A Policy and Technical Consultation on Regulating Processes for Endorsement of Textbooks and other Support Material Run by Awarding Organisations

Information pages

About you*

Your details:

Name:	Professor F A Rogers
Position:	Education Secretary
Name of organisation or group (if applicable):	London Mathematical Society
Address:	De Morgan House 57-58 Russell Square London WC1B 4HS
Email:	education@lms.ac.uk
Telephone number:	020 7927 0801

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 (</ >

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

() Personal views

(\checkmark) Official response from an organisation/group (please complete the type of responding organisation tick list)

If you ticked 'personal views', which of the following are you?

() Student

() Parent/carer

() Teacher (but not responding on behalf of a school or college)

() Other (including general public) (please state capacity)

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

Type of responding organisation*

- () Awarding organisation
- () Local authority
- () School/college (please complete the next question)
- () Academy chain
- () Private training provider
- () University or other higher education institution
- () Employer
- () Publisher of resources

(✓) Other representative group/interest group (please skip to type of representative group/interest group)

School/college type

- () Comprehensive/non-selective academy
- () State selective/selective academy
- () Independent
- () Special school
- () Further education college
- () Sixth form college
- () None of the above (please state what)

A Policy and Technical Consultation on Regulating Processes for Endorsement of Textbooks and other Support Material Run by Awarding Organisations

Type of representative group/interest group

- () Group of awarding organisations
- () Publisher
- () Employer/business representative group
- (<) Subject association/learned society
- () Equality organisation/group
- () School/college or teacher representative group

None of the above (please describe the nature of your group)

Nation*

- (✓) England
- () Wales
- () Scotland
- () Northern Ireland

() Other EU country (please state which)

() Non-EU country (please state which)

How did you find out about this consultation?

- (\checkmark) Our newsletter or another of our communications
- () Via internet search
- () From our website
- () From another organisation (please state below)
- () Other (please state below)

May we contact you for more information?

(✓) Yes

() No

*Denotes mandatory fields

Questions

This response relates to Mathematics.

Before answering the specific questions we would like to make some general points.

We were pleased to see that the consultation document sets down quite clearly many of the difficulties and disadvantages which attach to endorsement of resources by awarding bodies. However we were surprised and disappointed to see that it is being proposed that endorsement be allowed to continue, despite these clear problems. We do not believe that the problems can be removed by regulation.

We remain opposed to the endorsement of resources in Mathematics by awarding bodies. Our position on this and some related matters is set down in the <u>LMS</u> <u>Statement on Exam Boards and Textbooks</u>

A. To what extent do you agree or disagree that the endorsement of resources by awarding organisations for the teaching and learning of qualifications should be allowed.

() Strongly agree

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

Please provide comments or evidence to support your answer

We believe that endorsement is damaging in mathematics, for the reasons set down in the consultation document.

B. To what extent do you agree or disagree that we have correctly identified the risks that endorsement creates.

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

Please provide comments or evidence to support your answer

An additional problem is that the existence of resources endorsed by awarding bodies inhibits the development of other, probably better, resources because, at least in publishers' perception, there is less demand for them. Talent and experience can be wasted because teachers who could write good resources may not get support from publishers. Even if they do write the resources, uptake is reduced by the presence of endorsed resources.

C. To what extent do you agree or disagree that where an endorsement process is set up, the controls we are proposing are appropriate to manage these risks sufficiently.

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

Please provide comments or evidence to support your answer

We do not believe that the disadvantages of endorsement by awarding bodies can be removed by regulation.

D To what extent do you agree or disagree that the draft new guidance in relation to Condition A4, about conflicts of interest when a senior examiner also prepares resources for a qualification, is appropriate?

- () Strongly agree
- () Agree
- () Disagree
- (

 Strongly disagree

() Don't know/no opinion

Please provide comments or evidence to support your answer

The guidelines are not strong enough. No Senior Examiner should produce resources for the qualification concerned. In mathematics the issue of 'small volume' does not generally arise.

E To what extent do you agree or disagree that the draft new guidance in relation to Condition G4, about maintaining confidentiality of assessment material, is appropriate?

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

Please provide comments or evidence to support your answer

Confidentiality of assessment material is clearly a fundamental issue for awarding bodies. The possibilities which endorsement opens up of breaching such confidentiality, whether intentionally or accidentally, are a further reason for prohibiting endorsement by awarding bodies.

F To what extent do you agree or disagree that the draft new guidance in relation to Condition F2, about packaging qualifications and resources together, is appropriate?

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

Please provide comments or evidence to support your answer

In our opinion no such packaging of resources by awarding bodies should be allowed.

G To what extent do you agree or disagree that the draft new condition C3 and related, about awarding organisations arrangements with publishers, is appropriate?

() Strongly agree

() Agree

() Disagree

- (✓) Strongly disagree
- () Don't know/no opinion

Please provide comments or evidence to support your answer

No endorsement by awarding bodies should be allowed. The proposed conditions do not effectively mitigate the damage caused by endorsement, it is hard to see that any conditions other than simple prohibition could do this.

H. To what extent do you agree or disagree that public confidence in these arrangements will be improved as a result of the proposals.

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

Please provide comments or evidence to support your answer

I. Are there any other alternatives to introducing regulatory controls that we should be considering for endorsement processes?

It is our opinion that endorsement by awarding bodies should simply not be allowed in Mathematics.

J. What criteria for endorsement would you like exam boards to use to improve the quality of endorsed resources?

We do not believe that any resources should be endorsed by awarding bodies

Equality impact assessment

We have not identified any aspects of the proposed changes to our Conditions or guidance that may have a negative impact on students because of age, gender reassignment, pregnancy and maternity, religion or belief, sex, sexuality, racial group, marital status, dependents or disability.

Question K

Are there any specific positive or negative impacts on people who share particular characteristics²² that we should consider in relation to these draft Conditions? If so, what are they and how could we address any negative impacts?

We have no comment here since we do not support endorsement by awarding bodies in any form for Mathematics

Regulatory impact assessment

Question L

Would any of our proposals have financial or wider resource consequences, positive or negative, for schools, exam boards, publishers or others? Please provide evidence to support your answer.

In our opinion removal of any possibility of endorsement by awarding bodies would have financial benefit for schools.

Where endorsed resources exist, it is difficult for a school not to buy them for fear of missing out on some exam-oriented information; schools also feel a need to buy new versions whenever the endorsed resources are updated. Without endorsement it is much easier for teachers simply to use their professional judgment when buying or creating resources. Often this will mean that they can use superior resources which are not driven by the assessment process.

²² Including those defined by the Equality Act 2010, namely: age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, sexual orientation.