

the consultation questions

Name/Organisation:

INVERCLYDE COUNCIL: DEPARTMENT OF EDUCATION AND SOCIAL CARE

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

BUT

We are still looking for a consistent framework and we are not sure that this proposal is providing one.

We believe that, currently, many aspects of Standard Grade **are** in line with the principles and purposes of *A Curriculum for Excellence*, and that it should not be dismissed out of hand that they could be made more so, and that assessment requirements could be adjusted.

Additionally, there are implications which are not asked about in this consultation question but on which we would wish to make comment:

1. A one-year course in S4 will of necessity mean stripping out some of the content which sits in Standard Grades already. This could be controversial.
2. There are tensions between your stated desire not to 'drive students through the levels' and the possibility that S4, too, could become a 'two term dash'.
3. There is a lack of definition in the proposals: WHO will update? HOW quickly? WHERE are the necessary resources to come from? WHAT criteria will be used?
4. We are concerned that the implication could be that there will be little or no pupil choice in S1 - S3, which leads to a further tension between the principles of *A Curriculum for Excellence* and what is proposed.
5. There are concerns that since S1 - S2 has been for some time a cause for disquiet in terms of a shortfall in attainment, this might be exacerbated by extending a common course until the end of S3.

The schools, too, very much welcome the review of those courses, especially in the light of *Curriculum for Excellence*, although there are concerns in the schools about the narrowing of the curriculum implied for S4. When the courses are revised, great care must be taken to ensure that courses in subjects at all levels do articulate with one another, and mesh well.

Schools are also questioning where vocational education should be placed in the context of your proposals: surely this is the time, as part of the Scottish Government's own strategic thinking, to give vocational education parity, and to ensure that it is able to be taken up by young people at all levels, including Higher.

Some schools welcome the element of stability inherent in the proposals, with Higher remaining as a reference point. There is a feeling that this may well now remove the two term dash, and that the other qualifications can work back from a familiar standard - an internalised baseline, if you like. However other schools are concerned that the Scottish Government has not taken the opportunity to overhaul the whole system, and feel that the more you propose to retain, the more you will constrain schools.

There is a feeling that very careful attention will have to be paid to the S1 - S3 curriculum, with an element of choice introduced for pupils long before the end of S3.

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?

We are MOST concerned that this question does not ask for a yes/no response as to whether we think this new qualification is a good idea, and would like to identify a number of issues:

- The new qualification is NOT inclusive if it does not encompass those pupils who will attain at SCQF level 3. It might be argued that the majority of pupils in Scotland will attain at levels 4 and 5. All the more reason to ensure that the minority feels included. What would be the practicalities of timetabling here? We fear that most schools would be forced into a situation where the Access 3 class had to be timetabled separately, since there is nothing said to reassure us that the courses for the new qualification will be constructed in such a way that the level 4 courses can be taught alongside Access 3 courses. Nothing is said about pupils' likely ability to move between levels, particularly between levels 3 and 4.
- There is a real possibility that this would mean a return to the very situation Standard Grade was introduced to resolve. It is potentially divisive. It undermines everything Dunning aimed to achieve (and largely has achieved) and proposes to reinstate the divisions that Dunning condemned so trenchantly all those years ago. The equity in the system praised by the OECD could be eroded by this proposal.
- The narrowing of the S4 curriculum that we infer from the proposals is a grave cause for concern. The implications of a new qualification such as you describe is that (a) pupils would study only five subjects; (b) neither of those would have to be English/maths; (c) no attempts would be made to lay down desirable modes of study. One of the great strengths of Scottish education - its breadth - would therefore be sacrificed in favour of a narrowing of the curriculum which by no means guarantees depth.
- Would there be assurances that there would be the same wide range of subjects offered as presently by Standard Grades?
- What about Skills for Work?

Schools welcome all suggestions that are likely to cohere the system. Further opportunities to challenge able pupils are also welcomed, although there would need to be clear criteria for the meeting of outcomes before the senior stage, and strong reassurances about the capability to move between levels.

Their biggest concern, though, is that this proposal could be socially divisive, and that it works against the inclusion agenda.

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

NO

We quite like the idea in principle, but have concerns about the practicalities.

- What kind of weighting is envisaged between internal and external assessment of units?
- If all unit assessment is to be internal, how will moderation procedures be stepped up, who will undertake moderation, and how will this be financed? What plans have been made to increase capacity?
- What assurances will schools have that there are strict rules about re-assessment - rules that will be practicable, enforceable and offer protection for schools in the face of undue parental pressure?

Schools have grave concerns about the grading of units, although it does depend on what is eventually decided about how the units will contribute to the final course awards. But one thing they are sure about: whatever is decided must be consistent across subjects and levels, unlike the current situation where there is too much variation and lack of uniformity in the system.

There is a feeling that grading of units would have to mean stringent moderation procedures in order to ensure equity across the nation. How could this be sustained?

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

YES

BUT - only if there are very stringent moderation arrangements.
The validity of unit assessments would have to be much more robust than is currently the case.

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

Option B - Recognise unit passes only.

Or offer an 'ungraded'/'course complete' option at the level entered.

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.

NO

There is enough confusion in nomenclature within the system already among employers and the public in general. We do not agree that those new qualifications should be introduced, but if they were, then we think they should be called National Qualifications 4 and 5 (or, as we would wish to see, 3, 4 and 5).

There should be some link provided between the terminology used in S1 - S3 and that used in the senior stages, which in turn should be consistent with that used within the senior stages.

Nomenclature should be consistent across the system. Drop 'Access': SCQF 3 should be part of any new nomenclature.

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.

NO

We have a number of concerns.

We do not understand why Standard Grade (or its replacement) English/Mathematics cannot be regarded as measuring standards of achievement in literacy/numeracy. The consultation document suggests that the replacement courses at that stage in English/Mathematics would be freed up to explore other aspects of the subject in more depth and breadth. In that case, if literacy and numeracy were compulsory, then presumably English and Maths would not be. We think this is a retrograde step.

If, as is suggested elsewhere, literacy and numeracy were tested at the end of S3, then there would be a possibility that there would in fact be a **diminution** in the senior stage, rather than an increased emphasis.

If, as is also implied elsewhere in the consultation document, there were efforts to assess achievement in literacy and numeracy outwith departments of English and mathematics, then we see that as almost impossible to manage for schools.

Schools are questioning the educational validity of this proposal.

They have grave concerns about how it is to be managed.

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 AND NO!

We don't think that there should be new awards in literacy and numeracy (see above) but if there are, then because of the principles of entitlement, equality and inclusion, all levels of award should have the same arrangements.

Schools think that these new arrangements should have an increase in internal assessment. In other words, if internal assessment is acceptable for SCQF level 3, why not also for levels 4 and 5? Teachers have been trusted with internal assessments for years - it is time to demonstrate increased confidence in their professionalism.

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.

See our answers to questions 7 and 8.
But if you are pressing ahead, then we would opt for equal weighting.
Schools think there should be more weight given to internal assessment.

**Q10. When should young people be assessed for literacy and numeracy awards?
Please tick one option.**

We see any of these as unmanageable at all levels - national, local and school.
We question whether the capacity of the SQA could be extended enough to service the proposal.
But if the decision is made to go ahead, then Option A, as benchmarking before the senior stage.

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?

NO

What are the practicalities of this?

How feasible would it be for schools to manage a number of classes at different levels in the same subject - classes which were also aiming for an end point at three different times over S5 and S6 (and this without taking any 'fast track' S4 pupils into account)?

What would be the capacity/resource issues for the SQA?

How would increased frequency of examination diets be financed by local education authorities?

What implications might it have for pressures on schools' exam accommodation?

There might be a case for attempting to manage a one- and two-year Higher, but 18 months would be too difficult.

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

NO

We see this, together with the proposals outlined above, as a serious loss of teaching and learning time.

We really do not think it is required.

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

Not applicable

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?

NO

Surely there is a tension here between this proposal and the earlier statement in the paper (with which we concur) about not driving pupils through levels?

Again, we see ethical issues for schools: when do they identify such pupils? At what stage do they separate them out from the rest of the cohort? What would be the implications for inclusion and equality of schools' necessary actions in this respect, and about giving **all** pupils more choices and more chances?

We also see practical issues: if we are speaking of individuals rather than groups within a cohort (which we are exhorted to do in the body of the paper) then how do schools manage the prospect of pupils being identified for 'fast track' in some subjects but not others? How could this be timetabled?

Some schools feel that if S4, 5 and 6 could be timetabled all together, then this proposal might be manageable. Some have concerns about the creation of elite groups, and wonder again what the place of vocational education would be in such a system, and how schools would manage the academic/vocational divide which could open up as a result of it.

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

Why do we need more flexibility? What we really need is some streamlining, and for that reason would welcome some analysis of the interface between SCQF levels 5 and 6. Research has by no means demonstrated that Intermediate 2 is a better preparation for Higher than Standard Grade Credit - indeed, this varies from subject to subject, and what is needed is a credible analysis of the best progression aspects in each subject.

Too many choices and too much flexibility leads to confusion, and militates against most schools' ability to deliver satisfactorily at all levels. Choices are in fact being narrowed for S4 pupils, and breadth is sacrificed too early. It also, potentially, leads to creative subjects (and perhaps some other subjects) being squeezed out of the curriculum from the beginning of S4.

Where flexibility would be welcomed by schools would be in the form of innovative and creative proposals to recognise the broader achievements of young people, and for this to be integrated into the system.

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.

NO

This is too important to be rushed - the timescale proposed does not allow for any bedding in of *Curriculum for Excellence* and its practices. CfE is already behind schedule and this would have to follow on from it.

Further comments:

How are the proposals to be funded? How is this to be implemented in the context of local authority budget restrictions across Scotland? Most schools are also facing reductions in staffing.

We need a clear, simple structure readily understood by employers and wider society.

We accept that there have to be changes, but we would look for streamlining and simplifying rather than additional qualifications and a multiplicity of entry and exit points.

We should be decreasing the amount of external summative assessment, and even decreasing the amount of all summative assessment, to allow more room in the system for more quality learning through formative assessment. These proposals do not achieve this.

There are huge issues of equity underlying many of your proposals. The legislation on additional support needs and disability places a wider obligation on schools and education authorities to ensure justice and maximise chances for all pupils in the system. Many of these proposals, if implemented, could work actively against that principle of wider inclusion - a principle that we heartily endorse in this education authority and one which all our establishments strive to embody.