

Response to Professor Hayward's Independent Review of Qualifications and Assessment

Curriculum for Excellence - Four Capacities
1. Should information be gathered across all four capacities?
Yes
2. Please consider each of the capacities in turn. What kinds of information should be gathered on learners' progress and achievements in each capacity?
<p>We support gathering information across all four capacities. We support the opportunity for learners to have diverse opportunities to meet their needs and interests. Developing academic and wider skills early on provides a foundation for future learning. These capacities inherently include the skills and competencies as described in Question 3.</p> <p>Developing the four capacities will help learners as they progress beyond school to college, university, training, or work. Indeed, the four capacities align to the graduate attributes that universities are keen for their learners to develop. We recognise that some learners do not respond well to traditional assessment methods nor show their full potential in school qualifications. So gathering this information could help demonstrate potential for those beyond the more traditional learner journey.</p> <p>Collecting this information should be carried out in a fair, consistent, equal, and transparent way and be available to all so specific groups of learners are not disadvantaged. Learners should be able to understand how their learning develops these capacities and be allowed to reflect on progress so it can inform the next steps in their learning journey. We would suggest that the four capacities combined already develop <i>Successful Learners</i> however we agree that the underlying skills and competencies are not always visible.</p> <p>As mentioned above, the four capacities are intrinsically part of successful learning however Universities Scotland has the most to say on the types of evidence required for Successful Learners.</p> <p><u>Successful Learners</u></p> <ul style="list-style-type: none"> • Subject grades at specific levels are important in order to provide evidence of the potential to succeed at university.



- Qualification levels and grades also allow universities to differentiate between learners in the context of capped numbers where not all who are qualified are eligible for an offer.
- Qualification levels and grades are an important national metric to measure the attainment gap between the most and least disadvantaged in Scotland. They can identify issues and trends and drive policy making. Universities have introduced minimum entry requirements to help widen access and recognise potential, and data on the attainment gap is helpful in developing these policies further.
- Qualifications should also provide evidence of appropriate academic subject knowledge so learners can successfully continue their learner journey at university and are not at a disadvantage to those with alternative equivalent qualifications. This may be particularly relevant for subjects such as mathematics, science or foreign languages where prior academic knowledge is required at a particular SCQF level. Medicine for example typically requires maths and two science subjects at Higher while other subjects such as Business or Economics will require Maths at either National 5 or Higher depending on a university's curriculum content.
- Qualifications may also need to provide academic evidence suitable for meeting the needs of professional, statutory, and regulatory bodies (PSRBs). This is not only at Higher level. Some organisations require a minimum level of ability in a school qualification, for example in National 5 Maths, and it is important that these requirements can still be formally evidenced. Some of these bodies are UK-wide and some operate independently in Scotland, for example GTCS require Maths at SCQF Level 5 for an undergraduate degree in primary education. There is a risk that PSRBs increase their requirements for holders of Scottish qualifications (e.g., from National 5 to Higher), which might close doors for some learners otherwise well suited to a profession.
- Similarly, some employers require a specific standard in English and Maths in addition to a degree qualification and formal evidence of this may be required in the future, either in Scotland or nationally/internationally.
- Qualifications also need to be able to help learners understand their strengths and help inform their next steps. A formal record of academic attainment will help achieve that.
- Qualifications should provide evidence of reflective academic study skills and preparedness for further study or development.

Confident Individuals, Effective Contributors, Responsible Citizens

- We suggest these capacities and corresponding competencies could be included in the formal learning outcomes for each academic subject.
- We would welcome the opportunity for learners to demonstrate and reflect on the development and progression of skills relating to these capacities as these will be important for post school destinations, including university.
- We would also be interested in how these capacities could be alternatively delivered in a more interdisciplinary way such as the planned Welsh Advanced Skills Challenge Certificate if learner choice in a range of qualifications is maintained.
- These capacities are inherently more subjective and personal to the individual and collecting this information must be meaningful for both the learner and for those that use these qualifications. It may not be fair to assess these capacities given the subjective nature.

Out of school and college achievements and awards

3. What, if any, information on learners' achievements obtained outside school and college should be gathered? Please explain your response.

We understand that some learners may want to evidence achievements undertaken outside of school, particularly when preparing for university such as work experience or demonstrating key skills such as teamwork, communication, or leadership. If this information is to be collected, then a clear framework for what is recorded and how it is measured is required for it to be meaningful and fair. It should not be used as a method for differentiating between learners given that personal circumstances and the ability to undertake additional activities will vary and may not be fair.

Most learners considering university already use the UCAS application and provide an outline in their personal statement to explain their interest and motivation in applying to university. UCAS research shows that *"some fear that students who do not have access to high quality advice and guidance are not able to use the statement to shine in the same way that their more advantaged peers can"* (Future of Admissions, January 2023 <https://www.ucas.com/file/670161/download?token=TflyxBOa>) and UCAS is developing its tools to better support applicants in this process.

We understand that some learners however may want to contextualise their school qualifications in a more formal way so if this is introduced then we would suggest that there is consideration of the following:



- Clear definition of what these achievements should include.
- Purpose for collecting and maintaining this information.
- How achievements are verified and recorded.
- Whether this is fair for all learners as it is likely that that the most advantaged pupils will have the most capacity/opportunity for this.
- Whether this creates potential for additional unconscious bias and whether tools are in place to tackle and address this so that it does not simply advantage those students having opportunities that others do not.
- Whether this places an additional burden on learners outside the classroom and reduces opportunities for much needed “down time.”
- Whether this would only advantage those learners with good relationships with schools.
- Whether this duplicates any existing frameworks such as UCAS personal statements or CVs and creates additional administrative burden.
- Whether clear and equal information, advice and guidance for all students is in place to support this process.

In the interests of equity, we could only see the purpose of gathering this information for personal development purposes and it would not be suitable for university admissions. Please see Question 6 for our comments relating to the sector’s experience of the HEAR.

Skills and Competences

4. Should information be gathered on learners’ skills and competencies as part of their senior phase?

Yes

5. If you have views on how this might best be done please provide them here.

We believe that information on skills and competencies should be collected as part of the Senior Phase, but it is unclear how this will be different to the evidence collected in the four capacities in Question 1, as the skills and competencies are defined there. Qualifications should clearly list learning outcomes, and these could be categorised in



terms of skills and competencies as well as being explicitly mapped to the four capacities. Knowledge and skills can sometimes be conflated so gathering evidence in how these skills and competencies contribute to an award or outcome would be helpful to learners. There is also scope to recognise the development and progression of skills and competencies between the BGE and the Senior Phase. This could allow for greater recognition of achievements from “late developers” and help those who are changing schools at key points in their education. Formal recognition of competencies could give positive confirmation of attainment which will be of particular importance to those learners who are in hard-to-reach groups, such as widening access groups, or learners with disabilities.

Universities welcome interdisciplinary learning and try to incorporate this in the curriculum where possible but it can be challenging to map and relies on good administrative oversight and dedicated resource. It may therefore be more pragmatic to consider collecting this evidence at subject level.

It may be helpful to identify key skills and competencies within each subject at each level in addition to the academic grade. Key competencies with credits and threshold grades could be subsequently listed as happens to a certain extent in the New Zealand Record of Achievement. The current SQA Detailed Record of Attainment could be enhanced to include this information at each subject level. Standard Grades had both an overall grade and grades for different elements. There might also be potential to use this approach.

Universities may value seeing both the academic profile in addition to the corresponding skill or competency set to allow for further differentiation where appropriate depending on the differing recruitment needs of different institutions. Employers may also find this useful.

Considering how we gather evidence on achievements, awards and qualifications - Exams and other forms of assessment.

6. Please share your thoughts on what a ‘better balanced’ assessment system would look like. As well as considering the balance between external examination and internal assessment you may also wish to comment on the frequency of examinations.

Universities are open to change and already use a variety of innovative assessment methods as appropriate to the course and learning outcomes under assessment such as group work, problem-based learning etc . We would be happy to share examples of best practice from across the university sector.



We would support including this approach in national qualifications, with examinations being part of the mix for National 5, Highers and Advanced Highers. This should be done while preserving the academic rigour and standards of the qualifications.

Some of our members have reported a marked move towards more “authentic assessment” rather than sole reliance on a timed exam. In other words, assessments which test not only subject knowledge but their application in a more applied situation and this may benefit those learners with different learning styles. Exams remain important in many institutions and courses, but a mix of examination practice has developed in recent years at universities. For example, closed or open book or online formats and in terms of frequency, many universities now tend to have summative assessment at the end of modules which generally last one semester. There are pedagogic advantages to this system rather than year end summative examinations, but external assessment should underpin the framework of any qualification system in the future.

Assessment should be fair, valid, equitable and transparent for all learners so outcomes must be externally verified and moderated at a national level. Learners and parents as well as other stakeholders, including universities, must be able to trust outcomes and trust that the process is equitable. External assessment and/or validation provides consistency, credibility, and objectivity, and we feel that retaining substantial external assessment is important to identify and select successful learners for university. It will also provide assurance for those learners using their qualifications to study or work outside Scotland.

We believe that a qualification system without a strong framework allowing for external validation and assessment creates risk for fair, equitable and transparent access to university and other learning pathways:

- Universities need standardised, graded qualifications to allocate offers. Many courses have many more applicants than the university can accommodate, so it is important that these grades in combination with an applicant’s contextual background can be used by universities to identify those with the most potential to benefit from the course. The risk is that universities feel they need to introduce additional tests to assess applicants for entry, either because of variability in grading or because grades do not allow for selecting between candidates. Whilst universities would do this as fairly as possible and such tests can be helpful in focussing on aptitudes beyond academic qualifications, it would add costs and potentially stress for applicants. It might have most impact on those applicants who fall just outside of the widening access criteria. Some subjects with exceptional numbers of applications have already introduced such tests, for example, UCAT for selection for medical schools in the UK.

- Significant internal assessment may not allow students with SQA qualifications to study outside Scotland and their qualifications may be seen to lack academic rigour unless there is appropriate and robust national validation.
- A reliance on internal assessment may create a two-tier system externally where some schools are seen by some to be more or less rigorous than others (because of different interpretations of the guidance) unless there is appropriate validation and a robust moderation process in place.
- Internal assessment relies on well-resourced schools with fully staffed and experienced teachers across all subject areas. We have concerns that this could mean that some pupils in some schools may be disadvantaged more than others due to challenges in recruitment or due to the size of the school. More generally, without rigorous validation, there is a risk that unconscious bias could influence results.
- External assessment allows for consistent metrics to measure the attainment gap over time.
- External assessment allows candidates to perform well independently and anonymously in a structured environment.

We are, however, supportive of exploring additional assessment formats within school qualifications if external verification can be assured. The recent pivots to other forms of assessment in schools and universities has shown that these can be impactful. There is already a mix of internal and external assessment at SCQF Levels 5-7, and we would welcome for these to be standardised across subjects or disciplines as appropriate. Short courses, portfolios, case studies etc can provide a more authentic, real world learning experience if they are well planned and do not crowd an overcrowded curriculum, particularly if skills and competencies are also being assessed at the same time. Subject grades on their own often cannot show the ability of learners to apply their knowledge from different disciplines to different contexts which is important to real life and would help prepare learners for a range of post-school destinations, including university.

Some universities particularly value the learning and teaching in Advanced Highers as preparation for university study. The OECD report notes that the learning and teaching in Advanced Highers is closer to CfE ideals than National 5 and Higher. We therefore think it might be worth looking at whether some Advanced Higher style aspects could be introduced to Higher.

The opportunity to develop and design additional assessment formats is exciting however we believe care should be taken to ensure the load is carefully planned:



- Multiple assessment formats across different subjects at different times of the year could be overwhelming and stressful for learners (and difficult to manage for schools).
- Some learners may have additional support or help at home.
- Introducing multiple assessment formats could divert teaching staff from teaching the full curriculum.
- Investment in additional support for teacher continuing professional development will be required to ensure assessment outcomes are consistent.
- Alternative assessment formats need additional markers and a formal moderation process introduced at scale to ensure final grades are fair for all.

Considering how evidence should best be presented - Recognising Achievement at the end of the Broad General Education(BGE).

7. Please share your thoughts (advantages/disadvantages) on the idea of introducing an achievement, award or qualification at the end of the BGE.

Formal recognition of the completion of BGE could provide evidence of the skills and academic achievement to date and acknowledges the BGE as a distinct phase in the curriculum. This depends however on what qualifications are introduced as part of the Senior Phase and how they interlink and the format of any proposed BGE award or qualification. An unintended consequence of a BGE qualification is that it could result in even more focus on teaching to the qualification (depending on how it is configured) rather than providing a broad curriculum experience and thus create a more narrow curriculum.

If the Senior Phase continues as it is with most National 5 qualifications taken at the end of S4, an award or qualification at the end of BGE could be important for those learners who are limited in the number of subjects they can take at National 5. Current practice is variable, but school policy determines whether learners take 6, 7 or 8 National 5 qualifications. This can subsequently narrow the Senior Phase experience and a BGE qualification may allow learners to demonstrate their full knowledge and skills up to the end of S3 in comparison with other learners who have been able to take more subjects.

However, it is worth thinking how this would work with assessment at the end of S4. It is important that there is not too much duplication between S3 or S4, or the introduction of more assessment in S3, which might further cut into learning time. It might be possible to consider the award at the end of S4 but this may create a confusing two-tier system where



some learners have different certificates and qualifications. Standardised equal access at a consistent time to Senior Phase qualifications may be a fairer approach and may negate the need for another certificate or award at BGE level.

Recognising Achievement in the Senior Phase

8. Please share your thoughts (advantages/disadvantages) on the idea of introducing a type of leaving certificate at the end of the Senior Phase.

It is unclear from the question as to whether this would be in addition to existing current qualifications such as National 5, Higher and Advanced Highers or whether a leaving certificate will replace these. In question 3b we set out how skills and competencies could be set within subject qualifications. Universities require evidence to assess academic potential and a leaving certificate on its own may be too generic to do this.

A leaving certificate (on completion of education) is common to other education systems and can evidence the wider skills and competencies achieved as part of the full school experience. It also recognises participation within the school community. Indeed, the HEAR (Higher Education Report) offers something similar for graduates (although it is has not been not uniformly implemented by all universities) providing evidence of the range of verifiable knowledge, skills and experience a student has developed at university in addition to a formal transcript of results from the university.

A formal component of the International Baccalaureate is CAS (Creativity, Activity, Service) which recognises activities taken alongside academic studies. This allows learners to demonstrate their involvement in a broad range of activities and whilst not formally assessed, allows students to reflect on their achievements and development.

We would support exploring options for a Senior Phase certificate if seen as of benefit to learners and this was in addition to subject based qualifications, if verified by schools and if it was equally accessible to pupils in all schools.

Advantages for those interested in applying to university could include:

- Broader acknowledgement and recognition of skills development and activities within school.
- Encourage continued participation in school life after any university offers have been received.
- Could place academic achievement in context.

- Promote and recognise interdisciplinary learning, in addition to subject based qualifications.

Disadvantages could include:

- Activities for inclusion on a HEAR certificate for university students need to be substantial, verifiable, equitable, factual, and additional. We would welcome consideration whether it is possible to do this for a Senior Phase certificate within resource constraints in schools.
- The administrative burden may be too high, for example updating, maintaining, sharing, securing, and verifying records.
- Consideration of the purpose and objectives need to be clear and widely understood for this to be of value to external settings such as colleges, universities, and employers.
- May advantage only well-resourced schools and advantaged learners.
- May not be suitable for use in university admissions as could only be issued at the end of the Senior Phase.

Technology and Assessment - The Potential of Technology

9. How should Scotland’s qualifications and assessment system make best use of digital technologies?

Universities have been making increasing use of technology to support curriculum and assessments and over the pandemic universities had to switch their assessments online. In some cases, this involved adapting the type of assessment, but in others it was a matter of adapting the assignment to suit the media. This included online exams for some institutions/courses.

We welcome enhanced engagement with technology in subjects where it makes sense to do so as learners will be expected to interact and confident with this when moving on to employment or further study. Digital literacy is an important lifelong learning skill that will aid learners’ throughout their education as well as in post study employment. However, teaching of some skills, for example some scientific experiments, needs to be delivered in person and evidence and research from the pandemic will be helpful in deciding the best approach. The same approaches to assessment, whether internal or external, in terms of moderation and verification should also apply in the digital format.



Digital technology provides an opportunity for more innovative and relevant assessment, giving a more authentic learning experience. It could also make marking and grading more efficient (if learning and teaching methods are digital then assessment should be too) and makes learning accessible for many more learners. JISC's report on [Future of assessment](#) provides examples on how it can best be used in the HE and FE environment and it may also suit schools. If collecting evidence throughout the year on the four capacities becomes more important, then this may make downstream administrative tasks more efficient and effective. It may also open opportunities up for a lifelong e-portfolio.

Equity and access are important considerations for the use of technology however, and it is critical that individuals are not disadvantaged by lack of access to appropriate equipment, reliable internet access, and suitable study space. It is important that those students who need it have appropriate assistive technology to enable their participation. Digital technology also assumes that the same operating systems are used by all who need to interact with it (learners, schools, colleges, external agencies) and this may need longer term planning and resourcing. Consideration should also be given to the importance of academic integrity and the challenges that digital based assessments (especially those not in a controlled assessment environment) can present as evidenced by the rise in cases of plagiarism and collusion in universities during the pandemic. It is not impossible that essay mills target school pupils.

Digital technology changes rapidly and flexibility for future-proofing assessment systems will also be essential.

An approach that benefits all Learners' - Equity

10. How can we make sure that proposals for a future qualification system will uphold the rights of all learners to demonstrate their achievements?

Our members value qualifications that can:

- Develop well prepared students (for university, college, or work) both nationally and internationally.
- Allow universities to make fair, transparent, and equitable admissions decisions.
- Combine robust standards and rigorous assessment to recognise student achievement.
- Ensure qualifications are fair for all learners and assessment opportunities are transparent and available to all.



- Allow for progressive assessment practices but can also prepare learners for future different assessment types.
- Deliver academic content as well as broader skills acquisition.
- Allow for seamless education pathways including progression to university or HN qualifications.
- Provide quality information, advice, and guidance at key stages of the learning journey.
- Ensure Scottish learners are on an equal footing with learners with similar staged qualifications elsewhere to allow a successful transition in the learning journey.
- Provide national metrics for performance and support equality of opportunity within education.

Have we missed anything?

11. Is there anything else in relation to the reform of qualifications and assessment which is not covered in this consultation which you would like to raise?

We would like to highlight the following:

- The consultation questions have not indicated whether the timing of qualifications will change in terms of whether Higher qualifications will still be available at the same age and stage in S4, S5 and S6. Scotland's education system within the UK is unique in that most learners can apply to university or college after S5, having already achieved or partially achieved entry qualifications. It allows learners to take time and receive support and guidance to research and consider post school options and be prepared for the future. We would not want to risk losing this distinct advantage for learners.
- It is important that the curriculum does not narrow too quickly or too early: keeping learners engaged with as many subjects as possible for as long as possible is helpful. Different learners will develop at different paces, and this keeps their options open as well as broadening skills and abilities. Narrowing the range of subjects too soon may reduce the choices for post school. A certificate at the end of BGE may accelerate this and a standardised approach across all schools on choice would be helpful.
- The review is focused on the Curriculum for Excellence but does not address how other qualifications at SCQF Level 7 can or should feed into this discussion. For



example, HN qualifications are offered by colleges, sometimes taken by pupils at school or directly after school and are often used as an articulation route to university. If qualifications and assessment at school evolve, then consideration of the dependencies of other qualifications on these should also be taken into account.

- Any new qualification system must continue to be recognised nationally and internationally and allow learners to progress wherever they wish.
- Any new qualification system must not put learners at a disadvantage in comparison with learners who present with other qualifications. For example, the timing of results, level of academic knowledge and skills and method of assessments must be equitable with other qualifications.
- The senior phase can vary widely across the country. More rural schools or schools in more deprived areas can have more limited opportunities to study Advanced Highers, for instance. We would like to see more equity with a minimum number of core subjects on offer.
- There is an opportunity to consider a system wide approach to education and skills as part of this review as any changes to qualifications and assessment at the school level has implications for all other parts of Scotland's education and skills systems. Interdisciplinary learning, for example, is important at all levels of education and could receive improved attention if addressed at a systems level across the whole system.
- As the terms of reference indicate, we support the need for evaluation to be built in from the outset so robust evidence on the implementation and impact of these reforms can be generated and corrective action can be taken as necessary.

ENDS

