

ANALYSIS OF CONSULTATION RESPONSES

Analysis of responses to our
consultation on GCSE and GCE
music and dance

ofqual

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Executive summary

We have consulted on our proposals to make some small changes to our subject-level conditions for GCSE, AS and A level music, and GCSE, AS and A level dance. The consultation ran between 9 November and 9 December 2018. The consultation questions were available to complete online or via email. A copy of the consultation is available at <https://www.gov.uk/government/consultations/consultation-on-gcse-and-gce-music-and-dance>.

We received 370 responses to the consultation. Of these, 312 were complete online responses, 48 were partially-complete online responses, and 10 were email responses. We are grateful to everyone who participated.

We summarise the responses in this report.

Introduction

This report is a summary of the views expressed by those who responded to our consultation, which took place between 9 November and 9 December 2018. We sought views on our proposals to make some small changes to our subject-level conditions in GCSE, AS and A level music, and GCSE, AS and A level dance.

Following the first delivery of the reformed GCSEs and A levels in music in summer 2018, we identified two issues with our rules for the performance assessment in these qualifications. Both issues also apply to the reformed AS qualification in music. One of the issues also applies to the reformed GCSEs, AS and A levels in dance. Furthermore, we also identified an editorial error in our rules for the reformed GCSE in dance.

We proposed to:

- Revise our requirements to allow exam boards to determine how to mark a student's performance when that performance falls short of the minimum required length.
- Add a footnote to the conditions for GCSE and GCE music, to broaden the range of acceptable reference material beyond a traditional written score, where such a score is not available.
- Revise our requirements for how many dances students are required to perform in the GCSE dance performance assessment, in order to align with the DfE's subject content.

Who responded?

We received 370 responses to our consultation.

329 were personal responses; 41 were organisational responses.

We thank everyone who responded.

Personal responses:

Teachers: 311

Parents/carers: 2

Students: 1

Other: 15

Organisational responses:

Schools or colleges: 28

Academy chains: 1

Local authorities: 1

Awarding bodies or exam boards: 6

Other representative or interest groups: 5

A list of the organisations that responded to the consultation is included in Appendix A: List of organisational consultation respondents.

Approach to analysis

The consultation was published on our website. Respondents could choose to respond using an online form or by email. The consultation included 11 questions relating to GCSE, AS and A level music and GCSE, AS and A level dance.

This was a public consultation on the views of those who wished to participate. We were pleased to receive a large number of responses, including many from teachers. We recognise that the responses are not necessarily representative of the general public or any specific group.

We present the responses to the consultation questions in the order in which they were asked. Respondents could choose to answer all or just some of the questions. This means the total number responding to each question varies.

Some respondents chose to express their views without specifically answering the questions asked. These responses were considered but were not included in the total numbers of responses to each question.

We read all responses in full and summarise in this report the range of views that were expressed. While we structure the report by questions asked, many of the comments made inevitably straddled two or more of the questions. As a result we recognise not all views expressed or the extracts we have included fit neatly under individual questions.

We have sometimes edited comments for brevity and to preserve anonymity but have been careful not to change their meaning.

Views expressed – consultation response outcomes

In this section we report the views, in broad terms, of those who responded to the consultation document.

Question 1: We propose to revise our rules on minimum assessment times in the performance assessment for GCSE and GCE music and GCSE and GCE dance, to allow exam boards to decide how to mark performances which do not meet the minimum time requirements. This is a change to the current position, where they should not give students any marks in these cases. To what extent do you agree or disagree with our proposal?

Strongly agree 293 (80%)

Agree 51 (14%)

Neither agree nor disagree	7 (2%)
Disagree	9 (2%)
Strongly disagree	4 (1%)
Total responses	364

An overwhelming majority of respondents agreed with our proposed rule change.

Teachers' views

Teachers overwhelmingly agreed that the rules should be changed to allow the exam boards to decide how to mark performances of a length shorter than that required, with the following comment being typical:

Example 1: "Awarding no marks for the sake of performance time being 1 or 2 seconds short is ridiculously harsh."

2: "If a student in an English exam was only to answer half of the question they would still receive marks for the work they had put into answering."

Specifying a minimum performance time, some teachers noted, is inconsistent with graded music exams:

"None of the exam boards who deliver graded music exams impose any time limit per se. Limits are formulated by the choice of pieces based on demand only."

Several teachers felt that the current approach is not appropriate for the nature of the qualifications:

"These are 15 year olds - NOT professional dancers."

Teachers were of the opinion that the current rule values quantity over quality, which is problematic since longer pieces are not necessarily more meritorious:

Example 1: "The quality of a very short performance can sometimes be far better than longer ones."

2: "It is unfair to penalise a student on this basis when many difficult pieces of music are actually far shorter than the current minimum requirement."

Some teachers noted that the current rule can encourage students to ignore musical instructions in order to ensure they meet the minimum duration:

Example 1: "In order to meet the minimum time requirement, teachers and students are adding arbitrary repeats which destroy the integrity of the music."

2: "Currently it may be that pupils are playing pieces slower in order to go over the minimum time limit, which makes the piece easier to play and almost has the opposite effect to the desired one."

It was emphasised that durations can be fluid in music and dance, and therefore strict time requirements are inauthentic:

Example 1: "Dance/music subjects by their very nature are subject to change/differences when performed as no two performances will be the same."

2: "Professional musicians would not be penalised for their performance being slightly shorter than expected."

Many teachers also noted that nerves may cause students to perform pieces faster in assessment conditions than they might normally.

Some suggested the current rule might disadvantage students performing with particular instruments, or in particular genres:

Example 1: "Depending on the instrument there can be a lot of repetition, making it easier for, for example, a guitarist to reach the required minimum playing a repetitive pop song than a [...]violinist."

2: "There isn't parity between pianists and other performers as a pianist would perform for all of the allotted time and for example a brass player wouldn't if their solo is accompanied."

It was also felt by many that the current rule may disadvantage lower-attaining students, students with SEND¹, and students without access to extra tuition outside school:

Example 1: "I think it is a lot to ask, for students to have to complete four minutes' worth of music [...]. Considering that the course is meant to [be] open to all abilities, and some may have only properly started learning an instrument in Year 10, this may be quite some feat to complete and three minutes would be far more accessible."

2: "The 0 mark for under time performances is incredibly harsh and penalises our weaker pupils who struggle to put performances together."

Conversely, there was also the view that the current rule can disadvantage higher-attaining students:

"Last year I had students who had diligently prepared grade 5 Trinity board pieces. These were complex and demanding. They [fell] under the time limit and therefore they had to include another performance and overall marks came down. Totally unfair! Lower ability students chose simple, undemanding, repetitive pieces and were OK. In my view this penalised the students at the higher ability level."

Although this was not the topic of the consultation, several teachers felt that a minimum duration is not necessary, as short performances can be sufficient to exemplify the standard:

Example 1: "The purpose is to establish a standard of ability in performance. This can very often be revealed in no time at all."

2: "For some students, it can be very stressful and getting them to perform even once is difficult, and giving them no marks for a performance that is only a few seconds short seems ridiculous when you have enough of a performance to judge the standard and overall mark."

¹ Special educational needs and disabilities.

Some suggested the time requirements add to teachers' and students' workload:

Example 1: "I had a large group of 37 and spent hours timing each piece of coursework with a stopwatch to ensure minimum time was met – 4 pieces each student. Vast waste of time."

2: "We found ourselves in the ridiculous situation of having to re-record these students, and add an additional chorus of improvisation, in order to meet the time requirement. This was costly in terms of students' time off timetable, studio technician time, and staff requiring cover."

However, some teachers noted the benefit of minimum durations:

Example 1: "I think having a minimum time limit is a good thing and under the old spec it was possible to submit very short easy performances that scored highly. The increased rigour is good."

2: "The performance times need to allow examiners to mark with knowledge and demonstrate the learners' full ability."

3: "I think that there should be a minimum time requirement for a performance, as students should go through the discipline of developing a performance into a finished product, rather than just playing the bits they can play well and then stopping (which they may do if there was no time limit). Although, if they fall below this time requirement, there should be an automatic reduction in marks, rather than them not receiving any marks at all."

One teacher, while agreeing with the proposed change, stated:

"I am mildly apprehensive that aspirations and high expectations will diminish slightly."

A smaller number of teachers were less supportive of the proposed rule change. Some felt that students should simply observe the current rules:

Example 1: "Students should meet the expectations set in the specification. If a student has decided not to meet the expectations of the task then they should face the consequence. Students being awarded a zero mark has finally made students face some accountability for doing what is required."

2: "I think that the specification was very clear in terms of the minimum performance time and the penalty for not reaching this. I don't see why this needs to be altered."

However, some felt that responsibility for meeting the minimum duration lies with the teacher, and not the student:

Example 1: "I believe that schools should be able to know how long pieces are and there's no excuse for [not] being able to find suitable pieces of music that last longer than 2 minutes."

2: "The teachers themselves should be ensuring that students are following exam guidelines as it is mentioned in the GCSE dance spec."

Several teachers suggested changes to the current rule:

Example 1: "There should be a sliding scale so marks reduce the shorter the performance is."

2: "A percentage of marks should be deducted in line with the percentage of time missed."

Several teachers felt that it is important for exam boards to take a consistent approach to rewarding performances which run short:

Example 1: "I strongly feel that all exam boards should take a consistent approach on whatever the new outcome will be."

2: "My worry with giving the exam board the opportunity to decide might mean that each exam board does it differently."

One teacher was keen to emphasise that any change to the rule should not disadvantage those who are observing the current rule:

"We are happy to see this change as long as those candidates who do comply with the regulations are not disadvantaged in any way. There does not seem to be any reason why a candidate should submit work which does not meet the minimum time requirement."

Others' views

As with the teachers, other respondents were overwhelmingly in favour of the proposed rule change, for many of the same reasons:

"Awarding no marks when a student is within 30 seconds of the target is plainly unfair. Students play faster when nervous, so even the most carefully timed piece can run short."

All of the four exam boards that offer the qualifications agreed or strongly agreed with the proposed change. WJEC noted that:

"Current arrangements do not appropriately differentiate between performances which do not meet a minimum duration. Quality of performance is ignored as duration is the only assessment criterion applied."

As for suggestions for improvement, several respondents recommended a sliding scale of mark deductions for short performances.

OCR preferred an approach which would allow each performance to be assessed on a case-by-case basis:

"Students may demonstrate enough high quality work to show they meet the marking criteria. Conversely they may not be of an ability to achieve high performance marks and the decision as to whether they have presented enough to satisfy a judgement being made, therefore, should be made on a case by case basis."

RSL Awards and the Incorporated Society of Musicians stressed that it would be helpful for there to be guidance on how to mark performances which run short. (While RSL Awards is an awarding organisation, it does not offer the qualifications within the scope of this consultation.)

As with the teachers, a desire for consistency was expressed. ASCL felt that:

“A more proportionate and clearly stated approach would [...] ensure more consistency between visiting examiners and school examiners.”

Pearson proposed a joined-up approach across the exam boards:

“In the interests of fairness, our preference would be to work with JCQ and the other awarding organisations to collectively agree an approach on how to mark performances which do not meet the minimum time requirements.”

One respondent in this category felt that students should simply observe the current rules.

Question 2: To what extent do you agree or disagree with our proposed change to our rules for GCSE dance, to make it clear students can perform more than one dance?

Strongly agree	139 (40%)
Agree	51 (15%)
Neither agree nor disagree	146 (42%)
Disagree	2 (1%)
Strongly disagree	6 (2%)
Total responses	344

While a significant proportion of respondents stated that they “neither agree nor disagree” with our proposed change, there was still a majority in favour, with only a small proportion of respondents disagreeing

Teachers’ views

Several teachers indicated that they were in favour of the proposed change, since allowing students to perform more than one dance allows a broader range of skills to be demonstrated:

Example 1: “It will allow students to perform in a range of styles and scenarios that will enable them to show their best work.”

2: “This would give students the opportunity to demonstrate a wider variety of skills and would allow a rest between dances for recovery.”

One teacher went as far as to suggest that performing more than one dance should be compulsory.

Some felt that the proposed change would be appropriate for the subject, and would make it consistent with GCSE music:

Example 1: “I am not a dancer but have seen so many dance related performances that feature exactly that – variety and separate parts to the same or different storytelling.”

2: *“This would also bring it in line with music qualifications where more than one piece can be played, and would reflect the reality of the professional dance world, where a performance often consists of more than one dance.”*

There was also a view that the increased flexibility would make the qualification more accessible.

Many of those in favour asked for clarity:

Example 1: “Both documents should match to provide clarity to teachers and pupils.”

2: *“A greater degree of communication and clarity regarding specification requirements would be gratefully received.”*

Some respondents were in favour, but sounded a note of caution:

Example 1: “It should be managed to ensure students are not overwhelmed with additional work.”

2: *“As long as it is a centre decision, teachers can decide what will suit their students better.”*

Many of the respondents who stated that they “neither agree nor disagree” did so because they do not teach dance.

There were also several respondents who did not understand the need for the proposed change, since it would not require an adjustment to the GCSE dance specification that is currently being taught².

Some teachers expressed concern over students being permitted to perform multiple dances:

Example 1: “Asking students to perform more than one dance could be time consuming and just physically not possible in the time.”

2: *“Surely it is important that students can sustain the length of a full dance as a performance skill in itself.”*

We did not propose it should become compulsory for the performance assessment to be split into multiple dances. Our proposed change would merely allow this as an option, in line with the DfE’s subject content.

Others’ views

Several respondents felt that the increased flexibility and range allowed by the proposal would be beneficial. For example, ASCL said:

“We think it is appropriate to ensure students have the opportunity to split their performance into two or more discrete dances of their choice, to allow them to perform to the best of their ability. We therefore welcome this proposed flexibility.”

Others had similar views:

² To clarify, the proposed change is intended purely to address the unintentional inconsistency between our subject-level conditions and the DfE’s subject content.

Example 1: "This allows them to demonstrate technical ability in more than one way within the same timeframe."

2: "Dance exam entries should reflect their strengths and those who have a broad repertoire and dance experience should be able to demonstrate their broad dance repertoire. Limiting the performance to one dance may not enable [a] candidate to demonstrate their full dance potential."

AQA, the only exam board to offer GCSE dance, "strongly agreed" with our proposal. The other exam boards did not express a view.

As with the teachers, some other respondents noted that the proposed change would make GCSE dance consistent with GCSE music, while others noted that the proposed change is in keeping with the GCSE dance specification which is currently being taught.

As with the teachers, many of those who did not express a view did so because they have no involvement with GCSE dance.

Question 3: To what extent do you agree or disagree that we should revise our rules for GCSE and GCE music, in order to allow alternative forms of reference material where a written score is unavailable?

Strongly agree	247 (71%)
Agree	49 (14%)
Neither agree nor disagree	46 (13%)
Disagree	5 (1%)
Strongly disagree	3 (1%)
Total responses	350

An overwhelming majority of respondents agreed with our proposed rule change.

Under the proposed change, if a written score or lead sheet is available, it would still need to be provided. However, where a written score or lead sheet is unavailable, alternative forms of reference material would be permitted.

Teachers' views

Many teachers noted that the requirement for a written score effectively discounts certain genres of music:

Example 1: "Not all forms of music originate from a written score. Therefore we are penalising some styles at present, despite the statement that all styles of music are acceptable."

2: "Many compositions fall into genres that do not follow a "traditional" notated format. The GCSE should accommodate these in order to stay relevant with the skills needed for jobs related to the music industry."

Several teachers found the insistence on a written score to be an inauthentic approach:

Example 1: "A lot of modern music isn't composed using the score so any notation is an interpretation or approximation of the performance. Accuracy can't be marked against this when the student hasn't learned from the score but from a recording."

2: "Many pupils in popular, jazz and musical theatre styles learn by ear from recordings. Their performances are no less valid because of the lack of a score."

Some teachers noted that it can be time-consuming to locate or produce a written score:

Example 1: "Finding scores that match the performance, especially of modern popular styles, can be very time consuming, if not impossible as they are unavailable."

2: "To then find a score can actually cause more hassle than needed."

It was said by some that written scores are not always accurate, which is unfair on students:

Example 1: "Popular songs are not always written out accurately, which puts pupils at a disadvantage for getting full accuracy marks."

2: "Many songs are not notated 'accurately' so therefore a score would penalise them."

Some teachers suggested that an insistence on written scores might favour students from wealthier backgrounds:

Example 1: "Students from more affluent families are likely to be taking graded [instrumental] exams where scores are readily available."

2: "Currently it is very limiting and elitist, favouring traditional musicians."

One teacher felt that the proposed change would make the performance assessment more consistent with the approach of the composition assessment³.

A few teachers said that performance is about more than adherence to reference material:

Example 1: "When the performer ad libs, it can significantly enhance the performance and should be taken into account."

2: "Music performance should not be about recreating every single note exactly as it's written. There should be room for interpretation."

Some teachers went so far as to declare that reference material is not necessary at all:

Example 1: "I've never watched a professional performer with a score in my hand to make sure they're being accurate. I just enjoy an expressive, stylistically accurate and musical response."

2: "The realisation/recording should determine the final mark, not reference to the score."

³ In the composition assessment, students are required to submit "a complete recording of the piece" and "a score, lead sheet or written account of the composition".

Some teachers expressed support for the proposed change on the grounds of clarity and consistency:

Example 1: "I have a student who plays samba music to an extremely high standard and I'm finding it confusing and difficult to work out what material to submit as reference material and don't know if he will be penalised for this."

2: "Our board allows reference recordings, which really helps – this should be consistent across all the boards."

One teacher was in favour of the proposed change, although felt that the current arrangements are already sufficiently flexible:

"I do think the current system of allowing for lead sheets gives some flexibility. Tabs are fine too."

Several teachers were in favour but expressed some caution:

Example 1: "There needs to be clear guidance on what the reference material must include and some commentary to explain how the performance given relates to this."

2: "There should also be scope for interpretation and musicality."

Of the teachers who stated that they "neither agree nor disagree" with the proposal, for many this was because they did not teach music, although some took the view that the current rule did not cause any problems.

One teacher who disagreed with the proposed change felt that the current rule prevents classical musicians from being disadvantaged:

"The current lead sheet gives a basis to assess accuracy of the styles in question. Without this, classically trained students will be unfairly disadvantaged [...] as their peers will be allowed to provide less specific reference material."

Another teacher who disagreed with the proposed change felt that students should simply comply with the current rules:

"If the score [is] required then this is needed in order for assessment to be fair. Please let students learn that they must meet expectations set and sometimes they can't always do whatever they want."

Some teachers stated that scores are expensive to buy. Under our proposal, a written score or lead sheet would still need to be provided where it is available.

Others' views

As with the teachers, several respondents noted that written scores are not available in all genres of music. OCR said:

"Some genres or styles are not represented by written notation of any kind and in these cases a guide recording or equivalent evidence should be accepted as an alternative. Many students will be aural learners, who do not learn their performance pieces from notation, and in these cases a guide recording should be accepted as an alternative."

Hackney Learning Trust felt that:

“[The current] rule discriminates against practically everyone who isn’t submitting a classical performance.”

The Incorporated Society of Musicians said:

“It is important that exams reflect the different formats students work in, and are accessible in as many formats as possible.”

According to the Music Education Council:

“Any steps that can be taken to open up music for wider exploration by students is positive. It is impossible to predict which genres and styles will resonate most with learners and broadening what is available will help to engage more learners. Written scores are not authentic or appropriate means of notating/documenting some pieces of music.”

Hackney Learning Trust felt that a score or lead sheet is not necessary for examiners:

“Some of our music leads who are examiners comment that they find it unnecessary to have written scores for everything to judge accuracy. [...] It is perfectly possible to identify quality and weakness in a performance without having the notes in front of you. This is common in radio and TV shows where a performance and a score are critiqued by composers and other musicians.”

RSL Awards noted that they allow alternative reference material in their Level 1-3 qualifications.

Four exam boards offer GCSE and GCE music. AQA and OCR stated that they “strongly agree” with the proposal. Pearson indicated that they “agree” with the proposal, but suggested alternative revised wording, to allow greater flexibility:

“The proposed change in wording would restrict the reference material to having to be the notated score if they were available. However, in the case of many performances, a professional recording as reference material would be far more appropriate to make judgements on accuracy. If the proposed wording was used as it stands it could restrict the flexibility of reference material to be submitted rather than widen the options for candidates. We therefore would like to propose a slight amendment to the wording: “[Where, in circumstances in which a written score is not available/not appropriate, an awarding organisation allows the piece of music to be performed by the Learner, it must require an alternative to a written score to be submitted. Where an awarding organisation allows the performance, the alternative materials must be sufficient to allow assessors to make valid judgements against the marking criteria for the task.]”

The fourth exam board, WJEC, stated that they “disagree” with the proposal:

“We believe that in order to assess the accuracy of a candidate’s performance, it is necessary for the assessor to be able to access the score or lead sheet while they are listening to the candidate perform. We are not convinced that marking from memory will be as accurate, e.g. if the assessor has previously listened to a reference recording for comparison. Direct access to the score or lead sheet means that the familiarity of the assessor with the piece being performed does not impact on

the accuracy of the assessment. There is also the question of manageability for teachers, moderators and examiners. Candidates will expect their teachers to memorise the piece in order to assess their accuracy; this takes additional time for the teacher. This is also the case for moderators. In the case of examiners in a live performance setting, this becomes unmanageable as they do not know in advance of the day of the examination what piece they are going to be required to assess. To have to listen to a recording of it prior to the examination taking place would create logistical problems for the centre and the examiner.”

Some respondents felt that a broad interpretation of written evidence would be an appropriate approach:

Example 1: “Provided that there is written evidence and a key to decipher what is being performed, OK. But there should be SOMETHING available in all cases.”

2: “Highlighting that ‘scores’ might contain alternative forms of notation, such as annotated track sheets, piano rolls and waveforms, will broaden access and create greater relevance for much of the creative music industry.”

Of those who indicated that they “strongly disagree” with the proposal, some stated that students should simply observe the current rules.

Question 4: Do you have any comments on our proposed changes to our rules for GCSE and GCE music or GCSE and GCE dance?

Yes	158 (45%)
No	191 (55%)
Total responses	349

Teachers’ views

Some teachers were appreciative that concerns have been listened to:

Example 1: “It is pleasing that Ofqual have listened to teachers.”

2: “Glad to see that you are listening to feedback from teachers, musicians & those in the creative industries as well as caring about young people & the future & success of arts courses in schools.”

Some teachers suggested that the issues in music could have been anticipated:

Example 1: “This really could have been predicted. This was one of the biggest concerns from network meetings with local HoDs and from discussions at a national level – why was it not thought about sooner?”

Several teachers in favour of the proposed change stated that it should be implemented as soon as possible:

Example 1: “These changes should be made as soon as possible. The changes to reference materials could be made for 2019.”

2: “I firmly think the rules need to be changed around time limits, and quickly, so that this year’s candidates are not unduly affected.”

Some wondered whether the proposed change could be made retrospectively to students who have already been awarded grades:

Example 1: “I would like to see that they are given grades from last summer’s exam which [reflect] their musical ability and not the fact that they missed the timing of their performance pieces.”

2: “What will happen to those students who took their examinations last year – will grades be reviewed in light of any changes that may be made due to this process?”

Several teachers suggested other changes that could be made to the qualifications –these were beyond the scope of this consultation.

There was also a suggestion that other qualifications could also have come under the scope of this consultation, including GCSE and GCE drama⁴.

Some teachers suggested that the consultation could have been better publicised and remained open for a longer period of time.

Others’ views

RSL Awards and the Music Education Council suggested the use of a “performance window” instead of a minimum duration:

Music Education Council: “This removes the emphasis on the minimum (a duration that many students and teachers focus on) and gives more flexibility on the approach to the assessment. Having a top end on the performance lengths could also aid in standardising the assessment for learners.”

AQA suggested that the maximum durations in the dance qualifications should be reviewed in a similar way to minimum durations.

Another respondent praised the reformed qualifications’ ability to differentiate higher-achieving students.

Question 5: We have set out our view of the regulatory impact of our proposals on changing our rules for GCSEs, AS and A levels in music and dance. Do you have any comments on this assessment?

Yes	58 (17%)
No	281 (83%)
Total responses	339

⁴ In GCSE and GCE drama, students are required to participate in a performance of a stated minimum duration. However, our rules for these qualifications do not state that a performance of the stated minimum duration is “the only evidence which will be admissible”. Therefore, our rules for GCSE and GCE drama do not prevent students from gaining any marks if their performance runs short. It therefore would not be appropriate for these qualifications to fall under the scope of this consultation.

Teachers' views

The vast majority of teachers' responses to this question consisted of further thoughts pertaining to our proposed changes, or suggestions for other changes that could be made to the qualifications.

In terms of regulatory impact, one teacher felt that the impact of permitting alternative reference material could be greater than expected:

"I feel the time taken to mark work from a recording rather than a score could be more significant than has been suggested in the document."

One teacher identified an impact arising from the degree of availability of a written score:

"The only real regulatory impact I can see is that of verification where a student states that a score is unavailable. How is the examiner to know this? In order to circumvent this problem I would suggest adding a "reasonableness" criterion to the regulations. Therefore, a student would only have to take reasonable steps (defined perhaps by the objective standard of "steps which any reasonable GCSE, AS or A level student could take") in order to acquire scores in standard notation. Maybe a pro forma provided by the student to the examiner stating that they have checked 1) local retailers, 2) local libraries, 3) online & digital retailers (such as Musicroom), 4) digital document repositories such as Scribd and Jellynote. On that last possible source of music, there may be some intellectual property related issues and this would have to be verified by ISM's in-house counsel."

Another teacher also identified a potential copyright issue:

"If a teacher was recording a song (for example) from Spotify, or something similar, and then sending on to the exam board, would there be copyright issues?"

One teacher felt that the proposed changes would result in a reduced impact overall:

"If anything, this will reduce the regulatory impact as it will lessen any appeals made by student on the basis of miscalculations of time or appeals to parity and fairness with written examinations."

A small number of teachers stated simply that they agreed – although it wasn't clear whether they were agreeing with our view of the regulatory impact or with our proposed changes.

Others' views

RSL Awards identified an administrative burden around the proposal to permit multiple dances⁵:

"Allowing multiple dances may create problems with how evidence is presented and marked. The performances may be split apart so any submission and labelling of the evidence will need to be completed carefully. Any centres delivering would benefit from clear guidance on the new rules."

⁵ However, our proposal would not require any changes to the specification currently being delivered; nor would it compel students to perform multiple dances.

In the event of any changes being implemented imminently, AQA identified an impact arising from a collaborative approach with other awarding organisations:

“If these rule changes are to be in force for summer 2019, coordinating their implementation with other AOs may prove challenging.”

The Incorporated Society of Musicians felt that any impact on examiners would be minimal:

“These rules seem reasonable and unlikely to have a major impact on examiners.”

Other respondents to this question took the opportunity to share further thoughts pertaining to our proposed changes, which are captured elsewhere in this analysis document.

Question 6: Are there any additional steps we could take to reduce the regulatory impact of our proposals?

Yes	67 (20%)
No	264 (80%)
Total responses	331

Teachers' views

The message from teachers was that the changes should be made soon, and should be communicated effectively:

Example 1: “Ensure any decision to make change is done promptly and communicated effectively to all centres to ensure we can prepare our students effectively.”

2: “Implement them early enough that all teachers and students are aware of the changes and can adhere to them.”

One teacher recommended a “phased introduction”.

Several teachers stressed the need for clarity and consistency:

Example 1: “Make the rules on performing clear and simple.”

2: “Clear parameters around assessing work that does not fully meet the timing criteria.”

Several also stressed the value of teacher involvement:

Example 1: “Include industry and teaching professionals in the process – those currently practising, not advisers who have left “the classroom”.”

2: “Consult with teachers prior to making proposals rather than simply giving us a proposal / specification, running with it and making changes in hindsight.”

One teacher recommended that, once any changes are implemented, there should be no further changes “until the next intake of GCSE students”.

Other responses included suggestions for further changes that could be made to the qualifications. These comments have been captured elsewhere in this analysis document.

Others' views

Several respondents stressed the need for teachers to be supported in implementing any changes, including the Incorporated Society of Musicians:

"It would be useful to ensure that schools and candidates are provided with examples of how the new proposals will affect them to ensure they are guided correctly."

Another respondent emphasised the importance of input from teachers:

"Get the opinions of actual music teachers. Those who are 'on the front line', teaching this content are your best source of knowledge to understand today's students, what they are genuinely capable of, what they can achieve and how to go about assessing that in exam and performance situations. Those who work in the exam boards, with little to no student interaction, can be out of touch with today's students and what it is shaping their world – a range of sources must be consulted to gain the most effective and genuine results."

Two exam boards made suggestions with a view to ensuring a collective approach:

AQA: "If the rules change, it would be desirable for all AOs to make changes in a consistent way, and Ofqual could facilitate this occurring."

Pearson: "To ensure that all students are treated fairly our preference would be to work with JCQ and the other awarding organisations to collectively agree an approach on how to mark performances which do not meet the minimum time requirements."

Question 7: Are there any costs or benefits associated with our proposals which we have not identified?

Yes	49 (15%)
No	285 (85%)
Total responses	334

Teachers' views

Some teachers identified costs associated with updating specifications and any associated guidance. One teacher also noted that:

"Board-endorsed course books may have to be rewritten."

Some teachers identified costs associated with the admission (or otherwise) of alternative reference material in music:

Example 1: "The only possible cost is that of the examiner's verification of whether the student has taken steps to secure a standard score. If taken too far, this will add to the examiner's time management."

2: *"If providing reference tracks then schools may need to purchase these tracks, which would be an additional cost to the school."*

Others noted a time cost to teachers in familiarising themselves with any revised rules:

Example 1: "The time it will take to learn the new rules and implement them into our subject knowledge."

2: *"Yes, CPD, if this impacts on delivery of specification. Additional teacher time and planning for changes."*

However, some teachers stated that any costs would be worthwhile:

Example 1: "There are [no costs] that wouldn't be worth the expense to save our subject."

2: *"It is worth the financial investment if the rules around exams are fair."*

In terms of benefits, several teachers felt that the proposed changes would make the qualifications more accessible:

Example 1: "Greater access for all students who are musical. This could be the subject where they excel and become more confident learners. They shouldn't be punished because they can learn by modern methods."

2: *"This step would make dance more accessible and inclusive."*

One teacher felt that the proposed changes would bring about greater authenticity:

"Students can choose the best pieces for musical reasons."

Several teachers felt that the proposed changes would reduce costs:

Example 1: "Appeals and re-mark process may be reduced as a result."

Some perceived that there would be reduced cost as result of less money being required for written scores. However, as previously stated, under the proposal to allow alternative reference material, a score or lead sheet would still be required where it is available.

Several teachers identified timesaving benefits:

Example 1: "Many teachers are currently creating scores or lead sheets for pieces, particularly in popular genres which do not have published sheet music. I hope this would mean that the current necessity for this very time-consuming work would be ended."

2: *"Teachers should not be expected to produce scores as this can be time consuming."*

Others' views

Two respondents identified potential costs to exam boards:

WJEC: *“There is potentially a cost for exam boards, in terms of additional time claimed by moderators or examiners when having to listen to a recording prior to listening to the candidate’s performance.”*

RSL Awards: *“There may be implications for examination boards through the added complexities of submission.”*

Other respondents identified only benefits, in terms of greater accessibility and authenticity:

Example 1: “The changes will afford greater equality of opportunity to students at the lower end of the ability range.”

2: “Hopefully the exam will be more balanced and fair for students.”

As with the teachers, one respondent perceived that there would be reduced cost as a result of less money being required for written scores. Again, under the proposal to allow alternative reference material, a score or lead sheet would still be required where it is available.

Question 8: We have not identified any ways in which our proposals will prevent innovation by exam boards offering GCSE and GCE music and GCSE and GCE dance – in fact, we believe that all the changes we propose will allow for greater flexibility in their assessments and therefore may support greater innovation. Do you have any comments on this assessment? Please provide specific examples.

Yes	76 (22%)
No	263 (78%)
Total responses	339

Teachers’ views

Teachers overwhelmingly agreed that our proposals would allow for greater flexibility and innovation.

Some noted that this would make the qualifications more accessible:

Example 1: “I agree that these proposals will allow for more flexibility and will help make the qualifications more accessible to all learners, not just traditional musicians.”

2: “I agree – particularly with the range and innovative ways students could perform [...] music from a range of cultures.”

Others identified that our proposals would permit greater creativity:

Example 1: “They will [...] allow students to express themselves in a way that suits them best.”

2: “By allowing alternative forms of reference material, it allows performers to choose to perform from cultures that may not use traditional western notation, thus widening the performer’s options as well as enhancing the musical experiences of their peers by introducing them to musical styles that they may otherwise [not] have experienced.”

Some teachers stressed the value of exam boards being permitted to take a flexible approach:

Example 1: "I would welcome [a] proactive approach by the exam boards. They are all different and as such should have the flexibility offered to them."

2: "Exam boards should have the freedom to write specifications which allow students to show what they can do [...]"

A number of teachers did, however, sound a note of caution around there being greater flexibility:

Example 1: "My only fear is that leaving too much up to the exam boards may result in some exam boards penalising students more than/less than others and this would be unfair."

2: "I think it's still important to keep a level playing field even if you are allowing a certain amount of flexibility."

Others' views

Most other responses agreed that our proposals would allow for greater flexibility:

Example 1: "I completely agree with your statement – [it] will not stunt innovation. As you say, it will actually grant greater flexibility, which in turn supports innovation."

Some respondents felt that our proposals would be conducive to greater creativity:

OCR: "We agree that these proposals will allow for greater flexibility and innovation. Music technology as a performance "instrument", rappers, DJs and beatboxers are all examples of types of music students that can show tremendous talent and ability and this proposed change will support them in the changing landscape of the music industry and allow qualifications to include new technology and genres as they continue to arise and develop."

One respondent stated that more could be done:

"It's a place to start. There could and perhaps should be more innovation, particularly in digital resources."

Pearson agreed that the proposals would allow for greater flexibility, but reiterated their preference for an even more flexible approach to alternative reference material:

"In terms of the proposal regarding supporting reference material, we agree that this will also provide greater flexibility, providing that any changes do not prevent candidates from submitting other forms of reference material (e.g. reference recordings) if it is deemed more appropriate, even if a written score is also available."

One respondent did not perceive that our proposals would support greater innovation.

Question 9: We have set out our view that our proposals would not impact (positively or negatively) on students who share a particular protected characteristic. Are there any potential impacts that we have not identified?

Yes	20 (6%)
No	312 (94%)
Total responses	332

Teachers' views

One teacher felt that the proposals would positively impact on students from cultural backgrounds where written musical scores are not commonly used:

“The written score aspect of the changes I would expect to positively impact those students from ethnic backgrounds where notated music is not the norm. This will give them greater freedom to use a style with which they are familiar.”

Some teachers felt either that the proposed changes would impact all students equally, or that they would create an “equal playing field”:

“These proposals would help ensure equal access to the curriculum and assessment for all groups.”

Several teachers raised issues faced under the current rules by students who share particular protected characteristics. Some raised issues for disabled students in dance, while one claimed that the current requirement in music for a score or lead sheet “may disadvantage students from certain ethnic minorities”.

Some teachers stated that they did not understand the term “protected characteristic”⁶, while some raised issues for other groups of students (i.e. those who do not share a particular protected characteristic).

Others' views

Hackney Learning Trust identified that the proposal to allow alternative reference material has the potential to negatively impact groups who share particular protected characteristics:

“Some music genres are perceived as challenging groups who share a particular protected characteristic. For example, rap is seen as misogynist and/or homophobic. Safeguards to protect adverse impact e.g. promotion of hatred, should already be covered by school policies.”

Question 10: Are there any additional steps we could take to mitigate any negative impact you have identified would result from our proposals, on students who share a protected characteristic?

Yes	17 (5%)
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⁶ The Equality Act 2010 lists the protected characteristics as: age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex, sexual orientation. The public sector equality duty requires Ofqual to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it (though we are not required to have due regard to impacts on those who are married or in a civil partnership).

No	313 (95%)
Total responses	330

Teachers' views

One teacher felt that:

"Consideration needs to be given to how learners with SEN needs are identified."

Another said:

"Have a particular set of circumstances in place for students who present specific learning needs."

A dance teacher identified difficulties faced under the current rules by deaf students.

Others' views

Pearson said:

"No further steps are necessary."

There were no further responses.

Question 11: Do you have any other comments on the impacts of our proposals on students who share a protected characteristic?

Yes	5 (2%)
No	320 (98%)
Total responses	325

All comments submitted here are covered elsewhere in this analysis document.

Appendix A: List of organisational consultation respondents

When completing the questionnaire, we asked respondents to indicate whether they were responding as an individual or on behalf of an organisation.

Below we list those organisations that submitted a response to the consultation. We have not included a list of those responding as an individual.

AQA

ASCL

Bishop Thomas Grant School

CCEA

Chetham's School of Music

Epsom College

Fulston Manor School

Hackney Learning Trust

Hampstead School

Incorporated Society of Musicians

Kesgrave High School

Keswick School

Lipson Co-operative Academy

Loreto Grammar School

LWAD

Music Education Council

Music Publishers Association

OCR

Pearson

Pocklington School

Priory School Lewes

Queen Elizabeth's School

Ripley St Thomas CE Academy

RSL Awards

Seven Kings School

St Helen and St Katharine

St Mary's School

St Peter's School

St Thomas More High School

Steyning Grammar School

The Boswells School

The Grange School

The Judd School

The Queen Elizabeth Academy

The Winstanley School

Twyford CofE High School

UK Music

Ulverston Victoria High School

Weald of Kent Grammar School

WJEC

Wyndham High Academy



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