

Educational Institute of Scotland

Submission to Education and Culture Committee's

Review of Public Bodies' Spending and Outcomes - Scottish Qualifications Authority

1. The Educational Institute of Scotland (EIS), Scotland's largest education union, welcomes the opportunity to provide an initial written submission as part of the Committee's review of the spending decisions made and the outcomes delivered by the Scottish Qualifications Authority (SQA).
2. The EIS recognises that the SQA has been a significant partner in the development of Curriculum for Excellence, and in particular the new qualifications for the Senior Phase. SQA has developed, also, courses and certification, such as Skills for Work, which offer opportunities for a wider range of learners to gain qualifications. In addition, it has designed qualifications from National 1 upwards, ensuring that those with additional support needs have recognition within the qualification system and that they have the possibility of coherent pathways for progression. The SQA has made progress, also, in developing qualifications which match the needs of modern society- for example, adaptations to STEM qualifications which are more sharply tailored to meet the skills demand within this context.
3. The EIS also acknowledges the efforts made by the SQA to engage with stakeholders, the EIS included, and formally and informally with teachers. It regularly asks participants in its training events for feedback and meets representatives of the EIS in a number of contexts. Such dialogue has been useful in seeking to address teacher concerns, for example, in streamlining the verification of internal assessment within the new qualifications. The EIS and SQA have collaborated, also, on a number of professional learning initiatives.
4. However, the EIS has been disappointed at the SQA's apparent inability to respond appropriately to other significant elements of feedback from EIS members that has been given in the interests of learning and teaching. Indeed, this has been a matter of deep and ongoing frustration for the EIS and its members.
5. The EIS has endeavoured to convey to the SQA a number of the issues which have hindered the development and implementation of the new qualifications: unmanageable teacher/ lecturer workload and stress resulting from the burden of internal assessment, the late arrival of combined assessment approaches, changes to units and assessments at short notice, the absence of sufficient exemplification and practice papers, less than the promised fully fleshed out course material, poor communication and an inadequacy of professional support. Regrettably, the EIS has found the SQA to have been limited in its response to these issues. This would seem to raise some questions about the capacity and efficacy of the SQA throughout the implementation phase and of its self-evaluation processes overall.

6. In terms of the effect of this upon teachers and lecturers tasked with delivering the new qualifications, there can be no doubting the detrimental impact of SQA related pressures on their health and wellbeing. A survey of EIS members towards the end of the first year of new qualifications drew worrying conclusions: wellbeing and satisfaction with the teaching profession were at an all-time low caused by excessive workload, linked to which was the very large amount of paperwork as well as the number and speed of changes, in particular to the curriculum and assessment. Whilst there were concerns across the whole of the education system, the heightened levels of dissatisfaction in the secondary sector can be attributed to shortcomings in the level of support provided by the SQA for teachers and lecturers, and to the cumbersome nature of assessment design and early verification procedures.
7. Furthermore, the EIS has received considerable anecdotal evidence from its members that the weight of the internal assessment burden has been onerous for both pupils and staff. Too much time in the classroom is spent completing assessments, causing heightened stress for learners as well as a serious diminution of the amount of time available for teaching and learning.
8. Representations to this effect have been made by the EIS on numerous occasions and by parents' groups. Indeed, the EIS is advocating a suspension of verification procedures for the current session, except where there is demonstrated need for support from last year, in order that some of the assessment pressure of staff and pupils might abate, and a space created for looking at the original intention of unit assessment at National 5 and Higher levels.
9. Regarding specific groups of learners, the EIS has given feedback to the SQA on a number of occasions on the revised additional assessment arrangements for candidates with additional support needs. These new arrangements have resulted in the withdrawal of human readers and scribes for candidates whose additional support needs impact on their literacy skills and who are seeking to gain Literacy qualifications at National 4 or below. Instead of human support, as was an option at Standard Grade and continues to be an option for more able candidates within the new qualifications, support by technological means is the substitute provision. The SQA maintains that such a measure has been introduced to the new qualifications to safeguard the integrity of Literacy qualifications and to encourage learner independence. The EIS, however, has highlighted the lack of consistency of approach to assessment arrangements across the suite of English qualifications- candidates who require additional support in literacy at N5 level and above are entitled to the support of human reader/ scribes; those sitting National 4 English and below are not. Effectively, the candidates who are most disadvantaged are the least well supported.
10. Part of the difficulty lies in the fact that although SQA contributes to the partnership approach of Scottish education, its own governance procedures are removed from any meaningful scrutiny on the part of the Education community. Its publicly appointed Board would seem to be largely concerned with governance issues and certainly lacks any input from representative bodies such as teacher professional associations. The same has been true of its advisory body,

although steps are now in train to address this deficit. How the SQA assesses whether it is providing value for money would seem to be a largely internal process, therefore.

11. The EIS would accept that the SQA has sought to be responsive to the needs of learners, educators and employers in relation to the relevance of qualifications. Given its virtual monopoly within the Scotland as an awarding body, it clearly has a market imperative to respond to what is effectively its customer base. The area where the EIS would raise some concern relates to the ability of the SQA to take into account the capacity of schools to assimilate and apply the complex process of changes to qualifications. The SQA has been overly concerned with its own timetable for the implementation of the new qualifications, recognising, perhaps, a certain political imperative around the process, and insufficiently tuned in to the needs of schools and centres.
12. The EIS is unaware of detailed plans on the part of SQA to become self-financing but would be concerned about the possible detrimental impact on publicly funded education providers. As a significant income stream for SQA relates to the fees it charges for presentations, there is a danger that costs to centres, schools and colleges, will increase which will mean education budgets being further squeezed at either local authority or school level. An increase in exam fees could lead to schools and colleges being forced to review presentation policies, for example only putting forward candidates who were likely to get a qualification, rather than risking presentation for those whose chances of success were slim as such candidates' failure could be seen as a poor use of money within the context of reducing school and college budgets. In addition, the SQA currently pays, albeit modestly, a number of teachers and lecturers to undertake tasks such as preparing exam questions and ensuring standards are consistent for internal assessments. Any increase in exam fees arising from the SQA's status as a self-financing body could have an impact on education providers' willingness to release staff to support the work of the SQA as budgets would require to be redressed. A further issue is in relation to presentations for exams. Following the removal of the appeals process, which, it may be argued, was partly motivated by a desire to reduce costs, the recently established post-results service might cost more. Schools and colleges would then have to limit requests even further than at present, causing yet more disadvantage to pupils and students. Yet another concern is around the affordability of important events organised by the SQA such as those focused on understanding standards. In the event of the SQA becoming self-financing, these events may no longer be affordable for all providers as costs would be likely to increase in order to satisfy the demand for income.
13. On the other hand, if fees and charges remained static, an option which would allow the SQA to be self-financing would be for it to reduce its permanent staffing. This would be a matter of concern for the EIS both as a trade union and as a professional association. A number of our members are currently employed by the SQA on both permanent and part-time basis. Therefore, the EIS would be opposed to any development within the SQA which would pose a threat to members' jobs. Additionally, any reduction in staffing would be viewed as being detrimental to schools and colleges which need more rather than less support in the delivery

of new courses and qualifications, particularly looking to Developing Scotland's Young Workforce, for example.

14. The EIS is aware that SQA has developed a number of operations furth of Scotland; indeed when you log on to the SQA website there is an option to choose your country, and it may be that these activities are seen by the SQA as potential income streams for the future. Whilst not opposed to some broadening of activity on the part of the SQA, the EIS would express some caution about over expansion or any future dependence on income from this area, as we believe that Scotland's schools and colleges require the SQA to remain focused on meeting the needs of the qualifications system in Scotland rather than shifting the emphasis of its activities and courting further business internationally. In the event of such, there is a danger that the need to support Scottish education would become a mere afterthought within the SQA's overall business model to the detriment of Scotland's learners and teachers.
15. Overall with regards to a potential move to self-funding status, the EIS view is that the SQA has been slow at times to react to the needs of schools and colleges in terms of supporting the development and delivery of new qualifications. If finance dictates policy within the SQA in the future, the situation in terms of this is likely to deteriorate. To make matters worse any withdrawal of Scottish Government funding could create even less public accountability and the EIS is strongly of the view that the SQA needs to be made more accountable both to the profession and, also, to Scottish education more broadly.
16. Given that the Scottish education is still undergoing significant change and transition, however, a level of stability is required at this crucial point in time in order that existing concerns such as those outlined above can be adequately addressed. Whilst progress can be made on improving accountability, any future restructuring of such a key organisation as the SQA would need to be well-founded.