

**Analysis of Responses to our
Consultation on Conditions and
Guidance for GCSE, AS and A level
Film Studies and GCSE, AS and A level
Media Studies**



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Executive Summary

Our consultation about the Conditions and Guidance for GCSE, AS and A Level Film Studies and GCSE, AS and A level Media Studies took place between 26th February 2016 and 24th March 2016. The consultation questions were available to either complete online or to download. A copy of the consultation is available at:

<https://www.gov.uk/government/consultations/gcse-as-and-a-level-reform-regulations-for-film-studies-and-media-studies>

There were 188 responses to the consultation – 143 from individuals and 45 from organisations.

Our proposal to introduce a release date for the briefs in both subjects received strong disagreement from the majority of respondents. Responses to our other proposals were more positive.

Respondents also raised several issues that were outside the scope of this consultation, in particular in relation to:

- the Department for Education's subject content.
- the weighting of non-examination assessment in GCSE, AS and A level film studies and media studies.

1. Introduction

This report is a summary of the views expressed by those who responded to our consultation on the Conditions and Guidance for GCSE, AS and A level Film Studies and GCSE, AS and A level Media Studies. This consultation took place between 22nd February 2016 and 24th March 2016.

Background

New GCSE, AS and A level qualifications are being introduced in England. We have consulted on and announced our policy on the general design of these new qualifications. We have also set out our policy and technical arrangements for the subjects where first courses began in September 2015,¹ and for the subjects which will be introduced for first teaching from September 2016.²

Following earlier consultations³ we took decisions on the design of the new GCSEs in Film Studies and Media Studies, and the new AS and A level qualifications in Film Studies and Media Studies that are to be introduced for first teaching from September 2017.

This consultation focused on the regulatory arrangements that we must put in place to make sure that awarding organisations design, deliver and award these new GCSEs, AS and A levels in line with our policy decisions.

¹ New GCSEs in English language, English literature and mathematics, as well as new AS and A levels in art and design, biology, business, chemistry, computer science, economics, English language, English language and literature, English Literature, history, physics, psychology and sociology.

² New GCSEs in art and design, biology, chemistry, citizenship studies, classical Greek, combined science, computer science, dance, drama, food preparation and nutrition, French, geography, German, history, Latin, music, physical education, physics, religious studies and Spanish. New AS and A levels in classical Greek, dance, drama and theatre, French, geography, German, Latin, music, physical education, religious studies and Spanish.

³ www.gov.uk/government/consultations/gcse-reform-regulations-for-design-and-technology and www.gov.uk/government/consultations/development-of-new-gcses-and-a-levels-for-teaching-from-2017

2. Who responded?

We received a total of 188 responses to our consultation. Responses were from individuals or organisations based in England (177 responses), Wales (5 responses), Northern Ireland (2 responses), Channel Islands (2 responses), Scotland (1 response), and Oman (1 response).

Table 1: Breakdown of consultation responses

Personal / organisation response	Respondent type	Number
Personal	Teacher	119
Personal	Educational specialist	20
Personal	General public	4
Organisation	School, college or academy chain	39
Organisation	Awarding organisation	3
Organisation	Subject association or learned society	2
Organisation	Higher education institute	1

3. Approach to analysis

We published the consultation on our website. Respondents could choose to respond using an online form, by email or by posting their answers to the consultation questions to us. The consultation included 24 questions.

This was a consultation on the views of those who wished to participate and while we made every effort to ensure that as many respondents as possible had the opportunity to reply, it cannot be considered as a representative sample of the general public or any specific group.

Data presentation

We present the responses to the consultation questions in the order in which they were asked.

The consultation asked 24 questions and each had a different focus. Respondents could choose to answer all or just some of the questions.

For some of the questions, respondents could indicate the extent to which they agreed with our proposals, using a 5-point scale (Strongly agree, Agree, Neither agree nor disagree, Disagree and Strongly disagree), as well as providing comments on our proposals.

For these questions, we set out respondents' views using the 5-point scale. Where respondents provided further comments, we present these separately.

During the analysis phase we reviewed every response to each question.

4. Views expressed – consultation response outcomes

In this section we report the views, in broad terms, of those who responded to the consultation document. The consultation was split into three sections with questions relating to each section:

- Regulating GCSE, AS and A level film studies and GCSE, AS and A level media studies
- Our proposed Conditions and guidance
- Equality impact analysis

We have structured this report around the questions covered in the consultation document.

A consultation is not the same as a survey and the responses only reflect the views of those who chose to respond. Typically, these will be those with strong views and/or particular experience or interest in a topic. What follows is a fair reflection of the views expressed by respondents to the consultation.

A list of the organisations that responded to the consultation is included in Appendix A.

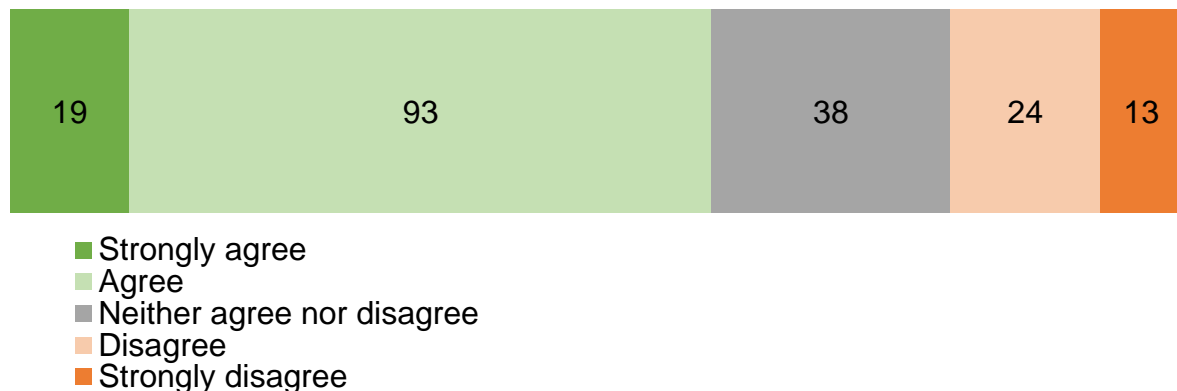
Regulating GCSE, AS and A level film studies and GCSE, AS and A level media studies

Question 1: To what extent do you agree or disagree that – for each of GCSE, AS and A level Film Studies and GCSE AS and A level Media Studies – we should introduce a Condition which requires exam boards to comply with the relevant subject content and assessment objectives?

As illustrated in Figure 1, 187 respondents answered Question 1, with the majority of respondents agreeing or strongly agreeing with the proposal.

Of those who responded to this question, 60 per cent (80 individuals, 32 organisations) agreed or strongly agreed with our proposal that we should introduce a Condition requiring exam boards to comply with the relevant subject content and assessment objectives in GCSE, AS and A level film studies, and GCSE, AS and A level media studies. 20 per cent of respondents (32 individuals, 5 organisations) disagreed or strongly disagreed with the proposal, and a further 20 per cent of respondents (31 individuals, 7 organisations) neither agreed nor disagreed with the proposal.

Figure 1 - overview of responses to Question 1



Respondents who agreed or strongly agreed, commented that it was important to require exam boards to comply with the subject content, as this would help ensure comparability between different specifications.

Respondents who disagreed or strongly disagreed, commented that:

- It is important for exam boards to have flexibility in the design of their qualifications, and requiring exam boards to adhere to the published subject content and assessment objectives would constrain that design. Though, a number of respondents recognised that there needed to be some parity across exam boards (especially in terms of assessment criteria).
- It is educationally unsound to tie all students across the country to the same narrow demands.
- With uniformity across the exam boards, teachers will not have the same chance to use a specification that works for their students and their school.

Respondents who did not express a preference, commented that:

- There was agreement in principle for the approach, but issues remained with the subject content and the assessment objectives.
- There is no need for the condition as exam boards should comply with the published subject content anyway.
- Having different content across the exam boards would be a good thing.

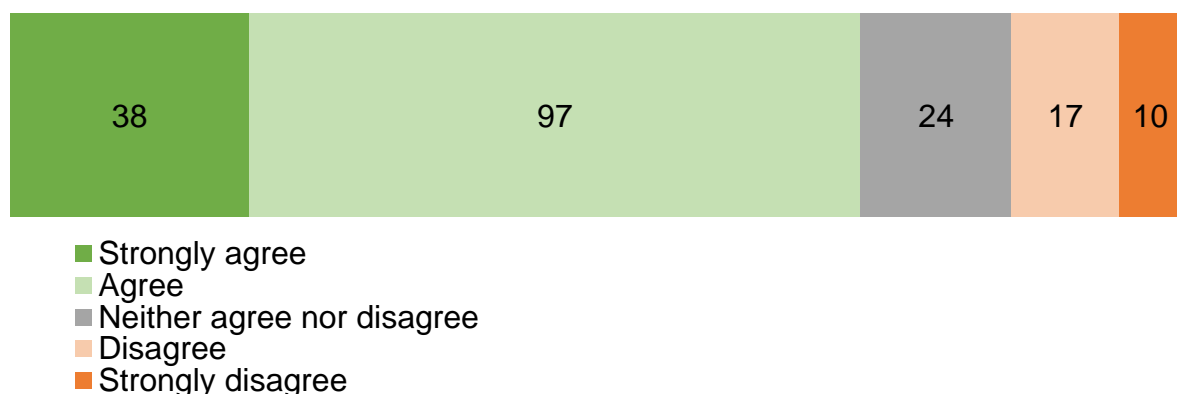
A number of respondents provided comments relating to aspects of subject content. This was outside the scope of the consultation – we discuss this under ‘Other issues’ below.

Question 2: To what extent do you agree or disagree that – for each of GCSE, AS and A level film studies and GCSE, AS and A level media studies – we should introduce guidance which clarifies how exam boards should interpret our assessment objectives?

As illustrated in Figure 2, 186 respondents answered question 2, with the majority of respondents agreeing or strongly agreeing with the proposal.

Of those who responded, most respondents supported our proposed approach with 72 per cent (101 individuals, 34 organisations) either agreeing or strongly agreeing with our proposal that we should introduce guidance which clarifies how exam boards should interpret our assessment objectives in GCSE, AS and A level film studies, and GCSE, AS and A level media studies. 15 per cent of respondents (24 individuals, 3 organisations) disagreed or strongly disagreed with the proposal, and a further 13 per cent of respondents (17 individuals, 7 organisations) neither agreed nor disagreed with the proposal.

Figure 2 - overview of responses to Question 2



The respondents who agreed or strongly agreed with the approach commented that:

- Guidance which clarifies how exam boards should interpret the assessment objectives would enable level of consistency to be achieved between the exam boards.
- It is important that Ofqual's expectations are made clear, and the guidance is an appropriate way to do this.
- Guidance should not be made too prescriptive.
- There is currently too much variation in the approaches taken by exam boards.

While the exam boards generally agreed with the approach, one exam board cautioned that the guidance should not use words or phrases that could easily be

misconstrued or those that have a clear technical meaning, as this can create rather than reduce confusion.

Respondents who disagreed or strongly disagreed with our proposal commented that:

- Exam boards are skilled, and are able to interpret assessment objectives without the need for guidance.
- Variation between exam boards is needed in order to ensure that the curriculum is suitable for students.

Respondents who did not express a preference commented that:

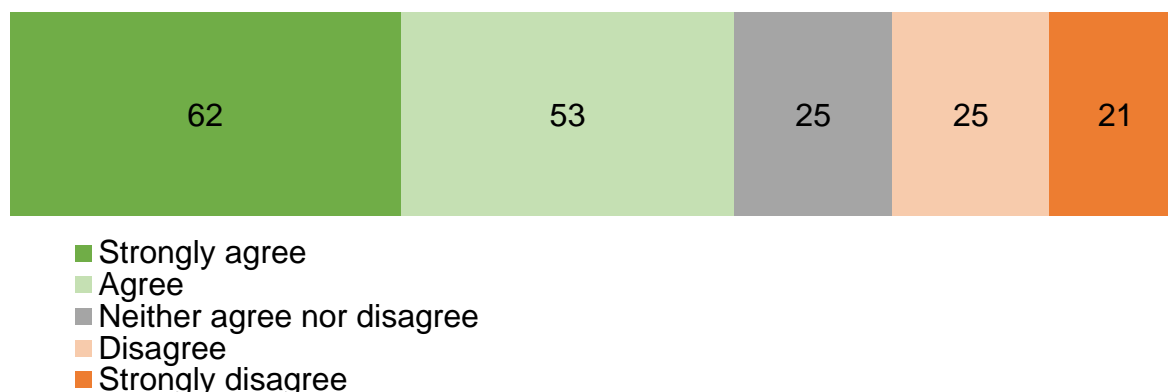
- It is important for exam boards to retain flexibility in the design of their qualifications.
- Whether it is appropriate to produce such guidance depends on whether this truly is guidance, so there is some flexibility left to exam boards, or whether this guidance will be viewed as a 'must', and is in fact a set of rules.

Question 3: To what extent do you agree or disagree that – for each of GCSE, AS and A level film studies and GCSE, AS and A level media studies – we should introduce a Condition which permits non-exam assessment, specifies the proportion of exam- and non-exam assessment, and allows us to set more detailed rules and guidance on non-exam assessment?

As illustrated in Figure 3, 186 respondents answered question 3, with the majority of respondents agreeing or strongly agreeing with the proposal.

Of those who responded, most respondents supported our proposed approach with 62 per cent (84 individuals, 31 organisations) either agreeing or strongly agreeing with our proposal that we should introduce a Condition which permits non-exam assessment, specifies the proportion of exam- and non-exam assessment, and allows us to set more detailed rules and guidance on non-exam assessment in GCSE, AS and A level film studies, and GCSE, AS and A level media studies. 25 per cent of respondents (37 individuals, 9 organisations) disagreed or strongly disagreed with the proposal, and a further 13 per cent of respondents (21 individuals, 4 organisations) neither agreed nor disagreed with the proposal.

Figure 3 - overview of responses to Question 3



Respondents who agreed or strongly agreed with our proposal commented that:

- The inclusion of non-exam assessment is essential to develop and test the full range of skills for film studies and media studies which would not otherwise be explored in examinations, so the inclusion of a Condition allowing this is also necessary.
- Implementation of the proposal would lead to consistency across the exam boards.
- Detailed rules and guidance are a good idea in theory, however allowances must be made for differences between centres.

A number of respondents commented that whilst they agreed with the introduction of a rule permitting non-exam assessment, they felt that more detailed rules around that non-exam assessment were not required, or that the rules should relate only to standards, and the application of marks, and not in relation to the design of non-exam assessment.

Respondents who disagreed or strongly disagreed with the proposal commented that:

- It should be left to the exam boards to design suitable non-exam assessment tasks, and this should not be constrained by detailed rules.

Respondents who did not express a preference commented that:

- There should be some rules and guidance in place around non-exam assessment, but these should not be too rigid.
- Non-exam assessment should remain part of the qualification, but tighter controls are needed.

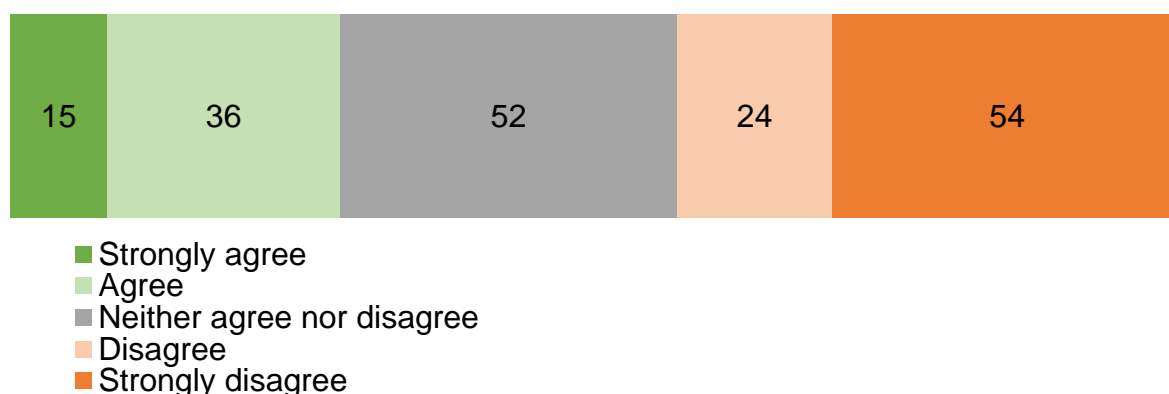
Several respondents also commented that there should be a larger weighting given to non-exam assessment in both film studies and media studies, or that it should be for the exam boards to decide what an appropriate weighting is for the subject. Others made comments relating to the subject content. However, these issues were outside the scope of the consultation – we discuss them under ‘Other issues’ below.

Question 4: To what extent do you agree or disagree with our proposed approach to allocating non-exam assessment marks to assessment objectives in GCSE film studies?

As illustrated in Figure 4, 181 respondents answered question 4. The responses to this question were mixed.

Of those who responded, 28 per cent (39 individuals, 12 organisations) either agreed or strongly agreed with our proposal to allocate non-exam assessment marks to assessment objectives in GCSE film studies. 43 per cent of respondents (58 individuals, 20 organisations) disagreed or strongly disagreed with the proposal, and a further 29 per cent of respondents (43 individuals, 9 organisations) neither agreed nor disagreed with the proposal.

Figure 4 - overview of responses to Question 4



Respondents who agreed or strongly agreed with proposal commented that:

- It is correct for the non-exam assessment to be split between product and evaluation.
- The proportions of the split suggested (20 per cent to assessment objective AO3 and 10 per cent to assessment objective AO2) fit well with the purpose of the film studies course.
- It is important for there to be clarity over which assessment objectives apply to non-exam assessment tasks.

Respondents who disagreed or strongly disagreed with the proposal commented that:

- It should be for the exam boards to determine which assessment objectives apply to the non-examination assessment.
- The full weighting of non-examination assessment marks should relate to the production of the film or screenplay (assessment objective AO3), and evaluation (assessment objective AO2) should be covered within examinations.
- There should not be such a high weighting given to evaluation (assessment objective AO2); it is the film or screenplay that is the most important aspect of non-exam assessment.

Many respondents who did not express a preference commented that they do not teach GCSE film studies and so felt unable to comment on the proposals.

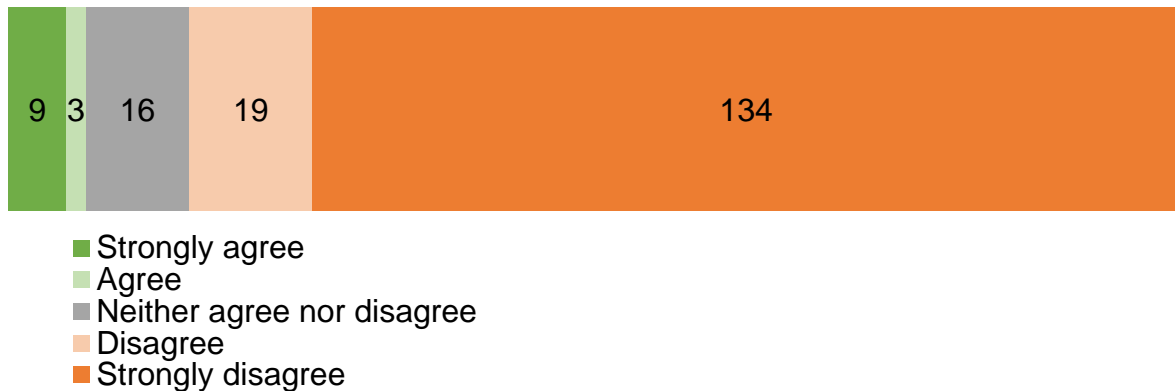
Several respondents raised issues relating to the subject content – for example, questioning whether there was parity between writing a screenplay and making a film, and expressing the view that research and planning should form part of the non-exam assessment. Others raised issues related to the overall weighting of non-exam assessment in the subject. However, these issues were outside the scope of the consultation – we discuss this under ‘Other issues’ below.

Question 5: To what extent do you agree or disagree with our proposal that the brief(s) for the non-exam assessment task in GCSE film studies should be released no earlier than 1 June in the year before the qualification is to be awarded?

As illustrated in Figure 5, 181 respondents answered question 5, with the majority of respondents disagreeing or strongly disagreeing with the proposal.

Of those who responded, 85 per cent (117 individuals, 36 organisations) either disagreed or strongly disagreed with our proposal that the brief(s) for the non-exam assessment task in GCSE film studies should be released no earlier than 1 June in the year before the qualification is to be awarded. 7 per cent of respondents (11 individuals, 1 organisation) agreed or strongly agreed with the proposal, and a further 9 per cent of respondents (13 individuals, 3 organisations) neither agreed nor disagreed with the proposal.

Figure 5 - overview of responses to Question 5



Respondents who disagreed or strongly disagreed with the proposal commented that:

- Coordinating the set brief with the subject content in GCSE, AS and A level film studies may be problematic if the brief has to change each year – particularly since the evaluation activity means that the brief must be with specific genre films or short films that are set out in the specification. Respondents felt that changing the brief every year might also require changes in the films set in the specification, which would not be feasible.
- Changing non-exam assessment briefs will create problems of comparability and continuity.
- The availability of tasks for several years provides the opportunity for teachers to learn from experience and to make good use of resources.
- There must be a choice of tasks for non-exam assessment to allow students to undertake non-examination assessment that interests them and plays to their strengths. If tasks must change each year there would be a disincentive for exam boards to provide a range of tasks.
- It is disruptive to centres to change tasks annually, and will lead to resourcing issues within centres.
- Teachers should be free to structure the teaching calendar of a GCSE course in the way they see fit for both themselves and their students.
- The reduction in the weighting of the non-exam assessment task will lead to there being less of a focus on this element of assessment in future years, so the concern around teachers spending excessive time on coursework will naturally be addressed.

- The tasks are not designed to assess recall of knowledge. Instead, it is how a student chooses to respond to the task that matters. The same task can elicit a wide range of different responses from students, and so having the same task each year does not cause an issue in itself.
- Currently exam boards do not have to release briefs annually, and the system works well.
- Work will need to be authenticated annually, which addresses the risk of malpractice taking place.
- Certain schools weight the timetable for creative subjects more heavily in year 10 than in year 11, in order to allow a greater focus on subjects such as English and maths in year 11. Having to complete the coursework in year 11 may have a negative impact on the ability of teachers in those schools to deliver the coursework within year 11.
- It will unnecessarily increase teacher workloads.
- Tasks should change less often – perhaps every three years. This would allow the development of schemes of learning over time and allow comparability and consistency of coursework standards, while not leading to the tasks becoming ‘stale’.
- If there is to be a release date it should be at least a month earlier, as 1st June does not allow much time for preparing and completing the work.
- Expectations for non-exam assessment should be clear before students begin the course, and preparation and planning for non-examination assessment needs to begin before the proposed release date.
- There is no evidence that teachers spend overly long on coursework assessment.

Respondents who agreed or strongly agreed with the proposal commented that:

- This currently works well for some media studies qualifications, and the timing of the release date should allow sufficient time for centres to develop teaching strategies for the brief that is set.
- The approach would allow for and encourage skills acquisition and wider knowledge, instead of focusing on how to address the same brief year after year.

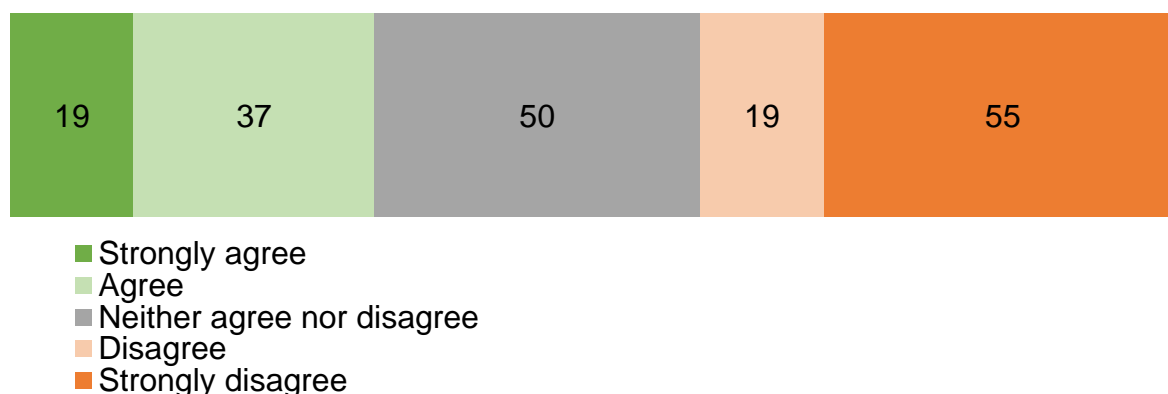
Respondents who did not express a preference in the main commented that this was because they did not have experience of GCSE film studies, and so did not feel they were in a position to express a view.

Question 6: To what extent do you agree or disagree with our proposed approach to allocating non-exam assessment marks to assessment objectives in AS and A level film studies?

As illustrated in Figure 6, 180 respondents answered question 6. The responses to this question were mixed.

Of those who responded, 31 per cent (47 individuals, 9 organisations) either agreed or strongly agreed with our proposal to allocate non-exam assessment marks to assessment objectives in AS and A level film studies. 41 per cent of respondents (57 individuals, 17 organisations) disagreed or strongly disagreed with the proposal, and a further 28 per cent of respondents (36 individuals, 14 organisations) neither agreed nor disagreed with the proposal.

Figure 6 - overview of responses to Question 6



Respondents in the main repeated many of the comments raised in relation to question 4 above.

Respondents who agreed or strongly agreed with proposal commented that:

- It is correct for the non-exam assessment to be split between product and evaluation.
- The proportions of the split suggested (20 per cent to assessment objective AO3 and 10 per cent to assessment objective AO2) fit well with the purpose and motives of the film studies course.
- It is important for there to be clarity over which assessment objectives apply to non-exam assessment tasks.

Respondents who disagreed or strongly disagreed with the proposal commented that:

- It should be for the exam boards to determine which assessment objectives apply to the non-examination assessment.
- The full weighting of non-examination assessment marks should relate to the production of the film or screenplay (assessment objective AO3), and evaluation (assessment objective AO2) should be covered within examinations.
- There should not be such a high weighting given to evaluation (assessment objective AO2), it is the film or screenplay that is the most important aspect of non-exam assessment).

Many respondents who did not express a preference commented that they do not teach AS or A level film studies and so felt unable to comment on the proposals.

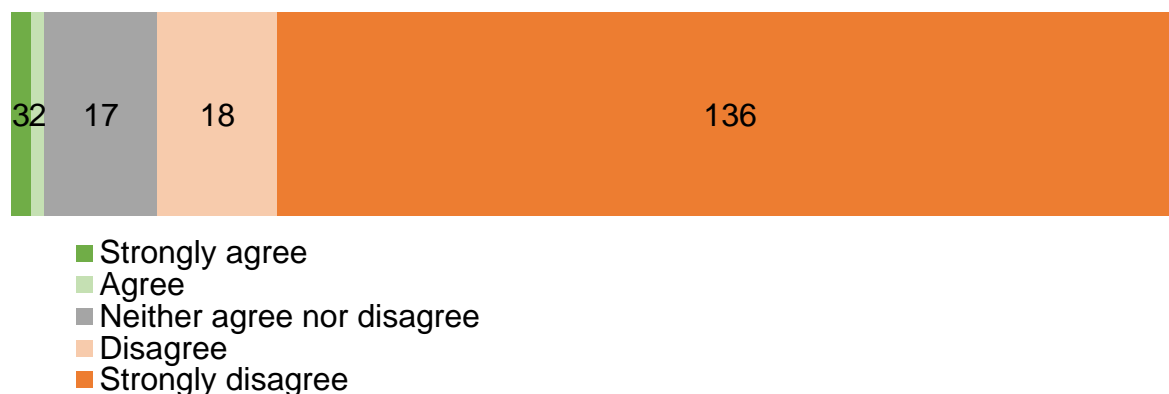
Several respondents raised issues relating to the subject content – for example, questioning whether there was parity between writing a screenplay and making a film, and expressing the view that research and planning should form part of the non-exam assessment. Others raised issues related to the overall weighting of non-exam assessment in the subject. However, these issues were outside the scope of the consultation – we discuss this under ‘Other issues’ below.

Question 7: To what extent do you agree or disagree with our proposal that the brief(s) for the non-exam assessment task in AS and A level film studies should be released no earlier than 1 June in the year before the qualification is to be awarded?

As illustrated in Figure 7, 176 respondents answered question 7, with the majority of respondents disagreeing or strongly disagreeing with the proposal.

Of those who responded, 88 per cent (118 individuals, 36 organisations) either disagreed or strongly disagreed with our proposal that the brief(s) for the non-exam assessment task in AS and A level film studies should be released no earlier than 1 June in the year before the qualification is to be awarded. 3 per cent of respondents (4 individuals, 1 organisation) agreed or strongly agreed with the proposal, and a further 10 per cent of respondents (13 individuals, 4 organisations) neither agreed nor disagreed with the proposal.

Figure 7 - overview of responses to Question 7



Respondents in the main repeated many of the comments raised in relation to question 4 above.

Respondents who disagreed or strongly disagreed with the proposal commented that:

- Coordinating the set brief with the subject content in GCSE, AS and A level film studies may be problematic if the brief has to change each year – particularly since the evaluation activity means that the brief must be with specific genre films or short films that are set out in the specification. Respondents felt that changing the brief every year might also require changes in the films set in the specification, which would not be feasible.
- Changing non-exam assessment briefs will create problems of comparability and continuity.
- The availability of tasks for several years provides the opportunity for teachers to learn from experience and to make good use of resources.
- There must be a choice of tasks for non-exam assessment to allow students to undertake non-examination assessment that interests them and plays to their strengths. If tasks must change each year there would be a disincentive for exam boards to provide a range of tasks.
- It is disruptive to centres to change tasks annually, and will lead to resourcing issues within centres.
- Teachers should be free to structure the teaching calendar of an AS or A level course in the way they see fit for both themselves and their students.
- The reduction in the weighting of the non-exam assessment task will lead to there being less of a focus on this element of assessment in future years, so

the concern around teachers spending excessive time on coursework will naturally be addressed.

- The tasks are not designed to assess recall of knowledge. Instead, it is how a student chooses to respond to the task that matters. The same task can elicit a wide range of different responses from students, and so having the same task each year does not cause an issue in itself.
- Currently exam boards do not have to release briefs annually, and the system works well.
- Work will need to be authenticated annually, which addresses the risk of malpractice taking place.
- It will unnecessarily increase teacher workloads.
- Tasks should change less often – perhaps every three years. This would allow the development of schemes of learning over time and allow comparability and consistency of coursework standards, while not leading to the tasks becoming ‘stale’.
- If there is to be a release date it should be at least a month earlier, as 1st June does not allow much time for preparing and completing the work.
- Expectations for non-exam assessment should be clear before students begin the course, and preparation and planning for non-examination assessment needs to begin before the date specified as the release date for the task.
- There is no evidence that teachers spend overly long on coursework assessment.
- The amount of term time available for teaching at AS and A level is often even shorter than for GCSE, so the problem of having an annual release date for briefs is even more acute at this level.
- This approach could affect teaching in unanticipated ways. For example, one aspect of film production may be taught in year 12 according with a teacher’s scheme of work, but after the task is released towards the end of the year it is discovered to be the focus of the non-examination brief. This could lead to having to repeat that topic which will take away the planned teaching time for other topic areas.

One respondent pointed to AQA’s current AS level model for media studies – a 3 year ‘rolling carousel’ cycle of new briefs becoming available – as a possible compromise position.

Respondents who agreed or strongly agreed with the proposal commented that:

- The approach would allow for and encourage skills acquisition and wider knowledge, instead of focusing on how to address the same brief year after year.

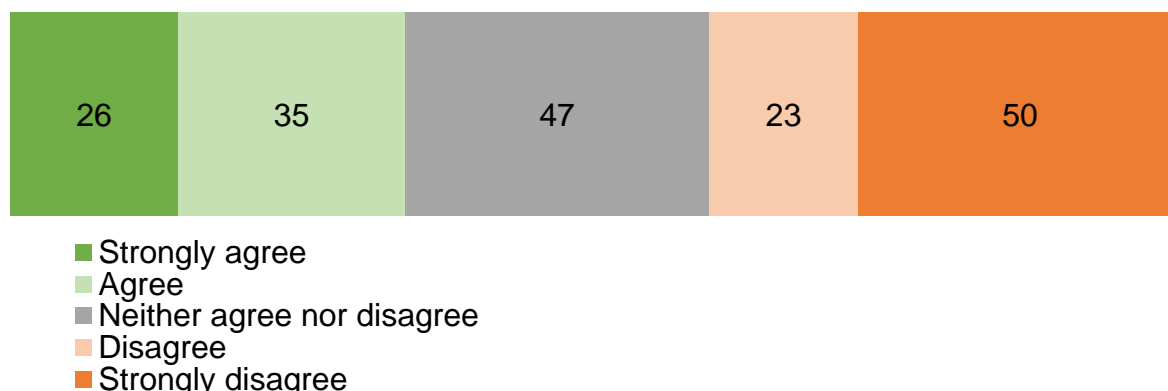
Respondents who did not express a preference mainly commented that this was because they did not have experience of AS or A level film studies, and so did not feel they were in a position to express a view.

Question 8: To what extent do you agree or disagree with our proposed approach to allocating non-exam assessment marks to assessment objective AO3 in GCSE media studies?

As illustrated in Figure 8, 181 respondents answered question 8. The responses to this question were mixed.

Of those who responded, 34 per cent (48 individuals, 13 organisations) either agreed or strongly agreed with our proposal to allocate non-exam assessment marks to assessment objectives in GCSE level media studies. 40 per cent of respondents (55 individuals, 18 organisations) disagreed or strongly disagreed with the proposal, and a further 26 per cent of respondents (36 individuals, 11 organisations) neither agreed nor disagreed with the proposal.

Figure 8 - overview of responses to Question 8



Respondents who agreed or strongly agreed with our proposal commented that:

- The non-exam assessment component seems the sensible place for assessment objective AO3 marks to be allocated.

Several respondents commented that they did not have any experience in relation to GCSE media studies, and therefore did not feel that they were in a position to comment on the proposal.

Several respondents commented on issues related to the subject content – for example, noting the lack of marks available for evaluation or research and planning. Others raised issues related to the weighting of the non-exam assessment component. However, these issues were outside the scope of the consultation – we discuss this under ‘Other issues’ below.

Question 9: To what extent do you agree or disagree with our proposal that the brief(s) for the non-exam assessment task in GCSE media studies should be released no earlier than 1 June in the year before the qualification is to be awarded?

As illustrated in Figure 9, 180 respondents answered question 9, with the majority of respondents disagreeing or strongly disagreeing with the proposal.

Of those who responded, 89 per cent (122 individuals, 39 organisations) either disagreed or strongly disagreed with our proposal that the brief(s) for the non-exam assessment task in GCSE media studies should be released no earlier than 1 June in the year before the qualification is to be awarded. 3 per cent of respondents (4 individuals, 2 organisations) agreed or strongly agreed with the proposal, and a further 10 per cent of respondents (11 individuals, 2 organisations) neither agreed nor disagreed with the proposal.

Figure 9 - overview of responses to Question 9



Many of the points raised in response to this question were similar to those raised in relation to questions 5 and 7 which covered the same proposal made for GCSE, AS and A level film studies above.

Respondents who disagreed or strongly disagreed with the proposal commented that:

- Changing non-exam assessment briefs will create problems of comparability and continuity.

- The availability of tasks for several years provides the opportunity for teachers to learn from experience and to make good use of resources.
- There must be a choice of tasks for non-exam assessment to allow students to undertake non-examination assessment that interests them and plays to their strengths. If tasks must change each year there would be a disincentive for exam boards to provide a range of tasks.
- It is disruptive to centres to change tasks annually, and will lead to resourcing issues within centres.
- Teachers should be free to structure the teaching calendar of a GCSE course in the way they see fit for both themselves and their students.
- The reduction in the weighting of the non-exam assessment task will lead to there being less of a focus on this element of assessment in future years, so the concern around teachers spending excessive time on coursework will naturally be addressed.
- The tasks are not designed to assess recall of knowledge. Instead, it is how a student chooses to respond to the task that matters. The same task can elicit a wide range of different responses from students, and so having the same task each year does not cause an issue in itself.
- Currently exam boards do not have to release briefs annually, and the system works well.
- Work will need to be authenticated annually, which addresses the risk of malpractice taking place.
- Certain schools weight the timetable for creative subjects more heavily in year 10 than in year 11, in order to allow a greater focus on subject such as English and maths in year 11. Having to complete the coursework in year 11 may have a negative impact on the ability of teachers in those schools to deliver the coursework within year 11.
- It will unnecessarily increase teacher workloads.
- Tasks should change less often – perhaps every three years. This would allow the development of schemes of learning over time and allow comparability and consistency of coursework standards, while not leading to the tasks becoming ‘stale’.
- If there is to be a release date it should be at least a month earlier, as 1st June does not allow much time for preparing and completing the work.

- Expectations for non-exam assessment should be clear before students begin the course, and preparation and planning for non-examination assessment needs to begin before the date specified as the release date for the task.
- There is no evidence that teachers spend overly long on coursework assessment.
- This added burden will cause even more media studies teachers to leave the profession – media studies teachers are currently particularly difficult to recruit.

Respondents who agreed or strongly agreed with the proposal commented that:

- The approach would allow for and encourage skills acquisition and wider knowledge, instead of focusing on how to address the same brief year after year.

One exam board commented that they understood the approach, and it could be accommodated within their assessment model.

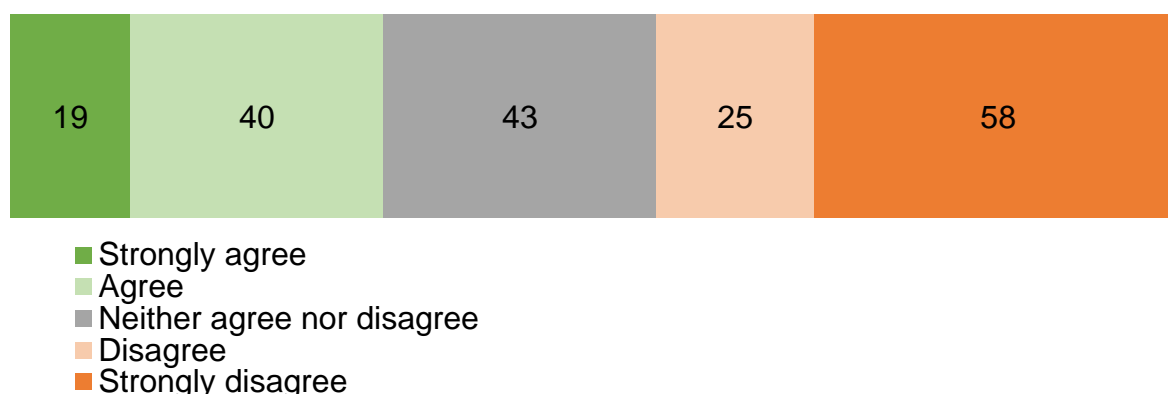
Respondents who did not express a preference in the main commented that this was because they did not have experience of GCSE media studies, and so did not feel they were in a position to express a view.

Question 10: To what extent do you agree or disagree with our proposed approach to allocating the non-exam assessment marks to assessment objective AO3 in AS and A level media studies?

As illustrated in Figure 10, 185 respondents answered question 10. The responses to this question were mixed.

Of those who responded, 32 per cent (46 individuals, 13 organisations) either agreed or strongly agreed with our proposal to allocate non-exam assessment marks to assessment objectives in AS and A level media studies. 45 per cent of respondents (62 individuals, 21 organisations) disagreed or strongly disagreed with the proposal, and a further 23 per cent of respondents (32 individuals, 11 organisations) neither agreed nor disagreed with the proposal.

Figure 10 - overview of responses to Question 10



Respondents who agreed or strongly agreed with our proposal commented that:

- The non-exam assessment component seems the sensible place for assessment objective AO3 marks to be allocated.

Several respondents commented that they did not have any experience in relation to GCSE media studies, and therefore did not feel that they were in a position to comment on the proposal.

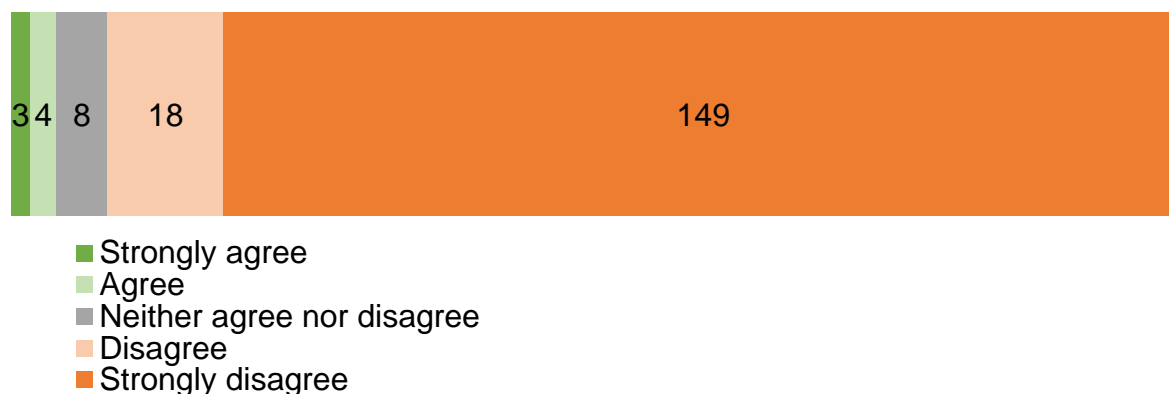
Several respondents commented on issues related to the subject content – for example, noting the lack of marks available for evaluation or research and planning. Others raised issues related to the weighting of the non-exam assessment component. However, these issues were outside the scope of the consultation – we discuss this under ‘Other issues’ below.

Question 11: To what extent do you agree or disagree with our proposal that the brief(s) for the non-exam assessment task in AS and A level media studies should be released no earlier than 1 June in the year before the qualification is to be awarded?

As illustrated in Figure 11, 182 respondents answered question 11, with the majority of respondents disagreeing or strongly disagreeing with the proposal.

Of those who responded, 92 per cent (126 individuals, 41 organisations) either disagreed or strongly disagreed with our proposal that the brief(s) for the non-exam assessment task in AS and A level media studies should be released no earlier than 1 June in the year before the qualification is to be awarded. 4 per cent of respondents (5 individuals, 2 organisations) agreed or strongly agreed with the proposal, and a further 4 per cent of respondents (7 individuals, 1 organisation) neither agreed nor disagreed with the proposal.

Figure 11 - overview of responses to Question 11



Many of the points raised in response to this question were similar to those raised in relation to questions 5, 7 and 9 which covered the same proposal made for GCSE, AS and A level film studies, and GCSE media studies above.

Respondents who disagreed or strongly disagreed with the proposal commented that:

- Changing non-exam assessment briefs will create problems of comparability and continuity.
- The availability of tasks for several years provides the opportunity for teachers to learn from experience and to make good use of resources.
- There must be a choice of tasks for non-exam assessment to allow students to undertake non-examination assessment that interests them and plays to their strengths. If tasks must change each year there would be a disincentive for exam boards to provide a range of tasks.
- It is disruptive to centres to change tasks annually, and will lead to resourcing issues within centres.
- Teachers should be free to structure the teaching calendar of a GCSE course in the way they see fit for both themselves and their students.
- The reduction in the weighting of the non-exam assessment task will lead to there being less of a focus on this element of assessment in future years, so the concern around teachers spending excessive time on coursework will naturally be addressed.
- The tasks are not designed to assess recall of knowledge. Instead, it is how a student chooses to respond to the task that matters. The same task can elicit a wide range of different responses from students, and so having the same task each year does not cause an issue in itself.

- Currently exam boards do not have to release briefs annually, and the system works well.
- Work will need to be authenticated annually, which addresses the risk of malpractice taking place.
- Certain schools weight the timetable for creative subjects more heavily in year 10 than in year 11, in order to allow a greater focus on subject such as English and maths in year 11. Having to complete the coursework in year 11 may have a negative impact on the ability of teachers in those schools to deliver the coursework within year 11.
- It will unnecessarily increase teacher workloads.
- Tasks should change less often – perhaps every three years. This would allow the development of schemes of learning over time and allow comparability and consistency of coursework standards, while not leading to the tasks becoming ‘stale’.
- If there is to be a release date it should be at least a month earlier, as 1st June does not allow much time for preparing and completing the work.
- Expectations for non-exam assessment should be clear before students begin the course, and preparation and planning for non-examination assessment needs to begin before the date specified as the release date for the task.
- There is no evidence that teachers spend overly long on coursework assessment.
- This added burden will cause even more media studies teachers to leave the profession – media studies teachers are currently particularly difficult to recruit.
- The amount of term time available for teaching at AS and A level is often even shorter than for GCSE, so the problem of having an annual release date for briefs is even more acute at this level.

A number of respondents referred to the approach that has been adopted in current qualifications by AQA whereby three briefs are provided, and one is changed each year.

Respondents who agreed or strongly agreed with the proposal commented that:

- The proposed approach offers ample time for A level teachers to prepare teaching plans in line with the brief.

- This has already proved to be a successful approach in AQA’s AS media studies.
- The approach would allow for and encourage skills acquisition and wider knowledge, instead of focusing on how to address the same brief year after year.

One exam board commented that they understood the approach, and it could be accommodated within their assessment model.

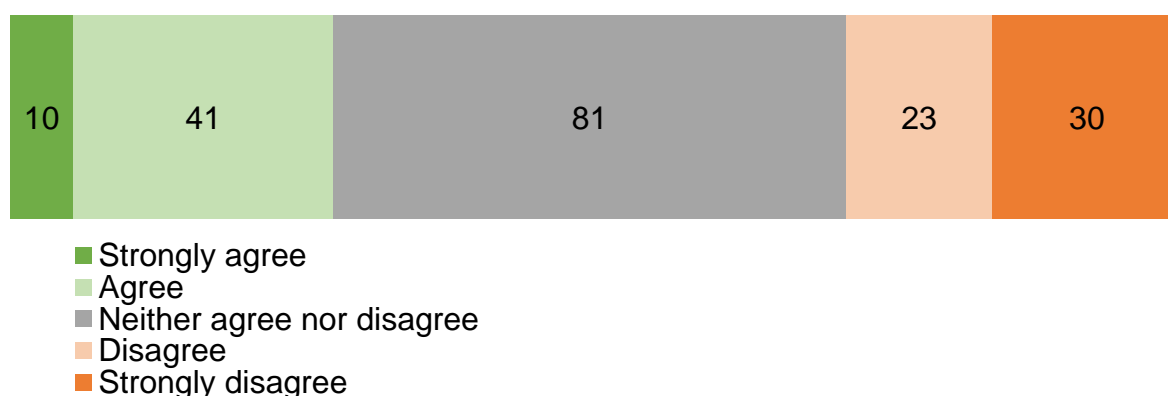
Respondents who did not express a preference in the main commented that this was because they did not have experience of GCSE media studies, and so did not feel they were in a position to express a view.

Question 12: To what extent do you agree or disagree with our proposed approach to the authentication of non-exam assessment in GCSE, AS and A level film studies, and GCSE, AS and A level media studies?

As illustrated in Figure 12, 185 respondents answered question 12. The responses to this question were mixed.

Of those who responded, 28 per cent (42 individuals, 9 organisations) either agreed or strongly agreed with our proposed approach to the authentication of non-exam assessment in GCSE, AS and A level film studies, and GCSE, AS and A level media studies. 29 per cent of respondents (41 individuals, 12 organisations) disagreed or strongly disagreed with the proposal, and a further 44 per cent of respondents (57 individuals, 24 organisations) neither agreed nor disagreed with the proposal.

Figure 12 - overview of responses to Question 12



Respondents who agreed or strongly agreed with our proposal commented that:

- Work should be clearly authenticated by centres and exam boards.

- There needs to be confidence that work generated is that of the candidate. This is particularly important during the planning, editing and evaluation stages.
- It is important that centres continue to assess the work as it allows for greater understanding and better delivery year, and improves the accuracy of marking.
- There should be a second opinion on assessment decisions to ensure teachers are not inflating marks.

Respondents who disagreed or strongly disagreed with our proposal commented that:

- The proposal calls into question the professionalism of teachers and their ability to monitor and control tasks set. Teachers are experienced practitioners who do not need such controls being put in place.
- Exam boards are best placed to develop the optimum approach to deal with the issue of authentication.
- The current system that is in place in relation to the authentication of work, works well and there is no need to change it.
- The proposal could lead to the non-exam assessment being conducted under exam conditions, which does not reflect the creative process involved in the subject.
- It is not clear from the proposal how the authentication process will work.

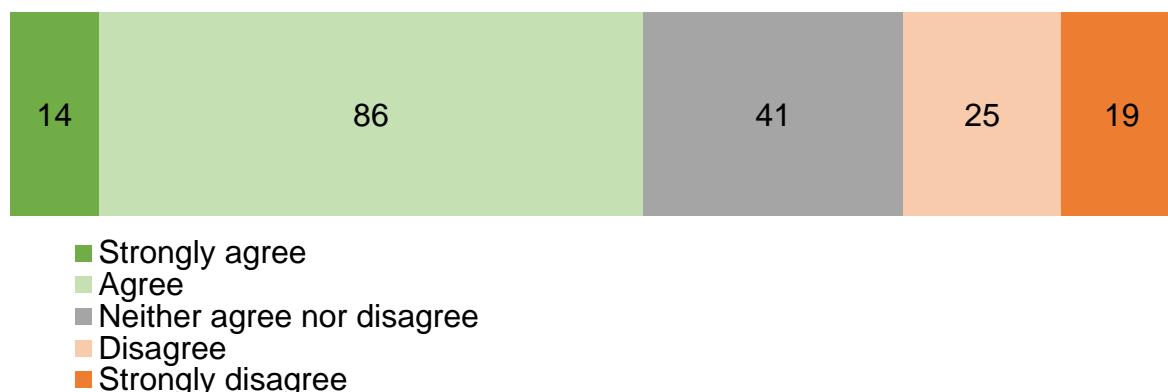
Respondents also raised issues relating to the subject content (for example, questioning the prevention of group work). This issue was outside the scope of the consultation – we discuss this under ‘Other issues’ below.

Question 13: To what extent do you agree or disagree with our proposed approach to marking of non-exam assessment in GCSE, AS and A level film studies, and GCSE, AS and A level media studies?

As illustrated in Figure 13, 185 respondents answered question 13, with the majority of respondents agreeing or strongly agreeing with the proposal.

Of those who responded, most respondents supported our proposed approach with 54 per cent (75 individuals, 25 organisations) either agreeing or strongly agreeing with our proposed approach to the marking of non-exam assessment in GCSE, AS and A level film studies, and GCSE, AS and A level media studies. 24 per cent of respondents (29 individuals, 15 organisations) disagreed or strongly disagreed with the proposal, and a further 22 per cent of respondents (36 individuals, 5 organisations) neither agreed nor disagreed with the proposal.

Figure 13 - overview of responses to Question 13



Respondents who agreed or strongly agreed with our proposal commented that:

- The proposal is similar to the current approach which works well.
- Marking of non-exam assessment should be conducted by teachers, and moderated by the exam board. This allows for fair assessment.
- There would be difficulties involved in introducing external marking, including the recruitment of examiners.

The majority of respondents who disagreed or strongly disagreed with the proposed approach to the marking of non-exam assessment commented that marking should be conducted by teachers and that this should then be subject to moderation.

Respondents also raised issues relating to the subject content (for example, questioning the prevention of group work). This issue was outside the scope of the consultation – we discuss this under ‘Other issues’ below.

Our proposed Conditions and guidance

Question 14: Do you have any comments on our proposed Conditions and requirements for GCSE film studies?

58 respondents (40 individuals, 18 organisations) provided comments in relation to our proposed Conditions and requirements for GCSE film studies as follows:

The majority of comments provided did not relate to the drafting of our proposed Conditions and requirements, and instead re-iterated issues raised in response to the questions above.

Respondents in the main commented that the release date requirement should be removed from the Conditions document.

Other respondents raised issues that were outside the scope of the consultation including:

- The proportion of non-examination assessment in GCSE film studies
- Issues related to the subject content – including the requirement for each student to produce individual work rather than contributing to the work of a group, and the demand of the content at this level.

We discuss these issues further under ‘Other issues’ below.

Question 15: Do you have any comments on our proposed guidance for GCSE film studies?

44 respondents (30 individuals, 14 organisations) provided comments in relation to our proposed guidance for GCSE film studies as follows:

Respondents who provided comments in relation to this question repeated the comments they made in response to question 14 above. None of the comments raised issues which related directly to the proposed guidance.

Question 16: Do you have any comments on our proposed Conditions and requirements for AS and A level film studies

64 respondents (45 individuals, 19 organisations) provided comments in relation to our proposed Conditions and requirements for AS and A level film studies as follows:

The majority of comments provided did not relate to the drafting of our proposed Conditions and requirements, and instead re-iterated issues raised in response to the questions above.

Respondents in the main commented that the release date requirement should be removed from the Conditions document.

Other respondents raised issues that were outside the scope of the consultation including:

- The proportion of non-examination assessment in AS and A level film studies
- The inclusion of an evaluation task within the non-examination assessment.
- Issues related to the subject content – including the requirement for each student to produce individual work rather than contributing to the work of a group, and the demand and amount of the content to be included within the qualifications.

We discuss these issues further under 'Other issues' below.

Question 17: Do you have any comments on our proposed guidance for AS and A level film studies?

53 respondents (39 individuals, 14 organisations) provided comments in relation to our proposed guidance for AS and A level film studies as follows:

Respondents who provided comments in relation to this question repeated the comments they made in response to question 16 above. None of the comments raised issues which related directly to the proposed guidance.

Question 18: Do you have any comments on our proposed Conditions and requirements for GCSE media studies?

73 respondents (47 individuals, 26 organisations) provided comments in relation to our proposed Conditions and requirements for GCSE media studies as follows:

The majority of comments provided did not relate to the drafting of our proposed Conditions, and instead re-iterated issues raised in response to the questions above.

Respondents in the main commented that the release date requirement should be removed from the Conditions document.

Other respondents raised issues that were outside the scope of the consultation including:

- The proportion of non-examination assessment in GCSE media studies
- Issues related to the subject content – including:
 - the requirement for each student to produce individual work rather than contributing to the work of a group,
 - the demand and amount of the content to be included within the qualifications, and
 - the exclusion of a film option from the non-exam assessment.

We discuss these issues further under 'Other issues' below.

Question 19: Do you have any comments on our proposed guidance for GCSE media studies?

66 respondents (43 individuals, 23 organisations) provided comments in relation to our proposed guidance for GCSE media studies as follows:

Respondents who provided comments in relation to this question in the main repeated the comments they made in response to question 18 above.

One exam board commented that they supported the proposed guidance, but indicated that they would welcome a definition of the word 'Create' in assessment objective AO3. They set out that at present it is not clear whether the process of creating a media product may (or indeed must) be assessed as well as the finished media product.

Another exam board commented that it needs to be clarified that for assessment objective AO3, learners would not be expected to produce entire television programmes, newspapers etc. (as per the definition of media products in subject content), but instead would be producing extracts from these. The same exam board indicated that the interpretations and definitions for assessment objective AO2 needs to include further clarification on the term 'analyse' in the context of Media Studies, suggesting that this should set out that in the context of GCSE Media Studies 'analyse' relates to how meanings and responses are created in media and involves making judgements and forming conclusions.

Question 20: Do you have any comments on our proposed Conditions and requirements for AS and A level media studies?

94 respondents (67 individuals, 27 organisations) provided comments in relation to our proposed Conditions and requirements for AS and A level media studies as follows:

The majority of comments provided did not relate to the drafting of our proposed Conditions, and instead re-iterated issues raised in response to the questions above.

Respondents in the main commented that the release date requirement should be removed from the Conditions document.

Other respondents raised issues that were outside the scope of the consultation including:

- The proportion of non-examination assessment in AS and A level media studies
- Issues related to the subject content – including:

- the requirement for each student to produce individual work rather than contributing to the work of a group,
- the lack of an evaluation exercise as part of the non-exam assessment task,
- the demand and amount of the content to be included within the qualifications, and
- the exclusion of a film option from the non-exam assessment.

We discuss these issues further under 'Other issues' below.

Question 21: Do you have any comments on our proposed guidance for AS and A level media studies?

75 respondents (53 individuals, 22 organisations) provided comments in relation to our proposed guidance for AS and A level media studies as follows:

Respondents who provided comments in relation to this question in the main repeated the comments they made in response to question 20 above.

The two exam boards who provided comments which directly related to the guidance on assessment objectives AO2 and AO3 at GCSE, raised the same issues in respect of the guidance for AS and A level (see question 19 above).

Equality Impact Analysis

Question 22: We have not identified any ways in which the proposals for GCSE, AS and A level film studies, and GCSE, AS and A level media studies would impact (positively or negatively) on persons who share a protected characteristic.⁴ Are there any potential impacts we have not identified?

54 respondents (34 individuals, 20 organisations) identified ways in which our proposals on resits would impact on persons who share a protected characteristic.

The impacts raised were as follows:

- The introduction of a release date for the non-exam assessment brief could disadvantage students who are pregnant, or undergoing gender re-assignment, who are likely to be out of school for long periods of time, as the task may only be available to them during a short window. Others commented that the

⁴ 'Protected characteristic' is defined in the Equality Act 2010. Here, it means disability, racial group, age, religion or belief, pregnancy or maternity, sex, sexual orientation and gender reassignment.

shortened window for the non-exam assessment task could disadvantage students with certain learning difficulties.

- Some respondents commented that the introduction of a release date for briefs could lead to exam boards setting very specific briefs, or only one brief for a certain type of media product. This could disadvantage students as media and form can be highly culturally specific and removing choice could create barriers for students from certain cultural backgrounds. Additionally, it could cause issues for students whose disabilities may mean that certain media products would be more appropriate for them to create than others.
- Many respondents commented on issues which related to the subject content. Many respondents commented that the lack of group work in these new qualifications would disadvantage those with protected characteristics. One comment from a professional organisation set out that:

The loss of assessed group work in particular is very disappointing. Many teachers have told us about the positive impact that assessed group work in these subjects has had on students with social difficulties, such as those with autism, and with physical disabilities. They describe examples where students have been socially isolated in other subjects but have become fully integrated in media and film. The removal of assessed group work seems a particularly mean strategy with no logical justification.

Other issues which related to the subject content were also raised:

- The choice of media theorists being Western-centric and inflexible may disadvantage certain groups of students.
- The requirement for a non-English speaking film text to be studied in film studies could cause issues for students with certain learning difficulties.

As set out above, issue related to the subject content were outside the scope of this consultation – we discuss them further under ‘Other issues’ below.

- Other respondents raised issues relating to the percentage of non-examination assessment within the new qualifications commenting that the reduction in the amount of non-examination assessment could disadvantage students with certain learning difficulties. This issue was out of scope for this consultation and is set out in more detail under ‘Other issues’ below.

Question 23: Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

55 respondents (33 individuals, 22 organisations) provided views on the steps that could be taken to mitigate negative impacts on those who share a protected characteristic.

The additional steps suggested were as follows:

- Remove the release date requirement from the Conditions.
- Change the release date requirement so that the briefs are changed less regularly.
- Make all types of media products available for creation each year so that students are not disadvantaged.
- Allow group work within these qualifications.
- Increase the percentage of non-exam assessment within these qualifications.
- Remove or amend the list of theorists from the subject content.
- Remove the requirement for students to study a non-English film text in film studies.

Question 24: Do you have any other comments on the impacts of the proposals on students who share a protected characteristic.

9 respondents (6 individuals, 3 organisations) commented on this question:

Some of those who commented repeated concerns raised in relation to questions 22 and 23 above, others expressed the following views:

- Including a release date will advantage centres who can afford to invest in a variety of equipment and training.
- The inclusion of group work assists those with protected status who benefit from the support of their peers and develop softer skills through their course of study.
- The current proposals will ensure that students from poorer backgrounds and with social disadvantages cannot succeed as well as those from richer backgrounds – those who traditionally thrive on examinations.

Other issues

As noted above, respondents to this consultation raised several issues that were outside the scope of this consultation, in particular in relation to:

- The subject content, which was subject to an earlier consultation by the Department for Education before being published.⁵
- The weighting of non-examination assessment in these subjects, which we decided following an earlier consultation.⁶

⁵ www.gov.uk/government/consultations/further-gcse-and-a-level-content-for-teaching-from-september-2017

⁶ www.gov.uk/government/consultations/developing-new-gcses-as-and-a-levels-for-first-teaching-in-2017

Appendix A: List of organisational consultation respondents

When completing the questionnaire, respondents were asked 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; however all responses were given equal status in the analysis.

Alexandra Park School

All Saints School

AQA

ASCL

Birchwood High School

British Film Institute

British School Muscat

Centre for Excellence in Media Practice

Chatham Girls

City and Islington Sixth Form College

City of Norwich School

Claremont Fan Court School

Debenham High

Hollingworth Academy

Holy Family Catholic School & Sixth Form

Hurtwood House School

Lampton School Academy

Media Education Association

OCR Examinations

Overton Grange School

Peter Symonds College

Preston Manor

Pudsey Grangefield School

Reigate College

The Beaconsfield School

The Hertfordshire and Essex High School

The Hertfordshire and Essex High School

The Toynebee School

Wac Arts College

WJEC

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