

**Professor Hayward's
Independent Review of Qualifications and Assessment
Phase 3
30 April 2023**

Introduction

1. The NASUWT welcomes the opportunity to comment on Phase 3 of Professor Hayward's Independent Review of Qualifications and Assessment.
2. The NASUWT is the Teachers' Union, representing teachers and school leaders in all sectors of education.

Question 1 - Do the three areas described above offer learners the potential to gather and reflect a broader range of achievements important for their future progress? Is there anything you would add or delete?

3. In short, yes – they do offer the potential to reflect a broader range of achievements; however, the proposal created much confusion among teachers and greater detail was frequently requested by members. A fundamental question was: how would this be administered and how might it impact on students and teachers on the ground? There is insufficient information on how this would work in practice.
4. With regard to Learning in Context, secondary teachers point out that interdisciplinary learning is a key tenet of the Curriculum for Excellence (CfE); however, it has withered on the vine, principally because of a

failure to guarantee it time in the secondary timetable, but also because of a lack of understanding of what is desired and a complete failure to exemplify this effectively. These teachers, quite rightly, are asking how things will be different if this is tried again.

5. While a personal pathway, like Learning in Context, sounds like a good idea in principle, there is again a lack of any detail on what this would look like in practice. There is a passing reference to the personal statement which was part of the University Admissions process, though this is being removed: is the personal pathway supposed to replicate this? If so, guidance/pastoral teachers and teachers of English up and down the country will throw their hands up in horror because the personal statement was supposed to be a pupil-chosen and driven piece of work but, in reality, was an enormous workload-driver for many teachers who checked, corrected and rewrote personal statements, usually under enormous pressure from senior managers driven by data and the numbers of pupils they could prove they had personally got into higher education.
6. The inter-relation between the three areas themselves is not clear and members want to know how they feed into one another.
7. In addition to issues around practical implementation, teachers raised concerns that multiple interpretations could be taken and that a lack of certainty in the proposal would undermine the consultation process and outcome. A failure to have a series of events/roadshows where teachers could explore these key questions is a significant missed opportunity in terms of addressing concerns and gaining credibility for any new system.
8. The proposal must also be landed within the current, challenging fiscal landscape where schools are at the mercy of wide-ranging council budget cuts, reductions in support for additional support needs (ASN) children and young people, and reduced numbers of Advanced Higher classes being able to run across all schools, barring consortia and

colleges. In light of the reality on the ground, teachers wonder whether this model will farm out upper secondary education to colleges, as happens in England with sixth-form colleges, to their own financial benefit and the detriment of the secondary system.

Question 2 – What are your views on the proposals for recognising achievements in subjects/curricular areas?

9. Some teachers looked at the subjects as the core and then tried to envisage building the other areas around that. They then asked whether this will inherently create unintended consequences such as a further dilution of subjects and narrowing of the curriculum. How do you fit the other areas into the school day, for example? Individual courses are required to maintain their integrity – would this mean cutting the hours for each course?

10. Accumulating credits across years and subjects also raised many questions for our members, who wished for greater clarity on how this would work in practice for those who are Christmas leavers or who decide to leave school without warning in S4. There are concerns that some pupils may leave without having amassed very much or that multiple systems would be put in place by schools ‘just in case’, which would have a substantial and deleterious effect on teacher workload.

11. When it says ‘The model would include a more appropriate balance between evidence gathered from examinations and from assessments undertaken in schools and colleges’, this seems sensible: however, without more detail on that balance, subject teachers say it is difficult to judge whether or not such an approach would work. Also, there appears to be no cognisance taken of the issues which some teachers experience in terms of authenticating the internally assessed coursework of pupils: there is already serious concern amongst Science teachers about the reintroduction of the Assignment in 2023/24 National Qualifications because it opens up the possibility of external influence (often by private

tutors). This means that when classroom teachers challenge grades, they can find themselves unsupported by senior managers who are driven only by high-stakes accountability and the grades 'their' pupils 'should' be getting. Similar concerns apply in other subjects, such as English and the Coursework Folio. These concerns about authenticity of pupil work have been exacerbated by recent coverage of Artificial Intelligence (AI) systems and how these can be used by pupils.

12. More broadly, while there is support for a move away from the three-year cycle of examinations in S4, 5 and 6, the suggestion that 'learners would only be presented for external examinations when they exit a subject' has set alarm bells ringing. This would appear to suggest that a pupil studying English through to S6, for example, would only be examined in that year. That would appear to introduce even higher risk to an already high-stakes system. There is huge frustration amongst teachers in some schools and local authorities in the current system who, despite being allowed in principle to suggest that higher-achieving pupils bypass National 4 and study a two-year higher course, are forbidden from doing so by local leaders. However, this does not mean that they would prefer to have no examinations at all until S6.

Question 3 – What are your views on the proposals for recognising achievements in knowledge and skills in action?

13. With interdisciplinary learning, if the Scottish Government had been serious in its intention to support collaboration, liaison and engagement between subjects and departments, the reduction in class contact time promised within the SNP manifesto would have already been delivered. As it has not, any reference to interdisciplinary learning is viewed with great suspicion.

14. It was noted that many subjects have skills in the descriptors set out in the Skills framework; indeed, every course has a couple. Rather than creating a new system, it might be possible to build on that, break down

more skills learned and embed these in each of the courses. By doing so, pupils would leave with recognition of the appropriate levels of qualification and, tied up with that, have access to a database which is able to illustrate the skills they have demonstrated in achieving those qualifications. Skills must be demonstrated in a context and will therefore vary between subjects. Trade unions use a similar digital-badging system to build up an accreditation portfolio for Reps: having an easy-to-use digital system will be critical to ensure the burden is removed from schools.

Question 4 – What are your views on the proposals designed to recognise achievements in respect of personal learning?

15. Questions were routinely raised regarding the appropriateness of accrediting everything that a young person does and teachers were not clear on how this would, in reality, be any different to the failed Record of Achievement attempted some years ago. Also, mechanisms to avoid middle-class advantage were absent from the proposal: there is a clear shared vision from teachers that schools must be a vehicle for levelling-up and dismantling systemic disadvantage, not further entrenching economic inequality.
16. International comparators were sought as to where other countries had succeeded in integrating a personal pathway, which had not been subject to abuse and which had supported equity and equality. The personal pathway proposal currently lacks sufficient clarity to assure the profession that it would even be well-received by pupils themselves: condescension must be avoided and lessons learned from the self-identification of pupils as being '#Nat4Scum'.
17. Teachers requested details on the type of platform for assessment being undertaken; for example, is it digital? Would it be similar to SNSA? It was noted that some of the personal development awards can be incredibly administrative and would create an enormous bureaucratic burden.

18. A detailed equality and equity impact assessment is needed on the proposal which sets out what should be recognised and collated, to what extent it is contingent on schools to offer opportunities and, if they do, how that could be built in to the existing school day. Many teachers, using funding from external sources like the Prince's Trust, for instance, are undertaking innovative work to create opportunities for pupils. However, those teachers can then become a single point of failure – if they move school, take a leave of absence or retire, the provision collapses.

19. Questions have been asked about what happens to those pupils who are unable to accrue sufficient experience or badges? How is this viewed alongside National Qualifications? Will it impact on the value attributed to high school education, with increasing numbers of universities then looking to institute high-stakes entrance exams? How will it impact on records of attainment?

Question 5(a) – What are your views on the idea of a Scottish Diploma of Achievement for all learners in Scotland?

20. There is a considerable challenge in engaging with communities, families and parents/carers. Nearly 30 years on, many parents/carers still refer to O Grades and Standard Grades. With any change, there will be a period of people not understanding what it is, and certificating when no one understands is difficult. Ultimately, it will be teachers on the front line having to explain how this all works and the devil will be in the detail.

21. Teachers were keen to provide detailed comments on this question and many of the associated proposals, but they were deeply disappointed in the lack of detail presented, which makes it difficult to hold a firm opinion. Some of the big questions about why we record what is achieved are missing in the narrative: are we focused on children's broadest achievements or will this become a more complicated league table to hold schools to account?

Question 5(b) – If you support this idea, what actions should be taken to make this approach work in practice? What alternative would you propose that would be consistent with the vision and principles identified in Phase One of the Review?

22. Some members acknowledged the potential of a digital, integrated system which recognises a pupil's standardised achievements (such as a Scout's badge) and which provides an easily searchable database containing all of the skills developed through their various courses. However, this will only be possible and achievable with a large financial investment in an electronic database and systems, not only at the launch of any new system but also to maintain the system and upgrade it over time.

Question 6 – What changes to existing practice, if any, would you recommend to support the development of a new qualifications and assessment system?

23. For any change, there would need to be clear transitional arrangements alongside a coherent narrative. As one teacher described, the current proposals seem to be *'soaking up the ingredients of things that have failed - 5-14, Record of Achievement, original CfE, interdisciplinary learning – and making this into not a meaty broth but rather a poison for most teachers in schools'*. When CfE launched, it was described as *'grappling with mist'*: it is critical that a central articulation of purpose, process and design vastly improves before any change to the qualification and assessment system is made.

Question 7 – To promote parity of esteem across all qualifications, academic or technical and professional, should all qualifications at a particular SCQF level have the same name?

24. Concerns remain that the reality in schools is that headteachers will prioritise whatever is most likely to reflect positively on the school. The

national narrative regarding vocational qualifications matters. To ensure all pupils are engaged, opportunities need to run in parallel.

25. There remains a lot of support for vocational courses: the key is that they are meaningful. There is a perception of substantial differences between courses in terms of quality. The name of an individual course matters less than the integrity and professional level of that course. For example, it is understood that Level 6 Games Design is not as hard as Level 6 Computing; that Level 6 Photography is not as challenging as Level 6 Art. School leaders will inevitably look at how to maximise the number of credit points available.

26. Teachers are looking for parity between courses at the same level. They are also keen to ensure pupils at all levels are able to attain and that schools are not trying to force pupils to sit in a class which is academically rigorous when that is not for them. Opportunities need to be available country-wide: at the moment, you do not have to travel too far out of the central belt for these opportunities to run dry.

27. Parity of esteem must also be felt in the classroom by pupils, avoiding a repeat of the unsettling self-described '#Nat4Scum'.

28. Practical barriers such as timetabling and the impact of pupil and teacher numbers upon this must also be considered, as well as the importance of having courses which articulate properly in a similar way to Foundation, General and Credit, where everyone could achieve at their own level. If the proposed certificate is clear, then that potentially is more equitable and should afford greater esteem than the current position where a pupil might have dropped down from Nat 5 and then 'scraped' a Nat 4.

Question 8 – Do you have any additional comments about the proposed approach to qualifications and assessment set out in this paper?

29. Even with a clearly articulated aspiration or vision, if the resources are not available, courses are unable to run.
30. It is important to remember that we are currently applying the same board of assessments for all students, but only 35% go on to higher education: it is not proportionate that a third of students are currently determining the shape of the entire assessment model.
31. It is unfortunate the review has not dedicated more time to exploring the role of AI. As a rapidly developing area, it is not inconceivable that advancements in AI may necessitate a swift reconsideration of qualifications and assessment within the next couple of years. Scottish education urgently needs a forum in which to discuss AI and the challenges and opportunities it presents.

Question 9 – Given we are now in the final phase of the Review, we would be interested to receive any feedback on our approach to this important exercise.

32. 'Despair and disillusionment' provides easy and short summation of the feedback received from members through our Phase 3 engagement process. The NASUWT has repeatedly raised concerns that insufficient time, publicity or space within the school day has been created for teachers to engage in the Review or respond to it and, sadly, these foundational procedural issues remain unaddressed. The message from teachers is clear: they feel this Review is something which is happening to them, with the consultation process at best being described as perfunctory.
33. While the IRG and CCGs have provided some structure for engagement, teachers are concerned that these bodies have been purposely instituted to drown out teacher voice: the IRG, in particular, focuses on people in

positions of organisational leadership and ultimately creates a deficit of teacher voice. The lack of weight, time, opportunity and platform given to teachers throughout the Review to date has been described as akin to designing a car without engineers. Indeed, given this absence of classroom teachers at the heart of the design and review process, many are reflecting on whether the procedure itself is intentionally ‘anti-teacher’.

34. It remains the case that many teachers were not even aware the reform process was ongoing, which in and of itself is hugely damning of the structures and procedures instituted to support engagement.

35. In the absence of teacher-led discussions, our members consider that much of the technical balance around how best to assess a subject has been lost. To date, the Review has spent insufficient time considering what might be an appropriate way to assess different subjects: indeed, this would have been a significant body of work and would have provided an ideal foundational evidence-base to then consider how to improve any exam or assessment system. In the absence of a technical, inquiry-led, evidence-based discussion, many teachers consider that the assessment review is ultimately ideological and, as such, in amongst a plethora of anodyne, generic and policy-based lingo, the craft, skill and professional knowledge of pedagogy and assessment has been lost.

36. Even for those who were willing to accept the vagueness of concepts and the wooliness of language within the consultation process, significant concerns remained regarding the positioning of this Review amidst the wider education reform landscape. A lack of faith, trust and confidence in systems purporting to support teachers, a history of inadequacy of these institutions in the eyes of the profession, alongside an apparent unwillingness on the part of those national bodies, often largely driving their own review, to do more than move the deckchairs, has left the profession jaded, depleted and disenchanted.

37. Transparency and honesty in the Review conclusions must be paramount. It will be insufficient to merely point to the systemic problems and suggest a well-intentioned broad-brush solution. If recommendations are not accompanied by a clear, evidence-based outline of how the existing barriers will be overcome, hearts and minds among the teaching profession will be lost. Teachers are looking to understand what any outcomes will mean for them: if they only find out at the point it is to be delivered, this is too late.

38. Should outcomes be published which are unachievable, teachers are aware that they will inevitably be expected to become the backstop, forced to hold together inadequate systems and processes at the cost of their own health, safety and wellbeing. Any conclusion to this final stage must be specific, realistic and achievable; further, it must recognise the capacity within the system and the impact on pupils' learning and life chances.

39. Given many of the criticisms above regarding process, it would be wise to consider an urgent review of timescales in conjunction with the Cabinet Secretary and the Scottish Government. The NASUWT would support a delay to the final Report alongside an extension to the consultation phase to seek to better engage with teachers, who are the experts and who have the lived experience of delivering internal assessment and interdisciplinary learning, as well as engaging in quality assurance.

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