

NASUWT

Consultation Response

Working Group on 14-19 Reform

14-19 Curriculum and Qualifications Reform: Interim Report of the Working Group on 14-19 Reform

1. NASUWT welcomes the opportunity to comment on the Interim report of the Working Group on 14-19 Reform.
2. NASUWT represents the interests of over 223,500 teachers, many of whom are employed in secondary schools, sixth form colleges and FE colleges which will be affected directly by the proposals for 14-19 curriculum and qualifications reform. The Association recognises the need for reform, which, if properly directed, resourced and implemented, should deliver measurable gains for both teachers and learners across the phase.

GENERAL COMMENTS

3. The Association has long recommended the need for coherence within the 14-19 phase as part of an effort to tackle disaffection and raise standards. However, reform to the system of education at 14-19 will be undermined where issues relating to institutional capacity, funding, organisation and staff pay and conditions, workload and accountability fail to be addressed.
4. NASUWT gives a cautious welcome to many of the 14-19 reform principles, since the delivery of these reforms will depend upon a considered and properly resourced implementation strategy. The Association anticipates being fully consulted on the Government's delivery strategy proposals for the phase.
5. The Association welcomes the approach taken by the Working Group which has emphasised the need for a long-term approach to reform. This will be essential in ensuring that any changes can be evaluated fully and effectively in consultation with the teaching and support staff unions. It is essential that the previous failures to address timetable and resource issues fully, prior to the introduction of new curriculum and qualifications models, are not repeated. NASUWT supports the principle that any new arrangements within the phase should be thoroughly evaluated prior to national implementation and that unions be fully consulted during the development and trialling process.
6. The implications for both pre- and post-14 education provisions will be considerable. A genuinely open consultative approach is needed prior to the introduction of proposals for 14-19 reform. Indeed, the delivery of any proposed package of reform will be dependent upon securing the commitment of teachers and other school and college staff who will be responsible for delivering the Government's reform strategy. In view of this, NASUWT is deeply dismayed that the composition of the Working Group on 14-19 Reform has excluded school and college workforce unions and that opportunities for dialogue with unions have been severely limited. The potential benefits of social partnership – as witnessed

in the areas of school workforce reform and reform to the pay structure for schoolteachers – should be recognised in respect of the developing agenda for 14-19 education. The Association looks to the Government to address this fundamental deficiency within the work of the 14-19 Working Group prior to confirming a strategy for reform.

7. NASUWT believes that the agenda for reform is wide-ranging and complex and will require fundamental changes not only to the work of pupils/students (i.e. in relation to the curriculum and qualifications structure), but also changes in respect of the work of teachers. As signatories to the National Agreement on *Raising Standards and Tackling Workload*, the Government, unions and employers have accepted that the reform of teachers' work, the removal of extraneous tasks from teachers' work, the provision of specific contractual entitlements to enable teachers to focus effectively on the job of teaching, and the provision of additional and skilled support staff in critical areas are essential to the delivery of high educational standards. NASUWT strongly recommends that the objectives of school workforce remodelling must be made explicit within any changes proposed for reform of 14-19 education.
8. The curriculum and qualifications reform priorities identified by the Working Group signal the need for further developments in respect of individualised learning, personalised careers guidance for every young person, extended student advice and support, the management of pupils across different institutional sites and the provision of extended learning; NASUWT recognises these as critical elements of an effective 14-19 programme tailored to the needs of every individual young person. However, such developments will require equal emphasis on extending the skills base within schools and colleges, harnessing the contribution of the whole school and college workforce, and ensuring that the work of teachers is focused on teaching and learning. Indeed, there is a range of activities that can appropriately and more effectively be delivered by school and college support staff. The Association does not believe that a reform agenda as fundamental as that which is proposed by the Working Group can be delivered without addressing the implications for the development of school and college workforce skills and staff deployment. It is vital that in its final report, the Working Group should consider the implications of workforce remodelling for the delivery of the new 14-19 agenda. The Association also recommends that the Working Group's reform proposals be referred to the Workforce Agreement Monitoring Group and the Implementation Review Unit for detailed consideration.
9. Key to the delivery of an effective curriculum and qualifications system will be a need to focus on reforms to the assessment regime. The Working Group has rightly identified that change is needed to the assessment system which is excessively burdensome on teachers and students, lacking in currency, confusing with too many qualifications and specifications, and which contributes to the disaffection and disengagement of too many young people. NASUWT welcomes the recognition that reform is necessary. However, it is essential that change does not introduce a new set of problems for teachers and learners. The assessment system must be fit for purpose and manageable. Moreover, it should not divert resource, time and energy from the process of teaching and learning.
10. NASUWT asserts that any changes to assessment arrangements must be properly evaluated prior to their introduction and the workload impact on teachers must be fully assessed.

11. NASUWT strongly recommends that the Working Group should delete proposals which would increase the burdens on schools and colleges through the extended use of a teacher-led assessment model as proposed in the Interim Report.
12. The Working Group has made a clear commitment to reduce the burdens of assessment for teachers and students. NASUWT regards this as vital to ensuring that teachers can focus on teaching and learning. Currently, teachers' time is disproportionately expended on tasks associated with the examinations system – including preparing students for examination and assessment, administering assessments and examinations, liaising with awarding bodies and marking and annotating work submitted by students. The examinations system has become the driver of much post-14 teaching and learning which has been to the detriment of students and their teachers. Moreover, the direct and hidden costs of the examination and assessment system have spiralled out of control and many teachers spend considerable amounts of their own time delivering the work of the awarding bodies without remuneration.
13. Each of the awarding bodies operate to augment their market share and extend the perceived credibility of their examinations amongst universities and employers whilst minimising their operating costs. This market in examinations has led to spiralling administrative burdens being imposed on teachers. Detailed annotation of students' coursework has become *de rigueur*; it has had a profoundly negative effect on the morale, motivation and workload of teachers, whilst implicitly challenging the efficacy of teachers' professional judgements and reducing the costs to the awarding bodies of instituting an effective and professional machinery for examinations. Moreover, the current arrangements have not obviated public concerns about the credibility and currency of 14-19 qualifications or prevented the now annual criticisms levelled against the achievements of young people and their teachers.
14. NASUWT does not believe that the current system of examinations is sustainable. A high quality 14-19 system of education depends upon a highly professional system of examinations in which students, teachers and other stakeholders can have confidence, which delivers qualifications with a recognised and agreed currency and which enables teachers and students to focus on teaching and learning. NASUWT does not believe that these objectives can be delivered within the existing arrangements, and requires that a move towards a single, publicly accountable national awarding body be considered and consulted upon.

NASUWT recommends that:

- ***Proposals for reform to the system of education at 14-19 must address issues of institutional capacity, funding, organisation, staff pay and conditions, workload and changes necessary to the system of school and college accountability.***
- ***The benefits of social partnership between Government, trade unions and employers should be extended to the delivery of the Government's agenda for 14-19 reform.***

- ***Any new arrangements within the phase should be thoroughly evaluated prior to national implementation and unions should be fully consulted during the development and trialling process.***
- ***The objectives of school workforce remodelling must be made explicit within any changes proposed for the reform of 14-19 education.***
- ***The Working Group's reform proposals should be referred to the Workforce Agreement Monitoring Group and the Implementation Review Unit for detailed consideration.***
- ***Changes to assessment arrangements must be properly evaluated prior to their introduction and must not increase the burdens on schools and colleges.***
- ***Proposals to extend teacher-led assessment in schools should be deleted.***
- ***The creation of a single, publicly accountable national awarding body should be considered and consulted upon.***

SPECIFIC COMMENTS

Chapter 1: Inclusiveness, Challenge, Quality and Choice

15. The Association notes with interest the success criteria identified by the Working Group. However, this does not go far enough. NASUWT does not believe that the reforms proposed can be delivered without corresponding action in respect of the school and college workforce. The Association believes that action is necessary to:

- improve the recruitment and retention of teachers;
- ensure that teachers are enabled to focus wholly on their main job of teaching and learning;
- substantially reduce the bureaucratic burdens on teachers, particularly those burdens associated with the assessment and examinations system;
- increase the number and range of support staff in schools and colleges to support teachers and students;
- extend the benefits of the National Agreement on *Raising Standards and Tackling Workload* to the further education sector;
- end the culture of institutional competition and casualisation that pertains to the employment of many school and college staff;
- reduce substantially the burdens on schools and colleges arising from the existing accountability and inspection frameworks;
- eliminate the carping media and political criticism levelled annually at teachers;
- abolish the discredited school and college performance tables.

16. NASUWT does not believe that changes within the school/college system alone will deliver positive and improved learning outcomes for students. Whilst the

Association recognises that schools and colleges can and should play their part, action is also required to secure the commitment and supportive involvement of parents, employers, HEIs and other bodies where appropriate, in delivering the wider cultural change necessary for the delivery of the lifelong learning agenda. Unfortunately, too few stakeholders, beyond those directly involved as providers of education and training, recognise or demonstrate the commitment to learning which is needed to make a reality the proposals set out within the Working Group's Interim Report. It is without doubt that this has had a direct and negative impact on the motivation of young people.

17. NASUWT has long recognised that a fundamental tension at the heart of the present system is the distinction between so-called 'academic' and 'vocational' qualifications. Fundamental to the success of the new qualifications framework is that the universities and employers respond positively to a mix of knowledge and skills, and that routes of progression reflect the importance of all forms of learning.
18. There is a danger that the Working Group's proposals will lead to the promotion of 'vocational' pathways by another name. Where the 'vocational' routes become associated with particular student constituencies this could well have a detrimental effect on the relative parity of alternative pathways. A key measure for the success of the proposed reforms will be the extent to which these are capable of increasing the take-up of 'vocational' programmes by all groups of students.
19. At the same time, an inclusive curriculum and qualifications system must be one which challenges stereotyping and encourages atypical choices. By increasing the ease with which more students can pursue alternative programmes of study, there are real dangers of recreating the elitism which characterised the former grammar-secondary modern system. Limits to curriculum flexibility must be identified and to ensure that educational and employment inequalities are not further increased. The Association believes that the Working Group's proposals must be subject to a detailed equality impact assessment to ensure that the new arrangements tackle, rather than reinforce, inequalities in relation to gender, ethnic background and disability. Equality of opportunity must be signalled by the Working Group as a key test for the future organisation and delivery of 14-19 learning.
20. The Association recognises the Working Group's commitment to tackle the problems of an inflexible curriculum. However, increased flexibility may produce a range of unintended consequences which merit detailed examination; in particular, leading to the marginalisation of particular student constituencies who are deemed unable to cope with a traditional academic curriculum content; the promotion of inter- and intra-institutional student segregation; higher levels of disaffection as a result of specialisation at too early an age; and increased workload and bureaucratic burdens on schools and colleges. The Association does not believe that these implications are adequately addressed by the Working Group in its proposals thus far.
21. The Working Group proposes that there should be "space' for innovative learning and teaching and personal choice" and that programmes of learning should 'contain scope for personalisation' to the particular individual interests of learners. This aspiration raises considerable implications for the organisation,

delivery and funding of teaching and learning, student guidance and for the workload of existing school and college staff. Regrettably, the Working Group appears to have adopted a seriously deficient and anachronistic view which envisages that teachers, in the main, will be the agents for the delivery of the raft of 14-19 changes proposed. The Association strongly recommends that the workforce implications arising from the proposed changes to the curriculum and qualifications framework be the subject of detailed discussions with NASUWT prior to the publication of the draft 14-19 reform strategy.

NASUWT recommends that:

- ***The Working Group's proposals must be subject to a detailed equality impact assessment.***
- ***The workforce implications arising from the proposed changes to the curriculum and qualifications framework should be the subject of detailed discussions with NASUWT prior to the publication of the draft 14-19 reform strategy.***

Chapter 2: Principles of 14-19 Curriculum and Qualifications Design

22. Critical to the delivery of a coherent 14-19 curriculum is the need to establish a transparent and appropriate funding model and an effective mechanism for its distribution. The mechanism for funding programmes in schools and colleges will, by necessity, need to change. The Association welcomes the recognition of this fact by the Working Group. In developing its proposals prior to its final report, NASUWT strongly recommends that it should be party to detailed discussions with the Working Group to develop the funding model.
23. Differences in the pay and conditions of teachers in schools, sixth form colleges and FE colleges could present a significant barrier to the creation of a coherent 14-19 phase and hinder students' transferability between institutions. Funding must be tailored in such a way as to recognise these differences. Parity of funding must be secured, based upon the principle of a substantial levelling-up of funding across all sectors.
24. Under the current arrangements, the 14-19 sector is funded by different funding methodologies. The post-16 sector is under the Learning and Skills Council (LSC) and its 47 local LSCs, while 14-16 students continue to be funded by Local Education Authorities. Under the LSC mechanism, the main driver of the funding is the number of students by course. Schools on the other hand receive the bulk of their delegated budgets based on pupil numbers weighted by age. Additional sums may also be delegated under the formula based on such factors as social deprivation.
25. There is a case for all education funding to go through a single, democratically accountable agency. The existing 47 LSC regions fail the test of democratic accountability and there are wide variations between the LSCs in terms of their treatment of school and college provision and their engagement with the school

and college workforce unions. Moreover, the conduct of the strategic area reviews has been a major impediment to developing diversity of provision and institutional collaboration, and has led to the closure of vital provisions on grounds which appear to be more related to financial than educational considerations.

26. There are also implications for the way in which the education of individual students on roll at one institution are to be funded when they are in receipt of learning provided at another institution.
27. Whilst a number of these matters may not come within the direct remit of the Working Group, they must be highlighted in the Working Group's final report and recommendations.

NASUWT recommends that:

- ***The funding implications associated with 14-19 reform must be considered in the Working Group's final report and recommendations.***
- ***A coherent 14-19 curriculum must be accompanied by a funding model that is transparent and appropriate.***
- ***Changes to the funding arrangements must be the subject of detailed discussions with NASUWT.***

Chapter 3: Diploma Programmes: A Template for 14-19 Learning

28. The Working Group has proposed a common template for all 14-19 learning which would comprise a core of generic components and main learning underpinned by a set of common skills. There is considerable emphasis on flexibility and for learning to be personalised according to the needs and interests of the individual learner. An extended project/personal challenge is proposed as a key element of the core learning programmes. Students would have the opportunity to specialise within a relatively unrestricted framework and would be expected to undertake wider community or work-related activities which reflect their personal interests. This template for learning raises considerable challenges for schools and colleges in terms of organisation, delivery and management of students' learning.
29. The Association acknowledges the desirability of flexibility, but asserts that there is a need to define clearly the limits to such flexibility. This is not to deny student choice, but recognises the limited capacity of institutions – whether working singly or in concert – to manage the delivery of open-ended programmes of learning which reflect the particular interests of every individual student. NASUWT does not believe that the level of flexibility proposed by the Working Group can be achieved without a massive additional investment of staff and other resources to schools and colleges. The implications for the school and college timetable are not inconsiderable, and it is unclear that the Working Group has considered this implication within their deliberations. At the same time, an

open-ended and almost limitless degree of flexibility could have a disastrous effect on the currency of 14-19 qualifications overall and would lead to further confusion for employers and universities in comparing the achievements of young people who pursue substantially different types of study.

30. NASUWT welcomes the approach taken in respect of common skills which would be embedded within learning programmes rather than being delivered as free-standing programmes and subject to separate assessment. However, the Association believes that the Working Group should go further. In particular, consideration should be given to extending the range of common skills that could be embedded in other learning programmes to include mathematical skills, communication and ICT. The Working Group proposes that mathematical skills, communication and ICT should exist as stand-alone elements within the core programme. However, such a view fails to recognise the potential for these skills to be taught and assessed in an applied manner within other areas of learning. Such an approach could help to ensure that learning in these areas is demonstrated as relevant to young people, and may also assist in tackling the problems of student disaffection and demotivation often associated with learning in these areas. This would not preclude students from pursuing a more in-depth study in these three areas as part of their main learning programme.
31. The Association is concerned that the core component is over-prescribed. The Working Group proposes that the core should include mathematical skills, communication, ICT, an extended project, wider activities and personal planning, review and guidance. NASUWT does not believe that an overly-prescribed core will assist in addressing the problems of student disaffection which currently marks post-14 learning, nor will it provide the level of curriculum flexibility which has been identified by the Working Group as a key reform objective.
32. The Working Group anticipates that all young people will achieve at least Level 2 in the core curriculum areas of mathematical skills, communication and ICT. NASUWT believes that such an aspiration is unrealistic in the current context and given the way in which the curriculum has traditionally been organised. Moreover, such a target does not recognise that for some students – including for some students with special educational needs – achievement at Level 2 of the National Qualifications Framework may be wholly unachievable. In view of this, it would be deeply unhelpful for such an unrealistic achievement target to be established. Moreover, there needs to be a greater recognition and value accorded to qualifications below Level 2.
33. Whilst supporting the principle of curriculum flexibility NASUWT believes that limits to flexibility must be made clear, if only to maintain manageability and sustainability of programmes and institutional structures. Any recommendations must address the implications of flexibility for student careers and outcomes as well as for institutional viability and sustainability of programmes.
34. It is essential that curriculum flexibility and early specialisation do not lead to the further establishment of elitist provisions on the basis of aptitude or ability which has been both discriminatory and divisive. In order to guard against certain groups (girls, disabled or black students) becoming over-represented in particular types of alternative provision, clear monitoring and accountability systems would need to be established.

35. Flexibility will place acute demands upon institutional providers. In particular, the sustainability of programmes could be placed at considerable threat if the 14-19 system were to be modelled on a customer/demand-led model of provision. This could seriously jeopardise certain provisions, regardless of their wider educational, economic or social value. Moreover, relatively unlimited flexibility could undermine teacher recruitment and retention which would, in turn, hamper the drive to raise educational standards.
36. NASUWT maintains that there is a need to provide learning that will engage all pupils, including a need for the 14-19 phase to “*become more responsive to those with special educational needs; to those from a range of ethnic backgrounds; to those from low income families; and to those in danger of social exclusion*”. (DfES Green Paper 14–19: *Extending Opportunities, Raising Standards*). Regrettably, there is little evidence that the implications of SEN and equal opportunities have been considered by the Working Group in the formulation of its reform ideas.
37. The issue of resource availability is a further issue which needs to be addressed. In too many schools, ICT facilities are available to students to use when they leave the classroom. The delivery of the 14-19 agenda will be dependent on ICT being available in every classroom, accessible to students, and available for use when it is appropriate in relation to the demands of the curriculum.
38. The Association believes that the current proposal that all students undertake an extended personal project is unacceptable. NASUWT recommends that the concept of a personal project should be replaced by an entitlement for students to undertake a defined range of planned group tasks. NASUWT believes that the proposal, in its current form, would give rise to considerable additional workload burdens for students and teachers which would need to be addressed. Whilst a personal project might motivate some students, it cannot be assumed that this would be the case for every student and, for some, such a personal project could exacerbate student stress, disaffection and truancy. There are also issues for how schools and colleges would organise such activities, the infrastructure and range of expertise that would be needed within institutions to support students undertaking a highly diverse and unpredictable range of personal projects, and how schools and colleges would be able to assure the authorship of the work submitted.

NASUWT recommends that:

- ***The staffing and other resource implications (e.g. ICT) must be considered, presented and consulted upon in detail prior to implementing the 14-19 reforms.***
- ***The weighting of each of the components within the Diploma should be reconfigured and the core component should be reduced substantially.***
- ***The Working Group should modify its wholly unrealistic target that all young people will achieve at least Level 2 in mathematical skills, communication and ICT.***

- ***A greater recognition and value should be accorded to qualifications below Level 2.***
- ***The proposed increase in curriculum flexibility must be fully evaluated in terms of its potential impact on institutional viability and the sustainability of 14-19 programmes.***
- ***The implications of SEN and equal opportunities must be addressed in full by the Working Group prior to the presentation of its final report.***
- ***The proposal that each student undertake an extended personal project should be replaced by an entitlement for students to undertake a defined range of planned group activities.***

Chapter 4: Choice and Specialisation: Diploma and Programme Types

39. NASUWT is concerned that the creation of two broad types of diploma – specialised and open – is unnecessary, could create a two-tier diploma and has the risk of marginalising and downgrading certain learning pathways. All pathways should provide opportunities for specialisation at the stage where this is appropriate to the needs and interests of the individual learner. The Association recommends that the Working Group should revise its proposals to provide a truly unified diploma structure which would prevent any potential for abuse arising from the currently bipartite proposition.

40. The Association is concerned that the proposals in their current form could encourage students to specialise at too early a stage in their learning. This could be counterproductive to the desire to tackle the problems of disaffection, equality of opportunity and lack of breadth of study.

41. The Association remains unconvinced that the Working Group has taken account of the implications of specialisation for the provision of 14-19 learning in rural contexts. The opportunities for specialisation in learning will be determined in large measure by the constraints of context. It is essential that the Working Group evaluates its proposals in relation to the implications for students in rural areas.

NASUWT recommends that:

- ***The proposal to create two types of diploma – specialised and open – should be abandoned.***
- ***A single, unified diploma structure is essential.***
- ***The implications of early specialisation must be further considered.***
- ***The implications for provision in rural areas must be addressed by the Working Group.***

Chapter 5: Diploma Levels and Progression

42. The Association recognises the potential benefits of establishing a diploma framework which is not age related. However, it is essential that the Working Group consider the implications of this fully before finalising its proposals. There are considerable implications for the organisation and delivery of teaching and assessment regimes which merit considerably more attention than is included in the Interim Report. At the same time, non age-related progression would require a review of the funding mechanism and have implications for the future of the school/college performance tables and the award of the diploma qualification.

NASUWT recommends that:

- ***The proposals for non age-related progression and qualifications should be subject to further detailed consultation with NASUWT.***

Chapter 6: Components of the Diplomas

43. The Association reiterates its concerns regarding the Working Group's proposals in respect of mathematical skills and communication within the requirements of the diploma framework. Whilst it is desirable to promote high levels of achievement in these areas, this should not become a blockage to students' progress and participation in higher levels of study within the diploma framework. For some young people, achievement at Level 2 in the stand-alone study of mathematical skills and communication may not be achievable; yet such students may well be capable of high levels of achievement in other areas which would merit full recognition within the qualifications framework. Moreover, the Association reasserts its belief that a more creative approach is needed to integrate mathematical skills and communication into the main learning programmes undertaken by young people, and where acquisition of mathematical skills and communication can be assessed within the context of learning in other areas. NASUWT urges the Working Group to consider such an alternative approach.

NASUWT recommends that:

- ***A more creative approach should be adopted by the Working Group to integrate the teaching and assessment of mathematical skills and communication into the main learning programmes undertaken by young people.***

Chapter 7: Recording and Grading Achievement

44. The Association welcomes the Working Group's commitment to simplify the qualifications system. This will assist with transparency and should provide sufficient motivation for students. The pressure to create a highly-differentiated qualifications framework should be resisted.
45. The Working Group has proposed three options for detailing the specific achievements of young people within the overall diploma framework: formal transcripts recording each learner's programmes and achievements; grading of individual diploma components; and grading of whole diplomas. Each of these have potential strengths, but there are also significant challenges and/or weaknesses associated with the three options presented.
46. The Association recognises that the qualifications and grading issue is critical to the 14-19 reform agenda. If the issue of grading is not resolved appropriately, then it is unlikely that the key reform objectives will be met – in particular, improving the transparency of the qualifications system, enhancing student motivation, tackling disaffection and reducing burdens on institutions.
47. It is essential that the grading system promotes achievement at all levels. A major criticism of the existing system, which is recognised by the Working Group, is that it encourages disaffection amongst those young people who are unable to achieve a Level 2 qualification. Moreover, the current system has been driven by expediency as reflected in the interests of the universities, employers and the school/college league tables which rely upon overly-simplistic indicators of students' achievements at A*-C.
48. It is essential that the Diploma does not restrict the potential of students to demonstrate all areas of their achievement. The Working Group should seek to ensure that any new arrangements do not lead to a crude and over-simplified interpretation of students' achievements by third parties including the universities, employers and the media. Indeed, the relevant sectors must be encouraged to review the whole achievement of individual students, albeit that it is essential that this must not result in additional burdens on teachers in schools and colleges.
49. The Association looks with interest to the final deliberations of the Working Group to address this issue from a perspective which addresses the interests of all groups of students whilst not adding to the burdens on schools and colleges, vis-à-vis assessment and recording.

NASUWT recommends that:

- ***The arrangements in respect of recording and grading must be transparent and provide sufficient detail about the whole range of an individual student's achievements.***
- ***Changes to recording and grading students' achievements should not result in any additional burdens on teachers in schools and colleges.***

Chapter 8: Assessment: Issues, Principles and Further Work

50. The Working Group has rightly identified that change is needed to the assessment system which is excessively burdensome on teachers and students. NASUWT welcomes the recognition that reform is necessary. However, it is essential that change does not introduce a new set of problems for teachers and learners. The assessment system must be fit for purpose and manageable. Moreover, it should not divert resources, time and energy from the process of teaching and learning.
51. NASUWT will not tolerate the introduction of a teacher-led assessment system, which results in increased workload for teachers. The benefits which have been achieved as a result of the school workforce remodelling must not be undermined by assessment reform.
52. NASUWT notes with concern that the Working Group has commissioned 'a technical group of experts from QCA and the awarding bodies' to consider changes to the assessment framework. Given the significant involvement of teachers in the assessment process, it is inconceivable that the teacher associations have not been invited to participate in these deliberations. Moreover, given the Working Group's desire for fundamental reform to the existing system, the appointment of this interest group is unlikely to deliver reforms in which teachers, students and the public can have confidence. NASUWT calls upon the Working Group to establish with urgency an appropriate mechanism to engage in dialogue with the teacher associations on this critical issue.
53. The Working Group has made a clear commitment to reduce the burdens of assessment for teachers and students. NASUWT regards this as vital to ensuring that teachers can focus on teaching and learning. The examinations system has become the driver of much post-14 teaching and learning; it has operated to the detriment of students and their teachers and has been inordinately expensive.
54. The activities of the awarding bodies are at the core of this problem, and the need for review of the work of these bodies must be considered as a matter of urgency.
55. NASUWT does not believe that the current system of examinations is sustainable. A high quality 14-19 system of education depends upon a highly professional system of examinations in which students, teachers and other stakeholders can have confidence, which delivers qualifications with a recognised and agreed currency and which enables teachers and students to focus on teaching and learning. NASUWT does not believe that these objectives can be delivered within the existing arrangements, and requires that a move towards a single, publicly accountable national awarding body be considered and consulted upon.
56. NASUWT asserts that any changes to assessment arrangements must be properly evaluated prior to their introduction. The Association has researched widely the views and experiences of teachers in the 14-19 phase. The results of the Association's investigation reveals that there is no support for the extension of teacher-led assessment. NASUWT strongly recommends that the Working

Group should delete proposals which would increase the burdens on schools and colleges through the use of a teacher-led assessment model.

57. The Association proposes that changes to the assessment system must be predicated on the following conditions:

- the recruitment of an adequate and separate cadre of qualified paid examiners;
- the increased contribution of technology in the assessment process;
- the removal of any requirement for teachers to annotate students' work;
- a light-touch external validation process.

58. In reducing the burdens of assessment, it is essential that the judgements of teachers are recognised as valid in their own right. The Association does not support the establishment of a cadre of Chartered Examiners as proposed by the Working Group, neither is it necessary to accredit schools and colleges or increase the burdens on schools and colleges through changes to the inspection system. NASUWT does not believe that these developments would be consistent with the objectives of the National Agreement – *Raising Standards and Tackling Workload*. Moreover, the Working Group's proposals would do nothing to reduce the bureaucracy associated with the assessment and examination regime. NASUWT recommends that the awarding body should be responsible for applying the national standards for assessment for demonstrating that assessment has taken place in accordance with these standards. The reforms to 14-19 assessment must make a clear separation between the responsibilities of the awarding body/examiners and the responsibility of teachers.

NASUWT recommends that:

- ***NASUWT should be fully consulted on any proposed changes to the assessment framework.***
- ***The composition of the technical group of experts on assessment, as commissioned by the 14-19 Working Group, should be revised to ensure representation of the teacher associations.***
- ***The creation of a single, publicly accountable national awarding body should be considered and consulted upon.***
- ***The awarding body should be responsible for applying the national standards of assessment/qualifications; teachers should be responsible for teaching and learning.***
- ***Proposals to extend the burden of teacher-led assessment must be abandoned.***
- ***The proposal to introduce a cadre of Chartered Examiners should be abandoned, together with the Working Group's proposals to accredit the assessment arrangements in schools and colleges.***

- ***Changes to the assessment system should be accompanied by the recruitment of an adequate and separate cadre of qualified paid examiners; increased contribution of technology in the assessment process; the removal of any requirement for teachers to annotate students' work; and a light-touch external validation process.***

Other Issues

59. NASUWT contends that the publication of 16+ performance tables, based largely on the results of GCSE examinations, will act as a blockage to coherence and progression across the 14-19 phase. The tables are both damaging and divisive and will militate against flexibility of learning options across different institutionalised settings and hamper institutional collaboration.
60. The merits of publishing performance tables cannot be supported in terms of their educational value. Moreover, the publication of the tables creates a destructive and competitive environment which is at odds with the Government's policy on inclusion and institutional collaboration.
61. There is a need for a more refined and efficient accountability framework with much less duplication. In developing their proposals for 14-19 reform the Working Group should not seek to prop up a failed system which has no educational justification.
62. Inequalities between school and college provisions need to be addressed in terms of its impact on educational access and student support. Pupils from minority ethnic groups are over-represented in the FE rather than schools sector. There is also evidence that women and minority ethnic groups are over-represented amongst FE staff employed on casual contracts.
63. The issue of flexible learning pathways raises fundamental questions for equality of opportunity. It would be wholly unacceptable for alternative pathways to be seen by learners and the wider society as inferior in quality, resourcing or support. Previous experience has highlighted the danger that certain groups (e.g. disabled or black students) have become over-represented in alternative provisions and that these provisions deliver fewer long-term employment opportunities. The 14-19 policy changes are likely to have major social inclusion and social justice implications which need to be explored fully. Moreover, any new flexible learning arrangements would need to have in place clear equality monitoring arrangements to track the progress and achievements of learners undertaking all forms of study.
64. Given the Working Group's proposals on greater differentiation and personalised learning, the Association believes that there is a need to consider fully the attendant workload and work/life balance implications, and warns that the current proposals could lead to a worsening of the working hours of schools and college staff, which could undermine efforts to improve recruitment and retention. NASUWT would wish to see any recommendations on 14-19 reform supported by a thoroughly considered set of proposals for staffing and resources.

NASUWT recommends that:

- ***The requirement for the publication of the school and college performance tables should be abolished.***
- ***The workload and work/life balance implications associated with the reform proposals should be subject to detailed scrutiny by the Working Group, and by the Workforce Agreement Monitoring Group and the Implementation Review Unit.***

For further information on the Association's response contact Patrick Roach, Assistant Secretary (Policy and Equality).

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