

**Junior Cycle Framework: New Specification for English**

**Teachers’ Union of Ireland (TUI) Response (September 2013)**

**Introductory Comments**

The opportunity to make observations on the draft specification for English is welcome but TUI does so with caution. As consistently highlighted the union believes that it is very unwise to move to implement changes of the magnitude set out in the junior cycle framework at this time of significant fiscal constraints and enormous contraction in the resources and supports available to schools and teachers. Even if some additional resources are committed to support implementation, these will fall well short of matching the cuts that have been imposed on staffing allocations, capitation grants and teacher pay in the past five years.

TUI takes this opportunity to re-iterate the commitment of its members to curriculum development and change reflected in the many initiatives they have been involved in over many years e.g. the humanities and science programmes in the seventies, vocational preparation programmes in the eighties, and post-leaving certificate courses, the Junior Cycle Schools Programme (JCSP) and the Leaving Cert Applied Programme (LCAP) in the nineties. These were followed by a range of educational equalities initiatives which included significant engagement with provision for special educational needs and massive expansion in further and adult education from the mid-1990’s to date. It is, therefore, not without experience and foundation that TUI members express grave reservations in respect of the enormous change initiative underway.

In particular, TUI notes significant disappointment and concern that, as yet, there is a considerable lack of clarity on some issues. Details in respect of the moderation approach being proposed is vague and sketchy and fails to provide sufficient information and guidance on what is actually intended or expected. For example there is no clear or detailed road map about school-based assessment for final certification e.g. What will it look like? How will it be organised to ensure consistency in and maintenance of standards, to protect the credibility of final (school-based) certification for students and to guard public confidence? What system of moderation will be deployed to ensure an adequate level of annual external monitoring and how will this be resourced? How will teachers be supported in implementation and how will they be recompensed for additional work and responsibility. It is, therefore, not surprising that aspects of the draft specification for English are also limited with regard to the detail provided, raising many questions for TUI members. This is worrying and makes it difficult for the union to engage in a truly constructive manner.

While TUI members find favour with aspects of the changes proposed for English in junior cycle they, by and large, believe that schools and teachers are now under constant pressure and, simply, will not have the capacity to implement change in a manner that will lead to the expected improvement in outcomes for all students. Therefore, without prejudice to any future position that TUI may take in respect of implementation it offers a number of observations on the draft specification for English. These are drawn from conversations with individual members, discussions at the Education Sub-committee and feedback at a consultation meeting organised for members. Broadly, members acknowledge the need for a shift in emphasis within junior cycle English and recognise the potential the new specification offers to promote student engagement and energise learning. This, however, will only happen if adequate resources to support teaching and learning are made available to schools and teachers. The main issues identified as requiring further consideration arepresented under a number of interdependent topics: **Content, Assessment and Certification and Resource and Support Requirements.**

1. **Content**
* **Prescription of Texts**: In general, members oppose over prescription of texts (novels, short stories, prose, poetry or novels). Such a move would be regressive as it would introduce a level of ‘regulation and constraint’ and discourage flexibility and creativity, features that are essential to language development and strong engagement in literary texts/literature. It would disempower teachers and further disadvantage students with lower levels of literacy as texts selected might be less likely to represent their social context, interests and prior experiences. However, it was accepted that some ‘scaffolding ‘and guidance will be helpful. An appropriate balance will be important between providing specific guidance and direction and enabling freedom and creativity to teachers and students when selecting content to address learning outcomes.
* **Range and Depth of Content**: The specification poses questions about the overall level, range and depth of content addressed in the suite learning outcomes. There is a strong view that the specification ‘overreaches’ and that there is a clear mismatch between the range and depth of content to be covered and the time available in each year and over the full cycle. For example, the level of suggested content (as per sample provided) for first year, a year that is being emphasised as an exploratory year to support transition, is a particular concern. Is it possible to cover two novels, three dramatic texts, an unspecified number of short courses, ten poems and a variety of non-literary texts along with the language/literacy element, while focusing on oral language development in 240 hours?

A primary concern is that in overall terms the potential content load, to be covered in the time available will result in a dilution, as opposed to a strengthening, of deep and higher order learning. In this regard, significant concerns were flagged about the capacity of the new specification to adequately prepare students for the demands of senior cycle and, ultimately, the final Leaving Certificate examination.

* **Coherence:** As currently presented there is a level of incoherence and confusion vis-a- via the relationship between the statements of learning, key skills, learning outcomes, assessment components, features of quality, emphasis for final certification and grading. How these could be effectively integrated within classroom practice and the assessment process requires further articulation. For example, must all learning outcomes be covered by all students or can teacher and/or students decide to leave some out? Will key skills be assessed, if so, which ones, to what extent and how?
* **Oral Skills and Digital Skills:** There is broad welcome for the focus on the development of oral skills. However, there are many concerns about addressing and accommodating the needs and abilities of all students, time demands, teaching resources, adequate professional development support for teachers and, particularly, about how oral skills can best be assessed –what, for example, will be assessed and how?

Many students, although described as ‘digital natives’ do not have strong basic operational skills on arrival in post-primary school. Question arises as to where they will be given an opportunity to develop the basic foundation skills if ICT is not a subject or short course in its own right? Will the burden simply fall to the English teachers, compromising the core elements of the English curriculum?

* **Common Curriculum**: There is growing concern that given the emphasis on a ‘common’ curriculum and shrinking staff levels some schools may no longer make provision for separate higher, ordinary and foundation classes. Notwithstanding the potential for, and benefit of, a differentiated approach within classroom practice there is a genuine concern about its limitations in certain contexts and circumstances.
* **Special and Discrete Needs:** Many question whether the new specification will be appropriate for, and accessible to, some students with special educational needs. The idea that students with wide ranging abilities, some with very special needs, can be accommodated in one group is seen as unrealistic - *‘if the ability range is too broad many students at both ends of the spectrum will be short-changed’*. Questions as to where the JCSP will fit, within the new English specification or the junior cycle programme in general, remain unanswered. Many are sceptical and feel the new framework represents a lack of understanding of the very different needs of students who participate in the JCSP. In tandem, there is insufficient clarity about the proposed Level 2 certification especially with regard to SEN students in mainstream classes. In this respect, there is a real concern that there will unrealistic expectations placed on schools and teachers to prepare class groups for two different types and levels of certification. The lack of clarity on these matters at this stage is worrying and much more explicit consideration is advised.

There was general consensus that the new specification and the assessment model proposed will not adequately provide for adult learners who wish to obtain a junior cycle qualification. While it is acknowledged that adult learners have access to other modes of certification it is understood many have a preference for the junior certificate as currently organised. Some consideration of the issues arising is recommended.

1. **Assessment and Certification**
* **State Certification/ School-based Assessment:** TUI continues to oppose the move away from state certification towards an assessment model totally reliant on teacher-led/school-based assessment and school certification. Members are adamant that this will lead to a lowering of status and recognition of student achievement at the end of junior cycle.

Many teachers have expressed concern that the proposed model for school-based assessment does not show due regard for the past and current experience of teachers in respect of the pitfalls of school- based work and projects for certification e.g. lack of student engagement, plagiarism, student non-completion, constant pressure on teacher to follow- up students, pressure on teachers to sign-off inappropriate material, lack of access to resources, facilities or timetabled hours. These issues have been consistently raised by the TUI and international practice also points up difficulties and risks in this area. Failure to recognise and address these appropriately at pre-implementation stage will lead to considerable problems and difficulties later.

* **Moderation Process:** The continued lack of clarity about the moderation process is giving rise to a lack of confidence in the move to school-based and teacher-led assessment. In particular, teachers emphasise that the absence of robust external moderation represents a flawed approach which will ultimately undermine the credibility and integrity of the overall process and outcomes, with considerable potential for general standards to be compromised over time.

There is an obvious lack of detail about the proposed internal or cross-school moderation - What processes and procedures will underpin it? When it will take place? What is ‘a collection of work’? Will the portfolio be similar to what is required for FETAC certification? What provision will be made for planning and review meetings? Who will lead and who will be responsible for particular aspects of the process? How many moderation events will be required? What resources will be made available? This is worrying and makes it extremely difficult for teachers to engage in a real discussion on the matter. In one person’s words ‘ There are too many ‘mights’ and ‘maybes’, either they (the NCCA and Department) don’t know what they are at or they are holding back details, which is unfair’.

Teachers remain concerned that the suggestions for internal moderation present very real possibilities for varied interpretations and practice at school level. Consequently, issues will arise in respect of consistency of student assessment outcomes and maintaining general standards. Escalating competition among schools and possible pressure from parents and school management authorities for ‘high results’ are a particular source of unease. The potential for a significant increase to teacher and school workload is a clear and real concern, especially given the lack of engagement so far on what, if any, additional resources and time allocation will be committed to schools.

* **Workload and Administration**: The overall assessment approach must be designed in a manner that it will avoid excessive time demands or represent significant additional work for teachers. There is special concern that the proposed assessment approach for English will result in considerable additional work for English teachers as the subject is a core subject and the content is more extensive in nature than most other subjects. In designing an assessment model this must be borne in mind, while also giving due consideration to standards and how best to assess the learning outcomes.

The lack of detailed discussion, thus far, on the operational and administrative matters that will arise from school-based and teacher-led assessment is a cause of much concern. This is serving to increase distrust among teachers and principals and undermining engagement with possible solutions to some concerns.

* **Coherence:** As currently presented the assessment approach does not appear to sufficiently support the connection between the relevant statements of learning, learning outcomes as set out in the specification, key skills and the features of quality that will determine the final grade. This represents a deficit and incoherence in the relationship between the assessment model and other central aspects of the curriculum. More detail, coherence and clarity are necessary.
* **Number of Assessment Components:** A general view emerged that three assessment components, in addition to the written exam (four in total), will be excessive, too difficult to manage and unhelpful. This level of assessment activity could prove too demanding and could inadvertently compromise and undermine the overall process and quality outcomes. Two components would be more realistic. It is noted that ‘ordinary level students’ and especially ‘foundation level students’ will have a difficulty with the comparative study as set out in current draft. In this regard it is considered that the oral assessment should be retained but the creative/personal writing and comparative activity could be merged. At the very minimum the depth and breadth of what is required in each component should be realistic in terms of the time available. In general, it was considered that insufficient clarity is available on the components. Much more detail is required to take an informed view.

In relation to the personal/creative writing component there is concern about a potential over emphasis on student self-assessment and self-selection of pieces to be used for final assessment/certification. More thought and clarification is required.

* **Oral Skills and Focus on Media**: Attention to the assessment of oral skills is broadly welcome. The primary issue is how to devise an assessment approach and process that is not contrived and that is fair to all students in terms of their personal ability. The idea of a presentation is considered reasonable by some but many believe that it has limitations as an assessment instrument - *‘while it makes immediate sense it is an easy option and does not necessarily represent day-to-day contexts or language competence’*. Issues arise as to how a presentation would be designed and to whom student would make the presentation - to one teacher, their class, more than one teacher? Some students will have access to considerable external props and supports, others much less so, leading to unfair advantage in some instances. Organising and conducting individual student presentations will be very time consuming. It is suggested that consideration be given to the role a guided group discussion might play in the assessment of oral skills. Questions also arise as to how students with particular language difficulties or special needs (e.g. those who have autism, those for whom English is not their mother tongue) would be assessed fairly. Some suggest that there is a mismatch between the new emphasis on ‘learning through oral language’ and the continued predominance of written assessment (60%).

Media is seen as a very relevant and accessible part of the current curriculum and the different focus in the draft specification is problematic. This should be revisited especially with reference how inclusion at the point of assessment for certification.

* **Collecting Evidence:** A requirement to collect and retain evidence for assessment purposes is an issue of much concern not least because of the potential time involved ( students and teachers) but also for reasons associated with storage, security and data protection. It is accepted that some evidence of student work will be necessary to support assessment outcomes. However, requirements must guard against cumbersome and unrealistic demands and the appropriate technical and administrative support must be available. Otherwise an excessive amount of teacher and student time and energy will be diverted away from quality teaching and learning. It is felt that the practical difficulties associated with compiling and storing evidence are being avoided or are certainly not being explored in sufficient detail.

The idea of creating portfolios, and in particular eportfolios, raises many questions about what and how much detail should be included? Who will be responsible for ensuring they are secure? When and where will the material be developed and uploaded? Who will have access to them, when and for what purpose? How secure will they be and who will manage them? The lack of clear detail is adding to the confusion and anxiety at this point. Careful consideration is necessary and there must be a frank and open discussion, embracing practitioners’ views, as a matter of urgency. In the absence of this, there is obvious scepticism about industry involvement in advising on matters such as portfolio development and ‘cloud’ storage.

* **Reasonable Accommodation (special needs):** There is a lack of confidence among teachers that the ‘common level’ approach with differentiation at point of assessment will appropriately and fairly accommodate all students. Particularly, students with lower ability are considered at risk of being short-changed, albeit unintentionally. In particular, the need for the retention of a foundation level is noted.

Provision for reasonable accommodation at point of assessment for certification is not clearly articulated and, therefore, is as big concern among some teachers and schools. Questions arise as to what additional time and support should be made available to students with special needs in completing projects, tasks and portfolios (now commanding 40% of overall marks) as well as written exams. Inadequate attention to this serious matter at this point will almost definitely lead to greater inequities and will place unnecessary and unhelpful pressure on schools, teachers and, most importantly, students.

* **Appeals**: An issue of some concern is the potential for an increased focus on appeals. In the absence of plans for external moderation teachers feel very vulnerable. Whatever moderation process emerges must ensure adequate protection for individual teachers and schools against unjustified criticism or unrealistic expectations from parents/guardians. In broad terms, TUI considers provision for appeals to be somewhat contradictory to some of the principles espoused in the framework and advocates that restrictions be placed on the circumstances in which an appeal can be sought. At minimum, procedures must be clear and simple and schools must be provided with additional resources to accommodate these when deemed appropriate.
1. **Resource and Support Requirements**

The foregoing issues all point to the need for appropriate and timely resources to enable and ensure effective implementation of the proposed junior cycle framework. TUI draws particular attention to the following.

* **Additional Teaching/ Co-ordination Hours:** Teachers feel aggrieved that change of the magnitude proposed is expected at a time when general pay levels, teacher numbers and posts of responsibility are shrinking. There is now very limited capacity for re-orientation of current resources and additional teacher hours (level will depend on a number of factors) will be essential to facilitate implementation of a new junior cycle framework. In particular, sufficient resources (time, substitution, and pay in some circumstances) must be made available to accommodate teacher engagement in assessment activities including moderation and co-ordination. In some cases and at certain times this will necessitate that schools have additional freedom and flexibility in how they operate and organise the daily or weekly schedule.

Additional teacher hours will also be essential to support the senior administrative and co-ordination activity which will inevitably emerge from the introduction of school-based assessment. This will be crucial to ensure that a number of people have specific responsibility and time to drive change and support day-to-day operation in a manner that leads to positive outcomes for students, teachers and the system in general.

In particular, TUI highlights that smaller schools (under 250 students) will need an additional weighting of teaching hours to enable them offer an appropriate range of subject/ short course options and form an appropriate number of class groups. It draws particular attention to the current provision for an additional teacher allocation to schools that offer the JSCP. It advocates that this be retained for schools already offering this programme as it provides some, although small, opportunity to promote equality of access and participation.

* **Continuing Professional Development (CPD) and Initial Teacher Education: A**ccess, during normal school hours, to high quality CPD support will be crucial. The proposed three days (in total) release from teaching is considered grossly inadequate to support teachers in bringing about the changes proposed in programme planning, in teaching and learning and in assessment (for and of learning) practice. In particular, the emphasis on teacher involvement in assessment and moderation is a new departure for many teachers in post-primary education. Teachers must have adequate time to explore and discuss new practices and ‘ways of doing’ in detail, in face-to-face mode, with colleagues. The timing of CDP is also important and teachers are highly suspicious they will end up investing a lot of additional, personal time in professional development activity.

It was noted that initial teacher education must embrace the new emphases so that new teachers are well equipped as they enter the profession. Stronger links on an on-going basis between schools and third level colleges are also advocated.

* **Planning Time:** In tandem, members have emphasised that reasonable time must be made available during school time for planning activity at subject department level and across disciplines as appropriate to the programme being offered. This is critical in the introductory phase and must be in addition to core CDP activity so that internal school planning and the integrated approach being advocated are strong and coherent.
* **Modern Technology:**  While ICT and modern technology should be visible in the curriculum and drawn on to support teaching and learning a number of issues are of concern:
* A critical number of schools do not yet have good and/or speedy access to the web, placing many students and teachers at a disadvantage vis-a-via others. In addition, many students have limited or no access to ICT in the home or their local community. While it is acknowledged that the government has committed to improving general access to broadband nationwide there is much concern about the pace of implementation and/or that some geographical areas will remain poorly served for some time.
* Even where access to broadband is not an issue there is considerable variation in terms of adequate access to modern, technological equipment and aids in classrooms. A general view prevails that ‘vague or open-ended direction’ on how resources might be deployed in this regard is insufficient. Strong and clear guidance to management authorities and school principals on the minimum facilities that must be available in each classroom and in the school in general is required. This calls for adequate budget allocations to enable schools meet minimum requirements.
* Many schools continue to have limited or no access to the necessary expert technical support (internal and external) to support day-to-day use of modern technology. This acts as an obstacle to and/or disincentive for many teachers when reference to using technology in the classroom. But, in this regard, schools are no different to other work contexts and it is now fairly well established that good and timely access to the appropriate technical support is a precursor to efficient use of time, personal expertise and facilities.

* **General Resources**: Easy access to high quality, tailored classroom materials and resources (including through electronic mediums) essential to support effective and efficient planning, teaching and learning, will be important. Appropriate strategies, tools and exemplars will be necessary to support development and promote collaboration among teachers. In this regard, it is noted that the exemplars provided in the English specification appear to mostly focus on high achievers; a wider range should be provided.

Administrative and operational issues, student supports and access to technical expertise (e.g. storage, data and IT systems, subscription for websites and IT resources, book/library supports, ICT support) will all demand additional resources to ensure that all schools are well placed to make an effective transition to a new junior cycle programme and that no school or student is unduly compromised because of socio-economic background.

***In conclusion***, TUI welcomes the opportunity to expand and further clarify the above points at the NCCA Consultation event in September and at further meetings of the English Development Group, the Junior Cycle Board and the NCCA Council. It emphasises that much more clarification and discussion about the assessment model to be implemented is necessary before TUI can fully endorse any subject specification for a new junior cycle programme. Furthermore, the importance of government commitment to resource issues in the pre-implementation and early phases of introduction cannot be underestimated as it will represent a strong message to teachers and principals that they will be supported in embracing change.

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