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Email only

UCU Response – Qualified For the Future

The University and College Union (UCU Wales) represents almost 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales. UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world. We welcome this opportunity to respond to Qualified for the Future.

Technical & General Remarks

With respect to the main body of questions, UCU does not agree with the proposals for the reasons which we briefly outline below;

1: As presented in this consultation, the qualifications represent a modest adjustment and do not adequately reflect the needs of the new curriculum

1:2: It is the view of UCU Wales that the likely assessment function will not address the four purposes of the new curriculum.

1:3: The structure of the consultation serves to limit debate with questions which are at once myopic and narrow.

1:4: Examining the proposals, UCU Wales sees little indication of a convincing research base.

1:5: It is almost impossible to reconcile the proposed introduction of 1.5 width English, Welsh and Science GCSE with the purpose of a creative and agile curriculum. Put bluntly, where will academic staff find the space to teach all of this?

1:6: Whilst UCU Wales welcomes the principal of a non-weighted, progression orientated numeracy qualification, we feel that an important opportunity is being lost. The Association of School and College Leaders has proposed an innovative Passport in English and Numeracy (see below). Intended as a respected core qualification, it would replace the English Language GCSE and could be taken different levels between the ages of 15 and 19, ending the wasteful GCSE resit industry.

1:7: Acknowledging the limited scope of the current consultation, UCU Wales detects a depressing direction of travel. Seeing no evidence of disaggregation between qualification and assessment, 'weighty GCSE's' promise none of the creativity scoped either by Professor Donaldson or [Professor Bill Lucas](#). Rather, the exciting possibility

of embedding progressive and formative assessment which enables learners to develop capabilities and habits of mind alongside knowledge seems likely to be subsumed by the same dull focus on examination craft and memory tests.

1:8: With respect to Qualifications Wales' Equality Impact Assessment, UCU notes that the regulator has only considered one aspect of discrimination (unconscious bias) while completely derogating from any consideration of socio-economic or [neuro-typical disadvantage](#).

A Growing Debate

In this section, we address 1, 2 and 5 – Impact Assessment.

UCU Wales seeks to evidence a growing [debate](#) surrounding the relevance of GCSE's and the role of high-stakes summative assessment. Accepting that the impact of the Covid 19 Pandemic has forced a sector-wide effort to resolve immediate problems (such as arrangements for the 2021 assessment), there is an obvious risk that the interests of consistency and system-stability will frustrate any attempt to engage in a wider examination of the qualifications system. This is unacceptable for two principle reasons. Firstly, an acceleration in the rate of pedagogic adaptation combined with Covid's medium to long-term impacts, demands a period of reflection during which lessons can be learnt. Secondly, and more fundamentally, it is difficult to determine how an assessment regime which is designed to fail a third of candidates in order to maintain its own credibility can provide suitable foundations for an equality led recovery. Indeed, the challenge is made more acute when considering the very high proportion of learners experiencing multiple deprivation who fail to achieve a C grade.

Being familiar with the counter arguments, UCU Wales is yet to be impressed. After all, and following the scale of last summer's assessment train wreck, it would be bizarre for any stakeholder to suggest that the status quo best satisfies the requirements of public confidence. Similarly, we think it entirely unsurprising that many of our HE members now [question](#) the efficacy of GCSE's and A-Levels in preparing learners for transition to higher education; a position which is also shared by a growing number of notable employers. We feel that it would be accurate to say that, having haemorrhaged confidence, these qualifications increasingly serve no other purpose than to police a sharp line of demarcation between academic and vocational study. Supporting this point, we draw attention to Qualification Wales' own [report](#) into the Importance of Engineering – where it was claimed that, since NVQ [PEO] attracted "bottom-band pupils", a GCSE would open up the possibility of study for "more academically able learners". This was despite the review's own finding that academic teaching staff valued the vocational qualification;

"The majority of higher education institutions told us that both A levels and vocational qualifications enable learners to progress to higher education. We were told that learners progressing from A levels often have a stronger academic background whilst those progressing from vocational qualifications tend to have better practical skills and are better able to solve problems and learn independently."

Noting the inclusion of an Engineering GCSE current in the current consultation, one questions whether parity of esteem can ever be obtained through surrender to prejudice?

Similarly, UCU Wales finds it incongruous that standardised exams purported role in addressing unconscious bias - one aspect of systemic disadvantage - should trump the every other factor in structural inequality. If the regulator accepts the existence of ample evidence that excessive standardised testing tend to [penalise](#) those from marginalised groups (see the Forgotten Third, below), any rational theory of change must take account of how various aspects of disadvantage intersect before proposing a proportional solution. For instance, in the case of unconscious bias one might legitimately consider peer moderation, consciousness raising and centre collaboration.

All in all, UCU Wales believes that the consultations scope is insufficiently wide to take account of the broader strategic questions posed by ourselves and others. Even allowing for the impact of the pandemic, we also feel that crucial evidence has not been properly considered. Consequently, we have sought to enable a useful review by organising a digest of materials into two categories; 1: evidence deserving immediate consideration and, 2: useful context and supporting evidence

1: Evidence Deserving Immediate Consideration;

[Education fit For the Future in Wales Report](#) (2019)

Prepared by Professor Calvin Jones (Deputy Dean - Cardiff Business School) in collaboration with the Future Generations Commissioner, the 2019 white paper finds that the existing system of qualifications and assessment is not fit for the future needs of the Welsh economy. Drawing from an extensive evidence base comprising structured interviews and action research, it is further maintained that curriculum reform and pedagogy will be undermined unless extended to an outmoded regime of summative assessments and memory tests. In essence, the report identifies the strategic role played by the Welsh examiner and qualifications regulator in determining what and how subjects are taught. The relevant recommendations are summarized as follows;

10. GCSEs are no longer fit for purpose. There is a strong rationale for their replacement with narrative based assessment that tells employers exactly what learners are all about.

11. Indeed, in terms of preparation for the future, public exams at 16 are largely pointless, lead to costly gaming between and within schools, and the hugely problematic process of 'off-rolling' less academic children.

12. Assessment needs to be value-added and pupil-centred, across programmes (not just at the end) and diverse; not comparable across schools and testing a narrow range of recall and process skills.

13. Vocational streams need to be of high quality, employer engaged and early-starting. Not least because white, working-class boys, immigrant learners and some ethnic groups disproportionately end up on these programmes.

Given the importance of this report, UCU Wales is surprised to see no trace of its recommendations reflected within this consultation.

[Independent Review of the summer 2020 Arrangements to Award Grades and Consideration for Summer 2021: Final Report](#) (2020)

Commissioned by Welsh Government, the Independent Panel provides an overview of the failures leading to what is popularly termed the 2020 exams debacle. Making full use of their remit, Part 11 (pages 48 to 49) addresses the need for wider system change. UCU believes that these recommendations are fundamental to any meaningful discussion surrounding the future of Welsh Qualifications. Consequently, we have reproduced the panel's argument in full;

11.3 In terms of the future role and design of qualifications, in 2021 and beyond, our conclusion, is that the cancellation of exams for a second year, provides the Welsh education system with a unique and important opportunity to prepare for the new curriculum by engaging professionals in robust discussion about alternative assessment pathways. Alongside the many constraints and difficulties experienced during Covid-19, we are of the view that a unique opportunity now presents itself in the transition to the new curriculum.

11.4 A recent Estyn report (Preparing for the Curriculum for Wales) identifies the impact of uncertainty about external assessment on curriculum planning: In a majority of schools visited, there is a reluctance to plan new whole-school curriculum and assessment arrangements while still delivering a curriculum that meets the needs of current public examinations. A minority of schools visited cited the lack of information about future qualifications and assessment arrangements as a reason to delay the development of a new curriculum. These schools use accountability as a reason not to develop an exciting curriculum or to make even minor adaptations. This suggests that the focus in these schools is more on 'teaching to the test' rather than on delivering a broad, balanced and relevant curriculum.

11.5 We question whether current examinations, particularly at 16, remain fit for purpose. A report by Cardiff Business School (Fit for Future Education in Wales²⁵) concluded:

In terms of preparation for the future, public exams at 16 are largely pointless, lead to costly gaming between and within schools, and the hugely problematic process of 'off-rolling' less academic children. (p27)

The Future Generations Report similarly concluded:

There is a need to align our qualifications system with the Well-being of Future Generations (Wales) Act and vision for education in Wales. The way children and young people are currently taught to pass exams will not provide them with the skills and knowledge to meet future needs. Assessment should reflect the values and principles of the new curriculum: a focus on narrative feedback, a move away from age based assessing and a need to separate pupil assessment from how we hold teachers and schools to account. (p130)

11.6 Qualifications Wales acknowledge that their vision for 16-year olds in Wales is to take globally respected qualifications that inspire and prepare them for life, learning and work. Such qualifications will require appropriate, robust, and reliable assessment processes that reflect and embrace the new curriculum. If the aspirations laid out in the new curriculum are to be fulfilled, this will mean moving away from an over-reliance on testing or examinations as the dominant form of assessment.

11.7 The four purposes of the new curriculum demand a radical change in pedagogical practice, a new approach to teaching subject knowledge and alternative forms of assessment that are in keeping with a dynamic, new curriculum in Wales. Planning for

the new curriculum, through alternative assessments to exams, is an opportunity to close the gap between the perceived value of academic and vocational qualifications, equally valuing learning in all fields of study and learning from the good practice that already exists in the vocational sector.

11.8 The education system in Wales prides itself on its national mission to deliver equity and excellence for all learners. If this is to be realised, the opportunity to rethink assessment and examinations cannot be wasted, side-stepped or derailed by a desire to return to an examination system that cannot meet the requirements of a new curriculum and the needs of all learners in Wales. The first year of external assessment of Curriculum for Wales will be 2027 and we recommend that the doors are opened to a transition to alternative forms of assessment much sooner than previously planned.

11.9 We are aware that there are education systems that perform particularly well on a wide range of international assessments (e.g. Finland) and have few mandatory tests or external exams, relying instead on teacher assessment and continuous assessment methods. There is much that can be gained from looking at the awarding of qualifications in other education systems, not to borrow their approaches, but to learn from differences.

Whilst 'Fit for the Future' amounts to an important discussion paper, the Independent Panel Report (whose recommendations were accepted by the Minister) constitutes a major inquiry, deserving a full response and careful consideration. It is not enough for the regulator to privately accept this or that aspect of its findings. Indeed, it is impossible to see how any public organisation, finding itself the subject of such a report, could proceed without identifying some occasion for reflection and focused consultation. Since the current process allows for neither, UCU Wales believes that the only feasible course is to hold fire and remodel Qualified for Life's delivery schedule until an appropriate opportunity can be found. Fully acknowledging the magnitude of the task confronting regulator in lieu of the 2021 assessment, this alone cannot justify deferring a conversation beyond Qualified for Life's decision making stages. To do so would effect a *fait accompli* whose impacts would likely be suffered by Welsh learners, employers and the education workforce alike.

2: Useful Context and Supporting Evidence

[The Forgotten Third](#) (2019)

Commissioned by the Association of School & College Leaders (ASCEL), the report evidences how early disadvantage catalyses with a high-stakes comparable outcomes in a qualification system whose very credibility is based upon the certainty that it will 'fail' one third of all learners;

"The fact that more than a third of 16-year-olds do not achieve at least a grade 4 standard pass in English and maths year in and year out is not an accident but the product of the system of comparable outcomes which is used to set GCSE grade boundaries. This system determines the percentage of students achieving the respective grades at GCSE by looking at what cohorts with similar Key Stage 2 results achieved in previous years."

Measuring the damage done, both in terms of learner's withdrawal from education and the reproduction of a 'two-tier system' of academic and vocational, the authors

conclude with a series of recommendations which echo both Donaldson and the most recent Colegau Cymru report "[Enabling renewal](#)" (see below).

It is worth noting that some of the reports thinking loosely coincides with the progression orientated 'small qualifications' proposed in Qualified for Life. However and as already mentioned, The Forgotten Third sets out to model a major core qualification intended to replace GCSE English (and maths) as essential gateway subjects.

"Recommendation 10: A working group representing the Department for Education, Ofqual and the professional associations should be established to introduce a Passport in English to replace the current GCSE English Language. This highly respected qualification would be taken by all students 'graduating' from school/college into the workplace or higher education. The Passport should be criterion referenced, comprising online assessment, a portfolio of a student's writing and a significant oracy component. The qualification could be taken at different levels between the ages of 15 and 19, ending the wasteful GCSE resit industry. It is recommended that the Passport in English be certificated by a body with international standing, with employer approval and branding. It is also recommended that similar consideration be given to a companion Passport in Maths."

In concluding, the report makes the following observations

"What we don't intend is a system which abandons high standards in the pursuit of prizes for all. On the contrary, the Passport would be a robust qualification which encourages the highest standards in reading, writing and spoken English and thereby helps students to access all areas of the curriculum. The fact that every student should be able to achieve a recognised level of competency in the Passport is surely a good thing, not a bad thing. Why does a system which 'fails' a third of students uphold standards better than a system which allows every student to leave school or college with a qualification of which they can be proud? Why are we seemingly addicted to the analogy of education as some sort of sporting competition in which the very notion of 'prizes for all' is instant anathema. Surely our aim should be a system in which all young people can achieve."

"Neither is this report proposing the wholesale abandonment of the GCSE system. It focuses on English, and suggests maths could be treated similarly, because these are the essential gateway subjects to the whole curriculum and key to the life chances of young people. Our report certainly recommends that a bigger conversation is needed about what our exam and accountability system should look like in the future, and how we might make it better for young people. That conversation may lead to the conclusion that we need to do things differently."

As indicated, UCU Wales wholeheartedly supports ASCEL's call to have this 'bigger conversation'.

[Enabling renewal](#) (2021)

Representing a collaboration between Collegau Cymru, Professor(s) Karol Willian, John Buchanan, Caroline Lloyd and Johnathan Payne, the report brings together economic and pedagogic themes to vision a future tripartite collaboration between FE, workforce and business. Commencing with an uncompromising overview of the Welsh economic landscape, Enabling Renewal proposes a relationship with Welsh business's missing middle - simultaneously intended to economically empower learners and develop a

socially rooted Welsh 'Mittelstand'. Key to its recommendations, the report proposes the development of a new suite of qualifications designed around breadth of learning with flexible modules to enable specialisation.

For ease of reference, these proposals bear some similarity with the highly portable German system (where a baker apprentice will learn enough applied chemistry to work in laboratory environments) whilst providing social partners with an exciting opportunity to shape future professions.

The report situates its proposals in the Welsh economy as it exists to make several recommendations in relation to qualification reform. Whilst these deal largely with vocational qualifications, its theory of change engages with the relationship between 1: pedagogy; knowledge, competencies and capabilities; and 2: job quality, professional prestige and labour bargaining power. In short, it rejects a best-of-possible-worlds, 'business as usual' approach and identifies co-created qualifications as one lever through which over-qualification and deskilling can be directly tackled in a Welsh context. UCU feels that this approach best fits the ambitions of Donaldson and the purpose of curriculum reform.

Sadly, UCU finds little of this bespoke creativity in Qualified for the Future. Rather, its qualifications sketch seem designed to meet an English standard whose value was arguably [debauched](#) even before the summer of 2020. It is partly this curious sense of detachment which informs our grave misgivings. Ignoring the economic realities and discrete needs of Welsh learners, the regulators proposals considers neither that which is immediate nor far away (exciting developments in Quebec, Norway or the State of Victoria). Instead, its gaze remains firmly fixed on an internationally out-riding regime of exam focused qualifications which have since been disowned by their [progenitor](#).

Conclusion

It is an established principle that good management flows from describing an exciting vision and inviting others to help one achieve it. Finding minimal reason for excitement and little in way of inspiration within this consultation, UCU Wales remains nonetheless committed to achieving a qualification system which delivers the ambitions of Donaldson whilst providing all Welsh learners with an opportunity to flourish.

To reach that point, we believe that it will be necessary to;

- 1: Depart from a sound research base
- 2: Understanding that a qualification should act as a summary of what is learned, begin by examining the new curriculum and not simply seek to squeeze its content into a slightly modified existing suite of qualifications.
- 3: Revisit to the agility and creativity of the Donaldson recommendations and privilege the discrete needs of Welsh learners over public policy considerations
- 4: Most pressingly, take full stock of a range of views and widen the process to enable a meaningful conversation. This will be further enabled by Qualification Wales' decision to publish responses where consent is given.

In our response, we endeavor to identify specific areas of concern and sketch out options around how qualifications could be modeled towards a more exciting and useful purpose. Crucially, we also identify challenging evidence that has been thus far been ignored and strongly recommend that Qualified for Future's timeline be adjusted to accommodate a very necessary debate.

In all fairness, balancing a major work stream with the pressing needs of crisis management would tax the most effective organization. Consequently, there is no dishonor in the regulator choosing to take stock, review the data and engaging in a vital conversation around what has been learned in Wales, the UK and elsewhere.

Considering that the expertise sits within the FE & HE sector, if Qualifications Wales chooses to adopt this course, then it will find a constructive and committed partner in UCU Wales.

However, we can neither endorse nor work towards restoring consent for an arcane, high-stakes system of assessment which necessarily fails one third of learners so as to maintain its own credibility.

UCU Wales provides Qualifications Wales with consent to publish this response.