as set out by the Department for Education in the development of reformed GCSEs (for those subjects for which the Department for Education

consults on and publishes subject content requirements). To what extent do you

agree with this proposition? (X) Strongly agree () Agree () Disagree () Strongly disagree () Don't know/no opinion 41. Exam boards should be required to develop assessment strategies for their reformed GCSEs. To what extent do you agree with this proposition? (X) Strongly agree () Agree () Disagree () Strongly disagree () Don't know/no opinion 42. Exam boards should be required to review systematically the effectiveness of their assessments for each of their reformed GCSEs. To what extent do you agree with this proposition? (X) Strongly agree () Agree () Disagree () Strongly disagree () Don't know/no opinion 43. The Apprenticeships, Skills, Children and Learning Act 2009, requires us to consult before we impose an accreditation requirement on exam boards. Do you agree that the reformed GCSEs should be subject to an accreditation requirement, that is, that they must be checked by Ofgual before they can be made available? (X) Yes () No

The Society would recommend that Ofqual draw on the expertise of the relevant subject communities, especially the subject specific Learned Societies, in its undertaking of the accreditation of reformed GCSEs.

44. Do you have any other comments on the regulation of the reformed GCSEs?

The Society has made Ofqual aware that the Society's Director and Head of Education are members of the DfE Geography Expert Group. This group has contributed to the drafting of the DfE's proposals for the new Subject Content and Assessment for GCSE Geography (June 2013), alongside the reviews of the geography National Curriculum and A Level.

The Society has previously been invited by various AO's to join their internal review groups/consultation committees in respect to their review of GCSE (and GCE) geography.

However, given the Society's role with DfE it has felt it inappropriate to join, and be party to, these AO's discussions. As a result none of the Society's paid staff or trustees have accepted such invitations.

The Society would welcome the opportunity to provide its independent expertise and advice in support Ofqual's review of GCSE (and GCE) specifications and sample materials.

Section 7: Subject-specific features of the reformed GCSEs

45. Please indicate whether you have read the Department for Education's subject content consultation document and associated documentation by ticking one box per row:

Subject	I have read the DfE subject content	I have not read the DfE subject content
English language	X	
English literature	X	
Mathematics	X	
Sciences (biology, chemistry, physics and double award science)	X	
Geography	Х	
History	X	

Please note, we are not consulting at this time on reformed GCSEs in modern foreign languages or ancient languages, although the DfE is consulting on the content for these subjects.

English language

46.	The Department for Education's draft English language content includes a spoken language assessment which cannot be assessed by an external written exam. To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
47.	The outcome of the spoken language assessment should be reported separately on the certificate, and not form part of the overall grade. To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
48.	Some disabled students may be granted an exemption from the spoken language assessment because of their disability, for example, deaf or hearing impaired students. Should this exemption be shown on the certificate or should the certificate just include the grade from the exams?
	() Exemption reported on certificate
	() Exemption not reported on the certificate
49.	Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about the proposed design requirements for the reformed GCSEs in English language?

 English literature 50. The Department for Education's draft English literature content can be assessed by externally assessed written exams only. To what extent do you agree with this proposition? Strongly agree Agree Disagree Strongly disagree Strongly disagree Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about the proposed design requirements for the reformed GCSE in English literature
assessed by externally assessed written exams only. To what extent do you agree with this proposition? () Strongly agree () Agree () Disagree () Strongly disagree (X) Don't know/no opinion 51. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about
 () Agree () Disagree () Strongly disagree (X) Don't know/no opinion 51. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about
 () Disagree () Strongly disagree (X) Don't know/no opinion 51. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about
 () Strongly disagree (X) Don't know/no opinion 51. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about
 (X) Don't know/no opinion 51. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about
51. Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about
being dealt with through the Department for Education's consultation – about
Mathematics
52. The Department for Education's draft mathematics content can all be assessed by externally assessed written exams only. To what extent do you agree with this proposition?
() Strongly agree
() Agree
() Disagree
() Strongly disagree
(X) Don't know /no opinion
53. Do you have any comments, other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation, about the property of the system of COOFs in reach a system.
proposed design requirements for the reformed GCSEs in mathematics?
proposed design requirements for the reformed GCSEs in mathematics?

The sciences (biology, chemistry, physics and double award science)

54.	practical elements. These practical elements cannot be assessed only by an external written exam. To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
55.	The practical science element should be assessed by teachers in accordance with exam board requirements. To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
56.	The practical science assessment element should contribute 10 per cent to the student's overall marks for the GCSE science qualifications. To what extent do you agree with this proposition?
	() Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	(X) Don't know /no opinion
57.	Do you have any comments, other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation, about the proposed design requirements for the reformed GCSEs in sciences?

Geography

- 58. The Department for Education's draft geography GCSE content includes a fieldwork element. The outcomes in the draft content **can** all be assessed by an external written exam **only**. To what extent do you agree with this proposition?
 - () Strongly agree
 - (X) Agree
 - () Disagree
 - () Strongly disagree
 - () Don't know/no opinion
- 59. Do you have any comments other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation about the proposed design requirements for the reformed GCSEs in geography?

Note: For further details on the Society's comments please see the Society's consultation response to DfE on the review of GCSE subject content and assessment in geography.

The Society strongly supports the explicit inclusion of a requirement for fieldwork within the GCSE subject content, and that this fieldwork take place in 'two contrasting environments'. In addition, the Society supports the proposal for an annual 'fieldwork declaration' to be made by a school, (to be signed by the head teacher and head of geography) to its AO outlining what fieldwork has taken place for GCSE (and similarly GCE) geography.

The Society believes that together the fieldwork requirement and declaration, should addresses any concerns that the move to 100% terminal examinations will reduce geographical fieldwork. However, the Society does request that the level and range of geographical fieldwork at GCSE be monitored so that evidence can be collected about any unintended consequences of the removal of internal assessment.

The Society does not support the argument that the removal of controlled assessment will necessarily reduce the opportunities for geographical fieldwork.

In short, the Society believes that the new GCSE criteria and accompanying specifications will be sufficient in making explicit what teachers should teach and which highlight the necessity for geographical fieldwork – not the style of assessment.

Note: Assessment in GCE geography. However, as discussed with both DfE and Ofqual, the Society has argued strongly for the role of an (internally assessed, externally moderated) extended piece of individual project work at GCE geography. The Society believes that at GCE there are significant elements of the required geographical knowledge, skills and understanding which can only be adequately assessed in this way. This should be through a

piece of writing, ideally of 4,500 words in length. The Society does recognise the issue of validity in such work, and indeed our university colleagues have been dealing with similar issues for a number of years. However, we feel there are practical and cost effective models which would address this issue which have been proposed to Ofqual previously.

ПIST	ory
60.	The Department for Education's draft history GCSE content can all be assessed by external written exam only . To what extent do you agree with this proposition?
	(X) Strongly agree
	() Agree
	() Disagree
	() Strongly disagree
	() Don't know/no opinion
61.	Do you have any comments – other than about the detailed syllabus, which is being dealt with through the Department for Education's consultation – about the proposed design requirements for the reformed GCSEs in history?
	dentified above the Society strongly recommends that the assessment of GCSE graphy and history are developed in a comparable way.
Sect	ion 8: Equality impact assessment
62.	We have identified a number of ways the proposed requirements for the reformed GCSEs may impact (positively or negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified?
	() Yes
	(X) No
	If so, what are they?

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

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	() Yes
	(X) No
	Please comment on the additional steps we could take to mitigate negative impacts.
64.	Taking into the account the purpose of qualifications, could the proposed design of the reformed GCSEs be changed to better advance equality of opportunity between persons who share a protected characteristic and those who do not?
	() Yes
	(X) No
	If so, what changes to the design of the reformed GCSEs would you suggest to better advance equality of opportunity?
65.	Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?

Contact Would you be happy for us to contact you again in relation to this consultation response? (X) Yes () No Email address of key contact person to whom we may speak with about your response to this consultation* Director@rgs.org **Additional information** How did you find out about this consultation? () Ofqual's newsletters or other communications (X) From Ofqual's website () Media/press () Via internet search () Via another organisation (please state which) () Other (please state how) We want to write clearly, directly and put the reader first. Overall, do you think we have got this right in this document?

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

(X) Yes

() No

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