

ATL, ASCL and NAHT submission to the 14-19 Qualifications Review

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14-19 Qualifications Review Project Board meeting 14.03.12.

Thank you for inviting us to present evidence to the Review. This submission has been prepared jointly by ATL (the Association of Teachers and Lecturers), ASCL (the Association of School and College Lecturers) and NAHT Cymru (the National Association of Head Teachers). ASCL and NAHT represent the majority of school leaders in Wales; ATL represents thousands of teachers, lecturers, support staff and leaders across Wales and the UK.

In preparing this submission, we drafted a series of questions which seem to us to cover the most significant aspects of the qualifications landscape in Wales which are particularly pertinent to the schools' sector.

Introduction:

- The Qualification Framework should support rather than lead the curriculum. In that context, we endorse and support the curriculum vision set out for Wales in The Learning Country and would resist proposals for change which would undermine that curriculum plan.

- We must achieve clarity about the priorities for the Qualifications Framework within Wales. Are our priorities to be determined by:
 - i. the needs of individual learners or the requirements of the Welsh economy and society as a whole?
 - ii. the need to assess the performance of education providers? In our view, the learner is of paramount importance. Qualifications must benefit the learner and not be used primarily as a means for judging institutions.

- These judgements will ultimately be made by policy-makers. Once such clarity is achieved, the performance measures used to judge the success of individual pupils and the institutions that educate them must reflect those values and aspirations. Tensions which arise when such clarity is lacking is not helpful as is evidenced, for example, by

current confusion about whether PISA scores or GCSE results are most valued.

- Divergence, particularly from English system, which may follow a determination on Welsh priorities, will need to be carefully managed. The benefits to students in terms of skills, knowledge and aptitudes from the emerging Welsh model will have to be clearly presented to employers and higher and further education providers beyond Wales' borders so that the qualifications are properly understood and students are in no way disadvantaged by a lack of understanding of the Welsh system.
- If numeracy and literacy are to be two of the main drivers of Welsh education policy, **they must be clearly defined**. Schools, colleges, employers and Government need to have a detailed understanding of what constitutes success at each stage of a pupil's educational journey in relation to numeracy and literacy. Literacy is not the same as reading (which will be tested via the new reading test) nor is literacy necessarily guaranteed by success in a GCSE exam in Welsh/English; numeracy is, arguably, not the same as the mathematical skill measured by a GCSE exam. If literacy and numeracy skills, aptitude and proficiency cannot be measured by schools' current performance indicators, then the performance indicators need to change.
- We must remain conscious of the fact that young people in the 14-19 age group in Wales and England take more external assessments than in any other country. The system is managerially unwieldy and expensive to administer. We must achieve a sensible balance between necessary external assessment and guarding against excessive loss of teaching and learning time to examinations.
- The examination system has changed considerably in recent years. Staff have been retrained to meet new demands; new marking schemes have been introduced and new costs have been incurred. We would urge strongly that the current Qualification Review team remains mindful of these consequences and ensures in as far as is practicable, that its recommendations describe a robust Framework that will remain relevant and

appropriate for many years.

Specific issues:

1. How do schools and colleges decide which qualifications to offer and promote?

Schools base these decisions on the qualifications in which their pupils are likely to achieve the best success levels while simultaneously meeting the Skills Framework requirements. Decisions are made within the context of the Local Curriculum Plan, as required by the Learning Skills Measure 2009. The evidence from Estyn is that the vast majority of providers were in compliance with the Measure before the deadline.

There are other significant influences:

- There is often a bias towards subjects in the National Curriculum, as schools necessarily employ staff with these skills;
- The curriculum offer is influenced by historical student choice, the aptitudes and interests of staff, demand from parents, employment trends, the availability of suitable premises and equipment and any national steer on desirable areas of experience (e.g. specific vocational paths);
- Concern about the cost and sustainability of courses delivered by external providers. There are examples of external providers becoming bankrupt and failing to deliver the promised course.

2. What would you say is wrong with our current Qualifications system? Does it allow clear progression for all?

- There is an inconsistency in the grading systems between different types of qualification, for example between BTEC and GCSE exams, where students are able to gain accreditation in one without having the necessary skills to gain accreditation at the same level in the other.
- On occasion, due to conflicting interests, there is a poor inter-institution understanding of the judgements made in relation to successful completion of a course, so that students may be required to start afresh at 16 on courses at the same notional level.

- There are perverse incentives in the system. The omission of Entry Level and Level 1 qualifications from school performance measures has not encouraged schools to promote them despite the fact that they might contribute to a more coherent progression model; equally the NPFS funding mechanism has encouraged FE colleges to enable students to accumulate Level 2 qualifications instead of progressing to Level 3 qualifications.
- There is a lack of comparability and continuity. While a Level 2 school-based qualification in bricklaying and construction, offered in collaboration with an external provider, may be a significant achievement for an individual learner (and represent a useful skill for the world of work), that pupil on transferring to a FE institution may not be considered ready for a Level 3 Qualification – often because of a lack of facility in literacy and numeracy.

3. How can the system be simplified and better understood?

- The Welsh Baccalaureate is a success. Grading it to maintain its credibility is entirely to be welcomed.
- We favour making the Welsh Baccalaureate compulsory at intermediate and advanced level. It could incorporate the literacy and numeracy requirements once these have been properly clarified.
- Banding has introduced a capped point score performance indicator. If this is what is now to be measured and valued, schools will respond accordingly. The effect of this will be to limit choice - 8 subjects + Welsh Baccalaureate and statutorily compulsory subjects (PE [Physical Education], RE [Religious Education], WRE [Work-Related Experience] for example). This will not however reflect the total achievement of pupils. It also conflicts with the 30-subject stipulation in the Learning and Skills Measure.

4. What qualifications would you say employers value?

- Generally, employers say they value basic literacy, numeracy and IT skills, interpersonal skills, and a willingness to learn. There is some recognition of these in the curriculum currently, particularly in relation to Essential and Key Skills, but their status is not high. If

these are genuinely the skills employers, Government and society want and need, their value must be reflected in the Qualifications system and the performance measures used to judge the success or otherwise of pupils and schools. Hence our support for the concept of a compulsory Welsh Bacalaureate from 14+, given that it will then build upon the foundations laid by the Skills Curriculum at Key Stage 3.

5. Should any qualifications be discouraged/stopped? How do we construct a qualification system that recognises achievement on vocational courses without artificially inflating school performance indicators?

- Many schools report that greater recognition for vocational qualifications has been very positive in terms of engaging many students for whom a more traditional curriculum is unattractive.
- The Welsh educational framework has always been based on a belief that all students are important and valued and deserve an appropriate curriculum for their interests and aptitude. Some students will succeed in courses based on examinations whilst others will not. Vocational courses provide an opportunity for students to study a work related programme, based on a programme of continual assessment. Many students both enjoy and succeed at these courses and progress to the next level of study. Conscientious students who work hard and apply themselves to their work *can* reach University level through this progression route. Schools and colleges have constantly promoted the vocational route as it gives many students an opportunity of success and progression in courses which are appropriate for the individual student. The issue of equivalence between academic courses and vocational courses needs to be resolved so as to assist in ensuring that *all* HE institutions give equal weight to vocational qualifications for admission purposes. How this is achieved should not detract from the importance to the student of having access to good quality vocational education.
- We need an honest look at this based on a consideration of this question: Does building up a portfolio to record activity mean the same thing as being able to solve complex problems in an examination?
- Following the English route of stripping out a huge number of vocational qualifications

from league tables and effectively devaluing them would damage the benefits that have resulted from the more extensive vocational offer in Wales and irrevocably downgrade the qualifications in the eyes of parents and pupils;

- There are some outliers in terms of doubtful equivalence - for example a relatively low level Vocational ICT course being equivalent to 4 GCSEs is not sustainable.
- Consideration should be given to redrawing the equivalencies, so that only distinction (or perhaps merit) grades in BTEC equate to level 2 passes at GCSE; also to link the GCSE equivalent value to the number of Guided Learning hours – i.e. to make it impossible to gain twice the value in point or number of qualifications in the same teaching time as is required for one GCSE.

6. What are the tensions between individual choice and the needs of the institution?

- Too much choice tends to obscure judgments on what is really valued.
- The current Learning and Skills Measure, with its 30 subjects in theory provides a choice of 650,000+ combinations of four options. Institutions, within the local curriculum plan, must then constrain that choice to achieve a manageable level (of about 4000 combinations) by organising provision into option blocks. The expansion of choice in this context is largely determined by the skills and expertise that can be offered by the current staff complement and the available facilities within the consortium.
- If it were clearer what qualifications, aptitudes and skills were valued, this process would be less about individual choice and more about individual (and social/economic) need.
- The current system operating under the Learning and Skills Measure is very expensive and absorbs a great deal of the 14 - 19 funding available.
- There will be tension between the need for schools to respond to the new capped point score performance indicator and the requirements of the Learning and Skills Measure.

7. How can we use school performance measurement as a driver to improve the selection and quality of the qualifications offered?

- Fundamentally, we need to be sure that the performance measures reflect what we think should be valued and encouraged in our education system.
- That literacy and numeracy are equated with a positive result in the subjects of English and Mathematics in our current system is a clear failing. The examination syllabi for English Language, Welsh Language and Mathematics extend well beyond the concepts of basic literacy and numeracy. It would be a step forward if the assessment of literacy and numeracy became separate from the examinations for specific subjects. It would be logical if performance within a graded and compulsory Welsh Baccalaureate, which includes a national assessment of literacy and numeracy became a factor within school performance measures. The separation of literacy and numeracy from English and Mathematics would assist in promoting literacy and numeracy a shared responsibility between *all* teachers.

8. Are there any perverse incentives created by the banding system?

- The banding system will focus the attention of schools on the performance indicators within it. If these are to be maximised, there will be a shift of resource towards these areas. Schools will certainly be looking at the time allocated to English/Welsh and Mathematics, possibly at the expense of other subjects.
- Under the current equivalencies there may be a mushrooming of interest in vocational ICT courses which will make a disproportionately high contribution to the capped point score.
- Essential Skills qualifications and the Welsh Baccalaureate may feature more prominently once schools are more certain about how these contribute.
- All of these will require curriculum time, which must come from somewhere.

It will then be a matter of judgement whether these consequences represent perverse incentives. Arguably not if the clear focus is on literacy, numeracy and the Welsh Baccalaureate; almost certainly yes if what is desired is a broad and balanced curriculum.

Certainly this does not sit comfortably with the Learning and Skills measure which currently requires schools to offer 30 subjects at Key Stage 4.

9. How should we respond to developments in England, including long-term reform of GCSEs?

- Portability of qualifications must be protected, particularly at level 3 when Welsh students often transfer to English institutions. There will be a heavy reliance upon the Regulator to ensure comparability between qualifications in the different areas of the UK so that portability is not affected and the support of parents and students, particularly in East Wales, is retained.
- Given that the majority of students are retained in education or training beyond the age of 16, one question that should be discussed is whether the concept of terminal exams at the age of 16 is (or will continue to be) relevant. It is worth remembering that the curriculum plan for Wales, as defined in the Learning and Skills Measure, is entitled the Learning Pathways **14-19**.
- Wales should not be driven by the League Table agenda. Wales needs to assign points to the things it values – even if this means adding another column/commentary to any common performance tables which will inevitably, given the difference in scale, be constructed in response to the English policy agenda.
- Linear assessment may suit some students but it is not appropriate for all. At level 3, the introduction of the AS examination was intended to enable students to attempt to progress at that level without the risk of devoting two years to a study programme which they were ultimately unable to complete successfully. The high A2 pass rate in recent years been due to the fact that some students give up their studies at AS level having achieved a measure of success. Thus in our view unitised or modular assessment is valued and should be kept as an option for schools and colleges if they deem it appropriate for their students. One compromise, given the concern of schools regarding the escalation of examination costs associated with modularised assessment, might be for mid course or end of year assessments as distinct from six modular tests.
- Controlled assessments are not helpful in most subjects however. In effect these are

exams masquerading as coursework. They absorb a huge amount of teaching time (for science an assessment involving an experiment and the associated writing up in formal exam conditions can take 5 hours; for modern foreign languages it means a number of one-to-one assessments of oral skills which take teachers away from other students. Neither of these scenarios seems reasonable as a response to the original concern – that pupils were receiving too much parental assistance with homework and a controlled assessment would offer a fairer judgment of their capabilities. However, some subjects, music and art for example, will continue to require a controlled-assessment-type regime.

10. What issues are relevant to the school sector in relation to the marketplace for Awarding Bodies?

- We have no set view on the question of multiple, single or franchised awarding bodies.
- We feel however that there would have to be considerable evidence in favour of a change to balance the turbulence which such a change would bring to the system.
- A choice of awarding bodies is appreciated by teachers; competition can also be beneficial in driving up performance and addressing issues of poor service.
- There is evidence (from National Curriculum test procurement) that there is only a small number of agencies who would compete to provide a national test or examination scheme (especially one on such a vast scale).
- The establishment of a single awarding body for Wales could have implications for the three country agreement with England and Northern Ireland which has attempted to keep exams such as GCSE in line across the three countries.
- If Wales had one single awarding body, centres in Wales could still choose to take exams offered by an England based Board and it is difficult to see how legislation could be framed to prevent such access.
- Equally, the commercial activities of awarding bodies, including examination fees and textbooks, are a concern. Our members are concerned about the apparent lack of separation between their awarding and commercial functions. We believe that the

economic regulation of the exam system should be kept under regular review.

- We hope the economic regulation of awarding bodies will be sufficient to bring escalating costs under control. Over recent years, stipulations about the development of new qualifications or decisions to amend existing qualifications have been made with no attempt to cost the changes either for the awarding bodies (whose costs are passed on to centres as fees) or for schools and colleges. In future, we would like to see all changes to qualifications costed before implementation.