



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.

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

Name: Ailin O’Cathain	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Federation of Awarding Bodies	

Address:
133 Houndsditch, 5th Floor, Room 555, London EC3A 7BX

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 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 type="checkbox"/> Subject Association	<input type="checkbox"/> Governor
<input checked="" type="checkbox"/> Other (please specify)		

Comments:

The Federation of Awarding Bodies is the trade association for vocational awarding bodies with over 130 organisations in membership ranging from large generic awarding bodies to those working in specific occupational areas, including professional bodies. A number of our members offer vocational qualifications which have been recognised by the Department for Education and are eligible to be counted in the school performance tables at Key Stage 4. We therefore have an interest in any policy developments which have the potential to impact on the opportunities available to learners at 14-16 and their access to vocational education and training.

This response is submitted on behalf of the FAB membership following consultation with them and with the Federation's Board of Directors. The Federation has only responded to the specific areas of the consultation that our relevant to our members. However,

awarding bodies are a diverse community and our members may wish to make their own individual submissions containing their own particular perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

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

Local authority maintained school

Academy mainstream school or academy chain

College, FE or HE institution

Special school

Alternative provision or pupil referral unit

University technical college

Studio school

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:

Schools will be best placed to support their learners in making decisions about whether the Ebacc route is suitable for them or whether other learning routes and qualifications are more suitable to meet the needs of the specific learner. Placing a 90% target on schools in relation to uptake of the Ebacc is making this route of study more or less compulsory and will place pressure onto schools and their staff to enter learners for the Ebacc, even when they know it is not the best option for the individual. Schools should have the freedom to work with learners to support them in making decisions about the best route to pursue for that individual learner.

The Federation feels that the introduction of the 90% target for schools is a retrograde step which cancels out the positive step taken with the introduction of Attainment 8 and Best 8 which provided a means for up to 3 technical/vocational qualifications to be counted in the performance tables of a school and signalled the government's commitment to achieving parity between academic and technical/vocational 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:

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

Comments:

UTCs, studio schools and FE colleges offer learners the opportunity to focus on technical specialisms. They provide a valuable option for learners who do not feel that the traditional school offer meets their learning needs. Therefore, placing a 90% target on these institutions will result in their offer for 14-16 year olds being almost identical to that of other schools as once the Ebacc subjects have been covered in the curriculum there will be little time left to focus on the technical subjects. Applying the 90% requirement to these learning institutions will, in effect, strip choice out of the education offer for 14-16 year olds.

Implementation

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

Comments:

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

Comments:

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:

As well as teacher recruitment, schools will need to consider:

1. The impact the Ebacc will have on the curriculum and the amount of time that will be available for learners to engage in subjects outside of the Ebacc requirements, whether these are other GCSE subject or vocational subjects on offer in the school. The EBacc proposal means that every pupil taking GCSEs would have to study a minimum of seven, narrowly defined, GCSEs: English literature and English language, maths, double or triple science, a modern and/or ancient language, history and/or geography. This leaves limited time available for learners to take additional subjects.
2. The impact that the pressures on curriculum time may have on learners who find that their access to a broader range of subjects, including vocational learning routes, are not available to them because the pressure to achieve the 90% Ebacc

target. The result of this is likely to be that learners are channelled down one rigid pathway regardless of their specific needs.

3. From an engagement perspective, not having sufficient time to provide access to a broader range of subjects may lead to some learners becoming disengaged; not only from school but from learning more broadly.
4. The impact on school staff and resources in terms of dealing with learners who are not engaged with their learning and who may exhibit this dis-engagement in a number of ways.

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

Comments:

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.

Please acknowledge this reply.	X
E-mail address for acknowledgement: ailin.ocathain@awarding.org.uk	

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
---	-----------------------------

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

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