

## **Education, Children and Young People Committee**

**3<sup>rd</sup> Meeting, 2021 (Session 6), Wednesday 22 September**

### **Alternative Certification Model Submissions pack**

This pack contains submissions from several of the witness organisations taking part in this week's meeting regarding the Alternative Certification Model.

- [EIS](#)
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## **EIS**

### **EIS Submission to the Education, Children and Young People Committee on the Alternative Certification Model, 2021.**

The Educational Institute of Scotland (EIS) welcomes the opportunity to submit evidence to the Education, Children and Young People Committee to assist the scrutiny of the Alternative Certification Model 2021.

As the largest union of teachers in Scotland, the EIS was invited to join the National Qualifications 21 Steering Group and the associated Working Group in the Autumn of 2020, following the announcement that National 5 exams would not go ahead in 2021. EIS representatives have attended almost all meetings of these groups between October 2020 until the present.

Ultimately, the ACM model delivered a robust set of qualifications for Scotland's students, who deserve recognition for their resilience in the face of challenging circumstances; underpinning that was a herculean endeavour by teachers and lecturers across the country who ignored the political clamour of off-stage noises, to focus on the needs of their students.

If there is a single abiding observation to be made from a review of the Alternative Certification Model, the EIS would suggest it is that Scotland can rely on the professionalism of its teaching workforce.

### **Design of the Alternative Certification Model**

From the outset, EIS representatives on the NQ21 Working Group and Steering Group sought to ensure that the design of the ACM enabled the prioritisation of learning, teaching and sound assessment, and was underpinned by trust in teacher professional judgement of students' demonstrated attainment in the course of undertaking a proportionate amount of assessment, appropriately timed and in a variety of formats, moving as far away as possible from one-off high-stakes type experiences. The EIS also pressed to ensure that final decisions relating to students' provisional and final results were based on each students' actual evidence and were free from the application of algorithms or formulaic statistical equivalent that would use data from previous cohorts' attainment.

We pressed hard to ensure that in design at least, the ACM took account of the workload and wellbeing of teachers and of the needs of learners- both in terms of their learning and their mental health and wellbeing, all of this particularly pertinent since the anticipated period of recovery from the pandemic had barely got underway before a further phase of disruption had emerged.

The EIS, in the face of much opposition at times, was successful in ensuring that these elements featured in the original design of the ACM.

### **EIS alternatives rejected**

That said, it would not have been the EIS's preferred approach to operate an alternative to certification of this kind.

We put forward a series of alternatives over several months prior to the cancellation of exams and after plans were already underway for the ACM.

In the summer of 2020, we argued that an exam diet should not go ahead during the forthcoming academic session, deploying a continuous assessment model as an alternative and planning the new S4 qualification framework over two school sessions rather than one. This was rejected out of hand by the Scottish Government.

Following the announcement of the cancellation of the N5 exams, the EIS suggested that assessments could be conducted internally and marked externally by SQA colleagues. The SQA rejected this approach.

When the Higher exams were cancelled (after much prevarication on the part of the Scottish Government and the SQA), the EIS suggested certification of S5 and S6 candidates only; or that certification of S4 could be delayed until the autumn. With the Scottish Parliament elections forthcoming, the Scottish Government ambition remained to deliver NQ certification for all candidates in one sitting and this EIS proposal to certificate only candidates who required certification for their onward progression, primarily S5 and S6 students, was dismissed.

Regarding the SQA national sampling exercise (announced in Parliament, without consultation with the teaching profession, at the same time as the cancellation of the N5 exams) the EIS suggested that this should focus on Higher and Advanced Higher only, especially as over 90% of S4 pupils progressed into S5 and their qualifications, therefore, were largely about determining their next level of study. Unfortunately, the EIS's trust in teacher judgement was not matched by that of the Scottish Government or the SQA who were determined to push ahead with national sampling of all courses, levels and presenting centres in addition to the rigorous quality assurance processes that were planned to take place locally, creating a significant workload pressure for schools and college departments.

### **Confusing SQA Advice**

Although the design of the ACM, as a result of EIS influence, quite deliberately encouraged centres not to seek to replicate the SQA diet, separate subject specific advice from the SQA to centres often contradicted that principle by citing "exam style" evidence as the most reliable for producing estimates / provisional grades.

As a result, many schools defaulted to running exam type assessments, fearing that the validity of students' provisional awards would be called into question by the SQA on the grounds that teacher judgements were not based on the use of assessment evidence generated by conditions mirroring an SQA exam.

This was confusing for centres and resulted in many cases in students being subjected to over-assessment, often to the detriment of their wellbeing, as reported by many EIS members, as well as by young people themselves and their parents and carers.

### **Delivering the Alternative Certification Model**

The post-Christmas lock down created a significant challenge to delivery of the ACM model as it meant that the gathering of assessment evidence was effectively delayed during the period of remote teaching and learning.

In schools and colleges the length and breadth of the country, teachers and lecturers strained hard, in the latter part of Session 2020-21, to support young people through their National Qualifications within what had become a very truncated timescale due to the lack of preparedness for such a post-Christmas lockdown coupled with the late decision to cancel the Higher and Advanced Higher exams; and the absence of any other contingency model other than that devised pre-Christmas 2020. By Easter, the combination of these factors brought the ACM plans onto a knife-edge in terms of deliverability. With this evident, the EIS pressed for the deadline for the submission of Provisional Results to be shifted to allow for more time for vital learning and teaching before assessment. This led to the deadline being moved from the end of May until June 23<sup>rd</sup>.

In spite of the pressures, and amidst ongoing Covid-related disruption, staff in Secondary schools and College Departments endeavoured to ensure that young people were certificated fairly for their efforts towards gaining their qualifications in the most difficult of circumstances.

The relatively low number of appeals this session is testament to the strength of the endeavour by schools, colleges, teachers and lecturers, in delivering the ACM and indicative of the generally high levels of trust that young people and their parents/carers had in teacher judgement and in the surrounding processes.

### **Workload impact on teachers and lecturers**

Although the model was successfully delivered by the profession, this was not without cost to teachers and lecturers in terms of associated workload and stress.

Even prior to the post-Christmas lockdown, the EIS had been clear that delivering the ACM would incur increased workload and raised this as an issue within the NQ21 Working Group and Steering Group, seeking a number of actions in response. We sought agreement that delivering the ACM would be the key priority for Secondary schools, and college departments that were delivering N5, Higher and Advanced Higher with other non-critical priorities being stood down to enable the safe delivery of the ACM.

Whilst there was round-the-table agreement that this would be the case, the EIS did have to push in the subsequent months for adherence to this principle, a notable example being in relation to SNSAs which the Scottish Government insisted on running during the last academic session, initially planning to do so with S3 pupils. Only after intervention from the EIS was it conceded that S3 pupils would not be expected to complete SNSAs.

At school and local authority level, there was variability as to the extent to which other non-critical priorities were stood down. For example, many schools pressed ahead with early timetable changes involving configuration of new classes, changes of

teachers, beginning of new courses- all while the ACM was underway, this resulting in further intensification of the workload of many teachers at this time.

As the ACM was being designed, the EIS had also pushed for additional inset days, 3-4, to be granted to support its delivery. There was a significant delay in these being granted and in the eyes of many EIS members, the 2 additional days provided were insufficient in covering the time demands of assessment and associated quality assurance. Many also regarded the £400 paid by the Scottish Government to be a token gesture.

Some EIS members were further antagonised by the announcement that the payment would be made on a pro-rata basis to teachers who worked part-time, failing to understand how many timetables operate, so potentially resulting in some teachers who had contributed fully to ACM delivery, receiving only partial payment. The EIS advocated strongly that every teacher who was involved in fully in supporting the ACM should receive the full £400 payment on the basis that only some employment scenarios would have justified a pro rata payment such as a 50:50 job-share where duties associated with the ACM are shared on that basis.

### **Addressing the Equality impact of the pandemic**

As the post-Christmas lockdown continued, EIS members expressed concern about the implications of the disruption on students from the poorest socio-economic backgrounds whom they could see were less able to engage in the remote learning offer. Many of these young people had also been forced to self-isolate on multiple occasions prior to the lockdown, and more so than their more affluent peers; and due to the disproportionate impact of Covid on and resultant death rate within poorer communities and families, were more likely to have suffered mental health impacts, trauma and grief over the course of the year.

With this in mind, the EIS pushed within the NQ Working Group and Steering Group for additional accommodation to be made for young people who, as a result of having faced even greater disruption than that experienced by the whole senior phase population, might have struggled to undertake all of the assessment opportunities provided in the final term.

We requested that an additional window of certification be created that would allow some additional time for those young people for whom it was appropriate to complete their courses in session 2020-21, to complete the evidence requirements in order that they could be certificated.

The SQA was originally reluctant to build in such an accommodation, viewing it to be unworkable. However, the EIS persevered, gaining support from SLS colleagues in particular, until finally such provision was made in the form of additional e-Sgoil input and the creation of the Incomplete Evidence Contingency which extended the deadline for submission of provisional results for students requiring it until 3 September 2021.

## **Appeals**

A further source of conflict within the NQ21 Groups centred on arrangements for appeals in the context of the ACM. The SQA wished to shift the responsibility and associated workload for appeals onto schools and teachers.

Despite opposition from EIS, SLS and ADES, who were each clear ahead of the SQA's national consultation around this that pragmatically and philosophically, responsibility for the appeals process had to remain with SQA, the SQA framed the terms of the consultation disingenuously in such a way as to suggest to respondents that the preferred direction of travel was that appeals would be conducted by centres themselves.

Although there had been much made by the SQA at the beginning of the discussions around the ACM that the approach would very much be one of stakeholder collaboration and co-creation, the parties external to the EIS who had the biggest stake in how the appeals would be run, were firstly, completely excluded from the consultation design; and secondly, somewhat blindsided by the terms of the consultation when they emerged, they were clearly the opposite to what had been expressed in the strongest of terms within the two NQ Groups.

SQA was in no doubt of the position of EIS, SLS and ADES and yet completely disregarded it, presumably in the hope that learners and parents would opt for schools being in charge of the process.

Once again, the EIS had to intervene at government level to avoid a scenario whereby significant additional workload responsibility would be dumped on schools by the SQA at a time when the deliverability of the ACM itself was already at risk, and the health and wellbeing of thousands of secondary teachers very much under strain.

## **Summary of the EIS position around the key principles of the ACM**

### **Professional judgement**

The EIS is clear on its trust of teacher judgement and the need for the system as a whole to share that trust. We see teacher professional judgement supported by collaboration among colleagues, as being central to the design of the ACM process. We envisage a longer-term transition to approaches to senior phase assessment that have teacher professional judgement at the heart.

### **Moderation**

In terms of collaboration, as well as enhancing the strength of these judgements, collaboration around the moderation of assessment provides teachers with a degree of protection from pressure from students and parents or carers in relation to candidate results. Of course, collaboration needs time and schools and local authorities should have been working together to create the time necessary for teachers to undertake the necessary moderation. LNCTs sought to agree approaches to local moderation that were proportionate and manageable.

**Demonstrated attainment**

The EIS also supports the premise that professional judgements should be based on evidence of learners' demonstrated attainment. This offers a protection to teachers who are making judgements and reflects the views of young people who were previously aggrieved at the use of the algorithm which did not take into account the assessment evidence that they themselves had produced, in determining their grades. The fairness principle is also at play here.

**Assessment approaches**

In terms of how candidate evidence is generated, the EIS was consistently of the view that schools should not be running their own high stakes exam diets in lieu of the SQA diet.

The ACM afforded flexibility to schools in designing their approaches to assessment in the interests of maximising time for learning, teaching and sound assessment, and in the interests of safety, the wellbeing of students, minimising inequity and managing teacher workload.

The EIS shares the view expressed by many that the scheduling of exam diets undermined these aims to a fair extent, especially when they were being run immediately post-Easter when the focus should have been on support for young people around wellbeing and on consolidation of their learning. Given the disruption of the prolonged post-Christmas lockdown, we would like to have seen assessment take place as late in the term as possible.

It was for this reason that we pushed for an extended deadline for submission of Provisional Results in order that young people would have the best chance to succeed in spite of the difficult circumstances of this academic year.

## **NASUWT**

### Introduction

1. The NASUWT welcomes the opportunity to comment on the Education, Children and Young People Committee Inquiry in to the Alternative Certification Model (ACM) 2021.
2. The NASUWT is the teachers' union, representing teachers and school leaders in all sectors of education.

### **National 4 deadline**

3. The National 4 submission deadline presented significant challenges. The original deadline was 20 March 2021 and whilst the extension to 4 June may have been intended to alleviate some difficulties, it must also be considered in the appropriate context: the 20 March deadline became impossible as a result of a second lockdown. Although there were processes to extend this deadline further, they were not straightforward and could not be adopted wholesale.
4. Teachers were under enormous pressure and strain to provide National 4 results: the operational reality in schools was that 28 May, or earlier, was a completion deadline to allow data returns to the Scottish Qualifications Authority (SQA) before 4 June 2021. There was little acknowledgement from the SQA of the negative impact of the situation upon teachers, given the cumulative burden of bureaucracy, confusion around procedures, truncated deadlines and an unachievable workload. It is critical that the significant difficulties flowing from system-level decisions are acknowledged and recognised as having a serious detrimental impact on the wellbeing of young people, as well as teachers.
5. A typical approach in many schools is to give pupils an opportunity to achieve an award for the National 5 course, failing which, to give them an opportunity at the National 5 unit. Only if they do not achieve these are they then switched to the National 4 course, this being an aspirational model that has pupils' best interests at heart. Having the National 4 deadline several weeks before the National 5 one in this context was illogical. As the following teacher comment succinctly sets out, there were significant logistical challenges in meeting the National 4 deadline:



*'Their deadlines are set up to suit themselves but without any understanding of the constraints teachers are working with in schools. National 5 students failing "Assessment Gathering" exams (which are simply SQA Exams administered in schools) are then required to complete Unit assessments to gain Unit assessment passes. If they fail the first attempt at these, they are entitled to a resit. If they then fail the resit at National 5, they then have to sit unit assessments at National 4 level (with a corresponding resit). I am sure you can see why teachers have concerns, as this whole process is expected to be completed in a three-four-week window at best.'*

6. The NASUWT repeatedly called on the SQA to look again at the National 4 deadline in light of the information provided above: flexibilities for exceptional circumstances did not address the whole-scale system-wide challenges.

### **Timeframes**

7. Local authority quality assurance procedures, while necessary, led to earlier deadlines for submission of grades: the precise deadlines did vary between authorities. Simultaneously, schools and local authorities were required to spend time preparing explanations and meeting with Education Scotland staff to explain their quality assurance processes, which was time-consuming and was not felt to be wholly productive by those who participated. Teachers voiced frustrations that Education Scotland, while enquiring about the actions taken to avoid over-assessment, were unable to adequately define 'over-assessment'. The result of all this compression is that while each level of management takes its chunk of time to allow for quality assurance, teachers in schools faced an almost impossible task to complete all of the assessment, quality assurance and certification in the very short timeframe left available to class teachers and departmental managers.
8. The one commodity which teachers cannot manufacture is time. This situation was exacerbated by the adoption of double blocks of learning time in some local authorities, and corresponding two-week learning cycles, which mean that in week one you may see a class for one double-session block, but in week two you may see the same class for three double-session blocks. If you have a bank holiday and an in-service training (INSET) day, then a teacher may end up seeing senior phase classes only one block out of the three. If the pupils were not physically

sitting in front of you, it was not possible to assess them, especially considering that the pupils may have 12 or 15 other assessments in a variety of other subjects.

### **Flexibility**

9. Much was made publicly of the 'flexibility' in the system by the SQA and the National Qualifications Group, but to what extent did this flexibility exist?
10. Senior phase classes missed out on their normal start to the new timetable in May/June 2020 as the country was still in lockdown, meaning that teachers and pupils were playing 'catch up' in National Qualifications courses from the very beginning. While the SQA National Qualifications Group eventually addressed this by making changes to courses, by the time these decisions were made, many teachers had already taught the parts of the course which were then withdrawn, nullifying any potential benefit.
11. As a result of the circumstances in the first half of the academic year, the opportunity to prepare pupils to a level where they could attempt any type of formal assessment before Christmas under conditions which would provide evidence of 'demonstrated attainment' were extremely limited and, many would argue, impossible. It was not recognised in the political narrative that it would not have been possible for many subjects or teachers to be able to use assessment materials from earlier in the year.
12. At the start of 2021, we entered a second lockdown, where the emphasis was rightly on teaching and learning, rather than assessment, and this message was reinforced for the initial return to school shortly before Easter in Blended Learning.
13. In reality, therefore, the only possible period for the gathering of evidence for most subjects was from the return in mid-April. In most cases, teachers were directed to gather such evidence in timed assessments, using unseen papers in controlled conditions: in other words, examination conditions. For example, this applies to all of the Maths courses and 70% of the National 5/Higher English courses. These subjects, of course, account for most of the presentations for awards by some distance and, therefore, affect all pupils.

14. It is therefore understandable why claims of flexibility in gathering evidence appeared hollow to the teaching profession and were indeed unachievable for most teachers in the majority of subjects.

### **Business as usual approach**

15. While there was significant variation in practices across Scottish schools, the NASUWT strongly advocated against any move to progress with normal timetable changes in secondary schools: a 'business as usual' approach was not appropriate.
16. Feedback from teachers confirmed that forcing through early timetable changes created an impossible workload burden, and there were no clear answers on how all these competing and conflicting demands on the finite teaching resources should be managed. Adding to this already overloaded the system, and the challenges of supporting on-site transitions left the profession wondering whether there was any real understanding of the current reality in schools.
17. Not only were teachers facing an insurmountable task, but so too were pupils. The Scottish Government's rhetoric on mental health and wellbeing would have been cold comfort to pupils facing an onslaught of assessments. In order to facilitate this programme of assessments, Pupil Support Assistants (PSAs) and extra teaching time was diverted, which also had a knock-on effect on the support which would otherwise be available for Additional Support Needs (ASN).

### **Clarity of advice**

18. The SQA guidance, under stage 3 'role of a teacher', stated that teachers should: *'provide ongoing feedback to learners regarding their progress and assessments, including, at the conclusion of the course, provisional grades based on evidence of demonstrated attainment'*.
19. The Union was clear that it expected schools and local authorities to protect teachers from pressure to change the provisional grades and, further, that guidance should make it clear that the professional judgement of the teacher should not be questioned at this stage. There would, of course, need to be arrangements for candidates to have a right of redress in cases where there have been genuine errors in awarding. The NASUWT communicated with the SQA its expectation that, as a regulator, the SQA should deter negative and inappropriate

behaviours from parents/pupils and, further, believes that it is incumbent upon the Scottish Government and other national bodies such as the SQA to take responsibility and provide clearer explanations to local authorities and teachers.

20. Sadly, a lack of central clarity around issuing feedback raised concerns among the profession regarding both security and potential malpractice. Teachers were uncertain whether they should be sharing interim marks with students, as they complete each section of the SQA-provided assessment, if they had split a paper as per the SQA guidance. There was considerable variation on the ground in terms of sharing marks with students who had completed an initial assessment window and an absence of clear advice on whether teachers should or should not refrain from reviewing the assessment paper with the student as part of the feedback process. Teachers were navigating new processes, under extreme pressure, and a lack of precision in the information provided centrally left already fraught teachers feeling stressed and anxious in case they were inadvertently leaving themselves open to accusations of malpractice.

### **Change of direction**

21. On 10 May 2021, a statement was issued on behalf of the National Qualifications 2021 Group. Whilst the effort therein to take account of disruption to learning was broadly welcome (i.e. a Contingency Arrangement for Incomplete Assessment Evidence), the decision to extend the deadline for submission of grades to September for some pupils felt like a knee-jerk response to a systemic crisis which, instead of solving the crisis, risked piling more workload onto pupils and teachers over the summer, thereby disrupting the new term before it had even begun.
22. Stating that '*Further guidance will be developed... in due course*' at a late stage caused more angst for teachers and pupils alike. Changing guidelines that schools have been working over a number of months in the middle of the assessment period would be challenging at the best of times, but even more so when the changes were more likely to increase teacher workload. Ultimately, it was teachers who would have to navigate the considerable pressure from parents seeking exemptions and exceptional circumstances.
23. The NASUWT considered that rather than tinkering around the edges of a disastrous ACM and citing a level of flexibility in the system which did not exist, a

swift decision should have been made to allow teacher judgement to be placed at the centre of this process and enable teachers to have genuine flexibility in reaching those decisions. This may have meant the adoption of some form of the arrangements that were in place for 2020 as the only practical solution to these issues. While these arrangements were by no means perfect, they perhaps represented the only practical option for addressing the profound difficulties that the ACM caused and, on balance, would have addressed the challenges created by the cancellation of normal arrangements more effectively than the ACM.

### **Knock-on impact**

24. We have already seen an impact this session, following the decisions made under the ACM, and there are numerous ways in which it continues to detrimentally impact education. Some schools did not change their timetable in May/June, which means that their pupils are potentially further behind than others in terms of their study of 2021/22 National Qualifications.
25. The significant levels of pupil and teacher absence since the return in August has further added to teacher workload, through covering for absent colleagues, including preparing work for their classes, and being asked to post work for absent pupils on digital platforms while still teaching a full timetable. It will have also likely affected the progress of some pupils on National Qualifications courses.
26. A key question remains unanswered, and that is at what stage do the SQA and Scottish Government decide that the level of disruption necessitates a change in approach to National Qualifications this year? And what data will be used to inform such a decision? Openness and transparency of decision-making and providing sufficient detail to the profession are essential. The SQA guidance has so far said:  
*'To prepare for this scenario, teachers and lecturers should — as they would in a normal year — gather examples of learners' work and keep a record of any assessments that take place throughout the session; for example, prelims, practical performances or class tests that provide an appropriate degree of challenge, integration and application of the key knowledge and skills of each National Course.'*
27. The Union was concerned that unless schools were given clearer guidance about what they will need to collect, they may feel pressure to generate, gather and

assess an excessive amount of evidence 'just in case' it is required. It is helpful to some extent for the SQA to most recently have commented that for 2021/22:

*'Under this approach, there is no requirement for schools, colleges and training providers to run additional assessments. Doing so would place excess workload on teachers, lecturers and learners. Provisional results would be based on in-year assessments that normally take place during the school year such as prelims, practical activities, performances and class tests.'*

28. However, it is important to recognise that if local authorities and schools ignore this guidance, we would look to the SQA and the Scottish Government, perhaps through Education Scotland using its inspection powers, to intervene directly to put matters right where unacceptable practices are being adopted. One of the challenges last year was that there did not appear to be any effective oversight of the ways in which local authorities were undertaking their responsibilities, and there was some variation in practice that was difficult to explain or justify. In the event the examinations are cancelled in 2021/22, it will be important that more effective steps are taken to intervene in the case of local authorities and schools that impose excessive and unnecessary additional burdens on staff.

### **What now?**

29. The NASUWT remains clear that it is important that lessons are learned in the longer term from the experiences of awarding qualifications in 2020 and 2021.
30. Following the controversies over the awarding of qualifications in Scotland in 2020, the Scottish Government commissioned Professor Mark Priestley of the University of Stirling to lead an independent review of the awarding process. Considerable reflection is now needed on whether the recommendations and outcomes of that review from 2020 have indeed influenced the direction of travel in 2021.
31. An issue the NASUWT has consistently raised is the lack of collaboration and engagement from the SQA. The Union had hoped, given the controversies caused by the decisions made in 2020, that the SQA would recognise the need to become more inclusive of other stakeholders. While informal dialogue continues with the SQA, the NASUWT remained excluded from the SQA's National Qualifications 2021 Group, suggesting that the SQA and the Scottish Government are continuing with their selective approach to engagement from stakeholders.

32. The Union has been clear that there must be public and political accountability for all those involved in the decision-making process, including the SQA, Scottish Government and Ministers. The Cabinet Secretary for Education announcement on 22 June 2021 of the intention to replace the SQA and consider a new specialist agency for both curriculum and assessment while also taking forward reform to Education Scotland, including removing the function of inspection from the agency, was welcomed. The Scottish Government needs to grasp this opportunity to develop a genuinely collegiate approach going forwards, ensuring these reforms are not a cosmetic exercise and that the perspective of the classroom teachers is placed at the heart of any reform.
33. It is also important that the Scottish Government's decision to replace the SQA does not create more uncertainty for students and teachers in the short term, otherwise it may significantly impact the process of awarding qualifications in 2022.
34. Students, teachers and school leaders have worked extremely hard to secure this year's results in the face of unique and hugely difficult circumstances. School staff deserve recognition of the huge pressures and additional workload they have faced. Young people also deserve praise for the tenacity they have shown in dealing with the huge uncertainties and anxieties of the last 18 months. Whilst schools have done a tremendous job in picking up the pieces caused by the failures of Ministers and the SQA, many teachers were left running on empty, with teacher workload at a breaking point at the end of last term. We cannot afford a repeat of this confusion and chaos for yet another year. It will be essential to ensure that the workload burdens associated with the ACM are not replicated in 2022, irrespective of whether such burdens arose from deficiencies of national advice and guidance or from the local implementation.
35. The NASUWT is clear that a robust, fully-funded recovery programme to repair the damage caused to the mental health and wellbeing of teachers and pupils who are suffering the consequences of an ill-thought-out ACM must be a priority of the Scottish Parliament. Indeed, in an emergency motion to Scotland Conference 2021, the following asks of the Scottish Government and Scottish local authorities were made:

- a. provision of additional supply staff to schools to alleviate excess workload;
  - b. provision of additional in-service days to allow staff to undertake work which has been displaced by the burdens associated with the ACM;
  - c. a robust, fully-funded recovery programme to repair the damage caused to the mental health and wellbeing of teachers and pupils;
  - d. realignment of the role of Her Majesty's Inspectorate of Education (HMIe) in schools to that of a genuinely supportive partner;
  - e. a formal review of the whole approach to National Qualifications in 2021 and, where necessary, key decision-makers to be held to account; and
  - f. a commitment to genuine consultation and engagement with the NASUWT and its members in future.
36. Teachers can support recovery by focusing on their core responsibilities for teaching, leading teaching and learning. In this academic year, it will be critical to ensure that they are not distracted by tasks and activities, either imposed centrally or by their employers, which detract from it.

Dr Patrick Roach

**General Secretary**



## SSTA

### Alternative Certification Model (ACM) – September 2021

The SSTA conducted a survey in response to the high numbers of members raising concerns regarding the Alternative Certification Model (ACM) and its impact on teachers and their pupils.

The survey took place in May 2021 and received 1711 responses. The survey gave a clear indication of the difficulties teachers and pupils faced in trying to deliver the ACM.

The introduction of the ACM by the Scottish Qualification Authority (SQA) showed little understanding of the situation that teachers and pupils faced in schools throughout the pandemic and in particular the period following the January to April lockdown.

The collecting of evidence demanded by SQA in such a short time period (mid- April to end of May), without making any allowance for the disruption caused by the pandemic put a heavy burden on teachers and pupils.

The survey highlighted:

- 96% of teachers said that the collection, marking and moderation of evidence had created substantial additional stress/pressure for them
- 92% of teachers also said that the ACM process has created substantial additional stress/pressure for their pupils
- 36% of teachers believed that the evidence that they had collected truly demonstrated their pupil's attainment.

The SSTA believes that the ACM resulted in a large number of disillusioned young people and teachers as the restricted collection of evidence disregarded the disruption caused to pupils education during the pandemic

The SSTA constantly pressed for the inclusion of teacher professional judgement and previous knowledge of their pupils with a restricted collected evidence, to ensure all young people had a positive education experience and achieved the results that they deserved.

SSTA Headteachers members said

*“No proper Headteacher representation on the NQ2021 group to talk about the actual operational actions that they have asked us to do – clearly no one on that group has had recent or living school experience”.*

*“This whole ACM has been a nightmare of stress for both staff and pupils. I have visibly seen the stress on the faces of my staff and the pupils. This has been the worst, most pressurised time of my whole career”.*

Attached: Appendix A - Selection of Members Comments

Seamus Searson  
General Secretary  
Scottish Secondary Teachers' Association

## SSTA Survey - Alternative Certification Model (ACM) – May 2021

### Appendix A - A Selection of Members Comments

#### SSTA Headteacher Comments

“Workload has been phenomenal. Teaching and leading for over twenty years. I have never had a workload like this year. My staff and I are exhausted, stressed and deeply concerned about the mental health of pupils within our care. The logistics and timescale of what we are being asked to do is unachievable within a normal working week. Weekend working is now my normal. Very little has changed on our expected normal school year but all the additional work throughout this year has been beyond belief”.

“There have been numerous times that I have been really close to having to stop before I went under. I wept through frustration of not being listened to, wept through exhaustion and wept because I felt that I was failing my staff and the pupils. The only thing that kept me going was experience that I knew that I was good at my job and if I left or was ill with stress the house of cards would collapse. I could write a novel on the insanity of this year. The only positive I can state is the pride in my staff who have supported each and every pupil throughout this academic year”.

“No proper Headteacher representation on the NQ2021 group to talk about the actual operational actions that they have asked us to do – clearly no one on that group has had recent or living school experience”.

“Meetings with parent forums where information was shared re the alternative certification date and the need for schools to use anything for evidence saying children can be reassessed as many times. This happened a week before the SQA posted anything to the profession”.

“Putting the pressure on teachers to deliver the good or the bad news re provisional grades. This is causing a major stressor in the system and this should not be our news to break. The timescale for QA and then scrutiny from LA means we will need to turn reports around in two days. Mistakes will be made”.

“Appeals process has yet to be outlined is only adding to the pressure on all. How can you play the game when you don’t know the rules?”

“Staff have tried to shield our pupils from the burden of excessive assessments however this has had a detrimental effect on them. The pupils have appeared to be stressed regardless of what we’ve tried to do”.

“This whole ACM has been a nightmare of stress for both staff and pupils. I have visibly seen the stress on the faces of my staff and the pupils. This has been the worst, most pressurised time of my whole career”.

Teacher Comments

“Demonstrated attainment only with SQA papers being deemed the best highly predictive evidence. Every paper is in the public domain as they were told would happen and so there is now no integrity in the system and young people will have advantage and disadvantage in equal measures”.

“No consideration of the four months of remote learning – how were we suppose to gather evidence which was valid for assessment?”

“No plan B for schools where young people were ill/asked to isolate – simply told to delay assessments where possible OR worse than that – do it next year!”

“Lower ability children do not have the same time scale for generating evidence as N5 to AH and AGAIN where there are issues – just certificate them next year! SO in the SQA’s eyes these kids don’t matter”.

“No effective support for PE where young people are national standard and haven’t trained in their sport for a year – expected to demonstrate attainment in other sports”.

“The additional workload created by the SQA on teaching staff is ridiculous. Having to mark and cross mark papers within the school (more than one assessment paper) plus moderation marking with other schools. As a SQA marker previously I have found this year to be substantially more stressful with a huge increase in workload with no additional time to complete these duties”.

“I worry about how equitable this system is across all of Scotland because standards across schools/regions can and likely will vary. The SQA marking keys were largely insufficient and needed to be modified in order to better support students' results and to ensure that the marking was fairer. This also incurred more workload for me”.

“This has been a terrible time for staff and pupils, all for the sake of grades/qualifications that are always going to have a question mark over their credibility. I normally mark for SQA but have found myself doing more marking. My colleagues and I are all exhausted and stressed. The pupils are simply not being given a "fair deal" considering the disrupted year they have had”.

“Awful term for both teachers and pupils. Ridiculous amount of stress on both sides. Aware of some teachers who have been very specific in telling the pupils what to revise in some cases, which heightens the inequalities our pupils face”.

“There is a vast difference between pupils of lower SIMD and higher. Yet again the gap will be widened. There was more to it than just being provided with a device and internet connection. A lot of pupils don't have a quiet space to work at home, were sharing devices, need to help look after siblings. Not to mention health issues going on- mentally and physically. AND these are CHILDREN who suddenly are meant to be capable of motivating and teaching themselves!!! I would like to know what the plan is for next year! Courses are already behind due to delays in changing timetables. We need to know NOW what the exam arrangements for 2022 are”.

“COVID related absence is now making it impossible to assess and collect the evidence we have been told we must have which is basically the same as usual, an assignment and an exam”.

“The ACM is an absolute disgrace with so many mixed messages from the SQA, the Scottish Government and local authorities. There is no consistency across schools, SQA papers are being used at different times and in different ways, some schools are using teacher judgement, some are sticking strictly to grade boundaries, some pupils have had four weeks of assessment since returning.....the list goes on!”

“The goal posts have changed way too late. The requirements introduced by the SQA have rendered much of the work pupils produced before these announcements less valuable. The SQA clearly does not have teachers in their ranks, otherwise they would have more understanding of what is achievable. Teacher's professional judgement should be the standard going forward, because the SQA does not know what it wants. The SQA has not put pupils first and this is their greatest failing”.

“Assessments are a disgrace. They are exams pure and simple. Pupils, teachers and parents fully aware the SQA has done nothing to aid mental health and has exacerbated the situation by providing guidance AFTER most of the course work was completed. Paperwork 'updates' far too long-winded and teachers insulted by the re-hashing of updates that still had last year's date on them”

“As well as the huge workload involved with two rounds of formal assessments for seniors, we are trying to get BGE classes back on track, do SNSA, do tracking reports on all years, and get ready for new timetable on a few weeks. The workload is totally unreasonable”.

“Pupils have returned to school and rather than support them in enhancing their mental health, schools have added additional pressure to pupils which was unnecessary. Completely and utterly unacceptable the way children and normal classroom teachers have been treated since the return to school”.

“The statement from SQA that grades must be evidence based is being largely ignored by parents who focus on 'teacher judgement' and 'grades will not be amended by SQA'. Parents have the impression that teachers are responsible for 'awarding' grades and despite being told these are evidence based, believe these are somehow at teachers' discretion”.

“My school's approach has been disgraceful for the pupils. It has severely impacted upon their mental health, with several taking panic attacks or crying during class time because of the sheer number of assessments (up to 3 a day) and pressure put on them, it's tragic to see”.

“Crazy expectations of both pupils and teachers, really not good for anyone's health and well-being. I believe a lot of teachers will leave the profession and pupils will leave school early due to the unreasonable demands placed on both of us”.

“Our pupils are under SO much stress. It is distressing to see how this "evidence gathering" exercise has caused so much upset and mental exhaustion. Some pupils

are undertaking 3 assessments in one day and some have multiple days like this. It is ridiculous. So much for "no SQA exams".

"Hearing the First Minister say that there was no requirement for exams, and the Deputy First Minister / Education Secretary say that teachers could use professional judgement and take pupil circumstances into account, when the documentation from SQA says the opposite of this brought me great dismay. Parents have not read the SQA advice that we have to work to, and just hear that teachers supposedly have more control than we actually do. If SQA did not follow the advice they were given by the politicians, then that needs looked at immediately. It is too late to institute major change, but the inclusion of teacher judgement and consideration of individual circumstances would be welcome".

"This session has been a total disaster from the SQA. Persistent changes in outgoing information have made it very frustrating with regards to keeping pupils informed and composed. The Alternative Certification Model and guidance surrounding it has only gone on to cause a total nightmare for pupils, teachers and senior managers. We have practically inherited the workload of the SQA in terms of administering, marking and moderating assessments".

"We have completed assessments with some of our pupils already and are now being told to get them to sit even more assessments to prove that they are competent at the "minimum requirements". I have pupils who would think they were "done" with the subject after these assessments, but I now have to tell them they need to sit even more material".