EIS

Submission to the Education and Skills Committee on the Roles of ADES, Education Scotland and the SQA in Supporting Education Delivery, Learning and Assessment During the Covid 19 Pandemic

The Educational Institute of Scotland (EIS), Scotland's largest teacher trade union, representing members in all sectors and across all career levels, welcomes the opportunity to provide a written submission ahead of the appearance of representatives of the Association of Directors of Education (ADES), Education Scotland (ES) and the Scottish Qualifications Authority (SQA) on Wednesday 3rd March.

In preparing this submission, the EIS consulted Local Association Secretaries, in addition to Secondary members of EIS Council and Subject Specialist Networks.

Support for Education Provision in Schools

ADES/Local Authorities

Regarding the role of local authorities in supporting education provision, this school session thus far, the feedback from our networks was variable. Within and across local authorities it was reported that there have been different amounts and types of support provided to schools, with resultant disparity in terms of positive impacts felt or observed by schools and teachers. The key areas around which Local Associations in particular provided comment were as follows:

Supporting Recovery and Covid Secure Pedagogy

Cited among the supports provided by local authorities between August and now were, in one locale, directorate teams and QIOs keeping in weekly touch with headteachers as they endeavoured to manage school reopening and then the maintenance of Covid-secure pedagogy. The same local authority had also been proactive in providing good quality risk assessment templates and updating these as required.

In another area, it was reported that the local authority had offered good support around education recovery on the reopening of schools in August, encouraging an emphasis on the wellbeing of pupils and discouragement of formal assessment. This was relatively short-lived, however, with the same authority driving a 'business as usual' approach from October onwards- tracking and monitoring, formal assessments, and local moderation activities, at a time when teachers continued in their endeavour to find creative ways of teaching and assessing while grappling with the restrictions of health and safety mitigations. The same local authority is now advocating the use of SNSAs for P1 on their return to school from 22nd February.

The 'business as usual' mantra was referenced as being prevalent across another local authority, also, grossly failing to take account of the extremis of the Covid context. This has been a familiar complaint from Local Associations to the EIS national body since school reopening in August.

Only one Local Association referenced additional staff having been employed, mostly to cover absence, so little additionality to the core staffing complement had been achieved.

Supporting Remote Learning

Whilst a small number of local authorities had made available good quality online learning and teaching resources and opportunities for good practice sharing within local digital hubs, others had provided nothing additional to the national e-learning offer, which was felt by some Local Associations to have been a shortcoming, especially given the gaps in provision that they had found within the national e-learning offer for Primary education.

Other means by which local authorities have sought to support remote provision is by offering teachers professional learning around the use of digital platforms, and technical support where difficulties were encountered in using devices and digital media. One Local Association reported strong collegiate working with the local authority in producing guidance on remote learning, including live teaching.

Digital Provision

Highlighted among the responses we received was that some local authorities' digital infrastructure requires to be updated, its current condition hindering the effective delivery of remote learning and teaching. Teachers expressed concern about the associated equity issues around some learners in some parts of the country benefitting well from the remote learning being offered via several digital platforms while others in some parts of the country do not, and where teachers have additional challenges to face in meeting the needs of their learners compared to colleagues in other locales.

It was reported that a few local authorities had made progress in addressing digital exclusion, most commonly by providing senior phase pupils with devices, and in some cases internet connectivity, to enable their access to their schools' online learning provision. One Local Association indicated that whilst the local authority had ordered devices, there had been problems with supply, which meant that the young people in the authority were still without devices at this stage. Another Local Association indicated that the initiative had been funded by PEF money by the agreement of Headteachers in the authority, rather than being paid for with additional local authority spending.

Education Scotland

On the whole, EIS Local Associations did not have much to report in terms of the visibility of Education Scotland in providing support to schools within their locales.

One Local Association indicated a supportive presence of Education Scotland both in relation to local authority and RIC activity.

In the main, feedback was that other than written guidance having been provided by Education Scotland, which was met with mixed response in terms of

perceptions of its utility, and online resources curated by them, there was general expression of a lack of awareness of anything in the way of on the ground particular support being offered by ES in local areas.

One Local Association articulated some frustration that what has been provided by Education Scotland falls short of what was promised earlier in the pandemic in terms of supporting remote/blended learning. The reality is that the biggest weight of responsibility in designing online learning has fallen to schools and teachers.

Challenges Remaining and Support Required

Teachers cited a number of challenges that they have faced and continue to face in providing learning and teaching during the pandemic.

The most commonly signalled challenge was in relation to the significant workload demands around delivering a remote learning provision, with teachers stressing the much greater time demands in terms of preparing for lessons and providing feedback to learners remotely.

For many, this reality is coupled, again, with a 'business as usual' expectation that most other priorities remain to be overtaken- tracking, monitoring, report writing, parents' evenings, etc. There is also additional bureaucracy associated with the greater focus this session on tracking and monitoring levels of pupil engagement with the online learning provision. Many teachers have struggled with this additional workload burden and report that it has had a detrimental impact on their mental health and on their general wellbeing.

Another challenge highlighted is in relation to the expectation that teachers can be responsible for providing in-school and remote learning at the same time, which in the EIS view, is wholly unreasonable in terms of the associated workload, in addition to being pedagogically unsound.

With regards to these challenges, there is a role for local authorities in ensuring that priorities are sufficiently streamlined with all non-essential activities being deprioritised in support of the remote learning and phased return to school provision; and in ensuring that sufficient numbers of additional staff, with the requisite sectoral and subject specialisms, are employed to enable the proper delivery of face to face and remote learning by different members of staff. Employment of additional staff would also facilitate the adoption of a blended learning approach would enable the safe return of pupils to classrooms and face to face learning in a way that would place less workload strain upon teachers.

Some teachers reported being under-skilled in using technology to enable their delivery of remote learning, indicating the need for the provision of CLPL by the local authority/Education Scotland in this regard.

In one area, digital exclusion of both pupils and staff remains a difficulty that requires to be overcome by local authority provision of devices and internet connectivity.

One matter which was frequently raised as a concern was the lack of engagement with remote learning by some young people, particularly those who would normally receive greater support with their learning in school. This coupled with the fact that a significant number of pupils had their in-school learning disrupted between August and December points to a need for increased levels of Additional Support Needs provision throughout the period that young people are returning to face to face learning and on into the period of Recovery. In the meantime, teachers are keen to have advice on how to engage learners for whom the remote learning experience is more difficult to access. There is a role for Education Scotland here.

Teachers also expressed concern about the mental health of senior students in particular as a result of the prolonged uncertainties in relation to course content and assessment. Local authorities, ES and SQA each need to consider their roles in responding to these concerns about young people's wellbeing and in minimising any further negative impacts.

Many teachers are concerned about the impact of the reduction in face to face teaching time and are urging the need for maximisation of time for learning and teaching as pupils return to the classroom. Again, there is a role for local authorities in ensuring enhanced staffing levels and that lesser priorities are set aside to enable this; and for the SQA to play its part in cutting out non-essential assessment and quality assurance activity in order that no time that should be devoted to learning and teaching is lost to needless bureaucracy.

In all areas of the curriculum that contain a practical element, there have been difficulties posed by the current public health restrictions. Teachers are anxious about the fact that they have simply been unable to cover significant aspects of learning in these subjects-Drama, Music, Practical Woodwork, Metalwork and PE, for example- and worry about the implications, particularly for senior phase learners who are undertaking qualifications.

Support for Assessment

Responses from Local Associations, EIS Council members and Subject Specialist Networks largely focused on the role of the SQA in relation to senior phase assessment within practical and non-practical subjects. Responses covered the challenges around assessment and quality assurance processes, and the support that is required to overcome these.

The feeling conveyed by the majority of Secondary teachers who contributed to our consultation was deep anxiety about the timescales remaining for assessment to be undertaken by senior phase students. As each day passes with the majority of senior phase pupils not able to be in school for the majority of the time, there is less time to prepare students adequately for the assessments upon which teachers will base their judgements of provisional results. There are several risks associated with this:

> 1) Young people will sit assessments before they are sufficiently prepared and their performance will be compromised

2) Young people will, a short time after their return to school, be sitting multiple assessments across multiple subjects all within the same tight timeframe

3) The pressure on teachers to deliver, mark and quality assure this volume of assessment in such a short timeframe will make the alternative certification model undeliverable.

These risks are particularly critical for practical-based subjects, some of which are not able to deliver the full course content and associated SQA assessment requirements, as a result of public health restrictions.

There is a role for SQA, ADES and ES in addressing these challenges and risks.

As mentioned previously, local authorities are required to ensure that all other non-essential priorities are set aside and that additional staff are employed to ensure the deliverability and effectiveness of the quality assurance process.

Anticipating the likelihood of further disruption to education and the strain that this would place on timescales and upon teacher and student workload, the EIS had initially suggested that items of assessment undertaken by young people in school could be sent to the SQA for external marking. SQA was resistant to this from the outset and has remained so throughout discussions around the alternative certification model. Teachers continue to cite this as something that would support them in at this time.

Short of taking responsibility for external marking, SQA is required to pare back assessment and evidence sampling requirements such that teachers and schools are able to devote the requisite time to learning, teaching and sound assessment in the classroom, and to meaningful engagement with the quality assurance process both locally and nationally.

Teachers have been deeply frustrated by the quality of support from the SQA throughout this session. They have complained repeatedly about SQA inertia in terms of supplying guidance around course content and assessment; and about a lack of completeness to some of the guidance that has been produced late in the day. For example, whilst SQA has provided some question papers which many schools intend to use for key pieces of assessment, there have been no cut-off scores indicated by the SQA within the marking schemes. Teachers are also seeking greater clarity on what constitutes acceptable assessment practice within the terms of the alternative certification model.

The EIS view is that schools, in the interest of pupils, should be afforded maximum flexibility in utilising assessment evidence to arrive at their judgements of candidates' provisional results. For example, for Advanced Higher Modern Languages, the SQA has decided that the Speaking element will no longer count towards the final grade, though many schools have spent significant time already in developing skills in this area. The reinstatement of Speaking as a component of course assessment would be a time-saver in terms of learning, teaching and assessment of AH Modern Languages.

In light of the duration of the current remote learning phase and subsequent pressure on in-person teaching and learning time, teachers are anxious to have new updates from the SQA around minimum course coverage and on the detail of the SQA national sampling exercise.

Teachers have also expressed concern about learners who are undertaking National 4 qualifications this session. Whilst in some N4 courses the Added Value Unit as a mandatory element was removed earlier in the session, it has remained in others. Teachers are concerned that pupils have been unable to work effectively on the AVU Unit in the remote learning context and will have insufficient time to compete it when they return to school. The EIS raised this as an issue with the SQA some weeks ago; SQA indicated that the issue was being considered internally. The EIS understands that a decision has been taken to remove the mandatory aspect of the AV Unit but this has not been communicated to teachers or learners. Once again, anxiety for both has unnecessarily been prolonged by SQA's sluggish response.

The lack of timely and complete information and support materials from the SQA has been a constant challenge and source of significant stress for teachers this session. That said, in part, the timing of the actions of the SQA has been bound together with that of the Scottish Government which has also taken too long to deliberate over critical decisions around the cancellation of exams and details of the alternative certification model.

Some teachers are also anxious about the practicalities of administering assessments to senior phase students at the same time as enabling the requisite physical distancing between young people and between young people and staff. This has implications for space, the number of adults required to supervise assessment and the security of the assessment material if assessments cannot be scheduled to take place for all candidates within a course simultaneously. Pupil absence on days when key assessment is taking place is another issue that teachers will be required to manage. There is a role for local authorities in supporting schools to manage these practicalities and for the SQA in providing additional assessment material.

The current public health restrictions have significant implications for assessment within practical subjects such as PE and Drama. Teachers and students of these subjects are crying out for clarity as to how assessment will be modified by the SQA to enable course completion. It is simply not possible for schools to meet the assessment requirements as they currently sit, at odds with the advice issued by Education Scotland on teaching practical subjects.

There is also a role for local authorities in ensuring that the recently issued Education Scotland guidance on prioritising the return of senior phase learners is followed such that students are only in school buildings to complete essential practical tasks which cannot be done at home. Teachers have reported some disparities in terms of how the guidance is being interpreted within and across local authorities, potentially resulting in inequity for students of subjects which are not strongly practical-based, for example, Modern Languages, due to some in some areas being encouraged to come into school whilst others in other

areas, rightly, are not. Teachers have suggested that reinforcement of the ES messaging regarding this is necessary to ensure greater equity of experience for students.

Support for Quality Assurance

Finally, our consultation with our networks on this theme elicited a number of responses around quality assurance as a major component of the alternative certification model. Three main concerns were recurring within the feedback:

1) Insufficiency of Understanding Standards material provided by the SQA;
2) Lack of clarity around how local and national quality assurance processes will work;
3) How time will be created to enable teachers to participate in the three layers of quality assurance within the alternative certification model- centre-based, local authority- based and national.

In terms of the support required, teachers are seeking more Understanding Standards material, including further exemplification of standards, and webinars from the SQA. Some teachers have indicated that it would be particularly helpful to have more 'Markers' Meeting' type activity and sessions in each subject area that focus on the use of assessment approaches that are similar to those suggested for each subject and level by the SQA.

There is a role for both local authorities and for SQA in providing absolute clarity around how quality assurance processes will work in practice on the local and national levels, respectively.

There is a critical role in this for local authorities. Firstly, as mentioned previously within this submission, they need to employ additional staff to support the efforts to deliver the alternative certification model, at the same time as ensuring that they do all that they possibly can to prevent teachers' time being taken up by lesser priorities otherwise the alternative certification model will simply be undeliverable within the current already very compressed timescales.

Teachers need time to set up networks for local moderation where they do not already exist (this is particularly critical for single-teacher departments) and to engage meaningfully with colleagues in other schools around discussion of standards.

Clarity around the timing of the two additional in-service days that have been granted for assessment support would also be welcome at this time to enable proper planning of quality assurance approaches. The EIS would wish maximum flexibility for schools in determining the timing of the in-service days in order to maximise their utility to the process and to avoid scenarios whereby the assessment of students is driven by dates that have been fixed nationally or local authority-wide.

In supporting local quality assurance activity, local authorities are also required to ensure that this is done safely- virtually where it can be and where it cannot, with all mitigations that require to be observed fully in place.

SQA, also, must resist the temptation to offload more tasks associated with the alternative certification model onto schools and teachers, in order to lighten the burden for SQA as an organisation. For example, submission of candidate evidence to the SQA for sampling purposes should be by whatever means is most practical and efficient for schools, not which would best suit the SQA.

Education Scotland also has a role to play in the quality assurance process. It requires to be more visible than it has been in local areas throughout the pandemic so far and should ensure that it actively supports schools and local authorities in carrying out the requisite quality assurance, for example, deploying the expertise of its Quality Assurance and Moderation Support Officers to support this effort.

As can be seen from the detail of this submission, the challenges that Secondary teachers delivering NQs are facing currently are many and deep; and the support that they require in meeting these challenges, from ADES, SQA and Education Scotland, (and Scottish Government) is extensive.

A way of alleviating the extreme pressure on the whole system at this time would be to cancel certification for S4 students who are not leaving school at the end of S4 (more than 90%). Certification is not required for their onward progression into S5 and, in many cases, attainment in S5/6 supersedes that obtained ain S4. At the very least, local quality assurance for this cohort could be scaled back and plans for SQA sampling scrapped. Certification of the vast majority of S4 candidates in August is an unnecessary expense in terms of time and resources given the current severe constraints.

The Role of the SQA in the Delivery of Qualifications within Further Education

Across Scotland, colleges provide a whole range of courses for FE students from non-award bearing courses to degree-level qualifications. A wide range of courses is delivered, including academic and vocational courses.

The majority of college courses are delivered in units, and accreditation is carried out by the SQA – these courses include: Skills for Work, National Progression Awards, National Certificates, Higher National Certificates/Diplomas (including Graded Units), Advanced Certificates/Diplomas and Professional Development Awards. The SQA thus accredits around 800 group awards – which means that it sets the unit and course aims, the assessment criteria and method.

The amount of learning in 2020-21 was reduced by the lockdown and assessment and accreditation was amended to allow the successful completion of most courses. Many lecturers found how the SQA did this to be stressful and workload intensive. The SQA did not seek to systematically work with the EIS in 2019-20 regarding assessment concerns – with contact being driven by the EIS.

When the colleges reopened in August 2020, students were required to be physically distanced from each other and staff. This led to less teaching time in colleges and continued reliance on remote learning to complement face-to-face college provision. At the start of the 202-21 academic year, the SQA stated to colleges that its usual assessment/accreditation method would be applied but

sought to alleviate the assessment concerns of practitioners and learners by: the introduction of a combined assessment toolkit to assist practitioners to reduce assessment load; subject-specific guidance on adaptations to assessment; and removed the requirement to complete the assessment for Graded Units with HNC/D and ACD. These measures were found insufficient in December 2020.

In early 2021, the SQA announced an alternative assessment approach that will allow Awards to be certificated based on course aims and key critical competencies/evidence identified in the units of the award. This will require an holistic approach using professional judgement confirming that the candidate has demonstrated overall competency in all the identified alternative requirements. This alternative assessment model is being rolled out now – with general guidance having been recently published and subject-specific guidance being developed and published.

The SQA formed an HNVQ21 Steering Group and HNVQ21 Working Group in January 2021 to oversee the implementation of the alternative assessment approach. Both groups have wide stakeholder membership that includes the EIS. The EIS welcomes the formation of these groups and believes they are the best way to lead these workstreams.

The alternative assessment approach is still being developed and rolled out for courses that that end in less than four months. This is a matter of concern to the EIS. The EIS believes that a more realistic alternative assessment approach should have been introduced in August 2020. The EIS had previously advised the SQA that its mitigations were insufficient.

The EIS believes that SQA support to lecturers during the whole pandemic has been poor and behind the curve. The EIS believes the SQA should reduce assessment loads faster and more deeply. Also, the EIS has asked the SQA to provide a bank of prior-verified assessments authored by lecturers across Scotland to be made available to all colleges via their secure administrative download site to assist with sharing of assessment resources and avoid unnecessary repetition of lecturer work. Little or no progress seems to have been made in this regard.