



Department
for Education

GCSE and A level subject content: equality analysis

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1. Introduction

This document assesses the equalities impact of new subject content for GCSEs in citizenship, cooking and nutrition, and drama, and for AS and A level drama and theatre. Impact is assessed by reference to the protected characteristics of pupils or students. Section 149 of the Equality Act 2010 requires the Secretary of State, when exercising functions, to have due regard to the need:

- to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- to advance equality of opportunity between people who share a protected characteristic and those who do not and
- to foster good relations between people who share a protected characteristic and those who do not

The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Age is not a relevant protected characteristic in relation to schools.

Pupils with Special Educational Needs (SEN), pupils eligible for Free School Meals (FSM), pupils with English as an Additional Language (EAL), and looked after children are not groups covered specifically by the Equality Act (although pupils within those groups may otherwise share a protected characteristic), but have been included in this analysis wherever possible. This is because those groups can be over-represented among low attaining pupils and we are keen to ensure the difficulties they face are not unnecessarily compounded by qualification reforms. They have not been included as a proxy for groups with protected characteristics.

2. Engagement and involvement

The public consultation opened on 25 September 2014 and closed on 20 November 2014. We received 446 responses from a range of stakeholders, including schools, equalities groups and awarding organisations.

In developing the new subject content, we asked awarding organisations to work with subject experts to establish what changes were needed to make sure the new qualifications are robust and rigorous. Subject experts included Citizenship Foundation, Association for Citizenship Teaching, pfeg, MyBnk, Jamie Oliver Food Foundation, The Springboard Charity, Quintin Kynaston school, LEON, All Saints Educational Trust, Food and Drink Federation, Design and Technology Association, Public Health England, British Nutrition Foundation, Ofsted, National Drama, SCUDD (The Standing Conference of University Drama Departments), Saint Benedict Catholic Academy, National Theatre, The Compton School, University of Winchester, University of Wolverhampton and University of Reading. The consultation proposals incorporated their suggestions for the new GCSEs in design and technology, citizenship, cooking and nutrition, and drama, and for AS and A level drama and theatre.

3. Description of the policy

The government is reforming GCSEs and A levels to ensure that they prepare students better for further and higher education, and employment. GCSEs are being reformed so that they set expectations which match those of the highest performing countries, with rigorous assessment that provides a reliable measure of students' achievement.

Reformed GCSEs will be respected qualifications in which students, employers and further and higher education institutions can have full confidence. They will provide students with more fulfilling and demanding courses of study. GCSEs will continue to be universal qualifications, entered by the same proportion of students as currently.

The new A levels will be linear qualifications that make sure students develop the knowledge and skills needed for progression to undergraduate study.

Reforms to these qualifications are already underway. GCSE subject content in English literature, English language and mathematics was published in November 2013, and the new qualifications will be taught from September 2015. GCSE subject content in ancient languages, geography, history, modern foreign languages, biology, chemistry and physics, which will be taught from September 2016, was published in April 2014. GCSE content in computer science, dance, music and physical education was published January 2015. These new qualifications will be taught from September 2016.

At AS and A level, subject content in art and design, biology, business, chemistry, computer science, economics, English language, English literature, English language and literature, history, physics, psychology, and sociology was published in April 2014. These new qualifications will be taught from September 2015. AS and A level subject content in modern foreign languages, ancient languages, mathematics, further mathematics, geography, dance, music and physical education was published in January 2015. These new qualifications will be taught from September 2016.

GCSE and A level reforms are not being introduced in isolation. Reforms across the education system will benefit all pupils and lead to improvements in teaching so that pupil performance will rise to meet the new higher standard. Many policies, for example the introduction of the Pupil Premium, SEN reforms, and the expansion of the academies programme, have a particular focus on those pupils left behind currently. A summary of DfE's programmes to support teaching for pupils with SEN is set out at Annex A.

4. Evidence base

Our analysis of the potential impact of the proposed GCSEs in citizenship, cooking and nutrition, and drama, and of the proposed AS and A level drama and theatre. has been informed by:

- i. meetings with employers, stakeholders, subject associations and awarding organisations.
- ii. a review of relevant literature, as referenced throughout the equality impact assessment
- iii. responses to our GCSE subject content consultation. DfE asked the following questions in the consultation on the GCSE and A level subjects under analysis here:
 - Do you think that any of the proposals have the potential to have a disproportionate impact, positive or negative, on specific students, in particular those with 'relevant protected characteristics'? (The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.) Please provide evidence to support your response
 - How could any adverse impact be reduced and how could the subject content of GCSEs and/or A levels be altered to better advance equality of opportunity between persons who share a protected characteristic and those who do not share it? Please provide evidence to support your response

5. Evidence review

The following summary of evidence draws on evidence in relevant literature, responses to the public consultation on the GCSE and A level content, and views expressed by stakeholders in face-to-face meetings in developing subject content.

In total, 155 respondents to the public consultation answered the question about potential disproportionate impact on students with relevant protected characteristics (from 446 respondents to the overall consultation). 94 stated that it would have a negative impact on those students with one or more protected characteristics. 40 said it would have no impact. 21 respondents were not sure if it would have an impact.

In the sections which follow, we have considered those concerns which have been raised by respondents to the consultation alongside other issues which we have identified through our own consideration of the relevant issues. In all cases our consideration of the issues has been informed by our previous work with stakeholders in developing subject content and the relevant literature.

5.1 Increased demand across all GCSEs

The government consulted on reforming key stage 4 qualifications in 2012 and published its response and its equality impact assessment on decisions early in 2013. The response stated that: reformed GCSEs should remain universal qualifications, accessible, with good teaching, to the same proportion of students as currently sit GCSE exams at the end of key stage 4. It also stated that at the level of what is widely considered to be a pass (currently indicated by a grade C) there must be an increase in demand to reflect that of high-performing jurisdictions. At the top end, the new qualification should prepare students properly to progress to A levels or other study. This should be achieved through more challenging subject content and more rigorous assessment structures.

GCSE subject content was developed in the context of these decisions. This impact assessment considers the proposals for GCSEs in citizenship, cooking and nutrition, and drama.

Impact

Fourteen stakeholders who responded to the equalities questions in the consultation raised concerns that increasing the demand of subject content would impact on less able students. Five of the responses were from teaching professionals, two were personal responses and the remainder were from organisations with specific subject interests. A large proportion of these were part of a campaign against the proposed increase in non-

exam assessment for GCSE Citizenship, which lies outside the scope of this equality impact assessment.

Whilst the less able are not a protected group under equalities legislation, there are some students with specific characteristics which may impact on their ability in some subjects, including EAL/ESL students, dyslexic students, those with SEN and those with certain disabilities.

The concerns raised related primarily to the fact that these subjects have historically had a large practical element to assessment, and both drama and cooking related GCSEs have been less prescriptive in content. In relation to the proposed new subject content for GCSE Cooking and Nutrition, one respondent on behalf of a school wrote: “Some students with SEN will struggle with the sheer volume of content. There should also be opportunity for more practical work to be assessed through speaking rather than writing. Many students can verbalise knowledge and understanding but find it difficult to write down. Exam questions often used words that some SEN students struggle to understand so they can't access them and get the marks but they do know and understand the subject.”

In relation to the concerns about GCSEs, DfE considered the evidence it had gathered during its September 2012 consultation on reforming key stage 4 qualifications, which indicated that a culture of high expectations is one of several consistent factors essential to high student attainment and good progress. The evidence suggested that, with the right teaching, all students will benefit from those higher expectations.

A discussion of this evidence can be found in the equality impact assessment we published in March 2013.¹ Our review of research indicated that the following factors are shown to have the greatest impact on preventing and responding to low student attainment:

- effective teaching
- a culture of high expectations
- understanding and meeting the needs of all students
- engaging and relevant curriculum
- initial assessments and on-going monitoring
- effective transition
- appropriate infrastructure and
- accountability at all levels

Andreas Schleicher, Deputy Director for Education and Skills at the OECD, has said that a common factor in high-performing systems is “the belief in the possibilities for all

¹ [GCSE Reform Equality Analysis, DfE, March 2013](#)

children to achieve” and there is evidence that suggests that, with the right teaching, students will benefit from those higher expectations².

Some of the specific concerns about the impact on less able students in cooking and nutrition, citizenship and drama refer to the increase in emphasis on theoretical knowledge and understanding. These concerns have been addressed in more detail in the relevant subject sections. The intention of reform is to ensure parity of quality and challenge across all subjects. We wish to ensure that students studying GCSEs in cooking and nutrition, citizenship and drama and the A level in drama and theatre will achieve a qualification whose value is recognised alongside other GCSEs and A levels, and which prepares them for further study or employment.

The impact on the less academically able must also be considered alongside the impact on the less physically able, such as those students with certain physical disabilities and those managing pregnancy or physical impacts of gender reassignment. Where there may be reduced emphasis on practical performance, this can be seen as a positive impact on students for whom practical performance can be more challenging, thereby making these subjects more accessible and appealing for students with relevant protected characteristics.

Conclusion

Our review of evidence indicates that a culture of high expectations is one of several consistent factors essential to high student attainment and good progress for all students, and particularly in responding to low student attainment. For this reason GCSE reform is specifically intended to raise the demand for all students; both more and less academically able. We feel the increased challenge is justified by the benefits we expect it to deliver in the form of higher attainment and better preparation for further study or employment.

We acknowledge that the increased demand may have a greater impact on some students who have characteristics which can make aspects of academic curricula more challenging, for example pupils with dyslexia or English as an additional language. However, we believe appropriate provision can, and should, be made to mitigate and support pupils with any additional challenge arising from increased demand in order to enable those pupils to benefit from greater equality of opportunity that will come from attaining higher standards. These provisions may take a number of forms including additional teacher support, extra time in exams and appropriate lesson differentiation, for example.

² [Ofsted \(2009\) Twelve outstanding secondary schools: Excelling against the odds](#), OECD (2010) PISA 2009 Results: [What Makes A School Successful](#)

Overall, DfE believes that all pupils will benefit from the higher aspirations, attainment outcomes and strong reputation expected of reformed GCSEs. It is of no benefit to any student to pass a qualification that does not provide evidence – for employers or others – of their competence in key areas that are essential to progression.

5.2 GCSE Cooking and Nutrition³

Practical skills

The proposals for the reformed GCSE Cooking and Nutrition included the requirement for students to demonstrate effective and safe cooking skills by planning, preparing and cooking using a variety of food commodities, cooking techniques and equipment.

The reformed subject content stated that specifications must require students to be able safely to apply all of the following skills when working with food: knife skills; preparing fruit and vegetables; preparing, combining and shaping food; tenderising and marinating; selecting and adjusting cooking processes; weighing and measuring; preparing ingredients and equipment; using equipment; water based methods using the hob; dry heat and fat based methods using the hob; using the grill; using the oven; making sauces; setting a mixture; using raising agents; making a dough; shaping and finishing a dough; testing for readiness; and judging and manipulating sensory properties.

Impact

Four respondents to the consultation raised concerns about the challenges that these requirements might present to students with physical disabilities, such as dyspraxia. The four respondents represented a range of organisations, including a school, a university and the Association for Nutrition, who wrote: “There are a wide range of skill requirements to undertake this GCSE, which require a degree of practical ability, including manual dexterity. It is not clear from the proposal how those with some disabilities will be able to acquire these skills during the course of the tuition period.”

DfE recognises that there may be challenges for students with certain physical disabilities, as there can be with all subjects that have practical components. However, there is effective legislation and guidance in place to mitigate potential adverse impacts on disabled students. Awarding Organisations are already experienced in ensuring that specifications for the three existing qualifications⁴ are accessible to disabled students and that assessment can be modified for students with physical disabilities as necessary and appropriate.

Section 96 of the 2010 Equality Act outlines the specific obligations for qualifications bodies and includes the duty to make reasonable adjustments to the extent specified by the appropriate regulator (in this case Ofqual). Ofqual allows reasonable adjustments to qualifications in the form of an exemption for a student from up to 40% of the marks available for a qualification. In light of Ofqual's determination, the JCQ's “Adjustments for

³ Please note that further to consultation, a decision has been taken to retitle this subject GCSE Food Preparation and Nutrition.

⁴ GCSEs in design and technology: food technology, home economics, and hospitality and/or catering

candidates with disabilities or learning difficulties” allow an exemption agreement to be reached by an awarding body, before the examination, for a candidate to miss a component or components amounting to no more than 40% of a GCSE or A level qualification.⁵

DfE is confident of the ability both of Awarding Organisations to mitigate against adverse impact on students with physical disabilities and of teachers to provide differentiation and support to those students facing additional challenge because of physical disabilities.

Four respondents to the consultation expressed concerns that the practical requirements of the proposed subject content might adversely impact on students from more disadvantaged and lower income families. Again, these included independent respondents, those representing schools and the Association for Nutrition.

One respondent, writing on behalf of an Academy, said: “To cover all the practical skills will be extremely costly as there is so much to cover. Families will struggle to cover these costs and departments will not have funds to cover it all.”

Over the last three years, DfE has introduced a number of important changes to how local authorities distribute funding to schools. These changes have led to a more transparent funding system with more money being allocated based on the needs of pupils. For 2014-15, local authorities are allocating around 90% of schools funding based on the needs of pupils, compared with 71% in 2012-13.

16 -19 Funding is calculated using the EFA funding formula that incorporates factors including student numbers, student retention, higher cost subjects, disadvantaged students and area costs. This is supplemented by additional funding for high needs students, bursaries and other financial support awarded to individual students.

Means of mitigation include the Pupil Premium, which is additional funding given to publicly funded schools in England to raise the attainment of disadvantaged pupils and close the gap between them and their peers. This funding is awarded per eligible pupil. It is not ring-fenced and can be used to help support pupils in whatever way their disadvantage impacts on their ability to access, engage with, or succeed in programmes of study.⁶

For all of these reasons, DfE is confident that schools and colleges will have sufficient funding to teach all the practical elements required in the proposed new subject content,

⁵ <http://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration/regulations-and-guidance/access-arrangements-and-reasonable-adjustments-2014-2015>

⁶ In the 2014 to 2015 financial year, schools will receive the following funding for each child registered as eligible for free school meals at any point in the last 6 years: £1,300 for primary-aged pupils and £935 for secondary-aged pupils. Schools also receive £1,900 for each pupil who has been looked after for 1 day or more, or has been adopted from care, or has left care under a special guardianship order, a residence order or a child arrangement order

and can provide additional financial support where pupils are facing the greatest economic disadvantage.

Two of the respondents made a slightly different, but related, point about not merely the costs of practical activities in school, but the relative disadvantage to pupils from families who cannot afford ingredients and equipment for pupils to practise the practical course components at home.

One independent respondent wrote: “There is a potential to negatively impact on students from lower socioeconomic backgrounds due to the need to source a wide range of resources, in terms of ingredients and equipment, in order to practice skills required for this GCSE.”

DfE acknowledges this concern, but feels that the issue is no greater for the proposed GCSE Cooking and Nutrition than for the existing GCSEs in food technology, home economics, and hospitality and/or catering. Practical skills are a vital component of a subjects such as cooking and nutrition in order to ensure that pupils are properly prepared for future career opportunities in this field. Not to ensure students acquire relevant practical skills would be to do them a disservice in relation to their future career prospects.

To mitigate this issue, DfE would again emphasise the value of Pupil Premium in allowing for targeted support for pupils from disadvantaged backgrounds in whatever way deemed most valuable and effective by schools.

A third concern raised by respondents to the consultation relates to those pupils who, for reasons of ethnicity, faith or ethical preference, are unable to handle meat and fish products. This issue was raised by five respondents, including two schools, a teaching union, an independent respondent and a charity promoting the importance of cooking for healthy lifestyles.

One respondent interpreted the proposed requirements positively, saying: “I think the inclusion of vegetarian and ‘alternative’ food products within the different technique sections had the potential to impact positively on students who do not wish to handle meat or fish products, particularly for cultural or religious reasons.”

The concerns raised by the other respondents seem to arise from a lack of clarity, highlighted by the same respondent about whether the vegetarian options are alternatives to, or additional to, handling meat and fish. She continues: “It is not clear, however, that students can choose not to demonstrate the skills specifically related to meat and this is potentially negative.”

The concerns raised by the other respondents are based on an assumption that the meat and fish handling components are compulsory and that the vegetarian options are

additional. For example, one respondent from a school said: “There will also be issues on the insistence to cover meat issues for vegetarians.” Another wrote: “Specifying students must prepare and cook with meat and fish may have a negative effect for some.”

DfE acknowledges a lack of clarity in the drafting used in the course content we consulted on. We will amend the wording to be clear that students who do not wish to handle meat and fish for ethical, faith or cultural reasons will not be required to do so. We are confident that Awarding Organisations can develop specifications and assessment criteria that offer parity and fairness for vegetarians and meat/fish eaters alike.

Conclusion

We have concluded that the practical skills required for the proposed reformed GCSE Cooking and Nutrition are reasonable and justifiable to equip pupils with comprehensive knowledge and understanding in this field and to ensure they are properly prepared for future career options. There is legislation and guidance in place to mitigate potential adverse impact on pupils with physical disabilities. Targeted needs-based funding should help mitigate any disadvantage to pupils from low income families, and provision for vegetarians in the subject content precludes any adverse impact on students who are unable to handle meat and fish products for ethical, faith and cultural reasons.

Theoretical content

As well as practical skills, the proposed subject content for GCSE Cooking and Nutrition requires students to demonstrate knowledge and understanding of the principles of food science, nutrition and healthy eating. In line with the other GCSEs being reformed, there is an increase in the level of demand expected of students in order to ensure they are properly prepared for further study or employment. Students are expected to understand: the functional properties, chemical processes and nutritional content of food and drinks; the relationship between diet, nutrition and health; the economic, environmental, ethical, and socio-cultural influences on food availability, production processes, and diet and health choices; and the functional and nutritional properties, sensory qualities and microbiological food safety considerations when preparing, processing, storing, cooking and serving food.

Impact

One response to the consultation from a charity advocating the importance of fresh sustainable food in schools noted the value of the theoretical rigour in the proposed subject content, but recognised the challenge it might present to less able pupils: “The scientific principles underlying the preparation and cooking of food' is an important module and makes this qualification challenging and robust. However, it has been

suggested by food teachers that some less able students will struggle with this module so teachers will need to carefully communicate course content and assess suitability of students.”

The same concern was raised about the new subject content by two schools and an independent respondent, with particular reference to the potential impact on pupils with special educational needs and learning disabilities. One school wrote, “those for whom English is a second language and low attainers, including some with special educational needs, will be impacted negatively.”

We have encountered these same concerns across the whole range of GCSEs being reformed. DfE has carefully researched and presented its rationale for increasing the level of demand in reformed GCSEs to ensure school pupils are properly equipped for further study or employment and are able to compete with students educated elsewhere internationally.

The increase in demand applies to all students, whatever their ability level and will not solely impact on less able students. The charity quoted above recognises that the mitigating response to these concerns lies in appropriate differentiated teaching with additional support for less able students or any other student who may struggle.

One school suggested that “many employers would not expect this level of written work e.g. in catering jobs or other jobs working with food.” However, it is important that the GCSE caters for all students, whatever their aspirations, and so should suitably equip both those with vocational objectives and those who aim to continue with further study. It is also important that the GCSE is recognised as having parity with other GCSEs to make it a valuable and respected qualification for students taking it.

Conclusion

Cooking and Nutrition is a practical subject which requires underpinning theoretical knowledge. The proposed reformed subject content covers both theoretical knowledge and understanding and practical skills. Both aspects of the course may present some challenges for certain pupils, but we are confident that the subject content offers an appropriate balance of both and that there are mitigating actions available to support students who may struggle with either aspect.

The proposed title: “GCSE Cooking and Nutrition”

As discussed above, the reformed GCSE Cooking and Nutrition is intended to replace the three existing related GCSEs in design and technology: food technology, home economics, and hospitality and/or catering. At the point of consultation, the title proposed for the new GCSE was “Cooking and Nutrition”.

Impact

Three respondents to the consultation expressed concerns about a possible detrimental impact on the appeal of the reformed qualification to boys. Two of these responses related specifically to the title of the GCSE.

One independent respondent said: "I do feel that the title of the proposed "cooking and nutrition" would be a huge impact on the take up of male students taking this qualification as an option."

Another felt that this impact was likely to be particularly disproportionate for boys of certain ethnicities: "I feel that certain race groups will not "allow" their sons to do a "cooking" GCSE."

An analysis of the uptake of related GCSEs in 2013⁷ shows that 9% of girls and 5.2% of boys took GCSE Design and Technology: Food Technology, whilst 2% of girls and 1.1% of boys took Home Economics: Food. There is clearly, therefore, a greater uptake of these related subjects among girls than boys already and it is hard to be certain how the change to the title of "Cooking and Nutrition" might affect either the uptake by different genders or by different ethnic groups and if there would be likely to be any combined impact. Therefore, DfE has taken the feedback of consultation respondents on board and is changing the title to "GCSE Food Preparation and Nutrition".

The third respondent, writing on behalf of a school, expressed a concern that "more boys like the practical elements in catering and we have a high uptake of lower ability boys taking the subject. Removing catering will have a negative impact on their option choices." However, as discussed above, the proposed new content of GCSE Cooking and Nutrition (or GCSE Food Preparation and Nutrition as it will now be titled) contains a strong practical element which should appeal to those students who were drawn to GCSE Catering. It combines these practical elements with sound theoretical knowledge to prepare them for further study or employment.

Conclusion

DfE has responded to feedback raising concerns about the title of the new GCSE Cooking and Nutrition and has changed it to GCSE Food Preparation and Nutrition. It is hoped that this will alleviate any potential disproportionate impact on boys. We would emphasise, however, that it is important for teachers and careers advisors to make clear the value of the qualification to all relevant careers in order that boys and girls alike can make informed decisions about studying it.

⁷ Gill, T, 2014, Uptake of GCSE subjects 2013, Statistics Report Series No.70, Cambridge Assessment

None of the respondents to the consultation raised any concerns about detrimental impact on homosexuals, pupils undergoing gender reassignment or those managing pregnancy or maternity. We also have not encountered any issues in our research to give rise to concerns in relation to any of these protected characteristics.

5.3 GCSE Citizenship Studies

Financial Education

The proposed subject content for GCSE Citizenship Studies included the requirement that students know and understand how taxes are raised and spent by governments, and how national economic and financial policies and decisions relate to individuals. Specifically, this includes: how public taxes are raised and spent by government locally and nationally; the practice of budgeting and managing risk and how it is used by government to manage complex decisions about the allocation of public funding; and different viewpoints and debates about how governments and other service providers make provision for welfare, health, the elderly and education.

Impact

Whilst we have not encountered any concerns about the inclusion of this component of the citizenship subject content, one respondent, a university professor, expressed a concern that it does not incorporate personal financial education. He wrote: “Not specifically and adequately including content related to personal financial education within citizenship risks having a disproportionate equalities impact in terms of equality of opportunity. Underperforming groups include first and second generation immigrants and those from relatively deprived, low-income backgrounds. Recent research suggests differences in financial education and advice could account for up to 40% of the difference in income at retirement, excluding the impact of starting incomes.”

Research evidence supports this claim about the value of financial education at the personal level. For example, a 2001 research paper carried out in the USA showed that compulsory high school education on household financial decision making raises both exposure to financial curricula and subsequent asset accumulation once exposed students reach adulthood.⁸

Whilst research suggests that the UK has higher levels of financial literacy than the USA, it remains the case that financially illiterate households in the UK have lower net worth, use higher cost credit and are more likely to report credit arrears or difficulty paying their debts than their more financially literate counterparts.⁹

The National Curriculum citizenship programmes of study for Key Stages 3 and 4, as published in 2013, outline the purpose of citizenship studies thus: “A high-quality citizenship education helps to provide pupils with knowledge, skills and understanding to

⁸ Bernheim, Garrett and Maki, 2001, Education and saving:: The long-term effects of high school financial curriculum mandates, *Journal of Public Economics*

⁹ Disney and Gathergood, 2011, Financial Literacy and Indebtedness: New evidence for UK consumers, University of Nottingham

prepare them to play a full and active part in society. In particular, citizenship education should foster pupils' keen awareness and understanding of democracy, government and how laws are made and upheld. Teaching should equip pupils with the skills and knowledge to explore political and social issues critically, to weigh evidence, debate and make reasoned arguments. It should also prepare pupils to take their place in society as responsible citizens, manage their money well and make sound financial decisions.”¹⁰

Explicit reference is made to preparing pupils to manage their money well, which is consistent with the respondent's views about the importance of this aspect of citizenship studies. This aspect of the National Curriculum is specifically addressed at Key Stage 3, where the programme of study states that pupils should be taught “the functions and uses of money, the importance and practice of budgeting, and managing risk.” This is an appropriate stage to introduce pupils to this key knowledge and understanding as citizenship is compulsory for all pupils in Key Stage 3 following the National Curriculum.

This knowledge is further built on at Key Stage 4, where citizenship is also compulsory. Here the National Curriculum states that pupils should be taught “income and expenditure, credit and debt, insurance, savings and pensions, financial products and services, and how public money is raised and spent.”

Whilst citizenship is compulsory at Key Stage 4, it is not compulsory for all pupils to take the GCSE in Citizenship Studies. It is therefore appropriate that the key skills of money management and financial decision making should be incorporated in the compulsory parts of the curriculum, where all pupils will benefit from them, regardless of any protected characteristics they might have, and not be confined to the optional GCSE.

Conclusion

Because personal financial education is compulsory within the National Curriculum, DfE feels that all pupils have sufficient exposure to it for it not to be essential in the GCSE. The GCSE concentrates more deeply on civic and state finance, in line with the focus of citizenship studies on the role of an individual within his or her community of citizenship.

As all students benefit equally from the provisions of the National Curriculum, students of all ethnic, faith, gender and socio-economic groups will have the same exposure to personal financial education. For this reason, we do not feel there is any detrimental impact on any group because it is not specified in the subject content for GCSE.

Similarly, we have encountered no reason to believe there will be any potential adverse impact on homosexual students or those managing pregnancy or gender reassignment.

¹⁰ <https://www.gov.uk/government/publications/national-curriculum-in-england-citizenship-programmes-of-study/national-curriculum-in-england-citizenship-programmes-of-study-for-key-stages-3-and-4>

Emphasis on theoretical knowledge and understanding

The consultation proposals for GCSE Citizenship Studies stated that specifications should require students to deepen their understanding of citizenship issues, to think critically, evaluate evidence, debate ideas, make persuasive arguments and justify their conclusions, and acquire the knowledge, understanding and skills to take responsible citizenship actions.

These requirements incorporate a lot of academic and theoretical content to provide students with the knowledge and understanding required for both active citizenship and further study.

Impact

Three respondents to the consultation raised concerns about the theoretical demands on pupils with special educational needs. These respondents included one writing on behalf of a subject expert advisory groups, saying; “The focus and volume of knowledge within the content will make this qualification very difficult to access for some groups of SEN pupils who have previously been able to participate in GCSEs for citizenship studies,” a respondent on behalf of a school, and a spokesperson for the Citizenship Foundation, who said “the dry and academic nature of much of the content will make it very hard for some SEND pupils.”

These concerns form part of the wider debate about raising the theoretical demand of GCSEs in general and the challenge it presents for less able pupils and those with specific learning disabilities or special educational needs. These issues have been addressed already both within this document and in previous equality impact assessments for other reformed GCSEs. The government has concluded that increased demand and greater focus on theoretical content is justifiable in line with its rationale for ensuring that GCSEs properly equip students for further study and employment and enable them to compete in a global economy. Mitigating actions are available to support those students facing particular challenges, especially as a result of special educational needs, via differentiated teaching and additional targeted support.

Conclusion

DfE has concluded that the theoretical content and knowledge specified in the subject content for GCSE Citizenship Studies is justifiable and necessary to ensure that all students choosing to study it can be confident that they are selecting a qualification which is viewed as having equal value and parity with other GCSEs and which will properly equip them for further study or employment. As with all other subjects, any potential adverse impact on pupils with special educational needs should be mitigated with appropriate teacher differentiation and support. There is provision within needs-based funding to ensure finance is available to support this.

Means of assessment

Alongside, DfE's consultation on the reformed subject content, Ofqual consulted on proposals to withdraw the non-examined (controlled assessment/course work) element of the GCSE Citizenship Studies so that the new qualification will be 100% examination. They proposed that a 15% weighting be given to active citizenship, to be assessed as part of the final exam.

Impact

Eight respondents to the equalities questions in DfE's consultation raised concerns about the move to 100% examination. All respondents used variations of this wording: "Some pupils who have difficulty with written communications but demonstrate good levels of citizenship knowledge, understanding and skills through other work, may struggle with the volume and extent of content to be learned and assessed under the current proposal. These students will be penalised by the shift to 100 per cent examination and students who are generally proficient at taking exams will gain an advantage. The current qualification with 60 per cent non-examined assessment and focus on active citizenship ensures students at the lower end of the ability range can engage with content in meaningful ways and have gained credit for their use of the full range of citizenship skills. The content of the citizenship qualification will be severely undermined by the current assessment proposals of 100 per cent examination."

Conclusion

Means of assessment are outside the scope of this equality impact assessment. It is for Ofqual, rather than DfE to ensure that the means of assessment ensure, in so far as is possible, that qualifications are accessible to members of protected groups and do not generate a disproportionately adverse impact on any of those groups. DfE is confident that staff at Ofqual are addressing any concerns in their own equality impact assessments.

Equal Citizenship

The proposed new subject content for citizenship requires that pupils "use and apply knowledge and understanding of key citizenship ideas and concepts including democracy, government, justice, equality, rights, responsibilities, participation, community, identity and diversity, to think deeply and critically about a wide range of political, social, economic and ethical issues and questions facing society in local to global contexts."

Impact

It is clear from the requirements outlined above that equality and respect for diversity are important aspects of the GCSE Citizenship Studies subject content. This has a positive impact on promoting equality for members of protected groups.

However, one respondent, writing on behalf of the National Secular Society, expressed a concern that there is insufficient emphasis on addressing barriers to equal citizenship: “Naturally we believe that educating young people on the relationship between equal treatment, and the principle of equal citizenship will have a positive impact on their understanding and empower them to challenge privileges and inequalities. We also believe that this in turn will have a positive impact on equality in the wider school environment. We are concerned that the course does not adequately address barriers to equal citizenship (including discrimination based on religion or belief, including non-belief) or unequal models of citizenship (e.g. models which privilege particular genders, religions or ethnicities).”

We have considered this concern, but feel there is sufficient scope within the subject content to encourage discussion of barriers to equal citizenship and for provision of this content within specifications. As well as the emphasis on equality, the subject content requires students to explore diverse identities and “the need for mutual respect and understanding in a diverse society and the values that underpin democratic society.” Exploration of the need for mutual respect in a diverse society is an appropriate context for consideration of the impact of inegalitarian societies on different groups.

The subject content also specifically requires students to have knowledge and understanding of “opportunities and barriers to citizen participation in democracy”, which again provides a platform for discussion of the barriers to equal citizenship referred to by the respondent. The content’s focus on global comparisons and its requirement to study “key differences in how citizens can or cannot participate in politics in one democratic and one non-democratic political system that is outside of the UK.” allows for these issue to be considered in international comparison.

Lastly, the focus on human rights in the subject content, including the “human, moral, legal and political rights and the duties, equalities and freedoms of citizens”, also provides a platform for discussion of the implications of unequal citizenship.

Conclusion

DfE concludes that there is not only provision within the subject content to encourage and support study of those issues of unequal citizenship and barriers to citizenship raised by the consultation respondent, but that the nature of the specified subject content will naturally prompt discussion of these issues. Awarding Organisations and teachers have further respective roles to play in the development of specifications and in the teaching of

them to ensure that the barriers to equal citizenship and implications of unequal citizenship are properly understood by students of GCSE Citizenship Studies. We view this as a positive aspect of the subject content in terms of promoting equality for members of protected groups.

5.4 GCSE Drama and A level Drama and Theatre

Prescribed analysis and performance of specific texts

The reformed subject content for GCSE Drama requires students to study a minimum of one complete and substantial performance text and a minimum of two key extracts from a second contrasting performance text, both of which must have been performed professionally. In addition, it requires students to participate in the performance of a devised piece and an extract from the complete performance text studied, or one of the key extracts.

The reformed subject content for A and AS level Drama and Theatre AS requires students to demonstrate knowledge and understanding of, and practical exploration of:

- at AS level - a minimum of one complete and substantial performance text and a minimum of two key extracts from two different texts, placed in the context of the whole text and the work and methodologies of at least one influential theatre practitioner
- at A level - a minimum of two complete and substantial performance texts and a minimum of three key extracts from three different texts placed in the context of the whole text and the work and methodologies of at least two influential theatre practitioners

It also requires that specifications in drama and theatre must require students to participate in:

- at AS level - a minimum of one performance from a text, which has been studied as part of the course
- at A level - a minimum of two performances, one devised and one from a performance text which has been studied as part of the course

Impact

Two respondents to the equalities questions in the consultation (one anonymous and one independent respondent) expressed concerns that the prescribed focus on analysis and performance of specific texts might impact on members of protected groups.

One respondent wrote: “The narrow focus of the drama subject content clearly precludes the positive experiences provided by process drama for the majority of students, in particular the experiential learning which allows for individual students to create their own responses to particular situations. The prescriptive nature of being required to engage with limited theatre texts rather than self-devised structures, as well as the lack of flexibility implied by the subject content will lead to some students being unable to express themselves and explore their personal needs, opportunities which currently exist

as an aspect of several of the current GCSE specifications (e.g. Edexcel Unit 1 exploration).”

The other respondent wrote: “The proposed content for drama will discriminate against people who do not speak English fluently; some students on the autistic spectrum who may wish to communicate through drama but not perform in front of their peers; any student who cannot read; any students who are victimised and bullied who may not wish to draw attention to themselves through performance (which essentially could cover any protected group). Sadly, the existing drama GCSE actually helps these groups, as they are given a safe environment to explore, discover, create and communicate. This experience will help them have the confidence to pursue careers, confidence they may not have had if drama had not been a viable option for them.”

Both concerns focus on the change from more explorative content to more prescribed, text-based content. This change at GCSE level is part of the Government’s aim to increase the rigour required of GCSE students and to raise the level of demand to ensure that GCSE Drama is a qualification which is viewed as having parity with other GCSEs and is valued by students and employers alike for its role in preparing students for further study or employment.

DfE acknowledges that, as with other subjects, an increase in demand may present additional challenges for certain groups of pupils, such as those with English as an additional language or those with special educational needs. DfE’s conclusion in relation to all subjects has been that the GCSEs should not be less rigorous or demanding as this would disadvantage all students because every student has a right to be confident that the qualifications he or she is studying will appropriately prepare him/her to compete in the job market or to continue on to further study. Instead, those pupils who face challenges should receive appropriate differentiation and teaching support to help them rise to the challenges and raise their achievements too.

The issue of confidence in performance is more specific to drama, but because of its central role in professional theatre, DfE considers the performance of dramatic texts to be an important part of preparing students for further study or employment. We would emphasise that the requirement to analyse and perform texts does not preclude schools and colleges from teaching the kind of explorative and improvised work that the respondents feel helps to build confidence, or from using process drama techniques. Indeed, this kind of work can often be a warm-up to rehearsals and performance of text-based work. It is also specified in both the reformed GCSE subject content and the reformed A level subject content that students perform a devised performance. This is an opportunity for the kind of creative, explorative work that the two respondents refer to.

The specific benefits of drama teaching for pupils with English as an additional language have been evidenced in various pieces of research.¹¹ Boudreault, 2010¹², summarises the benefits as follows:

- the acquisition of meaningful, fluent interaction in the target language
- the assimilation of a whole range of pronunciation and prosodic features in a fully contextualized and interactional manner
- the fully contextualized acquisition of new vocabulary and structure
- an improved sense of confidence in the student in his or her ability to learn the target language

It is clear that these benefits are not solely limited to process drama. Indeed, performing a text in drama can clearly help with putting that text into context and supporting EAL students in understanding the meaning of that text in interaction with other performers. The benefits for improving pronunciation and prosodic features are independent of whether students are performing from a text or improvising. Therefore, we feel that the subject content for GCSE and A level drama can be viewed as beneficial for EAL students, despite the changes, and we would expect to see an increase in confidence accordingly.

Stern (2010) discusses the role of drama in helping students to build confidence, claiming that drama raises self-esteem by demonstrating to students that they are capable of expressing themselves in realistic communicative situations.¹³ Again this benefit is not limited to process drama, although this is indeed a method that can be used in relation to the devised performances at both GCSE and A level.

One additional consultation comment on the analysis and performance of texts came from the Arts Council, who said: “Our concern in relation to equality would be that the selection of works studied should be wide and varied with relation to the protected characteristics – gender, disability, race/ethnicity, sexual orientation, age.” In response, DfE would note that the only requirement specified in the GCSE content with respect to a text is that it has been written specifically for theatrical performance. Awarding organisations are therefore free to include a variety of texts in their specifications, reflecting a range of different characteristics, from which students and teachers can choose. The same can be said in respect to the A level and AS content with the addition that it is a requirement that the text and extracts represent a range of social, historical and cultural contexts.

¹¹ e.g. (1) Kao, S M and O'Neill, C, 1998 *Words Into Worlds, Learning a Second Language through Process Drama*, Ablex Publishing, and (2) Sam, W Y, 1990, *Drama in Teaching English as a Second Language- a Communicative Approach*, *The English Teacher*, vol. 9, July 1990, Malaya.

¹² Boudreault, C, 2010, *The Benefits of Using Drama in the ESL/EFL Classroom*, *The Internet TESL Journal*, Vol 16.

¹³ Stern, 2010, *Why drama works – a psycholinguistic perspective*,

Conclusion

DfE concludes that the increase in demand is justifiable in the context of our rationale for introducing reforms that will better prepare students for further study and employment. As with other subjects, appropriate differentiation and support can be used to help mitigate any potential adverse impact on students who may struggle by virtue of characteristics such as their level of English language or the communication difficulties associated with autistic spectrum disorders. Overall, the benefits that drama offers in helping build confidence and support language acquisition would appear to remain in the proposed reformed subject content and, therefore, on balance, we see the GCSE and A level content as positive for students with these protected characteristics.

No other concerns have been raised about the impact of the changes to the course content on any other protected groups. DfE is confident that there is legislation and guidance in place to support pupils with physical disabilities in managing the performance requirements and allowing for mitigating actions where there are specific challenges. This includes the JCQ's "Adjustments for candidates with disabilities or learning difficulties", which allow an exemption agreement to be reached by an awarding body, before the examination, for a candidate to miss a component or components amounting to no more than 40% of a GCSE or A level qualification.¹⁴

Means of assessment

Alongside, DfE's consultation on the reformed subject content, Ofqual consulted on proposals for the means of assessment. They proposed that for GCSE Drama and AS and A level Drama and Theatre, 60% of marks should be assessed by non-exam assessment and 40% through examined assessment.

Impact

Two respondents to the equalities questions in DfE's consultation raised concerns about the means of assessment. A respondent, writing on behalf of a school, said: "Any requirement to be assessed for final examination through a written paper rather than through practical in GCSE Drama could adversely affect those with Special Educational Needs who might find the written element a challenge."

Another, also writing on behalf of a school, said: "Students who experience needs such as dyslexia are still excellent performers and can express through practical work and controlled assessment their thoughts. If assessment of these 'substantial texts' becomes purely through sit down written examination you will hinder their creativity and ability to access this qualification."

¹⁴ <http://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration/regulations-and-guidance/access-arrangements-and-reasonable-adjustments-2014-2015>

Conclusion

Means of assessment are outside the scope of this equality impact assessment. It is for Ofqual, rather than DfE to ensure that the means of assessment ensure, in so far as is possible, that qualifications are accessible to members of protected groups and do not generate and disproportionate adverse impact on any of those groups. DfE is confident that staff at Ofqual are addressing any concerns in their own equality impact assessments.

6. Summary

We believe that overall the proposals for reformed subject content examined in this equality impact assessment will have a positive impact on equality of opportunity by providing respected qualifications in which pupils, employers and further and higher education providers can have full confidence.

Equalities considerations have been taken into account before, during and after the process of developing new content. In examining the evidence and opinions we have collated, we believe the final changes proposed are objectively justified because they will have the effect of improving standards. Where concerns have been identified about the potentially negative impact of content, we have responded to the concerns as set out above.

Increasing demand across all GCSEs, including those which have traditionally had a significant practical component, is intended to help achieve parity in the value to students of all qualifications and in the perception among employers and further/higher education institutions of the qualifications' worth. We are confident that where this presents challenges to students with protected characteristics, there are a number of appropriate and available means of mitigation.

These include the provision of good quality teaching and support to students experiencing difficulties, such as those with special educational needs or English as an additional language. The quality of SEN teaching is central to ensuring pupils with SEN are given the best possible opportunities to achieve results in any of the GCSEs and A levels considered here. A summary of DfE's programmes to support good teaching for pupils with SEN is set out at Annex A.

Means of mitigation also include the Pupil Premium, which is additional funding given to publicly funded schools in England to raise the attainment of disadvantaged pupils and close the gap between them and their peers. This funding is awarded per eligible pupil. It is not ring-fenced and can be used to help support pupils in whatever way their disadvantage impacts on their ability to access, engage with, or succeed in programmes of study.

Further means of mitigation are already embedded in legislation or guidance, such as the JCQ's reasonable adjustments for candidates with disabilities or learning difficulties, which allow for exemptions where pupils are unable to participate in aspects of the course content.

We also believe that appropriate careers guidance and support can be used to help foster engagement among students with protected characteristics with subjects they may not perceive as relevant to them. We discussed this above in relation to the proposals for GCSE Cooking and Nutrition (now GCSE Food Preparation and Nutrition), when we

noted that it is important for teachers and careers advisors to make clear the value of the qualification to all relevant careers in order that boys and girls alike can make informed decisions about studying it.

DfE believes that every subject should be accessible and appealing to all students regardless of ethnicity, gender, faith, disability, sexual orientation, pregnancy or maternity. Rather than accede to perceived preferences among different groups, DfE strives for a climate in which no subject is, or is seen to be, better suited to students with any specific characteristics. Equality is as much about equality of aspiration as it is about equality of opportunity. Where practical impediments present obstacles to any particular group's participation or success, every effort has been made to ensure that mitigating action can be, or has been, taken.

As well as considering each subject individually, we have also given consideration to any potential cumulative impact of the changes across subjects. As we are confident that any possible adverse impacts identified in relation to individual subjects have appropriate means of mitigation, we have no reason to believe there will be any additional impact at the cumulative level.

Annex A: DfE programmes to support effective teaching for pupils with SEN

The quality of teaching is central to ensuring that pupils with SEN and Disabilities are given the best possible opportunity to achieve good results in their GCSE and A level studies. As well as reforming qualifications, DfE is committed to supporting the development of teachers' skills in meeting SEN. These include:

- Developing specialist resources for initial teacher training through the National College for Teaching and Learning (NCTL) and advanced level online modules on areas including autism and speech and language needs, to enhance teachers' knowledge, understanding and skills. Teachers themselves tell us that the quality of training for SEN is improving. The majority of new teachers rate this aspect of their training as good or very good and this proportion is consistently increasing ([DfE, NQT annual survey 2013](#)).
- Since 2009 we have funded more than 10,000 new SENCOs through the master's-level National Award for SEN Co-ordination and we funded a further 800 teachers to take this award in 2013/14.
- Awarded contracts totalling more than £2.5m a year to a number of sector specialists, including the Autism Trust, Communications Trust, Dyslexia SpLD Trust and National Sensory Impairment Partnership (NatSIP) to support the implementation of the SEN reforms and provide information to schools and teachers.
- The National Scholarship Fund for teachers and support staff provides opportunities to apply for funding to undertake postgraduate qualifications and training in supporting children with SEN and disabilities, including specific impairments such as dyslexia. We have part-funded 1,386 teachers and support staff to take qualifications since 2010. In April 2014, NCTL launched a new round of the National Scholarship Fund with up to £1 million of funding to support up to 50% of course fees for qualified teachers and SEN Support Staff. Staff from maintained schools, Special Schools, academies, free schools, PRUs and Sixth Form Colleges in England were funded to extend their knowledge relating to SEN. 648 awards were offered to teachers and SEN Support staff, including collaborative groups.
- Nasen (National Association for Special Educational Needs) has been funded to deliver leadership and implementation conferences and produce 'how to' materials supporting assessment, pupil progress, use of teaching assistants, working with 12 Outstanding schools. We have also funded them to set up a new [SEND Gateway](#) which was launched in May 2014. This is an online portal offering education

professionals free, easy access to high quality information, resources and training for meeting the needs of children with SEN and disabilities.

- Achievement for All (AfA) now provides whole-school support to around 2000 schools to improve outcomes for pupils with SEN and disabilities. We are also supporting them to provide leadership support to an additional 1200 schools and online support to around 10,000 schools to plan and manage the reforms as well as to close the gap for children and young people with SEN.
- An average of £5m per year of funding for significant investment in Educational Psychology training.



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