



Department
for Education

Consultation Response Form

Consultation closing date: 20 August 2013
Your comments must reach us by that date

Reformed GCSE subject content consultation

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

Publication

Information you provide in your response to this consultation may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000.

Confidentiality

Please make it clear if you want all/any part of your response to be treated as confidential and explain why. If a request for disclosure of the information you have provided is received by DfE, your explanation 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.

Please tick if you want us to keep your response confidential.	
Reason for confidentiality:	

Personal data

For the purposes of the Data Protection Act, DfE is the data controller for any personal data you supply in response to this consultation. DfE will process all personal data (such as your name, address and any other identifying information) in accordance with the Data Protection Act 1998. In most circumstances, this means that your personal data will not be disclosed to third parties.

Please do **not**:

- provide information in comments boxes that might identify you unless you are content for that information to be released into the public domain; or
- provide information in your response that might lead to the identification of other living individuals

Name: Pavan Dhaliwal	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): British Humanist Association	
Address: 39 Moreland Street London EC1V 8BB	

Information sharing

The Office of Qualifications and Examinations Regulation (Ofqual) is undertaking a parallel consultation on regulatory conditions for GCSEs. Please tell us if you or your organisation has responded or is intending to respond, to Ofqual's consultation:

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
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Please only respond to the next statement if you have ticked 'no' or 'don't know' above:

If you provide comments to us that are relevant to Ofqual's consultation, we intend to forward your responses to them so they can be considered by Ofqual. If you do not want us to do this then please opt-out by ticking the box below:

I do <u>not</u> want DfE to forward my response to this consultation to Ofqual	<input type="checkbox"/>
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Please mark the box that best describes you as a respondent.

<input type="checkbox"/> Academy and/or Free School	<input type="checkbox"/> Comprehensive School	<input type="checkbox"/> State Selective School
<input type="checkbox"/> Independent School	<input type="checkbox"/> Special School	<input type="checkbox"/> Sixth Form Only
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Organisations representing teachers	<input type="checkbox"/> Parent
<input type="checkbox"/> Young Person	<input type="checkbox"/> Higher Education	<input type="checkbox"/> Further Education

Local Authority

Teacher

Governor

Employer/Business
sectorAwarding
Organisation

Please Specify: Religion or belief organisation.

The British Humanist Association 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. Our policies are informed with the support of over 120 of the UK's most prominent philosophers, scientists, and other thinkers and experts and we seek to advance them with the help of over 100 parliamentarians in membership of the All Party Parliamentary Humanist Group. Our trained and accredited celebrants conduct funerals and other non-religious ceremonies attended by over 500,000 people each year.

The BHA has a long history of work in education, children's rights and equality, with expertise in the 'religion or belief' strand. We provide materials and advice to parents, governors, students, teachers and academics. We also work closely with others on wider equalities issues in a range of forums. The BHA is a member of the National Children's Bureau Sex Education Forum (SEF), the Children's Rights Alliance for England and the Religious Education Council for England and Wales.

Our recommendations

We have responded to questions 3a and 3d – i.e. those to do with science. Our comments include:

- **Science – sex education:** We are concerned that some aspects of sex education science (e.g. hormones and STIs) have been moved from key stage 3 to 4, while others (e.g. some areas of sexual health) have been removed entirely. We are also concerned that non-hormonal contraceptives may not be taught about.
- **Science – scientific method:** We think the 'Working scientifically' sections should be integrated throughout the programme of study. We are also concerned that some concepts are absent, such as the nature of evidence, whether evidence is reliable and why it might not be, causation and correlation, and blinding and randomising trials.

Previous consultation responses: We previously responded to the national

curriculum review's call for evidence in April 2011,¹ the draft primary national curriculum for science in August 2012,² the draft programmes of study in April 2013,³ and the programmes of study and attainment targets in August 2013.⁴

BHA policy on education

We are interested in education for three reasons:

- we aim for the UK to be secular state with no privilege or discrimination on grounds of religion or belief. The continuing religious discrimination in our state school system is therefore a concern for us
- we aim for Humanism to be better understood as an ethical and fulfilling non-religious approach to life and so we have an interest in ensuring that it features on the school curriculum on equal terms with religions
- humanists see education as a vital process and have been rich contributors to both the philosophy and practice of education

We have an interest in promoting better education that will meet these aspirations because we promote humanist perspectives in public debate and policy.

We concentrate on laws and policies that we believe are discriminatory and violate principles of human rights or equality in state-funded schools or on matters where we have a distinctive humanist view. For example we work for progressive reform of the school curriculum and inclusive assemblies in place of mandatory religious worship.

One of our aims is to promote a humanist perspective on public policy issues. Many humanists have had a profound interest in education and so the school curriculum has naturally been a focus for us. In practice, we concentrate on aspects of the curriculum where the humanist voice is excluded or weak or where others are actively promoting policies at odds with our principles.

If you have an enquiry which is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public

¹ *National Curriculum Review - Call for Evidence: Submission from the British Humanist Association (BHA)*, April 2011: <http://humanism.org.uk/wp-content/uploads/1bha-response-curriculum-review.pdf>

² *Draft National Curriculum for science Key Stages 1-2: Response from the British Humanist Association (BHA)*, 15 August 2012: <http://humanism.org.uk/wp-content/uploads/draft-national-curriculum-for-science-key-stages-1-2-response-from-the-bha.pdf>

³ *Reform of the National Curriculum in England: Consultation Response Form from the British Humanist Association*, 16 April 2013: <http://humanism.org.uk/wp-content/uploads/Reform-of-the-National-Curriculum-in-England-British-Humanist-Association-response.pdf>

⁴ *National curriculum review: new programmes of study and attainment targets from September 2014: Response Form from the British Humanist Association*, 8 August 2013: <https://humanism.org.uk/wp-content/uploads/National-curriculum-review-new-programmes-of-study-and-attainment-targets-from-September-2014-response-from-the-British-Humanist-Association.pdf>

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

Questions 1-6 below ask you to give your views with reference to a specific subject suite:

1. *English,*
2. *Mathematics*
3. *Sciences*
4. *Geography*
5. *History*
6. *Modern and ancient languages.*

You do not need to give answers for all the subject suites - please answer only with respect to those subjects on which you have a particular view.

Please ensure that you answer questions 7-11 as well – we would like responses from everyone on those.

1. English, including English language and English literature

1a Do **the proposed subject content and assessment objectives** for English, which includes English language and English literature, cover the appropriate knowledge and understanding for GCSEs in these subjects?

<input type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Comments:

1b Is **the relative weighting of the assessment objectives** right for English, which includes English literature and English language?

Yes

No

Not Sure

Comments:

1c Has the **right practical content** for English language been identified to allow students to gain the skills to progress in the subject, beyond the content which can be examined externally and reliably included in the GCSE grade?

Yes

No

Not Sure

Comments:

1d Do the proposed subject content and assessment objectives for English, which includes English literature and English language, **provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?**

Yes No Not Sure

Comments:

1e Will the proposed qualifications in English, which includes English language and English literature, **secure sound progression for the purposes of further academic and vocational study?**

Yes No Not Sure

Comments:

2. Mathematics

2a Do **the proposed subject content and assessment objectives** for mathematics cover the appropriate knowledge and understanding for GCSEs in this subject?

<input type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Comments:

2b Is **the relative weighting of the assessment objectives** right for mathematics?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

2c Has the right content for mathematics been identified for high achievers, **including those going on to study A levels** in science, technology, engineering and/or mathematics (STEM)?

Yes

No

Not Sure

Comments:

2d Do the proposed subject content and assessment objectives for mathematics provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?**

Yes

No

Not Sure

Comments:

2e Will the proposed qualifications in mathematics secure **sound progression for the purposes of further academic and vocational study?**

Yes

No

Not Sure

Comments:

3. Science, including biology, chemistry, physics and combined science

3a Do **the proposed subject content and assessment objectives** for science, which includes biology, chemistry, physics and combined science, cover the appropriate knowledge and understanding for GCSEs in these subjects?

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No -insufficiently demanding	<input type="checkbox"/>	No- overly demanding
<input type="checkbox"/>	Not Sure				

Comments: Our interest in the science curriculum is focused on three areas, namely the scientific method, sex education and evolution. We have no particular comments on the third of those areas, which seems to us to be sufficiently comprehensive (indeed significantly more so than the current consultation, which is to be commended), and instead focus our response on the first two.

Sex education

As we said in our previous consultation response:

'We believe that all children of all backgrounds are entitled to full, accurate and age-appropriate sex education, which should equip them with the knowledge and skills they need to prepare them for puberty, make informed decisions about relationships and to effectively safeguard children from sexual exploitation. At a primary age, this means educating younger children about different external body parts and what constitutes inappropriate touching on the part of adults. Older primary children should begin to learn about puberty and the basics of sexual reproduction. Reproduction should be covered in more depth in secondary schools and be joined by teaching about STIs, HIV and AIDS.

'This material should also be covered in sex and relationships education (SRE). However, the outcome of the PSHE Review has been that no changes will be made to the statutory situation with regards to PSHE or SRE. So as a consequence, while secondary schools must teach about STIs, HIV and AIDS, there is no requirement to teach anything else outside of whatever is in national curriculum science. In particular, primary schools do not have to provide any SRE at all. Furthermore, parents can legally opt out their children from any education which is provided, denying pupils this vital knowledge where it is taught. As a result, SRE cannot be relied upon to provide the knowledge that children need and are entitled to in this area, and so there must be strong coverage as part of the science curriculum.'

The reason we think the above aspects of sex education should be included in science is because the evidence shows that teaching around sexual health and contraception is particularly important as this reduces sexually transmitted diseases and unwanted pregnancies.⁵

While we are pleased that topics such as hormones, contraception and sexually transmitted infections including HIV/AIDS are included in the national curriculum, we regret the fact that they are in Key Stage 4 have been moved from an earlier placement in Key Stage 3 in the current curriculum. It is vital that education related to sex and relationships is delivered in a timely manner, i.e. slightly prior to young people needing access to the information they are being taught about. It seems that this move is letting down young people on this front.

We are also concerned that the reference to contraception is within a section called '*Hormones in human reproduction*'. This may lead some schools to not teach about methods of contraception which are non-hormonal. This would be a regression from what is currently taught.

In addition, Key Stage 3 of the current curriculum says that 'The curriculum should provide opportunities for pupils to: ... consider how knowledge and understanding of science informs personal and collective decisions, including those on substance abuse and sexual health. **Sexual health:** This includes issues related to contraception, pregnancy and sexually transmitted infections (see explanatory note for diet, drugs and disease in the 'Range and content' section).'

There are no mentions of sexual health or pregnancy anywhere in the national curriculum. While there are specific mentions of STIs and contraception in key stage 4, sexual health encompasses other topics such as pregnancy, abortion, and freedom to choose if and when to have sex and to reproduce. We are concerned that these considerations will be omitted from the school curriculum.

The scientific method

As we responded to the previous consultation:

'We believe that it is vital that young people not only learn scientific facts and theories, but understand what the scientific method is, why it works and the positive impact it has had on human society. It is only by understanding science as a process that people will be able to understand how science reaches the conclusions it reaches, and appreciate the veracity of those conclusions as well as their provisional nature.'

The 'Working scientifically' section seeks to fulfil this purpose. We would like to see

⁵ See, for example, *Does sex and relationships education work? A Sex Education Forum evidence briefing*: http://www.ncb.org.uk/media/494585/sef_doessrework_2010.pdf

this section integrated throughout the programme of study in order to emphasise to teachers the importance of considering the scientific method in their work.

We are concerned that there are some concepts which should be part of this section but which are absent. For instance, there is no mention of the nature of evidence, of whether evidence is reliable and why it might not be, or of causation and correlation – particularly as they relate to medical trials and common logical fallacies that arise when people analyse these trials. There is also no mention of blinding or randomising trials.

These topics are not too advanced for Key Stage 4 (or even younger for that matter) and should be something that every young person learns about, as they are important in helping members of the public, as consumers, assess evidence in day to day life.

3b Is **the relative weighting of the assessment objectives** right for sciences, which includes biology, chemistry, physics and combined science?

Yes

No

Not Sure

Comments:

3c Has the right **practical content** for science been identified to allow students to gain the skills to progress in the subject?

Yes

No

Not Sure

Comments:

3d Do the proposed subject content and assessment objectives for sciences, which includes biology, chemistry, physics and combined science, provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?**

Yes

No

Not Sure

Comments: As per our response to 3a, topics such as hormones, contraception and sexually transmitted infections including HIV/AIDS should not be moved from key stages 3 to 4.

3e Will the proposed qualifications in sciences, which includes biology, chemistry, physics and combined science, secure **sound progression for the purposes of further academic and vocational study?**

Yes

No

Not Sure

Comments:

3f **Will the combined science double award provide students with a sufficiently secure basis for progression** to A level study of each of biology, chemistry and physics?

Yes

No

Not Sure

Comments:

4. Geography

4a Do **the proposed subject content and assessment objectives** for geography cover the appropriate knowledge and understanding for GCSEs in this subject?

<input type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Comments:

4b Is **the relative weighting of the assessment objectives** right for geography?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

4c We are working on options to ensure that fieldwork takes place. One option might be a letter, submitted to AOs and signed by the head teacher and head of geography, which states that fieldwork has taken place beyond the classroom and school grounds. Do you think this would be **an effective measure to demonstrate that fieldwork has taken place beyond the classroom and school grounds?**

Yes

No

Not Sure

Do you have any other suggestions to verify that fieldwork has taken place beyond the classroom and school grounds?

4d Do the proposed subject content and assessment objectives for geography provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?**

Yes

No

Not Sure

Comments:

4e Will the proposed qualifications in geography secure **sound progression for the purposes of further academic and vocational study?**

Yes

No

Not Sure

Comments:

5. History

5a Do **the proposed subject content and assessment objectives** for history cover the appropriate knowledge and understanding for GCSEs in this subject?

<input type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

5b Is the **relative weighting of the assessment objectives** right for history?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

5c Should students be encouraged, as part of their GCSE history studies, to undertake **a historical investigation that gives them the opportunity to conduct independent research into a historical issue, event or process of their choosing resulting in an extended essay?**

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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If so, how can this be achieved best?

5d Do the proposed subject content and assessment objectives for history provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?**

Yes

No

Not Sure

Comments:

5e Will the proposed qualifications in history secure **sound progression for the purposes of further academic and vocational study**, including encouragement of the ability to conduct independent study in the subject?

Yes

No

Not Sure

Comments:

6. Modern and ancient languages

6a Do **the proposed subject content and assessment objectives** for modern and ancient languages cover the appropriate knowledge and understanding for GCSEs in these subjects?

<input type="checkbox"/> Yes	<input type="checkbox"/> No -insufficiently demanding	<input type="checkbox"/> No- overly demanding
<input type="checkbox"/> Not Sure		

Comments:

6b Is **the relative weighting of the assessment objectives** right for modern and ancient languages?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

6c Do the proposed subject content and assessment objectives for modern and ancient languages provide **assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?**

Yes

No

Not Sure

Comments:

6d Will the proposed qualifications in modern and ancient languages secure **sound progression for the purposes of further academic and vocational study?**

Yes

No

Not Sure

Comments:

Please answer all the remaining questions, which include questions on literacy, numeracy and impact on specific groups of students.

7 Does the English language content cover the **key elements of literacy needed for employment or further study?**

Yes

No

Not Sure

Comments:

8 Does the mathematics content cover **the key elements of numeracy needed for employment or further study?**

Yes

No

Not Sure

Comments:

9 Do any of the proposals have potential to have a **disproportionate impact, positive or negative, on specific pupil groups**, in particular the 'protected characteristic' groups? (The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation); if they have potential for an adverse impact, how can we reduce this?

Yes - Positive impact

Yes - Negative impact

No

Not Sure

10 Have you any further comments?

Comments:

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

Comments:

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.	
E-mail address for acknowledgement:	

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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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 on-line or 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 responses should be sent to the address shown below by 20 August 2013

Send by post to:
Qualification and Assessment Division
Department for Education
L2
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: GCSEcontent.consultation@education.gsi.gov.uk