



Department
for Education

Consultation Response Form

Consultation closing date: 20 November 2013
Your comments must reach us by that date

16-19 Accountability Consultation

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.	<input type="checkbox"/>
Reason for confidentiality:	

Name: Charlie Stripp	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Mathematics in Education and Industry (MEI)	
Address: Monckton House, Epsom Centre, White Horse Business Park, Trowbridge, Wiltshire, BA14 0XG	

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications

Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please mark the box that best describes you as a respondent.

<input type="checkbox"/>	School	<input type="checkbox"/>	College	<input type="checkbox"/>	Representative bodies
<input type="checkbox"/>	Parent/Carer	<input type="checkbox"/>	Young Person	<input type="checkbox"/>	Awarding Organisation
<input type="checkbox"/>	Headteacher/Principal	<input type="checkbox"/>	Governor/Governing Body	<input type="checkbox"/>	Union
<input checked="" type="checkbox"/>	Other				

Please Specify:
MEI is a charity and a membership organisation. It is an independent curriculum development body for mathematics. It is a major provider of mathematics teaching and learning resources, and of mathematics CPD for secondary school and post-16 mathematics teachers.

MEI developed and manages the DfE-funded Further Mathematics Support Programme.

Proposals for Publication of Data

1 Do you agree that in future only high value level 2 substantial vocational qualifications which meet pre-defined characteristics should be recognised in the Top Line performance measures for 16-19 year olds?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not Sure
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Comments:

This would seem sensible for the large majority of students, but some students may be better served by other qualifications and this should be recognised in the performance measures, otherwise these students may be directed onto programmes that do not meet their needs.

2 Should employer recognition, grading and external assessment or moderation be required characteristics for substantial level 2 vocational qualifications in the same way as they are for Technical Level qualifications at level 3?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

This would give the qualifications more relevance and credibility, so raising their status.

3 Do you agree that awarding organisations need a two year grace period to redevelop current qualifications to meet the characteristics required? This is the same time period that was given for the redevelopment of Technical Level qualifications at level 3.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

At least two years is needed. To develop high-quality qualifications that meet the needs of students and employers it is vital that the development work is not rushed.

4 What do you think this category of vocational qualifications should be called and how do you think it should be defined?

Comments:

They should be called 'Technical Level qualifications at level 2', ensuring a clear link to the level 3 qualifications.

5 What are your views on the necessity, benefits and implications for students and providers of a best 3 A levels measure?

Comments:

The 3 A level measure could have a very negative effect on the uptake of AS and A level Mathematics and Further Mathematics, and so cause a reduction in the standard of pre-university mathematics education.

Further Mathematics is almost always taken as a fourth AS/A level, so there is a serious danger that the 3 A level measure will discourage institutions from offering it, resulting in a fall in uptake and so undoing years of progress that have seen numbers more than double since 2005. The increased uptake of Further Mathematics has raised standards by bringing about real improvements in the mathematical knowledge and skills of many new undergraduates entering STEM degree courses; this is greatly appreciated by Higher Education.

Any measure that could jeopardise uptake of Further Mathematics must be avoided. A positive move would be to use the accountability measures to reward explicitly programmes of 4 A levels that included Further Mathematics, so encouraging, rather than discouraging, institutions to offer it. This would be consistent with the Government's continued support for Further Mathematics through its funding of the Further Mathematics Support Programme.

The 3 A level measure would also discourage institutions from offering AS Mathematics alongside 3 A levels in other subjects, or 4 A level programmes including Mathematics, such as A level Mathematics alongside A levels in each of the three sciences. AS Mathematics is an extremely valuable qualification in its own right, particularly for students going on to study social sciences and business, as well as many technical and scientific courses. 4 A level programmes that include A level Mathematics are also very valuable, particularly for high-flying students hoping to take prestigious degree courses in the sciences or medicine. Both AS and A level Mathematics, taken alongside 3 A levels in other subjects, should be rewarded explicitly in the accountability measures.

6 Do you agree that the measures set out in annexes A and B should be the top line and additional data published for students studying at levels one, two and three?

Yes

No

X Not Sure

Comments:

Yes and No. We had difficulty in answering such a composite question which covers a large number of measures.

For instance, we welcome the proposed level 3 additional measure: "Attainment of an approved level 3 mathematics qualification". This provides a useful incentive to 16-19 providers to encourage more students to study mathematics beyond GCSE and in particular to identify and provide appropriate courses. Once the expectation of further study becomes more established, it may be helpful to make this a top line measure.

However, we have several concerns about the proposed level 2 additional measure: "Attainment of level 2 mathematics and English qualifications". Our principal concern is that the measure seems to work against the declared aim to provide "incentives for providers to deliver English and mathematics GCSE for those who failed to achieve at least a grade C at age 16." The measure does not measure the percentage specifically achieving GCSE, but instead includes any level 2 qualification. We believe that if GCSE is the ambition for students, then this is what the performance measure should address. The same principle would then also need to be applied to the "Closing the gap" additional measure.

We are also not sure whether the level 2 mathematics and English qualification measure also applies to students studying level 3 programmes. There are students in this category who did not achieve grade C or above in English or mathematics at 16 and so this additional performance measure should apply to them as well.

7 Do you agree that we should explore how to report the achievement of students at level 2 and 3 taking work-based training (including Apprenticeships) with independent training providers in performance tables?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We would welcome further exploration of whether this would provide useful information.

8 What are the issues to consider in reporting the achievement of students in work-based training and in setting minimum standards for these providers?

Comments:

There is at least one issue but there may well be others. There may be good reasons why work based students are more likely to leave programmes early so non-completion rates are unlikely to be comparable with schools or colleges.

Minimum Standards

9 Do you agree that minimum standards at level 2 should be based on an attainment and completion measure for those taking substantial vocational qualifications?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

A minimum standard encourages 'gaming', with resources focused on borderline students, at the expense of all others. We have seen this happen, with very negative effects, at GCSE level. KS4 performance measures have just been changed to discourage it. We should not be re-introducing the problem for vocational qualifications.

10 Do you agree that we should not penalise providers if students leave their course to take up an Apprenticeship, Supported Internship or Traineeship?

Yes

No

Not Sure

Comments:

This covers such a wide variety of circumstances that it is not possible to provide a single answer. Students' reasons for leaving can be either positive or negative.

11 Do you agree that the level 3 minimum standards at 16-19 should be based on progress for academic and Applied General qualifications and on attainment and completion for Technical level qualifications?

Yes

No

Not Sure

Comments:

It needs to be understood that progress measures are based on average student attainment and the minimum standard for such measures would need to be set by proper statistical methods and would, necessarily, be below average.

Moreover, the value added from 16 to 19 is also dependent on the quality of teaching which students have experienced up to the age of 16. Some students have been taught to the test at GCSE whereas others have had a much more thorough grounding for further study. Consequently, students with the same attainment at age 16, as measured by GCSE grades, can have different levels of readiness for level 3 study and so will progress by different amounts. This is not under the control of 16-19 providers.

12 Do you agree that we should extend the reporting of the attainment of low, middle and high attainers to the 16-19 performance tables?

Yes

No

Not Sure

Comments:

This should be trialled before being implemented to establish whether there are any positive benefits of reporting such a measure and to ensure that there are no negative consequences of doing so. If such a measure is adopted then statistically valid methods must be used.

13 What categories of destination should we include when reporting the destination of students with learning difficulties and disabilities?

Comments:

Students with learning difficulties are not the same as students with disabilities. We have no specialist knowledge in either area.

14 What other data could be published to create the right incentives for post 16 providers to ensure the best progress and attainment for all their students, including enabling those with learning difficulties and disabilities to prepare for adult life?

Comments:

Most post 16 providers aim to do the best for their students. The publication of data is a separate matter.

15 Do you think the HE model of 'MOOCs' could work in a 16-19 environment?

Yes

No

Not Sure

Comments:

We are not aware of any evidence MOOCs have proved very effective in HE, particularly for mathematics. MOOCs participants are self-selecting and therefore likely to be highly motivated, yet drop-out levels are very high. A 'MOOC' approach would not seem sensible for 16-19 year olds in compulsory education.

The experience of the FMSP and MEI's online teaching and learning resources for A level Mathematics and Further Mathematics shows that online resources can be extremely effective at enhancing more traditional tuition through a 'blended' approach. However, our experience also suggests that 16-19 year old students are not sufficiently mature to learn mathematics effectively without the regular support of an expert classroom teacher or online tutor.

16 If the assessments could be proven to be robust and to meet other key quality criteria, how do you think we could recognise accredited online courses in the accountability system?

Comments:

Any online course at this level should make use of a 'blended' approach and also aim towards a recognised qualification; such courses would be picked up by the other measures.

17 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

Some of the questions in this consultation are leading or composite and, consequently, not easy to answer.

It is not the case that everything that is important can be measured in performance tables.

The main aim is to ensure that our young people have a good learning experience. This can best be achieved by ensuring that teachers are competent and confident by means of professional development; that would make the greatest positive difference to students but it is not mentioned in this consultation. Active participation by teachers in curriculum development should also be encouraged. Measures of teacher professional development should be explored.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.	X
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E-mail address for acknowledgement: charlie.stripp@mei.org.uk

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 20 November 2013

Send by post to:
Andrew Taylor
Inspections and Accountability Team
Level 2
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: 1619accountability.CONULTATION@education.gsi.gov.uk