GCSE and A level reform
If you would prefer to respond online to this consultation please use the following link: [https://www.education.gov.uk/consultations](https://www.education.gov.uk/consultations)

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

**Please tick if you want us to keep your response confidential.**

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<th>Reason for confidentiality:</th>
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Name: Sarah Manuel

Please tick if you are responding on behalf of your organisation. | y

Name of Organisation (if applicable): Association for Nutrition

Address:

28 Portland Place
London
W1B 1LY

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the GOV.UK 'Contact us' page.
Please insert an 'x' into one of the following boxes which best describes you as a respondent

- [ ] School
- [ ] College
- [ ] Subject associations
- [ ] Parent
- [ ] Young person
- [ ] Higher education
- [ ] Further education
- [ ] Academies
- [ ] Organisations representing school teachers and lecturers
- [ ] Employer/Business sector
- [ ] Local authority
- [ ] Teacher
- [ ] Awarding organisation
- [ ] Other

Please Specify:

UK Voluntary Regulatory Body for Registered Nutritionists. The Register is held by the Association for Nutrition.

About Association for Nutrition

Introduction

Association for Nutrition (AfN) is the voluntary regulator for qualified nutritionists. We protect and benefit the public by promoting nutrition and public health and championing high standards of practice in the nutrition profession. We maintain a competency-based register of individuals who are qualified and competent in nutritional science and practice and agree to uphold professional and ethical standards through a code of conduct. Only individuals who meet these high standards in evidence based science and professional practice can join and remain on the Register.

Registered Nutritionists occupy important positions, often with strategic input, in policy and service functions throughout the NHS and private healthcare, Public Health, in animal welfare, academia and the food sectors (retailing, service, manufacturing and aspects of agriculture) and across the field of Sports and Exercise Nutrition.

The Association accredits over 50 undergraduate and postgraduate courses in nutrition and promotes high standards of competence, skill and ethical conduct. Each year approximately 450 students qualified in the science of nutrition with a strong all round skill set and a firm understanding of and commitment to professional responsibility and accountability graduate from AfN accredited courses.

In addition, following completion of a project funded by the Department of Health under the Third Sector Investment Programme entitled *Improving Capacity, Confidence and Competence*
In Nutrition across the Workforce, we have launched our Certification Scheme. A major focus of this project explored how to reduce nutrition-related inequalities by improving the capacity, confidence and competence of the frontline nutrition workforce and our Certification Scheme assesses the training available to Levels 3 & 4 of the Public Skills and Careers Framework and Level 5+ on the Qualifications and Credit Framework.

Our purpose is to protect and benefit the public by defining and advancing standards of evidence-based practice across the field of nutrition and at all levels within the workforce.

Our Response

This response takes in the views of members of our Accreditation Committee and our Accreditation Assessors, who undertake reviews of university degree programmes for the Association for Nutrition. We have chosen to only respond in relation to the proposals for GCSE Cooking and Nutrition content, therefore 1b, 5 and 6.

Should you have any questions regarding our response, please contact Leonie Milliner, Chief Executive – l.milliner@associationfornutrition.org

Is the revised GCSE content in each of these subjects appropriate? Please consider:

- whether there is a suitable level of challenge
- whether the content reflects what students need to know in order to progress to further academic and vocational education
- whether the amount of content in the qualification is appropriate and, if not, whether you have any suggestions for removing or adding content

Please provide evidence to support your response.
1 a) Citizenship studies

- [ ] Yes
- [ ] No
- [ ] Not Sure

Comments:

1 b) Cooking and nutrition

- [x] Yes
- [ ] No
- [ ] Not Sure

Comments:

It is the view of the Association for Nutrition (AfN) that this GCSE is a welcome introduction to the range of subjects offered at GCSE level. We consider the proposal important as an introduction and development of an essential lifelong skill; introduction to the discipline of nutrition science at an important stage of a young adult's education and ensuring nutrition science becomes associated with food handling and preparation which can be utilised to demonstrate and reinforce the link between healthy eating and cooking skills.

The proposed curriculum is both extensive and very broad. We support the level and range of content as a sound preparation for the study of evidence-based science. In particular, we applaud the level of theoretical detail included in the curriculum (BMR, PAL etc). Our concern is that a wide range and large number of practical food preparation and technical skills are included. AfN is not sure whether this can be dealt with in sufficient detail at GCSE level, or that schools have sufficient teaching expertise or physical resources to deliver the proposed breadth or depth of curriculum.

It will be interesting to see in more detail the methods of assessments (practical, coursework, controlled assessment or exams) and the levels examined (foundation and higher tier?).
We would suggest the curriculum should include more knowledge and understanding of the development, use and interpretation of food labelling, for example, exploring use of terms such as 'light' or 'reduced.' Food labelling should be built into assessment, whereby students design a food product and its equivalent with a dietary change (such as low fat version).

Further, given delivery of the curriculum will be in an institutional setting (such as a school) the curriculum could easily incorporate consideration of institutional/mass catering and batch cooking, including the preparation of school meals. Not only would this be directly relatable to young adults but also would be an easily undertaken practical activity.

1 c) Design and technology

☐ Yes  ☐ No  ☐ Not Sure

Comments:

1 d) Drama

☐ Yes  ☐ No  ☐ Not Sure
2 Is the content for citizenship studies GCSE short course appropriate? Please consider:
- whether there is a suitable level of challenge
- whether the content reflects what students need to know, including whether it meets the national curriculum requirements
- whether the amount of content in the qualification is appropriate and, if not, whether you have any suggestions for removing or adding content

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Comments:
3 Is the revised A level content in drama and theatre appropriate? Please consider:
   • whether the content reflects what students need to know in order to progress to undergraduate study

Please provide evidence to support your response.

☐ Yes  ☐ No  ☐ Not Sure

Comments:

4 Is the revised AS qualification content in drama and theatre appropriate? Please provide evidence to support your response.

☐ Yes  ☐ No  ☐ Not Sure

Comments:

5 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.

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Comments:

There is 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.

Consideration also needs to be taken of the background of the students that are studying as it might be that there is not the opportunity to practice the techniques learnt outside of the classroom as might be necessary (e.g. homework or prior to an assessment if this was practical based).

6 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.

Comments:

Practical skills are an importance and integral part of the subject, it is therefore not clear how any adverse impacts could be reduced.

Ensuring that there is adequate accessibility for the students to the food preparation areas of the school outside of class time. This would need to be built into consideration when the school is offering this as a GCSE option.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.

E-mail address for acknowledgement:
Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

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All DfE public consultations are required to meet the Cabinet Office Principles on Consultation

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please contact Aileen Shaw, DfE Consultation Coordinator, tel: 0370 000 2288 / email: aileen.shaw@education.gsi.gov.uk
Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 20 November 2014

Send by post to:
Alex Smith
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: GCSEandAlevelSeptember.CONSULTATION@education.gsi.gov.uk