



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: Mark Anderson	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Pearson	
Address: 80 Strand, London WC2R 0RL	

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.

Teacher	Headteacher or school leader	Parent or carer
Employer/Business Sector	Organisation representing school teachers	Pupil
Local Authority	Subject Association	Governor
x Other (please specify)		
Awarding Body		

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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?

Pearson supports the aims of the EBacc – to ensure that the great majority of students have access to a core of essential subject knowledge that provides a sound basis for progression in a wide variety of directions. However we believe that an over-emphasis on the EBacc subjects risks unintended consequences when considered alongside other changes, and may not be the best way to ensure all students have the best chance of progressing successfully.

We support the move to ensure all students in the secondary phase follow an EBacc curriculum through key stage 3. However we believe that the national target of 90% taking GCSEs meeting the full EBacc requirement risks significant disadvantage to some students if it closes off other valuable routes.

The introduction of Progress 8 as the key headline measure will ensure that the vast majority of KS4 students take an EBacc-rich curriculum, with at least 5 GCSEs in EBacc subjects. We believe this ensures an appropriate minimum entitlement for those students. The additional incentive of meeting the full EBacc requirement requires a further 2 or 3 EBacc GCSEs (depending on whether separate or combined sciences are studied) and therefore gives the opportunity for only one or two additional subjects in the typical KS4 curriculum.

Following this full EBacc requirement will be an advantage for many students – and they should be encouraged to do so – but for some, excellence should be enabled in additional ways through the opportunity to study a slightly wider range of subjects, including different pathways. Imposing the full EBacc requirement risks becoming a disadvantage for some students, and we should not be building disadvantage into the system.

Different students have different aptitudes and interests, and a good curriculum will balance what the student is good at and interested in with the subjects deemed essential. A minimum expectation of 5 EBacc qualifications, as Progress 8 expects, will safeguard this entitlement and should be where any target is set.

Students typically need a minimum of 5 good passes, including English and maths, to progress to level 3 study. It is important that all students are given the best opportunity to achieve this threshold, and for some students it will most likely be achieved with 5 EBacc subjects and 3 or 4 qualifications from a wider selection. Denying them this opportunity through an over-emphasis on the full EBacc requirement risks holding them back so that they have to take further level 2 qualifications post-16, rather than progress to appropriate level 3 qualifications. Creating a sense of failure or disengagement

through an inappropriate KS4 curriculum has also been shown to lead to attendance and achievement problems, and all the evidence suggests that few students fully re-engage after such an experience. Disadvantage must not be built into the system.

Accountability for meeting the EBacc commitment

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

The information that should be built into accountability reports are the proportions of students entered for the EBacc, and the proportion of those entering who achieve it. Schools should be aiming for a success rate that is close to 100% of those entered. There are two explanations for schools falling significantly short of the 100% success rate; it could be the quality of their teaching – but it could also be an inappropriate entry policy. Schools should not pick and choose qualifications they feel are ‘easiest’ for students to achieve, but nor should they be put in a position where pressure is put on them to enter students for a programme of qualifications in which they are not likely to be successful.

A curriculum where a minimum of 5 EBacc qualifications is expected would ensure that there was no ‘picking and choosing’ but still ensure the school could provide a curriculum that was in the student’s best interests.

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

If the policy was redefined as expecting all students to meet the EBacc requirements within Progress 8, the policy could apply equally to all these providers.

However as UTCs, studio schools and FE colleges with KS4 students have a specific remit to provide an alternative curriculum to mainstream schools, it would be wrong to restrict their offer by having to add their particular specialisms on top of the 8-qualifications needed to deliver the full EBacc. There will not be the space available in the curriculum for these providers to make their offer distinctive in the way it is intended to be.

Implementation

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

We do not have direct experience of the situation regarding recruitment.

However, the demands on schools to re-balance their teaching staff to enable almost all students to study the full EBacc requirement will create pressures in some subject areas. It will not be to the advantage of any student to be taught French, for example, by a non-specialist teacher. There is a risk of a double disadvantage for some students who do not have an aptitude for a subject, and then are taught by someone who has not been trained in the subject.

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

No comment.

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

No comment.

7 Other than teacher recruitment, what other issues will schools need to consider when planning for increasing the number of pupils taking the EBacc?

Schools will need adequate budgets to purchase teaching and learning resources for increased take-up of EBacc subjects, especially as these subjects tend to rely on published resources.

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

No comment.

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.

Please see the comments made in response to earlier questions.

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.

The question of disadvantage should not be restricted to those with a protected characteristic. The scope for disadvantage runs much more widely than this, as described in earlier responses.

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
sian.owen1@pearson.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?

Yes

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

Completed responses should be sent to the address shown below by 29 January 2016

Send to: Maleck Boodoo, Curriculum & Standards Division, Department for Education, Sanctuary Buildings, 20 Great Smith Street, London, SW1 3BT,
English.BACCALAUREATE@education.gsi.gov.uk