



Glenys Stacey
Ofqual
Spring Place
Coventry Business Park
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CV5 6UB
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Dear Glenys,

Ofqual is seeking views about the introduction of new regulatory requirements for awarding organisations that endorse resources to support the teaching and learning of their qualifications. Ofqual has also asked for advice on its proposals about how to manage risks to qualification standards where senior examiners also author resources.

Some factors that contribute to the quality of textbooks are outside awarding bodies' and Ofqual's control, including frequent reviews and changes to curricula and subsequent change to examination criteria. However, ACME is concerned about the commercial relationships that exist between awarding organisations, senior examiners and publishers.

Some mathematics textbooks are written by examiners and some of these are of low quality.¹ A reliance on examiner-authored resources is restrictive and not in the best interests of students. It can result in unnecessary but significant damage to teaching and learning. Where textbooks are associated with particular examiners, schools and colleges tend to buy the textbooks because of their provenance. The damage to teaching and learning this can cause is arguably greater in mathematics than in other subjects owing to the large proportion of non-specialist teachers of mathematics, who require support in their teaching and subject knowledge, and for whom good textbooks are one source of such support.² The issue is all the more serious given the lack of guidance on teaching and learning in many schemes of work in mathematics.

Stricter rules than those proposed in this consultation are required. The proposed 'conflicts of interest' condition does not go far enough. A clear line should be drawn between examining and textbook writing and senior examiners should not be permitted to publish textbooks or curriculum materials. Awarding organisations should be prevented from using their names or logos on textbooks. It is not satisfactory to justify a continued link between examining and textbook writing by arguing that this is something that is necessary in smaller subjects due to limited expertise. Where it can be demonstrated that a subject has exceptionally few sources of curriculum expertise, a special dispensation from the rule should be sought. The alternative proposed by Ofqual will allow the damage noted above to continue in much more widely studied subjects.

I would welcome the opportunity for ACME to provide advice and guidance on this issue and to contribute to any gathering of further evidence that is required.

Yours sincerely,

Professor Steve Sparks, FRS, Chair of ACME

¹ Studies have shown that textbooks used in classrooms in England are often of a lower quality than those used in the highest attaining countries: [http://www.nuffieldfoundation.org/sites/default/files/Values_and_Variables_Nuffield_Foundation_v_we_b_FINAL\(1\).pdf](http://www.nuffieldfoundation.org/sites/default/files/Values_and_Variables_Nuffield_Foundation_v_we_b_FINAL(1).pdf); <http://www.nfer.ac.uk/publications/91117/91117.pdf>.

² <http://www.ofsted.gov.uk/resources/mathematics-made-measure/>.