



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**

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

The government is consulting on proposals to implement the EBacc manifesto commitment. This consultation gives the teaching profession and others with an interest in education the opportunity to help shape policy.

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.

<b>Please tick if you want us to keep your response confidential.</b>	<input type="checkbox"/>
Reason for confidentiality:	

Name: Annette Smith	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Council for Subject Associations	

Address: c/o NSEAD, 3 Masons Wharf, Potley Lane, Corsham, Wiltshire SN13 9FY

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: [consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@education.gsi.gov.uk) or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please insert 'X' into one of the following boxes which best describe you as a respondent.

<input type="checkbox"/> Teacher	<input type="checkbox"/> Headteacher or school leader	<input type="checkbox"/> Parent or carer
<input type="checkbox"/> Employer/Business Sector	<input type="checkbox"/> Organisation representing school teachers	<input type="checkbox"/> Pupil
<input type="checkbox"/> Local Authority	<input checked="" type="checkbox"/> Subject Association	<input type="checkbox"/> Governor
<input type="checkbox"/> Other (please specify)		

Comments: The Council for Subject Associations (CfSA) is a membership organisation, recognised as charitable company limited by guarantee. It is independent of government and acts as a single voice for its subject association members. The CfSA was officially launched in 2007 and has a membership of over thirty associations. These members specialise in over twenty different subject areas and cover all stages of the curriculum.

If you indicated that you are a teacher, headteacher, school leader or governor, please indicate what type of school

<input type="checkbox"/> Local authority maintained school	<input type="checkbox"/> Academy mainstream school or academy chain	<input type="checkbox"/> College, FE or HE institution
<input type="checkbox"/> Special school	<input type="checkbox"/> Alternative provision or pupil referral unit	<input type="checkbox"/> University technical college
<input type="checkbox"/> Studio school	<input type="checkbox"/> Other (please specify)	

Please Specify:

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:

The factors to take into consideration when deciding whether or not pupils should or should not be entered for the EBacc as currently constructed should be associated with the broad view of what a school education is for, and whether the EBacc is the appropriate vehicle for achieving that aim. Unfortunately, the purpose of education in England has not been clearly defined in relation to the EBacc and the purpose of the National Curriculum is defined in very narrow terms. CfSA has responded along with our member organisations to the recent Education Committee consultation on the Purpose of Education. We would advise that DfE takes the consultation on the Purpose of Education into account before taking any further steps with implementation of the EBacc.

There is general consensus that young people should have equality of access to a broad and balanced curriculum, which instills a love of learning, prepares them for a career, for their future roles and responsibilities as citizens and promotes their

wellbeing. Nearly all CfSA members have serious concerns about whether DfE's ambition to enter 90% of young people for the EBacc can ever help the aims of education (if constructed in this manner) to be achieved. The principal reasons that many of our members cite are these:

- The EBacc will typically comprise 7 and more likely 8 GCSEs allowing very limited student choice of additional subjects which will reduce the overall breadth of subjects taken
- Valuable subjects which promote young people's interest in learning, which help them to establish good health and fitness habits and which promote responsible citizenship are squeezed out of the time available by the EBacc subjects.
- The nature of the EBacc subjects and examinations makes them inappropriate for young people with low levels of literacy, with English as an additional language and with other differences. This will result in increased inequality in the system
- Many subjects vital to the economy are absent from the EBacc. These include the creative subjects and design and technology which form the basis of vital modern industries
- Subjects within the EBacc may suffer unintended consequences due to the framing of the EBacc – for example the inclusion of Computer Science in the Sciences options will likely have a detrimental effect on the number of young people taking physics – working against government efforts (backed by considerable funding) of recent years
- The statutory requirement for the study of RE will be compromised as this subject, which is also popular with young people because of its discursive nature and important for decision making and tolerance in later life, is squeezed out of school provision

These negative effects are already being seen – for example the EBacc has already had a negative impact on the uptake of arts subjects, with the Cultural Learning Alliance estimating a 13% drop in uptake between 2013-14 and 2014-15.

The EBacc also appears to be in conflict with the 'progress 8' accountability measure which refers to a broad curriculum and acknowledges that for some young people, the GCSE route is inappropriate.

## Accountability for meeting the EBacc commitment

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

Comments:

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

Comments:

The EBacc accountability measure is especially inappropriate in vocational courses and indeed it is detrimental to the uptake of these courses as it further exacerbates the disparity of esteem between the academic and the technical and vocational routes.

Implementation

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

Comments:

The recent changes in methods of teacher education and the changes in the EBacc subjects have created uncertainty in the supply of teachers and many subject associations are concerned that subject expertise will be adversely affected.

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

Comments:

Unfortunately from the subject associations' point of view, the strategies available to deal with shortages are twofold. One is to ask teachers to teach outside of their specialism. This can work well where there is robust professional development in place, which is long term and of high quality (such as the science Subject Knowledge Enhancement Courses). If this is not the case, then the quality of teaching and learning will suffer. The other strategy is to reduce further the breadth of the curriculum offered. Within the EBacc this could mean no choice of modern foreign language, or of Humanities subject. Outside the EBacc, this means that subjects will be dropped completely, with the consequences detailed above.

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

Comments:

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:

If larger numbers of young people are to take the EBacc subjects, this will result in a larger number of lower grades in the subject. This is a result of young people for whom the academic route is not appropriate following courses that do not engage them. This statement does not constitute a lack of aspiration for young people – teachers and schools should and do have the highest aspirations for their pupils and should be free to provide and deliver the most appropriate courses for them so that they are successful.

Alongside the introduction of the EBacc, the GCSE reform that its currently under way, with the move from lettered to numbered grades will create uncertainty and a lack of comparability between years.

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

Comments:

A central strategy that ensures coverage of all subjects in all geographical areas would be helpful.

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:

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:

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.

<b>Please acknowledge this reply.</b>	X
E-mail address for acknowledgement: annettemargaretsmith@gmail.com	

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 use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please email: [consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@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 29 January 2016

Send by post to: Maleck Boodoo, Curriculum & Standards Division, Department for Education, Sanctuary Buildings, 20 Great Smith Street, London, SW1 3BT

Send by e-mail to: [English.BACCALAUREATE@education.gsi.gov.uk](mailto:English.BACCALAUREATE@education.gsi.gov.uk)