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| **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**](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.

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| |  |  | | --- | --- | | Textbox | Please tick if you are responding on behalf of your organisation. | | X |
| |  |  | | --- | --- | | TextBox | Name of Organisation (if applicable): The Historical Association | | |
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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](mailto:consultation.unit@education.gsi.gov.uk) or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](http://www.education.gov.uk/help/contactus) page.

Please insert 'X' into one of the following boxes which best describe you as a respondent.

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| |  |  | | --- | --- | | DfE | Comments: The Historical Association is the only subject association for history in schools and as such we represent over 6000 members, the majority of whom are teachers and a further 17,000 who engage with us. | |

If you indicated that you are a teacher, headteacher, school leader or governor, please indicate what type of school

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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?

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| |  |  | | --- | --- | | DfE | Comments:  The Historical Association is committed to the principle of history for all to the age of 16 and for this reason welcomes the expectation that all students should be required to undertake a broad and balanced curriculum in which history features (albeit as one of two humanities options).  However, the format of the GCSE qualifications included within the EBacc measure means that they will not prove accessible to all young people. In these circumstances, the two key factors that should be taken into account, in making decisions about which pupils should not be entered for the EBacc are:  1) Pupils’ level of literacy, particularly in relation to reading and writing since the examination depends heavily on these forms of communication.  Low levels of literacy may, of course, be associated with and determined by particular kinds of special educational need or learning disability and these should clearly inform the decision.  2) Pupils’ level of proficiency in the English language, again because of its importance in enabling young people able both to access and to perform effectively in the examination.  Since written proficiency is known to take longer to develop than oral literacy, the current GCSE examination would prove particularly inappropriate for those in the *early* stages of learning English as an additional language.  It is also vital that careful attention is paid to the literacy demands inherent in the new GCSE examinations and that the reading levels required by different examination papers and source materials are accurately and routinely monitored both so that schools are fully aware of the nature of those demands and can make appropriate judgements in individual cases, but also so that the DFE, Ofqual and the Examination Boards clearly appreciate the level of challenge inherent in their expectations.  The current correlation between young people’s socio-economic background and their likelihood of achieving the EBacc qualification means that the HA welcomes the inclusive emphasis of this policy. (In 2014, for example, only 21% of pupils eligible for free school meals were entered for the EBacc, compared with 42% of all other pupils.) But the correlation also raises concerns that pupils’ exclusion from the qualification may ultimately derive from earlier failures to address the barriers to learning faced by those living in poverty – barriers that mean that they reach Key Stage 4 without the necessary literacy skills. Schools need therefore to attend to those barriers and to continue to receive targeted support in doing so, to ensure that the decision is not ultimately based on impoverished expectations of such pupils or inadequate resources to support them.  It is essential to note, however, that the decision not to enter a particular student for the EBacc for the reasons outlined above should not deprive them of the opportunity to study history to the age of 16 and to undertake an appropriate and worthwhile qualification in the subject. | |

Accountability for meeting the EBacc commitment

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

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| |  |  | | --- | --- | | DfE | Comments:  Schools’ performance in the EBacc needs to be published in relation to data that allows for consideration of students’ prior attainment, along with information about: (a) the proportion of pupils identified as having particular special educational needs or learning disabilities that impact on their levels of literacy; and (b) the proportion of pupils at different stages in learning English as an additional language. | |

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

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| |  |  | | --- | --- | | DfE | Comments:  As noted above, the Historical Association has an explicit commitment to history for all young people to the age of 16. While the EBacc falls short of this ideal in allowing students to choose between humanities subjects, we cannot endorse an exclusion from the EBacc expectation on the grounds that particular pupils have chosen to follow a more ‘vocational’ option. History remains an essential foundation for informed citizenship for all members of our society. Equipping all young people with knowledge about the development of ‘fundamental British values’ and the different ways in which those values have been threatened and defended over time plays an essential role in their promotion which is now a requirement of all educational institutions.  Given the choice between humanities subjects implied by the EBacc measure, the HA’s position is that the expectation of continued study of a humanities subject should apply to all young people regardless of the context of their schooling. In order for that study to be worthwhile for those students with lower levels of literacy/proficiency in written English, alternative history courses that allow for other ways of engaging with the subject and other more appropriate forms of assessment, leading to worthwhile qualifications, should be offered to them.  While most of the current Level 1 and Level 2 history awards are being discontinued from 2017, it is essential that action is taken to develop forms of assessment and qualifications that acknowledge and appropriately reward historical knowledge and understanding expressed in ways other than those rewarded within written examinations that depend on specific forms of literacy. To the best of our knowledge, the ASDAN short course in history (that can be taken within their Level 1/2 Certification of Personal Effectiveness) may be the only form of assessment left to validate achievement in history expressed in formats other than a written answer to an examination question in time conditions. While there may be useful lessons to learn from this model, further insights into effective provision and worthwhile forms of alternative assessment may perhaps been gained through careful consultation with special schools such as Bradfields School in Kent that have achieved the HA’s Gold Quality Mark in recognition of the quality of their history education provision for pupils with particular special needs. | |

Implementation

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

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| |  |  | | --- | --- | | DfE | Comments:  It is important to acknowledge that there are two dimensions to this problem in relation to history: (a) that of recruiting highly-qualified, specialist teachers to schools; and (b) that of matching teachers’ subject specialism to the subjects that they actually teach.  *i) The lack of availability of suitably qualified history teachers:*  While national data appear to suggest that there are no problems of teacher supply in relation to history, the HA survey of history teaching in English schools (conducted in the summer of 2015, which received responses from 425 different schools and colleges) 31% of respondents reported that they were currently concerned about the ‘lack of high quality applicants’ in history.  Our Secondary Committee have received regular reports from members who lead the history programmes within university/school initial teacher education partnerships of increasingly desperate emails from heads of history in June and July, enquiring whether there were any candidates left seeking jobs as they had been unable to recruit to fill their history posts. By that time the course leaders had no-one left to recommend as all their trainees had secured posts, meaning that they were unavailable to fill those vacancies advertised after the May half-term (vacancies conventionally taken by NQTs since teachers in post cannot tender their resignation after that date in order to move elsewhere).  *ii) The extent of non-specialist teaching caused by internal re-deployment as the balance of the curriculum shifts*  The problem of ensuring that all young people receive appropriate specialist teaching to prepare them for the EBacc is also related to the ways in which schools have been forced by shifts in the balance of the curriculum (and by trends towards a two-year Key Stage 3 programme) to re-deploy non-specialists within EBacc subjects. Schools obviously seek to avoid this at GCSE level, but only 81% of the respondents to the 2015 HA survey reported that all their GCSE classes were being taught by history specialists. In 8% of schools up to one quarter of the teachers taking GCSE classes were non-specialists without a history degree and/or history training; in another 8% of schools between a quarter and a half of teachers taking GCSE history classes were non-specialists and in 3% of schools this applied to more than half of the GCSE history teachers. When these figures are compared to those for 2014 the problem seems to be getting worse: 14% of respondents reported some non-specialist GCSE teaching in 2014; by 2015 the proportion reporting this phenomenon was 19%.  The problem of lack of specialist teachers is much more serious at Key Sage 3. In responding to the HA survey in the summer of 2015 only a third of schools reported that all their Key Stage 3 lessons were all taught by specialist history teachers. In 40% of schools up to one third of history lessons were being taught by non-specialists; in 20% of schools between a third and two-thirds of lessons were being taught by non-specialists, while in 8% of schools more than two-thirds of history lessons were taught by non-specialist teachers. This represents a very serious problem in light of the more rigorous and wider-ranging GCSE examinations being introduced for first examination in 2018, since the basis of historical knowledge and understanding built at Key Stage 3 will be essential to effective performance at GCSE.  While schools may be keen to redress this problem in light of the introduction of the expectation that 90% of students should be entered for EBacc subjects it is particularly difficult both to recruit new staff and to re-train those who are re-deployed internally at a time of austerity when schools are facing significant cuts in real terms to their income as they absorb the costs of increases in national insurance and pension contributions. | |

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

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| |  |  | | --- | --- | | DfE | Comments:  We know that a lack of qualified applicants for history posts may prompt schools to consider filling vacancies (or anticipated vacancies) by appointing unqualified teachers to train on the job through the School Direct salaried route. They may also turn to the School Direct unsalaried programme or consider developing their own school-centred training programmes in the hope that by recruiting trainees directly to their schools they will retain them after they have qualified. Among history departments support for this approach is, however, very limited as shown in their responses to a series of questions in the HA’s 2014 survey asking about initial teacher training. In reflecting on the impact of increasing the number of employment-based routes into teaching, only 17% of respondents suggested that they thought this would improve the quality of history teachers entering the profession. Fifty-three percent of the respondents thought that it would actually have a detrimental effect on their capacity to recruit high quality history teaching staff.  One reason for this is that many school-based training schemes struggle to provide trainees with access to specialist subject training and access to the historical scholarship that is much more readily found in universities. This is why respondents to the HA 2014 survey overwhelmingly argued that all training routes should include a minimum entitlement in terms of trainees’ access to university-based provision. Ninety percent of respondents endorsed the suggestion that all trainees should receive a guaranteed minimum entitlement to university-based elements in their training, incorporated within a partnership programme. Respondents were keen to acknowledge that it was not only the trainees but also their mentors and other experienced teachers working with the trainees who benefitted through the partnership arrangements from this access to subject-specific scholarship and educational research. | |

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

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| |  |  | | --- | --- | | DfE | Comments:  The HA has not conducted a further survey of history teachers since the specific proposal was announced that 90% of pupils would be expected to undertake the EBacc. However responses to previous surveys asking more generally about the effects of curriculum change suggest that history departments are responding to the EBacc and to the introduction of the new GCSE criteria and revised specifications in a variety of ways.  Some history departments have used the introduction of the EBacc measure to help them strengthen the foundation that they could provide at Key Stage 3, for example by switching from integrated humanities courses to discrete provision of history and geography teaching. Others have been able to argue for more time – or at least to resist the loss of further time to the core subjects, most obviously English and Maths.  There are mixed responses from schools in relation to their thinking about the length of time allocated to Key Stage 3. In some cases strong arguments have been made about the importance of Key Stage 3 as a foundation for GCSE study and the three year entitlement (to both history and geography) up the age of 14, established by the introduction of the National Curriculum, has been preserved. However, in an increasing number of schools, the expectation of more demanding GCSE qualifications – in terms of the range of types of different content and the different timescales on which history has to be studied, has created a demand to allow pupils to specialise earlier so that they have three years to master those subjects in which they will be examined (for the EBacc and the Progress8 measure). Anecdotal evidence since the announcement of the expectation of EBacc for 90% of pupils, suggests that the trend towards a reduced, two-year Key Stage 3, allowing three years for focused GCSE preparation, is likely to accelerate (with a particular increase over the past year among grammar schools adopting this approach, whereas previously reductions to the Key Stage 3 curriculum had tended to be most evident among the original sponsored academies).  What is clear already is that most history departments, once they are more familiar with the demands of the new specifications, expect to review their Key Stage 3 curriculum in order to ensure that it provides a secure foundation for GCSE. Some 65% of HA survey respondents thought that the impact of the new GCSE on their Key Stage 3 curriculum would be at least ‘considerable’ if not ‘profound’. What this might involve varies from school to school, with some departments (57%) thinking about the kind of background that they will need to establish at Key Stage 3 to provide a basis of essential knowledge and reference points on which to build, while others (40%) appear to be thinking rather more narrowly in terms of deliberate repetition or re-visiting of specific topics. The strongest influences that departments expect the new GCSE to have in terms of shaping their Key Stage 3 teaching relate to the kinds of questions that they routinely ask pupils to answer (87%); the way in which they use sources in answering questions about the past (61%); their approach to local history (56%); and the inclusion of history taught on different scales (depth, breadth and thematic) to reflect the different types of GCSE approaches (50%). | |

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

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| |  |  | | --- | --- | | DfE | Comments:    One strategy that schools may promote in order to manage the change may be to simplify timetable and staffing demands in the humanities by offering all their pupils a choice at GCSE between history and geography. The Historical Association wishes to make it clear that it does not support the principle of forcing young people to choose *between* these two subjects as a means of ensuring that they each undertake at least one. As the Geographical Association has argued in evidence submitted to the Education Select Committee on the EBacc proposal *both* subjects contribute to young people’s knowledge and understanding of the world as it is, of their place in it and of what it means to be a human being. Through studying these subjects ‘we develop knowledge, understanding and skills that enable us to understand and illuminate our common humanity and our relationships…By thinking geographically and historically about the past and the present we are better equipped to imagine our possible futures’. Schools therefore need to consider how they can structure the timetable and the options that they present to pupils to ensure that they retain the option to take *both* subjects should they wish to do so.  The most significant issues for schools are those related to teacher recruitment and to the training of non-specialist teachers – both those that are already teaching history without adequate subject knowledge development and subject-specific training and those who may be assigned to history in the future as the balance of schools’ curricula change.  It is important to acknowledge that even for specialist teachers, the introduction of the new qualifications for first examination in 2018 already presents significant demands, firstly in terms of developing their own subject-knowledge – with many ‘Modern World’ specialists required to teach both medieval and early modern history for the first time. (Previously many teachers have only taught these periods to Years 7 and 8). In the 2015 HA survey 54% of respondents reported that they were ‘concerned’ or ‘seriously concerned’ about the inclusion of unfamiliar content in the new GCSE specifications. A second demand that may be entirely new to the majority of teachers who have taught ‘Modern World’ GCSE courses relates to the kinds of teaching strategies required to teach long-term thematic studies, that focus much less on detailed study of specific events and more on the patterns of change over time. This was a reported concern for 35% of the survey respondents. A third demand, that becomes more pressing if GCSE courses are strung out over three years, relates to the need to develop teaching approaches that support the retention of knowledge. While many history teachers welcome the abolition of controlled assessment as part of the GCSE examination, a majority (64%) are concerned about the impact of an assessment strategy that relies entirely on terminal assessment.  The most significant concern expressed by teachers, however, relates to their anxieties about the suitability of the GCSE examinations for students with literacy difficulties who will struggle to access the EBacc qualification. Eighty-four per cent of 2015 survey respondents reported this as a matter of concern.  As we have noted above, in our answer to Question 1, the HA recognises that the nature of the only recognised qualifications within the EBacc makes them unsuitable for pupils with low levels of literacy (often rooted in particular special educational needs) and in the early stages of learning English as an additional language. While we have argued that worthwhile alternative forms of assessment should be made available to such pupils within the EBacc to ensure that all young people have the opportunity to continue studying history to 16, we also recognise that many history teachers have become accustomed to working only with students who seem likely to achieve a C-grade at GCSE. The findings of our annual survey reveal that while the introduction of the EBacc measure undoubtedly led to a significant increase in the proportion of young people taking history for GCSE, it also prompted a growing number of schools to steer certain students *away* from history. The proportion of respondents explaining that they deliberately discouraged or prevented certain pupils from taking the subject rose from around 16% in 2011 to 31% in 2012, 39% in 2013 and reached a peak at 45% in 2014. The fact that the figure fell slightly in 2015 suggests that the Progess8 measure (because of the way in which it rewards progress at all levels rather than simply recognising achievement at Grade C) may be impacting on schools’ decision-making, but the fact remains that in many schools, history teachers may be un-used to working at GCSE level with lower attainers and with those who struggle with the literacy demands of the course, and that they will need support and guidance in adapting their practice and in developing resources and strategies that will enable a much wider range of pupils to make progress.  There is already a significant demand for subject-specific professional development courses for teachers with 43% of respondents to the 2015 survey regarding the lack of subject-specific professional development courses as a matter of concern; but this is linked with the financial challenges for schools in funding training for everyone since an even higher proportion (49%) were concerned that even when subject specific training was available, their schools did not permit them to attend because of constraints on their finances.  In these circumstances it more important than ever that initial teacher education should include a strong subject-specific dimension, focusing both on essential content knowledge in relation to the new qualifications and on subject pedagogy. While both these elements are to be included in the core content for initial training courses (as recommended by the Carter Review) , such a recommendation will be difficult to achieve within small-scale school-based training programmes in which the numbers of trainees in any one subject is both limited and highly variable, making it difficult to develop communities of subject mentors well-versed not only in their subject but in the processes of providing subject-specific pedagogical support to beginning teachers. | |

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

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| |  |  | | --- | --- | | DfE | Comments:  (a) Regionally based teacher supply model If schools are to secure adequate numbers of well-trained specialist teachers, it is essential that the teacher supply model should take account of regional rather than national demands for history teachers. For this model to work effectively and to track the impact of different kinds of training routes in achieving the necessary supply of well-qualified teachers, it is important that the model should take account each year of any under-supply in previous years.  (b) Effective monitoring of the effectiveness of different routes into teaching – relying not merely on the data relating to initial recruitment and course completion, and to the quality of the applicants as they complete their initial training, but also on data revealing the retention of qualified teachers over the course of at least five years.  (c) The working group tasked with responding to the recommendations of the Carter Review has made it clear that the core content to be included within any the initial teacher training curriculum will be expressed in generic rather than subject-specific terms. Given this restriction, the HA would recommend that such a generic curriculum should at least be accompanied by more detailed suggestions or non-statutory recommendations in relation to particular subjects to ensure that all courses and partnership structures work to sustain and develop the necessary subject-specific expertise that new teachers will need. As noted above, in light of our members responses to the 2014 survey, the HA would advocate that all partnerships include a minimum number of trainees in any one subject so that their course can include subject-specific professional training and allow for the exchange of history teaching ideas and practices across different schools. Each course should also provide a minimum entitlement for all trainees in terms of university-input and access to academic departments that can support in the development of beginners’ substantive knowledge.  (d) The provision of additional funds to schools to support specialist training for history teachers engaging with content that is new to them and for the re-training of teachers of other subjects who are asked to take on history teaching as the balance of the school curriculum shifts. This funding should be used both to support attendance at specialist courses or engagement with online training programmes that includes input from academic historians and to allow for in-school mentoring – observation and feedback to help embed new knowledge and understanding in practice. | |

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.

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| |  |  | | --- | --- | | DfE | Comments:  The HA endorses fully a recommendation that helps to ensure that **all** pupils will be expected to undertake the same range of elements ensuring a broad and balanced curriculum, in which the humanities are recognised as playing a vital role. In light of recent concerns, for example, about the limited uptake of history by Black British students of African/Caribbean we welcome measures such as this which prevent certain pupils (or their parents) concluding that a particular subject is simply ‘not for them’.  However, given the obligation to ensure that this policy does not impact negatively on the needs of pupils with particular ‘relevant protected characteristics) it is essential that pupils with each of these characteristics see the courses which they are required to study as being of relevance to them and of value in making sense of their own identity. Courses/textbooks/examination papers (especially those endorsed by GCSE examination boards) should be should be regularly reviewed to ensure that such representation is achieved and that it has a positive impact on all groups. | |

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.

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| |  |  | | --- | --- | | DfE | Comments:  As noted above in answer to question 9, exam specifications, textbooks and other teaching materials (especially those endorsed by GCSE examination boards) and examination papers should be all regularly reviewed to ensure that they include effective representation of groups and individuals with protected characteristics and that their inclusion has a positive impact on all the scope that they provide for all pupils to draw critically on their history education in the construction of their own identity. | |

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.

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| |  |  | | --- | --- | | TextBox | E-mail address for acknowledgement: melaniej@history.org.uk | | |

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?

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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](https://www.gov.uk/government/publications/consultation-principles-guidance)

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](mailto:consultation.unit@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

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

Send by post to: Maleck Boodoo, Curriculum & Standards Division, Department for Education, Sanctuary Buildings, 20 Great Smith Street, London, SW1 3BT

Send by e-mail to: [English.BACCALAUREATE@education.gsi.gov.uk](mailto:English.BACCALAUREATE@education.gsi.gov.uk)