



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.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

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

Reason for confidentiality:

Name	Pavan Dhaliwal
Organisation (if applicable)	British Humanist Association
Address:	1 Gower Street London WC1E 6HD

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.CONSULTATION@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 type="checkbox"/> Union	<input type="checkbox"/> Employer-Business Sector	<input type="checkbox"/> Governor
<input type="checkbox"/> HT/Teacher	<input type="checkbox"/> Awarding Organisations	X Other

Please Specify: Religion or belief organisation

The British Humanist Association (BHA) is the national charity working on behalf of non-religious people who seek to live ethical and fulfilling lives on the basis of reason and humanity. We promote Humanism, support and represent the non-religious, and promote a secular state and equal treatment in law and policy of everyone, regardless of religion or belief. Founded in 1896, we have around 30,000 members and supporters, and over 70 local and special interest affiliates.

The BHA is an active member of many organisations working in education. We also provide materials and advice to parents, governors, students, teachers and academics. We have made detailed responses to all recent reviews of the school curriculum, and submit memoranda of evidence to parliamentary select committees on a range of education issues.

We have responded to questions 8, 10, 18.a), 18.b) and 28.

Title

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

Agree

Disagree

X Not sure

Comments: We do not have a position on this issue.

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

Agree

Disagree

X Not sure

Comments: We do not have a position on this issue.

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

Comments: We do not have a position on this issue.

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 X Not sure

Comments: We do not have a position on this issue.

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 do not have a position on this issue.

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

X Not Sure

Comments: We do not have a position on this issue.

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

Yes

No

X Not Sure

Comments: We do not have a position on this issue.

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

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

All

English

mathematics

sciences

history

geography

languages

None

Comments: We do not have a position on this issue.

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: We do not have a position on this issue.

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

X Other

Comments: We do not have a position on this issue. However, we do believe that it is important that young people receive strong education in the following areas:

- Personal, Social, Health and Economic (PSHE) education, including Sex and Relationships Education (SRE). We believe that this subject should be added to the national curriculum, as all young people have an entitlement to full and comprehensive education in a subject that is vital to helping them make informed and healthy decisions.
- Citizenship education. It is hugely important that young people understand the role and function of the state and their relationship with it, as well as their place in society as a whole. Strong citizenship education seeks to achieve this.
- Education about religions and beliefs. It is vital that young people learn about the variety of deeply held religious and non-religious beliefs commonly found in Britain today, as only by understanding each other can we learn to love and respect one another. Currently, this education is delivered through Religious Studies, although we would like the subject to be reformed into a wider topic focussed

around morals and ethics, which tackles larger philosophical questions as well as focussing on specific religious and non-religious beliefs.

- Science education. We believe it is extremely important that young people understand the scientific method, and the importance of science in making progress as a society. We have long campaigned on this issue, and in particular on the importance of teaching evolution while not presenting creationism as scientifically valid.

Currently, these four subjects find themselves in different situations:

- Very little PSHE is required to be taught, with a tiny amount of SRE on a statutory footing for maintained schools, and an even smaller amount required by the funding agreements for Academies and Free Schools. Furthermore, there are no examinations in PSHE or SRE, and so it is unclear what impact these proposed changes might have on the amount of time given to this subject.
- Citizenship does form part of the national curriculum, although we note that the expert panel reviewing the national curriculum recommended it be removed. Similarly to PSHE, there are no examinations in this subject, and so again it is unclear what impact these proposed changes might have on the amount of time given to its teaching.
- Religious education is statutorily required to be taught, but there is no national curriculum. Community, voluntary controlled and foundation schools follow locally agreed syllabuses set by an Agreed Syllabus Conference, while other religious schools can set syllabuses in accordance with the tenets of the faith of the school. RE is commonly examined, but the nature of the examinations vary widely depending upon the type of the school (for example, we do not support the continuing existence of confessional RE examinations). In addition, RE falls outside of the EBC subjects, so may have less time given to it after these reforms.
- Science education is on the national curriculum and is an EBC subject. Therefore, it may end up with more time given to it after these reforms.

We would be concerned if the changes being proposed result in insufficient time given to these four important subjects. As things stand, we think that more time needs to be given to PSHE and citizenship education; the nature of religious education needs reforming; while science needs its current position maintained.

Therefore, while we could not categorically respond that GCSE and EBC subjects get the same curriculum time (not least because PSHE and citizenship are neither), we might have concerns if EBC subjects are given greater curriculum emphasis and this causes PSHE, citizenship and RE to lose out.

Examination aids

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

Comments: We do not have a position on this issue.

Subject suites

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

Yes

No

Not Sure

Comments: We would like to reiterate the conclusions of our answer to question 8, above: We would be concerned if the changes being proposed result in worse teaching or insufficient time given to PSHE, citizenship or RE/RS. As things stand, we think that more time needs to be given to PSHE and citizenship education; the nature of religious education needs reforming.

With regards to Religious Studies in particular, we are aware that there has been a large campaign to add the subject to the English Baccalaureate performance certificate (the RE:Act campaign). Presumably this campaign will similarly think RS should be included within the proposed suite.

Our response to this remains the same as it was to the Education Select Committee Inquiry into the English Baccalaureate, where we concluded:

While we champion the importance of good quality education about religious and nonreligious beliefs and values in all schools, we note that, in its present form, RE is unfit for purpose in many schools. Arguments made in support of its inclusion in the EBacc are weakened by its patchy quality across schools, its restrictive nature at GCSE, and the ability of many schools with a religious character to

prescribe confessional syllabuses.

We share the belief of colleagues in the field that the omission of RS from the EBacc may cause schools to shift focus from the subject and have a negative impact on the quality of RE being taught at KS3. However, given the patchy quality of RE currently, putting RS on the EBacc without reviewing its place in the wider curriculum and the statutory provisions underpinning it, would be a missed opportunity.¹

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

Yes

No

Not Sure

Comments: We do not have a position on this issue.

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?

¹ BHA Submission to the Education Select Committee Inquiry into the English Baccalaureate, 10 March 2011: <http://humanism.org.uk/wp-content/uploads/bha-position-on-re-on-the-english-baccalaureate.pdf>

Comments: We do not have a position on this issue.

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

X Not sure

Comments: We do not have a position on this issue.

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: We do not have a position on this issue.

14 b) Prevented from offering?

Comments: We do not have a position on this issue.

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

Comments: We do not have a position on this issue.

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: We do not have a position on this issue.

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

Comments: We do not have a position on this issue.

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?

Adverse impact

Positive impact

Both

No impact

Comments: We think more consideration needs to be given to the impact in terms of religion or belief, particularly within the context of what is taught about Religious Studies.

As we said in response to Ofqual's consultation on A Level Reform:

Religious Education must aim for all young people to learn about and explore different religions or beliefs from an objective perspective and in a planned and coherent way. In the process, it should equip them with the attitudes, knowledge and skills to assess matters of religion or belief and ask the big questions.

We are concerned that currently, many Religious Studies and Philosophy syllabuses are not inclusive of non-religious beliefs such as humanism. Being inclusive of non-religious approaches is particularly important, with surveys consistently showing that a high proportion of young people are not religious. For example, the 2003 Citizenship Survey found 46% of 11-15 year olds not having a religion (44% were Christian);² while a 2004 Department for Education report found 65% of 12-19 year olds are not religious.³ It is vital that RE is as relevant to these pupils as it is to religious pupils, and this means that it must be as inclusive of non-religious beliefs as of religious ones.

Given these facts, and being mindful of the need to promote equality and non-discrimination in this area, we also think that it is important that in qualifications that relate to matters of an equality strand (such as Religious Studies), exam boards should work with groups from across the equality strand, and for the religion or belief equality strand, this clearly must include non-religious groups such as humanists.

While RS is (currently) excluded from the EBC, it nonetheless seems to the BHA that the Government should begin to consider these factors at the stage when the system is first set up.

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

² Christine Farmer, '2003 Home Office Citizenship Survey: Top-level findings from the Children's and Young People's Survey' (Home Office and Department for Education and Skills, 2005), p. 37:

<http://www.communities.gov.uk/documents/communities/pdf/452490.pdf>

³ Alison Park, Miranda Phillips and Mark Johnson, 'Young People in Britain: The Attitudes and Experiences of 12 to 19 Year Olds' (Department for Education and Skills, 2004), pp. 10-11:

<https://www.education.gov.uk/publications/eOrderingDownload/RR564.pdf.pdf>

Comments: To reiterate, we think that in qualifications that relate to matters of an equality strand (such as Religious Studies), exam boards should be required to work with groups from across the equality strand, and for the religion or belief equality strand, this clearly must include non-religious groups such as humanists.

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: We do not have a position on this issue.

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

Comments: We do not have a position on this issue.

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: We do not have a position on this issue.

Languages

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

Yes

No

X Not Sure

Comments: We do not have a position on this issue.

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

Yes

No

X Not Sure

Comments: We do not have a position on this issue.

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 Bacculaureate Certificates?

Yes

No

X Not Sure

Comments: We do not have a position on this issue.

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

X Not Sure

Comments: We do not have a position on this issue.

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

Comments: We do not have a position on this issue.

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

X Not sure

Comments: We do not have a position on this issue.

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: Further clarity would be welcome as to the Government's position on non-EBC examined subjects, and subjects which are not examined at all.

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?

X 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.CONSULTATION@education.gsi.gov.uk