



Department
for Education

Reforming Key Stage 4 Qualifications

Consultation Response Form

The closing date is: 10 December 2012
Your comments must reach us by that date.

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

Reason for confidentiality:

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If your enquiry is related to the policy content of the consultation you can contact The Department on:

Telephone: 0370 000 2288

e-mail: KS4QualReform.CONULTATION@education.gsi.gov.uk

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Consultation Unit by e-mail:

consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please mark the box that best describes you as a respondent.

<input type="checkbox"/> School	<input type="checkbox"/> College	<input type="checkbox"/> Academy
<input type="checkbox"/> Higher Education Institute	<input type="checkbox"/> Further Education Institute	<input type="checkbox"/> Local Authority
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Parent	<input type="checkbox"/> Student
<input checked="" type="checkbox"/> Union	<input type="checkbox"/> Employer-Business Sector	<input type="checkbox"/> Governor
<input type="checkbox"/> HT/Teacher	<input type="checkbox"/> Awarding Organisations	<input type="checkbox"/> Other

Please Specify:

UCU is the largest post-school union in the world: a force working for educators and education.

UCU, the University and College Union represents over 120,000 academic staff in generalist and specialist Further Education (FE) colleges and in universities and higher education colleges. The UCU members in FE colleges teach both general and vocational education programmes. They make a significant contribution to the education and training of young people.

UCU would like to thank the Department for Education for the opportunity to respond to this consultation.

Title

1 Do you agree that the new qualifications should not be called "GCSEs"?

Agree

Disagree

Not sure

Comments:

UCU disagrees with much of the argument supplied in favour of a new qualification. We do not feel that the English Bacculaureate Certificates (EBC) proposals put forward in this consultation are acceptable in their current form.

Whatever the title of any new qualification it should be regulated so that controversial grade-boundary shifts which work to destabilise the credibility of any qualifications system are a thing of the past.

We do not feel that the proposed EBC qualification is a genuine bacculaureate system and this title would not be a true representation of the qualification. We address this further in question 2a.

2 a) Do you agree that the new qualifications should be called English Bacculaureate Certificates?

Agree

Disagree

Not sure

Comments:

UCU's key concern is that the new qualifications should be given a title that is easily understood and gives an accurate understanding of the level of achievement.

We are concerned that employers will not be able to accurately distinguish across the various levels of Bacculaureate that are awarded across the United Kingdom, and indeed internationally. As an example, the already established Welsh Bacculaureate, is more comparable to an Advanced Level (Level 3) qualification than GCSE (Level 2) and so this could cause difficulty for employers at the short-listing stage of recruitment. This becomes increasingly problematic in the context of equitable recruitment processes where personal details which are not relevant to job performance, including address, are withheld from the initial selection procedures. Equitable recruitment procedures are, quite rightly, being used increasingly.

There is a further tension with the title 'Bacculaureate' in that it is typically employed to denote a programme of study which typically includes an

extended project with a cross-curricula focus. As put forward in this consultation paper, the title 'Baccalaureate' is used to simply group a selection of discreet subject qualifications.

We see that an unintended outcome of the EBC proposals would be the entrenchment of the perverse interaction between the qualifications and accountability system. The English Baccalaureate already exists as EBacc – a performance measure for English schools and it is unclear how and why the two would not be conflated. This consultation has conversely, however, stated that a key aim of the proposed reforms is to '*end the perverse incentives created by the interaction of our qualifications and accountability system*'.

We believe many of the proposals in this document need to be urgently reviewed if they are to have the stated outcomes.

2 b) If not, what alternative title should be adopted?

Comments:

UCU does not have a strong opinion on the title for an alternative qualification.

High expectation of performance and accurate grading

3 Do you agree with our expectations for grading structures, set out in paragraphs 5.4 to 5.5?

Agree

Disagree

Not sure

Comments:

UCU welcomes the proposed provision of more detail on student learning, but we are disappointed that DfE considers that Awarding Organisations are best placed to provide the detail of a student's learning to date. Clearly, teachers and learning professionals are most likely to have an accurate overview of a learner's personal and academic development and we would argue that teachers rather than awarding organisations are ideally placed to lead this process. It is our observation that moves such as these increasingly undermine and degrade the important role of teachers by writing them out of the very roles that they are best placed and qualified to perform. The Awarding Organisation only has a snapshot of a learner with no sense of the distance travelled and we believe that the suggested role would be highly inappropriate.

We do not believe that the grading structure should be confused with the assessment regime, as assessment should always be fit-for-purpose.

The proposed EBC model also further entrenches the devaluation of any achievement below C grade level again, undermining the distance travelled by a significant proportion of each cohort. The latest departmental Statistical First Release (October 2012) has highlighted that:

- 58.6 per cent achieved 5 or more GCSEs at grade A* to C or equivalent including English and mathematics GCSEs or iGCSEs;
- 25.0 per cent were entered for all of the subject areas of the English Baccalaureate and 18.1 per cent passed every subject area with grade A* to C;
- 59.2 per cent achieved English and mathematics GCSEs or iGCSEs at grade A* to C, compared to 59.6 per cent in 2010/11, a decrease of 0.4 percentage points; and
- 81.1 per cent achieved 5 or more GCSEs at grade A* to C or equivalent.

The consultation states that the EBC '*would still be something... all children with a good education should be able to achieve*', however, the data above which is largely consistent with data from previous years, shows that contrary to this statement, in the very least 40% of students would not be able to attain the EBC. Far from being a general qualification for all, the EBC as proposed caters only to the highest achieving, and typically, most advantaged learners.

Furthermore, contrary to paragraphs 5.7 and 8 of the consultation, there would absolutely be a two tiered system whereby those who fail to achieve the EBC are consigned to a set of ill-defined GCSE qualifications which will apparently hold very little currency. These proposals risk reinventing failure for those who are already marginalised. UCU believes that the proposals as currently outlined must not be implemented.

4 Do you believe that we should insist on a common grading structure for all English Baccalaureate Certificates or should we allow Awarding Organisations the freedom to innovate?

Common Grading Structure Freedom to innovate Other

Comments:

We believe that the grading structure should be clear and easy to understand. It should also enable comparisons across subjects and be easily understood by stakeholders.

The grading structure should be same irrespective of the method of assessment and the two should not be confused.

No tiering

5 Do you agree that it will be possible to end tiering for the full range of subjects that we will be creating new qualifications for?

Yes No Not Sure

Comments:

UCU believes that all students should be able to obtain an accurate acknowledgement of their learning and progress to date and so the examination process should facilitate this.

Some awarding organisations are investigating how technology can be used to support non-tiered exams. We believe that the proposed system of just one awarding organisation per subject limits the opportunities and funding for the development of innovative solutions to this problem. This concern will be discussed further in Question 14b.

Government must remove the link between pupil attainment, accountability and the resultant funding implications which can provide perverse incentives for institutions to be more strategic in their selection of students.

We are aware of the concern that the decision making processes for tier allocation can, in rare cases allow biased expectations of particular types of students' abilities to prevail. Again, government should support Awarding Organisations to develop appropriate mechanisms which support the decision making-process for the minority of cases where such a bias can occur.

A more appropriate system would be overarching forms of certification which are multi-level, with sufficient overlap so as to encourage and motivate learners to progress.

6 Are there particular approaches to examinations which might be needed to make this possible for some subjects?

Yes

No

Not Sure

Comments:

UCU believes strongly that there should be flexibility in the approach to examinations so that subject examinations are fit-for-purpose. A definitive set of conditions that restrict the format of examinations would limit the capacity to accurately assess learning.

We would ask that the Department for Education provides the evidence to support the theory that exams are an improvement device in their own right. The clear and evidenced examples of improvement devices include improvements to teaching and learning; improved teacher pay and conditions; increased funding and investment; and strong leadership and engagement. We would argue that improvement to these factors would support overall improvement at a far more significant level.

Assessed 100% by examination, or minimising reliance on internal assessment

7 a) We intend that English Baccalaureate Certificates should be assessed 100% by externally marked examinations. Do you agree?

<input type="checkbox"/> All	<input type="checkbox"/> English	<input type="checkbox"/> mathematics
<input type="checkbox"/> sciences	<input type="checkbox"/> history	<input type="checkbox"/> geography
<input type="checkbox"/> languages	<input checked="" type="checkbox"/> None	

Comments:

UCU does not believe that there should be pre-prescribed forms of assessment for different subjects. We consider that having a blanket requirement for the level of internal and external assessment is wrong. There are several international examples where internal assessment is a key component of the qualifications system.

UCU also highly questions the practicality and feasibility of a 100% external assessment policy. There are a number of practical elements in these subjects which would require new infrastructures and bureaucracies to be assessed externally. As examples of this, oral examinations in languages, practical experiments in science and fieldwork in geography are currently and appropriately assessed internally. Again we would highlight the negative impact of moves such as this on the professionalism of teachers. With due consideration to workloads, teachers are best placed to assess internal examinations. Teachers must be trusted to carry out the activities for which they have had professional training.

This proposal demonstrates a clear area where an equality impact assessment must be provided, and it is severely amiss that this has not been provided to date. Whilst the general Public Sector Equality Duty setting out a legal requirement for equality impact assessments to be completed has been removed, Public bodies must still give 'due regard' to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions.

As an example, the Awarding Organisations are clear on the evidence that girls tend to perform better with coursework while boys do better with end-of-year exams and so the impact assessment of the proposed move to 100% external assessment requires this very 'due regard'. We at UCU believe strongly that the Department for Education has a duty to publish an impact assessment, revise the consultation document accordingly and re-publish this consultation so that stakeholders can comment on the true, rather than hoped-for impacts of this proposed reform. Please see Question 18a for further detail.

There is also a clear need for the Department for Education to set out the detail on arrangements for learners with learning difficulties and/or disabilities, and similarly, learners with English as an Additional Language as these learners are not adequately addressed in this consultation.

UCU would welcome further detail on why it is felt that 100% external examination is appropriate at Key Stage 4 when indeed, further, higher and postgraduate education all typically assess learning using a combination of external and internal examinations and in the majority of cases, internal examination only.

7 b) If not, which aspects of English, mathematics, the sciences, history, geography or language do you believe absolutely require internal assessment to fully demonstrate the skills required, and why?

Comments:

UCU believes that assessment processes should be fit for-for-purpose and therefore be appropriate to the subject being examined.

As an example, it is not always possible to assess the true extent of learning through a timed end-of-stage examination. Where a deeper examination of a topic including contextual analysis and research are needed then this is a good example of where internal assessment might be more appropriate.

Size requirement for syllabus

8 Should our expectation be that English Baccalaureate Certificates take the same amount of curriculum time as the current GCSEs? Or should schools be expected to place greater curriculum emphasis on teaching the core subjects?

Same amount of curriculum time

Greater curriculum emphasis

Other

Comments:

UCU believes that the curriculum as prescribed by the EBC champions a skill set that is far too narrow.

As an example, the UK has the largest creative industries sector in the world. It contributes 6% of GDP, employs two million people and exports over £16 billion annually, yet the 'core' curriculum explicitly excludes subjects which introduce learners to this wider range of skills which support employment, and indeed the economy.

Creative and technical subjects are absent from the EBC qualification. The inclusion of a greater breadth of subjects in an EBC qualification would support all learners to gain a broad education and would reduce the potential for particular subjects to be perceived as high or low-value subjects.

The focus on the EBC certificate as the 'academic foundation' forces institutions to place a greater emphasis on 'success' in the EBC subjects. Whilst we agree that English and maths are key tenets of learning, the proposed suite of EBC subjects and the proposed pre-eminence of these subjects risk creating a deep sense of 'failure' for learners who do not attain the EBC qualification.

Given the high-stakes nature of this qualification schools may feel compelled to develop practices which focus on improving EBC success rates in an attempt to secure the best possible outcomes for their learners,. These proposals therefore provide a perverse incentives for practices such as teaching to the test. A further unintended consequence of this is that it is possible to foresee schools which limit their subject provision choosing to focus primarily on EBC subjects to the detriment of providing a wide and general qualification.

Examination aids

9 Which examinations aids do you consider necessary to allow students to fully demonstrate the knowledge and skills required?

Comments:

UCU believes that examination aids should be used appropriately and according to what is being assessed. As an example, some higher-order mathematics questions typically require examination aids which support learners to respond to the question. Similarly, where mathematics questions require more simple arithmetic, then examination aids should not be used. The key thing is that the rules should be clear.

Subject suites

10 Do you agree that these are appropriate subject suites? If not, what would you change?

Yes

No

Not Sure

Comments:

The subject suites are too limited

UCU does not believe that the bidding system for Awarding Organisations is an appropriate way to manage the examination tendering system. We will address this further in question 15.

11 Is there also a need for a combined science option covering elements of all three sciences?

Yes

No

Not Sure

Comments:

We believe that choice between double and triple award should be maintained but that qualifications should be designed so that students are not disadvantaged by sitting for a combined award qualification.

Track Record

12 What qualities should we look for in English Baccalaureate Certificates that will provide evidence that they will support students to be able to compete internationally?

Comments:

If it is indeed a baccalaureate certificate that government would like to pursue, then the qualities of the EBC should be aligned with the quality of international baccalaureate systems which these proposals aim to emulate.

The proposals set out in this consultation suggest that it is unlikely that the EBC would fare well in any international comparisons. Traditional baccalaureate qualifications typically assess a student's learning at the end of compulsory education, include a cross-curricular dissertation and in the example of the International Baccalaureate, more than 60 hours of after-school community service.

Since international baccalaureate certificates are typically taken at a later age, it is right and understandable that they have a narrower subject range. The lack of subject range presented in these EBC proposals is of great concern particularly given the inferior positioning of non-EBC subjects in this consultation. It is not helpful to force specialisation upon young people between the ages of 14-16, particularly in the context of the rising participation age which means that young people will now have the opportunity to specialise at a later stage within the compulsory education

system.

In order to ensure that the qualification is rigorous any significant reforms to high-stakes qualifications must be accurately be piloted and given sufficient lead-time prior to introduction. Failure to do so risks failing to learn the lessons learnt from the introduction of Curriculum 2000. The subsequent independent inquiry led by Lord Tomlinson concluded:

'The QCA should have provided clearer guidance to the schools, colleges and awarding bodies. However, the guidance most requested by schools, colleges and awarding bodies was that of exemplar material. Had the A2 examinations been piloted, the information required to provide guidance would have been available to the awarding bodies. Our evidence has shown that the QCA was not solely responsible for the issues arising this year. The DfES presented a timetable to implement Curriculum 2000 which was not properly thought through and placed considerable pressure on all those in the examination system from the QCA to the students themselves...

'The DfES should make greater use of the wealth of expertise within the QCA; if it had accepted guidance and allowed the A2 examinations to have been piloted, this report would almost certainly not have been necessary.'

We would urge that the Department for Education take heed of these recommendations and avoid repeating these errors and their catastrophic consequences.

There are already a significant number of changes taking place within the GCSE examination and it is unclear why these changes are not expected to be sufficient. Recent and proposed changes include the move from modular to linear examinations; examination marks for spelling, punctuation and grammar; 'tightening'; controlled assessment and the move to comparable outcomes. These extensive changes mean that the current Year 8 group are, at present, the only secondary year group who will not experience significant change in the GCSE examination process. UCU proposes that the effects of these changes be thoroughly evaluated before any reform plans are introduced.

It would be far more appropriate to set out the underpinning principals of Key Stage 4 assessment, at this stage rather than high levels of bureaucratic detail.

Assurance of literacy and numeracy

13 Do you agree that we should place a particular emphasis on the successful English language and mathematics qualifications providing the best assurance of literacy and numeracy?

Agree

Disagree

Not sure

Comments:

There is a significant need for innovation in literacy and numeracy provision. At present the only option for pursuing English and Maths certificates is via a GCSE. The suggested 'tightening' of these qualifications leads to the direct implication that less learners will be able to pass in this qualification. There should be a range of curricula offers in this respect.

School and Post-16 institution Support

14 In order to allow effective teaching and administration of examinations, what support do you think Awarding Organisations should be:

a) Required to offer?

Comments:

In order to support effective teaching and administration of examinations, assessment criteria, choice of syllabi, past/example papers, and practitioner training all need to be provided.

UCU believes that there should be a genuinely independent regulator which is genuinely open and transparent. We accept that some government involvement in the setting of exams is valid, however, any such processes should be open and transparent.

14 b) Prevented from offering?

Comments:

Clearly awarding organisations should be prevented from offering materials which if used would distort the exam results. Essentially they should be prevented from offering the questions or the answers to forthcoming tests.

Given recent controversy and concern about awarding organisations' teacher seminars, great care will need to be taken to ensure that training offers to do not stray into areas where abuses can happen. UCU members regard awarding organisations' training and briefing work very highly. UCU's position is that any abuse should be dealt with promptly and firmly.

UCU fundamentally disagrees with the proposed methodology for the competitive tendering of subject examinations. There are a number of inherent dangers which pose too great a risk to the Key Stage 4 qualifications system.

We are highly concerned that the proposals will limit innovation as there is a risk that in the absence of competition and the relevant income, awarding bodies will disband subject teams where they have not been successful leading to less innovation and the strong potential for whole subject teams to be made redundant. In addition this provides a strong incentive for awarding organisations to increase the cost of non-EBC qualifications

We find it pertinent to highlight another recommendation of the Tomlinson Inquiry into the Curriculum 2000 reforms which argued against the introduction of single exam boards offering a subject:

'It is significant that none of the evidence we received argued that the answer to problems of consistency is to have a single awarding body; on the contrary, the diversity provided by the three boards was welcomed. All three will continue to have an important role to play, not least because it is by no means certain that there are other bodies keen to enter this market.'

The consultation suggests that awarding organisations will '*compete to show that their qualifications are the most robust*'. It also sets out the expectation that awarding organisations submitting qualifications *have 'a strong reputation for excellence and evidence that they have existing qualifications with a good track record of supporting progression to further study'*. Based on this it would seem that the successful organisations could be selected now, without the competition even taking place. Can we, therefore say that this is a fair competition? It is also difficult to see how subsequent rounds of re-tendering after five years would allow awarding organisations to compete on an even footing since they would not have the 'track record' as suggested above. Again, the tendering process would not be a genuine competition. In the absence of a genuine market we can only see that mono- and/or oligopolies would prevail.

In addition these proposals pave the way for the inherent dangers of monopolies and oligopolies. For example increased costs for schools and colleges due to a lack of competition. It is very important that the government addresses what happens in the event of failure of an awarding organisation. What would be the mechanism for intervention? Has there been a risk assessment? What is the contingency plan? The consequences of the grade boundary changes to the English examination this summer give just a glimpse of the potential for severe and high-profile consequences which have the potential to damage the integrity of the qualifications system.

This non-risk assessed methodology is highly inappropriate given the public nature of education and the fact that Key Stage 4 examinations are set up as high-stakes examinations with the potential for significant consequences for whole cohorts of young people in the event of failure.

UCU recommends that the current system should be maintained with multiple exam boards and an independent regulator. Any state intervention should be open and transparent.

15 How can Awarding Organisations eliminate any unnecessary burdens on schools and post-16 institutions relating to the administration of English Baccalaureate Certificates?

Comments:

Examination costs and products should be monitored, and where relevant, limited.

Qualification supports progression of lower achievers

16 Which groups of students do you think would benefit from a "Statement of Achievement" provided by their school?

Comments:

All learners should receive a statement of achievement otherwise the implication is that they could be perceived as certification of non-achievement rather than their initial purpose. If they are not provided to all students then there is a high risk that learners with solely a record of achievement might be stigmatised.

We would recommend that a pro-forma is established to maintain quality and relevance and that the content should be a broad recognition of a learners progress, achievements, and contributions. This could include volunteer and work experience and community engagement.

If well implemented then statements of achievement could potentially reduce the need for colleges to carry out initial assessments.

UCU would welcome a far greater level of detail than is presented in this consultation on the statement of achievement. As an example, would they be graded? What work will the Department for Education undertake to ensure that the certificates of achievement have real credibility?

17 How should we ensure that all students who would benefit from a "Statement of Achievement" are provided with one?

Comments:

Statements of achievement could be made mandatory and perhaps monitored by Ofsted.

Students could be encouraged to contribute to their own statements of achievement, giving them stronger ownership of them.

Equalities

18 a) Do you believe any of the proposals in this document have the potential to have a disproportionate impact, adverse or positive, on specific pupil groups?

<input checked="" type="checkbox"/> Adverse impact	<input type="checkbox"/> Positive impact	<input type="checkbox"/> Both
<input type="checkbox"/> No impact		

Comments:

UCU finds it unacceptable that an equality analysis has not been published alongside this consultation. Public bodies must give 'due regard' to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions. The outcomes of this consultation will affect generations of young people and these changes should be debated without an embedded understanding of the various equality impacts is highly alarming.

Without a full exploration of the potential and extent of intended and unintended outcomes, there is a significant risk that decisions are made which pre-destine groups of learners to unequal opportunities and outcomes.

Qualifications could be designed around a 'stage' rather than 'age' framework. There must also be due consideration for learners with learning difficulties and/or disabilities.

Please see question 7a also.

18 b) If they have potential for an adverse impact, how can we reduce this?

Comments:

Department for Education should publish an impact assessment immediately and withdraw these proposed reforms which have the huge potential to be harmful to young people.

Implementation

19 Should we introduce reformed qualifications in all six English Baccalaureate subjects for first teaching in secondary schools in 2015, or should we have a phased approach, with English, mathematics and sciences introduced first?

In all six subjects from 2015

Phased approach

Other

Comments:

UCU disagrees with the proposals put forward in this consultation paper and would recommend the withdrawal of these proposals in their current form.

The Department for Education must also be clear that proportional changes to whole qualifications risk devaluing the skills of learners who achieve the outgoing qualification in the final cohorts.

20 How best can we prepare schools for the transition to these reformed, more rigorous qualifications?

Comments:

UCU does not believe that these reforms should be implemented. We object on the basis that:

- there must be an appropriate lead time in order to facilitate the rigorous implementation of Key Stage 4 reforms;
- any reforms implemented must be appropriately piloted;
- the results of the National Curriculum Review should inform the proposals for Key Stage 4;
- the proposed qualifications will exclude a significant proportion of students and create a heightened sense of 'failure' for students for whom this qualification is not appropriate; and
- we fundamentally disagree with the premise for these proposed reforms.

21 How long will schools need to prepare to teach these reformed qualifications?

- Up to 12 months 12 - 18 months More than 18 months
 Other

Comments:

Schools and colleges require more than 18 months preparation *after* the exam boards have finalised the relevant material.

The Tomlinson Inquiry also highlighted that a key problem with the implementation of Curriculum 2000 was that some learners began their courses of study before the examination bodies had had the sufficient opportunity to publish the examination specifications. This should not be repeated. Nor should awarding organisations be forced to develop a rushed set of specifications for such a high-stakes test.

Languages

22 Should all languages in which there is currently a GCSE be included in our competition?

Yes

No

Not Sure

Comments:

To do anything otherwise would denigrate the excluded languages.

23 Should the number of languages for which English Baccalaureate Certificates are identified be limited? If so, which languages should be included?

Yes

No

Not Sure

Comments:

All modern foreign languages ought to be included in a general curriculum.

24 Given the potential number of new languages qualifications to be developed, should they be introduced to a later timescale than history and geography English Baccalaureate Certificates?

Yes

No

Not Sure

Comments:

Post-16

25 Should we expect post-16 institutions to be ready to provide English Baccalaureate Certificates at the same time as secondary schools?

Yes

No

Not Sure

Comments:

There should be parity between the school and college introduction of any new qualification, particularly in light of the fact that the government has accepted the Wolf Report recommendation that students should be able to study in college from age 14 onwards. It would be highly inequitable if students in colleges were forced to study an old qualification whilst their peers in schools were studying towards a new qualification.

26 How best can we support post-16 institutions to prepare to provide English Baccalaureate Certificates?

Comments:

The arrangements should be the same as the arrangements for schools.

There should be an assessment of Initial Teacher Training also and the provision of additional bursaries to cover any skills gaps. The Department for Education should be aware of the cumulative effect of restricting awarding organisations' ability to talk to practitioners and the closure of a many of the non-departmental public bodies which support teachers and lecturers. The likely net effect of this is diminished opportunities for practitioners to get additional support.

Choosing the best qualification in each subject

27 Do you agree that five years is an appropriate period for the new qualifications to feature in the performance tables before the competition is rerun?

Agree

Disagree

Not sure

Comments:

We broadly agree that five years is an appropriate amount of time to enable evaluation and therefore potential change.

We strongly believe that any changes to a high-stakes qualification system need to be adequately piloted. Failure to do so ignores the key findings of the Tomlinson Inquiry which was a response to the failed introduction of the Curriculum 2000 reforms.

UCU does not believe that the bidding system for Awarding Organisations is an appropriate way to manage the examination tendering system. Key risks are the catastrophic consequences in the event of failure and the fact that existing infrastructure which is working well will be dismantled. This is also addressed in question 15.

UCU believes that government must take a firm position and either maintain the system as it is, or move to state control.

28 Please let us have your views on responding to this call for evidence (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

In line with Article 12 of the UN convention on the rights of the child UCU believes that there is a clear requirement for the Department for Education to consult with the very young people whom these changes will affect. We find the Welsh government's recent publication of a 'youth friendly' version of its consultation on A Levels a useful example of this.

UCU has noted the high number of loaded and heavily biased questions employed across this consultation. In particular the assumption throughout the consultation is that the respondent agrees with the suggestion that GCSEs need to be replaced, and that they should be replaced with the EBC has made completing this response unnecessarily complicated.

We would urge that all future consultations follow good-practice research methodology to enable respondents to give full and frank responses to proposals.

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

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

Yes No

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 consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed and emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, Tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 10 December 2012

Send by post to:

Public Communications Unit
Level 1 Area C
Castle View House
East Lane Runcorn
WA7 2GJ

Send by e-mail to: KS4QualReform.CONULTATION@education.gsi.gov.uk