



Department
for Education

Consultation Response Form

Consultation closing date: 29 January 2016

Your comments must reach us by that date

**Consultation on Implementing the English
Baccalaureate: Response from National
Association of Head Teachers (NAHT)**

Comments:

NAHT represents more than 29,000 school leaders in early years, primary, secondary and special schools, making us the largest association for school leaders in the UK. We represent, advise and train school leaders in England, Wales and Northern Ireland. We use our voice at the highest levels of government to influence policy for the benefit of leaders and learners everywhere. Our new section, NAHT Edge, supports, develops and represents middle leaders in schools. This puts us in an excellent position to provide a response to this consultation.

Pupils in scope

1 What factors do you consider should be taken into account in making decisions about which pupils should not be entered for the EBacc?

Comments:

NAHT believes a core academic curriculum is appropriate for almost all pupils but that the EBacc is not the right tool for ensuring this. It does not permit sufficient flexibility around the core to meet the aspirations and aptitudes of every student (independent of background) and it adopts too narrow a definition of rigorous academic study. The Progress 8 measure offers a much better balance.

It is true that some of the highest performing countries in the world recognise the importance of an academic core to the age of 16, however, this needs to be considered within the context of the education system of those countries and not in isolation. For example, in Finland teacher assessment is used throughout compulsory schooling until the one national exam at the end of secondary education; a completely different context to our own system. Although Finnish pupils are expected to continue to study subjects equivalent to the proposed English Baccalaureate to age 16, their basic compulsory curriculum is much wider than this and includes health, religion, music, visual arts and crafts. This compulsory curriculum for all pupils is broad, balanced and can meet the needs of pupils. It is very different to the narrow and limited curriculum of the proposed English Baccalaureate.

A focus for real concern is that at a national level, as the percentage of pupils in state-

funded schools entering the EBacc grows, the percentage achieving it falls. Currently this gap between entry and achievement is approximately 15% and it is likely to widen further as participation increases. The disparity between the numbers of pupils entering the EBacc and the numbers actually achieving it is the clearest evidence that the EBacc is not the right curriculum for the proposed 90% of the cohort. There are examples given in the consultation paper of schools who have secured high participation rates but their success rate does not match it. Although 91% of Year 11 pupils at Whitmore High School entered the EBacc in 2014, only 43% achieved it. At Denbigh High School, 75% were entered, but only 34% achieved it, the same proportion who achieved it at Ark St Albans Academy, where 89% of the cohort were entered. At Platanos College, an EBacc entry of 84% resulted in only 28% of pupils achieving it. Entering the vast majority of pupils for a limited suite of subjects in which a minority of them will achieve success is the very opposite of equality of opportunity and social justice for all pupils.

NAHT questions whether those subjects currently identified as part of the EBacc are the only subjects which are academic, rigorous and demanding, particularly in light of the extensive reform of both general and vocational qualifications at Key Stage 4. Creative and cultural subjects can be just as academic and challenging. The inclusion of only history and geography implies that these subjects are more academic than Religious Studies or Sociology, for example, which is not the case. This rigid and prescriptive set of GCSEs which currently form the EBacc is limiting and unrealistic.

NAHT supports our members to put the interests of their pupils first. It is right that schools should be able to personalise the curriculum and determine which pupils take the whole EBacc and for whom it would be inappropriate. This decision should be made in conjunction with the pupils and parents and the aim should be to make the best decision for each pupil. It is right that every student should have the opportunity to take the full suite of EBacc subjects if they want to, but not that every student should be forced to.

The Progress 8 measure offers a much better balance for pupils. It maintains the importance of English and Maths and would ensure all that, in addition, pupils took three EBacc subjects to give a clear academic core. There is then the benefit of the third basket which allows for further EBacc subjects or high quality non-EBacc or vocational courses. This enables schools to maintain a broad curriculum offer and pupils and parents to exercise some freedom to choose what is right for them within clear parameters which define approved qualifications.

Accountability for meeting the EBacc commitment

2 Is there any other information that should be made available about schools' performance in the EBacc?

Comments:

NAHT questions why it is necessary to introduce further accountability measures using EBacc. This fails to recognise the new Progress 8 measure which has been largely supported as allowing some discretion and flexibility for pupils, parents and teachers whilst clearly encouraging the take up of EBacc subjects. Furthermore, the proposed accountability measures for EBacc are all attainment based and so do not reflect the move towards progress based measures which are more meaningful.

NAHT agree that Progress 8 reflects the government's commitment to pupils studying a core of academic subjects as part of a broad and balanced curriculum. It does not require pupils to take the full EBacc and NAHT support this position as it is much more likely to enable individual pupils to achieve success.

With the suggested information to be made available about schools' performance in the EBacc, there is a danger that figures are taken at face value with no understanding of broader issues or context. For example, it would be wrong to hold a school to account for EBacc performance measures if the reason for low entry or achievement is a lack of high quality specialist staff.

3 How should this policy apply to UTCs, studio schools and further education colleges teaching key stage 4 pupils?

Comments:

The implementation of the EBacc for at least 90% of pupils in mainstream secondary schools may create a higher need for places at UTC's, studio schools and further education colleges. If, as seems likely, the impact of EBacc implementation is a narrowed curriculum offer at key stage 4 in mainstream secondary schools, pupils, supported by their parents, may decide the EBacc is not the right choice for them and seek an alternative. There is a risk that a two tier system will be created with pupils at age 14 making decisions about an academic or professional and technical route to their studies.

UTC's, studio schools and further education colleges, seek to meet the needs of their pupils through specialist technical, professional or vocational education. It is recognised in the government's proposals that pupils will generally study a reduced academic curriculum within these institutions and many are unlikely to enter the full suite of EBacc GCSE's. NAHT suggests that EBacc data is not published for these providers; it will have little validity and thus reporting on it as a performance measure

would not be meaningful.

When considering accountability arrangements for special schools and alternative provision settings, the proposal is to publish data on the numbers of pupils entering and achieving the EBacc, whilst accepting that the EBacc would not be accessible or appropriate for many of these pupils. With this being the case, NAHT would question the need to publish this data at all. It will have little validity or use. It would not be possible to utilise this data to compare with other similar provision due to the unique cohorts of pupils each of these educational establishments works with. For this reason, it would also not be possible to use this data as a measure of success over time.

Implementation

4 What challenges have schools experienced in teacher recruitment to EBacc subjects?

Comments:

NAHT members are reporting increasing difficulties in recruiting teachers in all subjects. Our 2015 recruitment survey is the most up to date and comprehensive view of school recruitment.

The survey found that 79% of those who had advertised vacancies said recruitment was a problem and had either struggled to recruit or not been able to recruit at all. Of those who had a shortage of subject specialists, the top four shortage subjects were Maths (37.21%), SEN (7.41%), English (23.92%) and General Science (15.28%)

The main reasons given as to why schools are struggling to recruit are the overall shortage of applicants (in 52% of cases) and the suitability of staff applying for vacancies (47%). This year, respondents reported a growing problem of teachers leaving the profession in their area. This figure more than doubled over the last year, being cited by 33% of respondents, up from 15% in 2014.

The growing struggle to recruit means that nearly half of schools now use recruitment agencies to recruit to their permanent roles and 69% of those said that they do so as they have failed to recruit previously. This is adding to schools' recruitment costs which average £3,000 per vacancy but can run up to £10,000. The use of temporary staff also has an impact on quality of teaching and learning as well as relationships in the

classroom.

The issue of recruitment of teaching staff clearly has an impact on EBacc subjects. If schools are unable to recruit specialist teaching staff, there may then be an EBacc strand which cannot be offered to all pupils, meaning EBacc entry rates will be low. If schools are able to recruit, or find a temporary solution with supply or non-specialist staff, some of these teachers may not provide the high quality teaching and learning experience for pupils which schools would seek to provide. This will then impact on EBacc achievement rates.

NAHT question whether the government have conducted detailed research into teacher supply implications for all EBacc subjects based on a 90% take up. This would add clarity to the potential recruitment issues which will arise.

5 What strategies have schools found useful in attracting and retaining staff in these subjects?

Comments:

The data from the NAHT 2015 recruitment survey was compared between academies and maintained schools. It was found that despite the greater flexibilities that academies have in terms of offering alternative pay and conditions, they struggle just as much as maintained schools to recruit.

The main reasons given as to why schools have struggled to recruit are the overall shortage of applicants (in 52% of cases) and the suitability of staff applying for vacancies (47%). There are many reasons why there may be a shortage of applicants for a post and in many cases a school can do very little to attract more. If applicants are not suitable for the post, it would be wrong for a school to appoint them.

Increased pay could attract more candidates, however, in this financial climate, schools cannot afford to offer higher salaries to attract or retain high quality teachers of EBacc subjects. The NAHT 'Breaking Point' survey of school finances released in November 2015 showed that nearly two thirds of school leaders (64 per cent) are making 'significant' cuts or dipping into reserves to stave off deficits. School leaders are being forced to cut spending in all areas, including essential maintenance (50 per cent) and on teachers and teaching assistants (49 per cent).

A period of stability would be a significant step towards addressing the retention problem. The stability at Primary level has contributed to improved results and less acute teacher supply issues. It would be sensible to mirror this in secondary, particularly as investment is static and pupil numbers are increasing.

6 What approaches do schools intend to take to manage challenges relating to the teaching of EBacc subjects?

Comments:

NAHT members will face the challenges of delivering the EBacc in their schools in spite of financial constraints and the risk of a narrowed curriculum. Head teachers will face difficult choices including finding a balance between their pupils' needs and success and that of EBacc accountability measures.

7 Other than teacher recruitment, what other issues will schools need to consider when planning for increasing the number of pupils taking the EBacc?

Comments:

The decline in available curriculum time for optional subjects and the exclusion of creative and cultural subjects from the EBacc will lead to a significant reduction in pupils taking these subjects. In order to refute this argument, data provided on the statistical release shows that in 2014/15 49.6% of pupils at the end of Key Stage 4 in state-funded schools were entered for at least one GCSE entry in Arts subjects. However, only 38.6% of pupils in this cohort were entered for the full EBacc, thus the curriculum time and choice elements were retained in a large proportion of schools allowing many pupils to take an Arts subject.

With the lack of curriculum time and choice available, it is inevitable that pupil numbers in certain subjects will decline. At a school level, a decline in numbers choosing an option will mean that non-EBacc courses may no longer be viable to run and these will disappear from the curriculum offer at key stage 4. With reducing numbers of specialist staff required to teach a subject at key stage 4, this will then have an impact on the ability to maintain a subject at key stage 5. For some subjects, a lack of grounding in a subject at key stage 4 would preclude pupils from being able to tackle a subject at this higher level. So not only will EBacc have the effect of narrowing the curriculum at key stage 4, but potentially will do the same at key stage 5 too.

There is a significant concern that a high proportion of pupils will fail to achieve the standard required for the EBacc. Not only will this “failure” have an impact on pupils confidence, self- esteem and attitudes to learning, these pupils are then expected to stay in full time education or training with a lack of suitable provision to meet their needs. Potentially, an increasing number of pupils would need a “rescue package” in Year 12, in order to then access a further education or training.

8 What additional central strategies would schools like to see in place for recruiting and training teachers in EBacc subjects?

Comments:

There is a significant difference between official statistics and the perceptions of those in schools. Recruitment difficulties are masked in the official data by the timing of information gathering and interim solutions put in place to keep schools operational. Headline figures also mask local, regional and subject variations. The DfE needs to work with key partners to develop more nuanced approaches to measuring recruitment.

Across all roles, the NAHT survey showed a growing problem with the recruitment of teachers and school leaders, and increasing numbers of cases where schools were unable to recruit at all. Overall a very high proportion (79%) of those who had advertised vacancies said recruitment was problematical; 59% recruited with a struggle and 20% were not able to recruit at all

The main reasons given why schools struggle to recruit are the overall shortage of staff (in 52% of cases) and the suitability of staff applying for vacancies (47%). Maths, English, SEN and General Science were the subjects where members struggled the most to recruit.

We also asked our members about the quality of NQTs and there was some concern about their preparedness, with 55% highlighting inadequate subject knowledge as a key issue. This is clearly a concern regarding preparation for secondary teaching. There is greater concern when considering the DfE’s own workforce statistics that show growing numbers of teachers teaching EBacc subjects without a relevant post A level qualification in that subject. For example 24.2% of maths teachers and 36.5% of physics teachers do not have such a qualification.

In terms of attracting teachers to the profession, our submission to the School Teacher Review Body’s review of teacher’s pay and conditions on the 27th of November 2015 has highlighted how the erosion of teachers’ pay since 2010 means that it is falling behind relative to other graduate professions. This is at a time when the private sector is starting to recover and be in a position to recruit more graduates and schools are increasingly struggling to recruit and retain teachers. NAHT are clear that without a review of teaching pay scales making them comparable to other professions, the profession will increasingly struggle to recruit and retain good graduates.

This is particularly an issue in recruiting teachers to teach STEM subjects. Applicants to initial teacher training are increasingly required to hold a class 2.1 or above degree, yet STEM graduates with that level of qualifications can enter other professions that offer far greater salary potential and a lesser workload than the teaching profession.

The language of criticism and failure deployed by successive governments is a serious deterrent to recruitment and retention of all teachers, including those of EBacc subjects. It is possible to be both proud of past achievements and ambitious for more and the government needs to develop a more productive way of engaging with the profession in order to secure improvement.

As well as concern about the number of teachers, our research has shown that schools are struggling to recruit teachers with the right kind of skills. The growing and changing demands on teachers and an increasingly challenging accountability framework for schools sets high expectations. There needs to be more investment in the professional development of teachers, both at a school, a national and a regional level. NAHT supports the work of the DfE appointed expert group, who are developing a standard for professional development, as a first step to support schools in both arranging and accessing more effective CPD.

Finally there needs to be ongoing funding to support teaching school alliances to deliver low cost CPD, mentoring and coaching by experienced practitioners. As the core funding for the first set of teaching alliances is starting to run out, increased funding, will enable teaching alliances to realise their potential to improve the skills and knowledge of teachers.

9 Do you think that any of the proposals have the potential to have an impact, positive or negative, on specific students, in particular those with 'relevant protected characteristics'? (The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.) Please provide evidence to support your response.

Comments:

The proposals for implementation of the EBacc have no more significant impact on those pupils with protected characteristics. The potential impact and consequences of the imposition of the EBacc as outlined in response to previous questions, are just as likely to be experienced by those with protected characteristics as those without.

10 How could any adverse impact be reduced to better advance equality of opportunity between persons who share a protected characteristic and those who do not share it? Please provide evidence to support your response.

Comments:

Any adverse impact could equally be suffered by those with or without protected characteristics. The issues with the EBacc, which have been earlier outlined, have the potential to impact on a broad spectrum of students. It is key to address these wider concerns to reduce the negative impact on all, rather than focus only on those with protected characteristics at this stage.