

NASUWT East Dunbartonshire

Response to 'A consultation on the next generation of National Qualifications in Scotland' (Cons.) read in conjunction with 'Building the Curriculum 3' (BtC3)

SUMMARY

NASUWT in East Dunbartonshire welcomes the opportunity to participate in this Consultation about the future of Scottish education. We acknowledge the spirit of many of the ideas contained in the Consultation, which seem motivated by a genuine desire to broaden and enrich the education of young people in Scotland. However, large parts of what is suggested seem vague, lacking clear explanation or suitable exemplars, some areas of both documents seem potentially contradictory whilst the huge scale of the proposed changes does not allow nearly enough time for staff to familiarise themselves with the ideas and principles suggested nor to develop the resources necessary to accompany such changes. The Scottish Government's apparent cherry-picking of only certain parts of the Organisation for Economic Co-operation and Development report *Quality and Equity of Schooling in Scotland* fatally undermines attempts elsewhere in the Consultation document to use comments from the same report in support of suggested changes.

We feel that the Respondent Information Form is too restrictive and wish the comments in this Report to be taken as our official response to the Consultation, though we have included the Respondent Information Form as an Appendix.

SPECIFIC COMMENTS

Experiences, Outcomes and Levels

'The experiences and outcomes are grouped into five levels...' (Cons. P.5)

It seems odd that we are moving from the six levels we currently have at 5-14 to only five levels in future. Furthermore, this smaller number of levels is designed to cover a longer period of time. This can only lead to less precision in the feedback to pupils and parents about progress.

More worryingly, there is a lack of clarity on what these Levels actually mean.

'The experiences and outcomes have been written in ways which will help staff to adopt engaging, enterprising and active learning approaches...' (BtC3 p.26)

The feedback from staff so far on experiences and outcomes is that, far from being helpful, they end up being confusing with language that is too often vague and a complete lack of associated exemplars to demonstrate what an outcome at a particular level looks like. There is a useful suggestion - 'Regular planned opportunities for dialogue will be required within and across establishments to help staff share and consistently apply standards.' (BtC3 p.27) – but this needs to happen long before implementation of these new Levels as currently no-one is confident of what such standards are supposed to be. The use of unjustified assertion such as, 'It is expected that the deeper and richer learning provided by the experiences and outcomes...' (BtC3 p.24) is far too regular.

Alongside all the talk of flexibility and addressing the individual needs of learners, it seems curious to introduce timescales, particularly in the clumsy language used: 'The period of time spanned by a level will generally be at least two years.' (BtC3 p.24)

Finally, the suggestion that 'A key step is to use the school's improvement planning process to develop or design high quality learning programmes based upon the experiences and outcomes.' (BtC3 p.38) may seem sensible but, apart from the difficulties in understanding some of those experiences and outcomes, there is also a problem with lack of time to do this properly. Many teachers already feel pressured to work more than 35 hours a week, including ongoing curriculum development. Adding massive change to the structure of the curriculum they are asked to deliver into an already crowded improvement planning process is unrealistic in the timescales envisaged

Proposals for S1-S3

Unfortunately, we again find ourselves in the realm of unsupported assertion here: 'By introducing breadth, challenge and depth throughout S1-S3 this period of education should lead to improvements in attainment and achievement, raising the bar for all young people.' (BtC3 p.36) Things are compounded by the rather arrogant presumption that no such breath, depth or challenge currently exists.

It also seems unusual to be insisting on a third year of 'general' education when a regular criticism of existing Secondary schooling is that pupils in S1 and S2 are too often 'marking time' until their pursuit of formal qualifications begins in S3. The restriction of formal examinations to the years S4-S6 would also appear to run the risk of restricting course content, especially in the proposed replacement examination for Standard Grade, leading to a possible dilution of standards.

'At the end of S3, a young person's progress within the outcomes should be recorded by their teachers. Teachers will be expected to assess the level and extent of achievement by reference to the young person's learning across curriculum areas...' (Cons. P.5)

There is no problem with recording progress (assuming that the outcomes themselves and standards associated with them are eventually understood); however, the second part of this statement appears to envisage teachers making assessments in areas beyond their subject specialism, which is not something we would encourage. Further concerns about cross-curricular suggestions are contained in the later section headed Inter-Disciplinary Learning.

Early Presentation

There appears to be a lack of consistency in what is suggested here. On the one hand we have: 'Before they enter the senior phase, where formal qualifications will be encountered, it is not anticipated that young people will be presented for examinations.' (BtC3 p.34).

This seems unequivocal, but we also read: 'Decisions about early presentation must be made in the best interests of an individual pupil...' (Cons. p.6)

Is there to be a firm line against early presentation or not? In a flexible educational world should there be an opportunity for some young people to begin a course in S3 on which they are examined two years later?

There are also significant concerns about what parental pressure for early presentation in S4 may lead to. According to the Consultation, 'Suggestions include: ... encouraging the most able young people to bypass lower level qualifications and to study Highers from S4 onwards.' (Cons. p.7) However, many schools currently have pupils who are presented for examinations at an inappropriate course level as a direct result of parental pressure which ignores the professional judgement of teachers. Under the proposed new structures that could see some pupils being inappropriately presented early for Highers, failing these examinations and leaving school with no formal qualifications at all. What safeguards are there in place to avoid such a situation arising?

Assessment

The Consultation alludes to increased flexibility in assessment and includes specific suggestions on: 'studying National Qualifications over 18 months as well as one year;' and 'introducing a winter diet of examinations'. (Cons. p.7)

We have serious reservations about the practicalities of such a suggestion and there are worries that this would lead to major timetable changes in the middle of the school year and consequent loss of teaching time and continuity of learning.

Alongside this, there are again worries about the vagueness of some statements: 'A young person's progress should be assessed in ways and at times appropriate to that person's learning needs. Judgements made about this learning should be based on evidence from a broad range of sources, both in and out of school and by reference to a learner's progress over time, across a range of activities.' (BtC3 p.27)

What do 'sources... in and out of school' and 'across a range of activities' actually mean? Where are the exemplars to illustrate what is meant?

Most worrying of all is the statement, 'Fuller guidance will be issued about the role of assessment in supporting the purposes and principles of Curriculum for Excellence.' (BtC3 p.27) Something as important as this should be part of the Consultation, not an afterthought.

New Awards in Literacy and Numeracy

There is simply not enough detail in the Consultation paper about these: exactly what form would they take? What would be the input of English and Maths Departments to these qualifications? What would be the contribution of other Departments? Is there a danger of importing the English model of English teaching where language and literature are separated? Where would the time come from to teach these? If the awards begin at Level 3, does this mean that some pupils will be assessed on these before or during S3 (which seems to contradict what has been said earlier about this phase of education)? In what seems typical of the Consultation and Building the Curriculum 3, we are simply offered vague statements such as: '... the awards should draw upon internally assessed evidence from a young person's work across the curriculum as well as being externally

assessed through an examination.’ (Cons. p.26) There is nothing about the balance between internal and external assessment or who decides on which internal assessments to select; or, ‘There should be coherence and consistency in the development of literacy, numeracy and other skills for life and work.’ (BtC3 p.37) There is no suggestion of how this can be achieved, partly, we suspect, because no-one yet knows what such qualifications are actually going to look like.

Proposed Changes to National Qualifications

‘A new qualification will replace the present Standard Grade General and Credit levels and Intermediate 1 and 2 qualifications.’ (Cons. p.7)

There are many concerns about this proposal:

- i) on its own, this is a huge change and the timescale suggested for implementation of it seems unrealistic, particularly if we bear in mind the length of time and the difficulties experienced by some subjects during the last major curricular upheaval;
- ii) following on from the last point, having finally bedded-in that last curricular upheaval teachers are now being asked to countenance another enormous change – the feeling of perpetual change breeds cynicism and distrust amongst teachers for the politicians and ‘experts’ who always seem to have a new idea to experiment with;
- iii) part of the alleged difficulty with the current system is noted as, ‘There is a relatively small, but growing, trend for some schools and education authorities to offer Intermediate qualifications to S3 and S4 pupils...’ (Cons. p.18). It seems curious then that a key part of the Consultation focuses on ‘increased flexibility’ with National Qualifications – are we not being told that such flexibility has caused some of our existing problems?;
- iv) ‘The proposed features of the new qualification are as follows: ... it will have a unit based structure with the units assessed and possibly graded by teachers.’ (Cons. p.19) Feedback from those Authorities who have used Intermediate qualifications in S3 and S4 suggests that the unit based structure caused a significant increase in workload for teachers and restricted their flexibility when compared to Standard Grade. The proposal for graded, rather than pass/fail, units would also, we feel, lead to an increase in teacher workload and is, therefore, to be avoided;
- v) ‘(The consultation will explore ways in which units could contribute to the overall course award)’ (Cons. p.19)

Again, it seems odd that a major Consultation such as this contains no specific proposals here.

On the one hand, we are in favour of including some form of coursework as an element of an overall award, believing that this is only fair on pupils who may not thrive on the examination-based model of assessment; nevertheless, this can only work where schools and teachers are properly supported if they challenge outside influence on any of that coursework.

- vi) ‘The proposed name for the new qualification is General and Advanced General.’ (Cons. p.22)

We would suggest Core and Intermediate instead.

‘The content of all National Qualifications will be updated to reflect the values, purposes and principles of *Curriculum for Excellence*.’ (Cons. p.6)

There is a lack of detail about what this will actually mean but, again, it is potentially an enormous change for teachers to prepare for and the current timescales are unrealistic in this regard. A fuller response can only be given when more specific proposals are produced. The vagueness of some of the comments in this area is unhelpful, such as, 'A key principle for the senior phase must be that qualifications and assessment should support a new approach to learning and teaching and meet the desired outcomes of *Curriculum for Excellence*.' (BtC3 p.40)

'One other feature of the senior phase will be the introduction of a Scottish Science Baccalaureate and a Scottish Language Baccalaureate... These awards are not part of this consultation.' (Cons. p.7)

It seems bizarre that a major change to National Qualifications in the senior phase of Secondary school is not part of this Consultation. Why is it not? There are concerns about the proposed pace of implementation of this qualification and the specific responsibilities of the different Departments who might be involved. The strangest thing of all is that we are being asked to consider a coherent new structure for the senior phase of Scottish education and yet a major part of that is being introduced at a different pace from the other suggested changes and without proper consultation. This is simply unacceptable.

'The Scottish Government wishes to introduce arrangements so that young people failing an examination have their learning towards that qualification recognised formally in some way.' (Cons. p.21)

This already happens in the form of unit awards being credited to pupils as they progress through a course. There is no justification for any change to this. Previous efforts to introduce compensatory awards have led to parental pressure to present pupils at inappropriate levels and were eventually abandoned.

Inter-Disciplinary Learning

'Curriculum areas are not structures for timetabling: establishments and partnerships have the freedom to think imaginatively about how the experiences and outcomes might be organised and planned for in creative ways...' (BtC3 p.20) Schools should certainly have some freedom to innovate, but there needs to be suitable National guidance surrounding this. Although this principle seems to be accepted - 'National guidance needs to support a flexible approach which meets local needs and changing circumstances.' (BtC3 P.25) – there is very little in the way of such guidance in the Consultation paper. The worry must be that some schools and Authorities will push things in their own personal direction, leading to a multi-tiered system and a varying experience for pupils, dependent on where they live.

'The scope offered by the three years from S1-S3 should be used by school and their partners to plan for *coherent* programmes which minimise fragmentation, for example by using small teams of teachers and other staff working together to cover curriculum areas, each contributing as appropriate from their subject specialism...' (BtC3 p.37)

This sounds like a reasonable aspiration – but surely this needs to be in place before moving to the proposed new Secondary school structure? Also, there is a concern that

teachers are being asked to introduce more depth as subject specialists, prepare pupils for new assessments in literacy and numeracy AND get involved in cross-curricular projects; it is difficult to see how all of this will fit into the time available.

Other Issues

‘... the opportunity to bring together the teachers’ judgements and the young person’s own record of their achievements and skills...’(Cons. p.5)

This sounds rather too close to the discredited and expensive error that was the National Record of Achievement. We would be opposed to anything similar being attempted.

M Corbett

**Local Association Secretary – NASUWT East Dunbartonshire
September 2008**

section 5: the consultation questions

Please note that the Respondent Information Form MUST be returned with your response.

As indicated in section 3 – How to Respond, responses can be submitted on-line, or on a copy of the questionnaire printed from the website, or by cutting out and completing this section of the document. Additional paper should be used if you wish to provide more extended responses but please ensure that any such pages include your identifying details.

Name/Organisation: NASVWT EAST DUNBARONSHIRE

PROPOSAL 1

National Qualifications at Access, Higher and Advanced Higher will be retained as points of stability. Highers, in particular, will remain the 'gold standard' of the Scottish education system. The content of all National Qualifications will be updated to reflect the values, purposes and principles of *Curriculum for Excellence*. Some aspects of the structure of these qualifications will also be reviewed.

Q1. Do you welcome the intention to update all qualifications at Access, Higher and Advanced Higher in line with *Curriculum for Excellence*? Please comment on any implications to be considered.

YES

NO

Comment

Not enough information to respond — see enclosed report.

RESPONSIBLE CITIZENS

EFFECTIVE CONTRIBUTORS

PROPOSAL 2

A new qualification will replace the present Standard Grade General and Credit levels and Intermediate 1 and 2 (SCQF 4 and SCQF 5) qualifications. The new qualification will be available in a wide range of subjects, as at present. The new qualification will reflect the best features of Standard Grade and Intermediate. Standard Grade Foundation level will be removed and Access 3 will provide certification at SCQF level 3. (See Annex A Table 1 for illustration of new qualifications on SCQF framework.)

Q2. Early consultation has identified the 'best' features of Standard Grade and Intermediate qualifications as:

- the 'inclusive' approach to certification contained in Standard Grade; and
- the 'unit based' structure of Intermediate qualifications.

Are there any other features in the present Standard Grade and Intermediate qualifications which should be included in the new qualification at SCQF levels 4 and 5?

Comment

See comments in enclosed Report.

Q3. One of the proposals is to grade units. Do you agree that units should be graded A-C rather than pass/fail?

YES

NO

Explanation

See also comments in enclosed Report.

Q4. Do you want ~~graded~~ units to count towards the final award?

YES

NO

Explanation

See also enclosed report

Q5. Which option for introducing compensatory arrangements would you most support?

Please tick one option or suggest an alternative.

- Option A Extend the range of grading in course awards to grade E.
- Option B Recognise unit passes only.
- Option C Compensatory award at the level of the course studied with no grade awarded.
- Option D Compensatory grade C award at the level of course below that studied.
- Option E Compensatory grade A award at the level of course below that studied.

Explanation/other suggestion

See also enclosed report.

Q6. The proposed name for the new award is General (SCQF 4) and Advanced General (SCQF 5). Please indicate if you are content with this suggestion. If not please offer an alternative and explain your choice.

YES

NO

Explanation/other suggestion

See enclosed report.

RESPONSIBLE CITIZENS

EFFECTIVE CONTRIBUTORS

PROPOSAL 3

New awards in literacy and in numeracy will be available at SCQF levels 3 to 5.

Curriculum for Excellence brings a sustained focus on developing literacy and numeracy skills in our young people. To help strengthen this focus, the Scottish Government is proposing new separate awards to accredit young people's literacy and numeracy skills – the Scottish Certificate for Literacy and the Scottish Certificate for Numeracy. The awards will be available at SCQF levels 3 to 5. The expectation is that all young people will be presented for these awards unless there are exceptional reasons for not doing so. The intention is also to ensure that the structure of these awards is flexible enough to make them available to adult learners.

Q7. Do you agree with the proposal to offer literacy and numeracy awards at a range of SCQF levels (3 to 5)? If not please offer an alternative.

YES NO

Explanation/other suggestion

Not enough information to respond – see enclosed report.

Q8. National Qualifications at Access 3 (SCQF level 3) do not have an external examination. Do you agree that any new awards in literacy and numeracy at SCQF level 3 should have an external examination?

YES NO

Explanation

See also enclosed report

Q9. Should the weighting between the internal and external assessments for the literacy and numeracy awards be equal? If not should more weight be attached to the internal or external assessment? Please explain.

- Equal weight
- More weight to internal assessment
- More weight to external assessment

Explanation

Consistency of internal assessment standards is sometimes difficult to achieve, especially in essay-based subjects.

Q10. When should young people be assessed for literacy and numeracy awards?

Please tick one option.

- Option A** At the end of S3 as part of the summer diet of examinations.
- Option B** In the December of S4 as part of a winter diet of examinations.
- Option C** At the end of S4 as part of the summer diet of examinations.

Explanation

PROPOSAL 4

Increased flexibility to better meet the needs of young people. Suggestions include:

- studying National Qualifications over 18 months (or 2 years) as well as one year;
- introducing a winter diet of examinations; and
- encouraging the most able young people to bypass lower level qualifications and to study Highers from S4 onwards.

Q11. Do you agree with the proposal to allow the study of Highers and Advanced Highers over 12 months, 18 months and 2 years?

YES

NO

Explanation

See enclosed report.

Q12. Do you agree with the proposal to introduce a winter diet of examinations?

YES

NO

Q13. If you agree with the proposal to introduce a winter diet of examinations, what subjects and levels of qualifications might first be offered?

Suggestions

Q14. Would you agree with changes to the system which allowed the most able students to bypass qualifications at lower levels and begin study for Highers from S4 onwards?

YES

NO

Explanation

See enclosed Report - a simple yes or no is not possible!

Q15. Do you have any other ideas for increasing flexibility within the senior phase (S4 to S6)?

Suggestions

TIMELINE

Q16. It is intended that planning for the new curriculum should commence in 2008/09, with approaches based on the new curriculum introduced from school year 2009/10. This suggests that the new and revised qualifications and any increased flexibilities would be required from 2012/13 onwards to ensure smooth progression between the curriculum and qualifications. Is this indicative timeline realistic? Please comment on any implications to be considered.

YES

NO

Comment

See enclosed Report.

RESPONSIBLE CITIZENS

EFFECTIVE CONTRIBUTORS

ANY OTHER COMMENTS?

See enclosed Report