



Department
for Education

Consultation Response Form

Consultation closing date: 1 May 2013
Your comments must reach us by that date.

**Secondary School Accountability
Consultation**

Consultation Response Form

THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://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.

Reason for confidentiality:

Name Matthew Harrison
Organisation (if applicable) The Royal Academy of Engineering
Address: 3 Carlton House Terrace
London
SW1Y 5DG

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Public Communications Unit 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 an 'x' in the box that best describes you as a respondent.

<input type="checkbox"/> Teacher	<input type="checkbox"/> Head teacher	<input type="checkbox"/> School
<input type="checkbox"/> Parent-Carer	<input type="checkbox"/> Local Authority	<input type="checkbox"/> Awarding Body
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Union	<input type="checkbox"/> Governor/Governing Body
<input checked="" type="checkbox"/> Other		

Please Specify:

Founded in 1976, The Royal Academy of Engineering promotes the engineering and technological welfare of the country. Our fellowship – comprising the UK's most eminent engineers – provides the leadership and expertise for our activities, which focus on the relationships between engineering, technology, and the quality of life. As a national academy, we provide independent and impartial advice to Government; work to secure the next generation of engineers; and provide a voice for Britain's engineering community.

1 Do you agree with the proposals for the headline accountability measures?

Yes

No

Not Sure

Comments:

The link between basic literacy and numeracy and positive labour market outcomes is well made (for example: Coulombe et al, 2004 for OECD countries and DeCoulon et al 2007 for the UK). Therefore we welcome the focus on mathematics and English in the 'floor standards' to ensure that basic literacy and numeracy skills are developed effectively in all schools.

However, Research published by the Royal Academy of Engineering (for example *Jobs and growth*, RAEng, 2012, Greenwood et al, RAEng, 2011) and many others show the superior labour outcomes obtained by those who progress in STEM subjects beyond the age of 16.

Therefore we cannot agree with the proposals for headline accountability measures without reservation as we do not believe they do enough to promote widespread progression in STEM subjects and in particular science (by which we mean biology, chemistry, physics) and computer science.

Research published by DfE (RR-195, 2012) shows that only 1% of those who obtain a grade C in GCSE mathematics go on to achieve A level mathematics and for science the equivalent progression rate is 7%. Getting a 'C' in a STEM GCSE is a license to stop rather than a ticket to progression. Therefore the current headline 5 A*-C accountability measure incentivises schools to get pupils to the 'C' and not further does little to promote STEM progression.

Unfortunately, the proposed 'average point score amongst 8' measure – whilst an improvement – still does not do enough to promote progression in STEM subjects for us to support it without reservation.

On the 'average point score 8' measure. With one slot reserved for each of English and mathematics; three slots reserved for other EBacc subjects (sciences, computer science, geography, history and languages) and the remaining three slots for further high value qualifications (such as GCSEs or those on the Department's list of vocational qualifications approved for inclusion in performance tables) we note it would be possible for schools to score highly on this measure **without any science or computer science**. We note that the proposals for the National Curriculum place science as a compulsory subject at Key Stage 4 but this means that pupils take a course in science but this may not lead to the award of a science qualification (with the equivalent of 'double science' being the accepted minimum for effective progression in post-16

science). We also note that the rise of Academisation, Free Schools and UTCs, schools able to opt out of the National Curriculum, the National Curriculum is becoming less effective as a national driver for STEM progression.

We note that the English Baccalaureate will remain on the 'headline measures' and therefore schools will be incentivised to see pupils succeed with at least two sciences and potentially computer science to achieve this. However, we know that the EBacc is a mark of distinction accessible only by higher attaining pupils and we are concerned that schools will 'game' the new combination of 'Ebacc + average 8' by steering pupils not likely to gain the Ebacc away from science or computer science and towards other subjects thought to be easier in order to maximise the overall headline measure scores for the school. This could place mid ability pupils who might be successful with GCSE science or computer science at a significant disadvantage in the labour market.

Finally, we note that there are no concrete proposals to remove the current limit of two high quality vocational qualifications 'counting' in headline accountability measures. At the request of the Chancellor George Osborne and Skills Minister Matthew Hancock, the Royal Academy of Engineering has re-developed the 14-19 Diploma in Engineering into a suite of 3 GCSE-sized qualifications. To safeguard the supply of engineering skills, it is important that barriers to uptake of the widely acknowledged best in Key Stage 4 engineering courses is removed and that all three count in headline measures. The wording of the consultation document is vague as to whether the *'the remaining three slots could be taken up by further qualifications from the range of EBacc subjects, or any other high value arts, academic, or vocational qualifications'* implies that 3 vocational qualifications would count as long as they are included on the Department's list of vocational qualifications approved for inclusion in performance tables.

Therefore, we make two concrete recommendations for improving the proposed headline accountability measures:

- (1) Include science in the 'floor standards' – justified on the grounds of the importance of STEM to accessing some of the best labour market outcomes
- (2) Confirm that 3 high quality vocational qualifications will count in the headline measures.

2 Is there any further information we should provide about the performance of disadvantaged students?

Yes

No

Not Sure

Comments:

The performance of schools in obtaining successful outcomes for disadvantaged pupils in mathematics, English, science and computer science GCSEs should be reported.

3 Should we look to use a relative measure as the floor standard in the first year of the new exams?

Yes

No

Not Sure

Comments:

The only practical approach to new floor standards in their first year is to publish the results for all schools, ranked in order.

4 Are there any other measures we should consider publishing?

Yes

No

Not Sure

Comments:

Access to some of the highest wages in the labour market requires progression with STEM subjects beyond the age of 16 and o at least Level 3. This effectively requires higher grades in **both** mathematics and at least double science (or equivalent). The proportion of pupils achieving this important combination of GCSEs is known to vary significantly between local education authority areas. The proportion of pupils in each school achieving at least a pass in both mathematics and the equivalent of two sciences should be reported.

5 Do you think we should collect and publish test data from internal assessments through the Data Warehouse?

Yes

No

Not Sure

Comments:

No specific comment.

6 What other data could be published to create the right incentives for schools, including special schools, to ensure the best progress and attainment for all of their students?

Comments:

Mathematics and science are valuable to everyone in society. All schools should report of participation and attainment in these key subjects.

7 Do you agree that the Department should stop the collection of Key Stage 3 teacher assessment results?

Yes

No

Not Sure

Comments:

No specific comment.

8 How should we ensure that achievement beyond formal qualifications is recognised?

Comments:

No specific comment.

9 How can national sample tests best be introduced?

Comments:

No specific comment.

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

E-mail address for acknowledgement: matthew.harrison@raeng.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, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/>	<input type="checkbox"/>
Yes	No

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 questionnaires and other responses should be sent to the address shown below by 1 May 2013

Send by post to:
Phil Elks
Department for Education
Level 2
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

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