

IEUA-QNT SUBMISSION

[2 May 2024]

Submission: Evaluation of the new Queensland Certificate of Education System

The Independent Education Union – Queensland and Northern Territory Branch (IEU-QNT) thanks the University of Melbourne, and the Queensland Curriculum and Assessment Authority (QCAA), for the opportunity to provide feedback on our members’ experiences with the Queensland Certificate of Education (QCE) system.

About IEUA-QNT

IEUA-QNT represents ~16,000 teachers, support staff and ancillary staff in non-government education institutions in Queensland and the Northern Territory and consistently engages in debate concerning education issues through its Education Committee, receives input from members working within the QCE system as teachers in non-government schools. We are also represented on the QCAA’s Senior Secondary Curriculum, Assessment and Certification Committee.

Our members, along with the members of the Queensland Teachers’ Union (QTU) therefore engage with the QCE system in a variety of ways and are well-positioned to provide insights into its benefits and drawbacks. Our membership is not homogenous and we have encouraged all of our members to engage with the evaluation process to ensure that their voice is heard during the evaluation. This submission draws upon feedback received through our Education Committee, and through comments provided to union officers by our broader membership during our day-to-day engagement in schools.

Written responses to the survey questions are provided below.

Q1 How fit-for-purpose have you found the new QCE system to be? How suitable is it for your context (please describe)? (Up to 500 words)

1. Our members report that parents/carers and students remain significantly confused by the mechanics of the new system, despite schools hosting numerous information evenings, providing information via newsletters and parent-teacher meetings etc.
2. Members also report that the new system has not addressed the problem of students completing unnecessary certificates and diplomas to obtain early and/or ATAR-independent guarantees of university admission.

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3. These behaviours are largely a result of the universities' continuing use of alternative entry pathways. We would suggest that the inclusion of VET qualifications in the ATAR calculation continues to confuse some students.
4. While VET is a valued, and valuable element of the senior secondary system, the loss of distinction between vocational and academic pathways has created additional challenges in terms of student and parent/carer capacity to understand the benefits and limitations of combining vocational and academic studies.
5. In particular, the new system seems skewed toward the needs of students seeking university admission and the value of the QCE itself is diminished for students who might pursue vocational or employment-based pathways.

175 words

Q2 How well do you think the new QCE system is being implemented (Up to 500 words)

6. Our members report that, while those who have designated roles within the system (e.g. confirmers, assessors etc) receive regular communications from the QCAA, there is negligible communication from the authority with other teachers who work within the system, but are not part of the endorsement, confirmation and marking processes.
7. While members indicate that the syllabus documents provide good detail that supports teaching and checking of assessment, there are still ways that schools introduce inequity into the system by exploiting the reliance on school-based decisions.
8. Members also report that the complexity of the new system means that there is limited capacity to respond quickly when problems with processes and procedures are identified.
9. Examples of problems in processes and practices include the retention of ineffective assessment items until a new syllabus, with alternative assessment items, is developed, and challenges of accessibility for specific items that cannot be overcome without fundamental changes to QCAA requirements for task layout, presentation etc.

161 words

Q3 The intended goals of QCE are to give students access to flexible learning pathways that respond to the dynamic world of work and learning, and provide them with the skills they need to succeed in a range of post-school pathways.

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How effective have you observed the QCE system is in relation to achieving its intended goals? (Up to 500 words)

10. Our members have indicated that, despite the intention of the new system to reduce the reliance on 'alternative' entry pathways for university admissions, problems persist because universities continue to make offers of admission that are not based on ATAR.
11. There is also little evidence that the system is responsive to broader societal changes in work and learning.
12. In fact, our members have raised concerns that the complexity of the new system actively discourages rapid and agile responses to broader changes in the fundamental characteristics and goals of work and learning.
13. We commend the QCAA for recognising, for example, the potential impact of artificial intelligence (AI) on teaching and learning practices through establishment of the AI Working Group. However, the complexity of the new QCE system, and the constraints around assessment practices complicate responses to change and may consequently limit the ongoing relevance and utility of the QCE.
14. As indicated in our response to Question 2, our members have also raised concerns that the value of the QCE is diminished by its overt emphasis on university pathways and lack of relevance for students pursuing employment or vocational pathways.

192 words

Q4. How sustainable do you think the new QCE system is? (up to 500 words)

15. Our members have clearly indicated that the workload of confirmation, endorsement and marking has a clear potential to undermine the sustainability of the system.
16. Our union has previously requested, via the QCAA Senior Secondary Curriculum, Assessment and Certification Committee, data on the number of confirmers, endorsers, markers etc who continue in the roles over an extended period, and those who perform the work for short periods, before withdrawing to focus on school-based work, but this data is yet to be provided.
17. Anecdotally, our members are concerned that the failure to accommodate the work within the role of a senior secondary teacher (rather than a voluntary add-on) risks the sustainability of the system.
18. Members are also concerned that, if the system is subject to further changes, the workload imposed for teachers this will exacerbate attrition from the profession.

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19. IEU-QNT members have also indicated that there is little opportunity for teachers who work within the system, but do not take on the formal roles of endorsers, confirmers or markers, to provide regular and ongoing feedback to the QCAA that would assist in identifying and resolving problems as they emerge.

192 words

Q5 Please provide any additional information (Up to 500 words)

20. In addition to their concerns regarding the sustainability of the workload associated with the new system, our members have raised concerns regarding the failure to consider the perspectives and experiences of teachers and students, particularly where their interactions with the system have been negative.
21. While we acknowledge that this evaluation of the new system provides opportunity for those with lived experience of the system to lodge feedback, we are concerned that many teachers and students will be unaware that the evaluation is taking place.
22. In the absence of a truly representative sample of students, parents and teachers, the true extent of benefits and drawbacks of the new system cannot be accurately gauged and any consequent changes to systems and processes are unlikely to result in significant improvements.

130 words

Concluding Comments

IEUA-QNT thanks the University of Melbourne, and the QCAA, for the opportunity to provide feedback on various elements and aspects of the QCE system.

We look forward to participating in further discussion as the evaluation is progressed.

Kind regards,



Terry Burke
Branch Secretary
Independent Education Union of Australia -Queensland and Northern Territory Branch
Thursday 2 May 2024