

The National Curriculum Framework

MUT's reaction



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Preamble

This document issued by the Malta Union of Teachers (MUT) is based on a consultation process held by the MUT Education Committee about the draft National Curriculum Framework (NCF) published by the Directorate for Quality and Standards in Education (DQSE) in May 2011. The MUT Education Committee conducted the consultation process with teaching grades between June 2011 and November 2011. Feedback was received via the dedicated email edcommut@gmail.com and through a series of consultation meetings held with teaching grades, teacher associations and groups. This document presents the Union’s reaction about the draft NCF. The Education Committee would like to thank all educators, teachers’ associations and groups who provided their feedback about the NCF.

This document has been divided as follows:

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1. Introduction

More than fifteen years have passed since the last revision of the National Minimum Curriculum. The revision of the curriculum carried out by the DQSE is much needed in view of new developments in the education field, the social realities that impinge greatly on schooling, and the challenges brought about by new technologies.

Contrary to what occurred during the previous revisions of the curriculum, the Union did not have any representative in the committee established to revise the curriculum. However this did not stop the Union from inquiring about the NCF proposals, given the importance of the curriculum. It is with this spirit that the Education Committee carried out the consultation exercise with teaching grades and whose outcomes are being presented in this document.

2. The consultation process about the NCF held by the DQSE

It is evident that great emphasis was placed on the collaboration and participation as highlighted in the NCF:

"The challenges ahead require the concerted effort and the collaboration and participation of all stakeholders if the proposals of the NCF are to be accepted, understood and implemented successfully."(Document 1, pg 29).

There was also clear reference to include all stakeholders:

"In order to achieve this as a reflective community that is learning together, the process of consultation needs to include all stakeholders in a professionally engaging manner." (Document 1, pg 29)

Furthermore, the implementation will be based on the recommendations that emerge:

"It is acknowledged that a meaningful strategy for the implementation of the NCF can only be developed once the recommendations are debated and the full impact of their implications understood (Document 1, pg 29)

It must be recognised that contrary to the introduction of recent reforms like the introduction of the college system, the directorates have embarked on a wide consultation process with stakeholders. However this wide consultation process was seen by most educators as an information and propaganda exercise.

In reality the consultation period has been too short and limited for such a major change to be studied in depth and for the outcomes of the implied changes to be evaluated. No pilot projects were carried out even though the draft proposes changes that have serious implications, especially in terms of subjects being taught, the subject matter, the methodology, training of educators, deployment and the possibility of redundancies.

Instead, teachers have been presented with new Form 1 syllabi which are based on the NCF (supposedly a draft document for consultation!). These syllabi do not give them the freedom to monitor and adapt the content to the needs and intelligences of the students. These syllabi are highly prescriptive and tied by precise number of sessions related to specific teaching objectives. This is far from one of the tenets of the NCF:

"...a paradigm shift away from a prescriptive curriculum towards a framework which allows for some degree of internal flexibility." (Document1, pg 12)

The general perception of most teaching grades is that the decisions have already been taken. Although it was supposed that the recommendations and constructive criticism will be studied, this seems highly improbable since even the time frame of the consultation period does not allow the time for the input from questionnaires compiled by teaching grades, parents and students to be examined seriously.

Questionnaires

The questionnaires prepared for teaching grades, parents and students consisted of leading questions or did not give a true picture of the theories proposed, maybe because it is still unknown how these will be put into practice.

The teachers' questionnaire contained mainly principles that are agreed upon by most educators. Answers to most questions involving educational principles was straightforward for many educators but the way results of this questionnaires could be compiled could easily imply that there is agreement about all the principles highlighted in the NCF. This could easily be translated as "the great majority of teachers are in favour of the proposed NCF".

The primary school pupils' questionnaire which was highly leading with colourful 'smileys' for the desired answers, for example asked students if they would like to have longer breaks, or whether they would like to have more than two PE lessons per week. However it failed to explain that for this to materialise, school hours would have to be extended. The same applies to secondary school students' questionnaire.

The presentation prepared by the Directorate for students to watch before answering the questionnaire caused some problems because it was not distributed in time and also because not all schools had the right equipment to present it to students. It is also worth noting that parents had very little preparation about the proposals of the NCF.

Consultation meetings

Teaching grades were brought together to discuss the NCF at college level and this hindered some of them to express themselves freely given the large number of teaching grades (from different schools) attending the meeting and the presence of the highest educational officials. Representatives of the directorates present in these meetings intervened on a number of occasions and even rebuked participants rather than listening to the feedback presented. In some occasions this resulted in uproar and confirmed that this was indeed not a healthy exercise. Furthermore, teaching grades in some colleges reported that were not free to discuss the areas they wanted since participation in workshops including rapporteurs were pre chosen.

During recent visits to some schools carried out by an advisory team of the directorates, the teaching grades who participated in the supposed consultation exercise reported that they were interrupted by this team with team members objecting to what was being raised by these participants. Another example of best practices!

There is evidence tat shows that some conferences held as part of the consultation process were rehearsed. Through an official correspondence sent by email, school administrators were asked to prepare students about a number of themes in view of the conference attended by student representatives of each College. Students were thus not really free to express themselves, even though one media report of the said conference stated that: "from now on they (children) will be able to speak out their opinions and that they (children) will be listened to".

3. The Science Vision

Core Science

The proposal that sciences will be integrated to cater for students who are not interested in specialising in sciences is commendable. However the way Core Science will be presented must not give the impression to students that it is a softer option, thus reducing motivation and efforts. There is however no indication regarding the way Core Science will affect the transition to the post secondary and tertiary sectors. This is related particularly to the MATSEC exams (intermediate and advanced) as there is presently no indication about the way exams will be revised to cater for this new subject. Furthermore there is the issue about the corresponding career choices for students who study only Core Science and for other students who study also the respective science subjects.

Change in subject titles

Existing subject titles (Physics, Chemistry, Biology) should be retained. They have been used both locally and internationally for decades. This terminology should be retained to ensure comparability and recognition of subjects and the corresponding qualifications both locally and internationally. This change could also be confusing. For example internationally, Materials Science does not include only the chemical and physical properties of materials but includes also applications in engineering. The same applies to Life Sciences which internationally include also areas like psychology.

Science Options

The proposal whereby students will not be able to choose just one science subject as an option has a number of implications and may block students from pursuing a number of careers due to subject choices. This affects particularly students who presently pursue their studies in physics and mathematics. These students follow careers in science, architecture, engineering, land surveying and environmental matters. The proposed subject choice disadvantages also students who presently study home economics together with geography or biology to pursue careers in health and beauty. The choice of two science subjects may result in less students choosing sciences. The proposed science options must take into consideration the various courses offered at post secondary and tertiary levels by the various local and foreign educational institutions.

Teacher Training

The NCF proposes a complete change in the way sciences are taught. Teacher re-training in pedagogy and content of the proposed core science is therefore required especially for physics teachers who are mainly trained in physics and mathematics. Training should not be superficial but well planned and organised. It should be provided before teachers start the implementation of the proposed subject in classrooms and not simultaneous with the teaching of the new subject. Support should be provided both before and during the implementation of the new teaching approach. As per agreement, this training should not be held outside school hours and should not take place during a particular day of the week, with the result that the large teaching load is spread on the remaining four days. Training sessions should

continue to form part of contact hour time and should not be additional to teaching loads.

Setting

Setting of students in science subjects is a major requirement given the wide range of students' abilities and the need to provide all students with the best entitlement.

Resources

Inquiry-based learning requires adequate resources. A number of schools do not have sufficient science labs to cater for groups of students who perform practical work simultaneously. Similarly, apparatus is often not sufficient to cater for the needs of all groups, and therefore further resources must be provided.

Allowance to NQT

The proposal to double the allowance to newly qualified science teachers (NQT) as an incentive to attract more science teachers is not acceptable and is in breach of present agreements regarding allowances to teaching grades. The NCF should not create any divide between teaching grades who are presently teaching sciences and NQTs. It should also not create any divide amongst teachers who teach different subjects.

Science in Primary Schools

The proposal to teach science in a formal way in all primary schools is commendable. However the proposal to change working conditions of the peripatetic service to act instead as support teachers is unacceptable. Peripatetic science teachers are presently providing a good scientific experience to primary school students and their role cannot be reduced to being simply advisors to primary school teachers. Should the change in roles of peripatetic science teachers be implemented, extensive training would be required so that primary school teachers would be able to teach science.

4. Mixed ability, Inclusion and differentiated teaching

- There is no clear distinction between mixed ability and inclusion.
- The NCF does not appear to take into account mixed ability teaching in individual schools, especially the present provisions for differentiated learning in church and independent schools. The NCF must allow flexibility to enable these schools to continue building on the experience gained over the years.
- The NCF does not take into consideration the wider definition of Inclusion that does not only consist of disability. Inclusion necessitates allocation of time to coordinate services to reach all students.

- The reality of cultural diversity has not been dealt with. The NCF does not define diversity and inclusion.
- The NCF fails to address the current failures in inclusion and does not provide any guidelines regarding the standardization of services provided by Learning Zones.
- The NCF highlights the importance of preparing students for the world of work. Although there is a specific post (transition coordinator) who can facilitate this, will statemented students really be prepared for the world of work?
- Mixed ability teaching necessitates smaller classes and adequate resources, issues which are not tackled in the NCF.
- High achievers are not being catered for. The adaptation of work is being made to cater for low achievers who are evidently receiving more support.
- All the syllabi in the primary sector need to be reviewed to allow time to develop the creativity of students and in that way cater for the different abilities and learning styles. Syllabi and the volume of content should be less demanding to ensure the necessary flexibility.
- Behaviour has only been addressed through the Learning Support Zones or Nurture Groups. Are these services effective in all schools and what progress has been registered following their introduction? Behaviour issues, which in turn affect educational attainment, are the most difficult and are clearly not tackled in the NCF.
- Students referred to the Statementing Moderating Panel should not wait for months before receiving the necessary support. The NCF does not tackle the need to provide more human resources in this regard in the state and non-state sectors. These trans-disciplinary teams include educational psychologists, councilors, and social workers. Reviews are also not materializing. Students are only being assessed for transitional purposes
- Differentiated teaching requires time and leaves little time to monitor student performance. Time constraints will inevitably force teachers to move on, leaving some slow learners behind.
- Differentiated teaching requires additional resources. Textbooks, workbooks and audiobooks should also be differentiated as it is impossible to expect teachers to prepare teaching material for all levels of ability.
- Will the present drive towards differentiated teaching lead to differentiated exams, differentiated diplomas and ultimately differentiated degrees?
- Without adequate training and support, informal streaming will inevitably be done by the teacher within the class to be able to assign differentiated work to each student according to the different abilities.

5. Timetables and time allocation

Primary school timetables

- Years 1 and 2 timetables should be similar to early years to facilitate transition. The range of activities should also be similar to those of the early years.
- Rigid timetables defeat the purpose of cross curricular approaches.
- Three timetable models are being presented in the document, where the total number of hours tallies with the present timetables. These include the weekly 1.5 hours of curricular planning. These are acceptable as long as one model is finally adopted and there is no variation in entitlement in the different colleges.
- The document indicates the provision of subject based teachers whereas it proposes to transform peripatetic teachers to support teachers. Peripatetic teachers ought to be given the autonomy to teach students rather than advising class teachers.

Secondary school timetables:

- The rotating timetable based on 6 days is not feasible as it leads to additional stress and confusion, especially to students who share homes between the two parents. In general, students find it very hard to adapt to the lack of routine brought about by a rotating timetable and changing lesson times.
- The proposal for the mid-morning break not to be considered as curricular time goes against the educational theory whereby extensive work is done by teaching grades during breaks especially with regards to pastoral care. Proposals to provide supervision duties during mid-morning breaks as presently done during mid-day breaks results in further load on administrative staff in charge of supervision. All this is unacceptable.
- The proposal for a staff development held weekly outside school hours is also unacceptable.
- Overall, the proposed timetables are demanding a longer working day of 6.5 hours and this is unacceptable.
- The curriculum is supposed to establish the weekly time allocation for the various subjects and not timetables. In the proposed timetable models, weekly time allocations for different subjects vary greatly and this will ultimately impact teachers' loads and eventually result in redundancies. Furthermore if colleges adopt different models of timetables, student curricular entitlement will vary from one school to another. Thus curricular provision will not be the same. This is unacceptable.

- Timetable models should instead be based on the total number of school hours included in last agreement between the government and the MUT. Lessons should have similar duration and be spread to make it is easy for everyone to remember the commencement and termination of each lesson without having to compute it or refer to time schedules for determining lesson time. Lessons should also be spread uniformly during the day and not be loaded on a particular time of the day or between breaks as proposed. Timetables should be based on a clear routine.

6. Learning areas

Learning Areas – Health Education – PSD, PE, HE

- The NCF proposes to change the name of PSD to PSHE. At the same time it is still referred to as PSD in a number of appendices in Consultation Document 3. This shows inconsistency in the text. No rationale has been provided for this proposed change in name.
- In view of the preparation for the world of work which is given importance in NCF, it is recommended to increase the number of PSD lessons so as to dedicate more time to career education. This will support career guidance.
- The proposed timetables include PSD only under Health Education while in the learning areas it is also included under Citizenship Education.
- The methodology and practice used in PSD is already in line with the pedagogical approach presented in the NCF.
- There is the impression that PSD is being seen as information giving not as a developmental subject that includes the emotional aspects.
- PSD must be introduced in the primary years 1-3 as this learning area is crucially important at such an early stage.
- Time factor is an issue with PE, PSD and HE allocated 88 hours whilst Mathematics is allocated 105 hours
- According to timetable model C, primary students will have PE every day. Is this going to work? Will classroom teachers do PE every day without added support? Do all schools have available premises? Will the uniform reflect the need for PE every day?
- Reference to PE and Sport as a means to develop a child's physical skills and agility seems to be restricting PE to skills and only one aspect of fitness (agility). The inclusion of a more generic phrase such as development and ability would be more appropriate.
- PE activities listed in Health Education do not include swimming which is an important physical activity accessible to all. Furthermore physical literacy has not been included as one of the Aims.

- There is a degree of overlap between the learning outcomes of PSHE and those of PE. There must be also be a clear distinction between PE and Sports.

Learning Area Arts Education – Art, Music, Dance, Drama, Literature

- Document 3 states that 'Aesthetic appreciation and creative expression is enhanced through the study of art, music, dance drama and literature'. However very little time is dedicated for all of this as evidenced in the number of hours per learning area per scholastic year (Appendix 3).
- Subjects which presently form the ALM (art, music, u literature) are being given less importance by not being provided to all students. Furthermore schools will decide whether to leave out some of these subjects, resulting in varied curricular entitlement provided by different schools.
- Drama involves various pedagogical aspects which should be included in the document and the present role of drama teachers must be maintained. This does not only involve teaching drama but advising and helping schools in drama activities, and participating in Theatre in Education Projects.
- Dance is not given its due importance. It is included as part of PE in Educational Dance. Will it be included in all schools?
- Music must be given its due importance as an appreciation of culture. Not enough time is provided in timetable modules for years 1-3 whilst there is no reference to music in appendices.
- To be given its due importance, Performing Arts should be included in the Option list although it is worth noting that Music has been introduced as an option.
- Overall the framework is not sufficiently providing learners with the opportunities to enhance creativity and artistic expression. There is the perception that system is relying on private entities to provide these opportunities to students outside school hours.

Learning Area – Religious Education

- The NCF is proposing an Ethics Education Programme drawn by the Education Authorities. It is interesting to know who are the competent people in this regard? Who are the education authorities that will draw up this programme? Will this programme run parallel with the present subject (religion) and result in a softer option for students?
- This Ethics programme is causing preoccupation in all schools, particularly in Church Schools as it seems that there is insufficient information about it.
- The NCF speaks about respect for other religions but makes no recommendations of inclusion of multi-cultural beliefs

Learning Area – Science Education

- Positive element that Science is being given more importance in the primary sector as it is considered as a core subject. This will have effect on the development of science in the secondary sector.
- Option lists will oblige students to choose physics with another science subject. This might result in less students choosing the subject as presently physics is taken with different subject options like Art or Computer Studies.
- Students cannot choose just one of the 3 sciences. They have either to opt for core science or take two sciences. This may result in less students taking up science options whilst keeping core science.
- Training of teachers in this new approach is the main concern. When is this to be held? The core science programme requires teachers to be familiar with all three sciences. This will in fact be difficult for teachers as for instance most Physics teachers are graduates in Maths as a combination.
- Inquiry-based learning with emphasis on investigative procedures will require more time. Is content to be sacrificed? There is already a big gap from secondary to post-secondary

Learning Area – Citizenship Education – Social Studies, History, Geography, Environmental Studies, PSHE

- What are the basic values of Citizenship Education? Maltese Culture should be an important feature of such education. The terminology used to describe Citizenship Education can be misleading and does not wholly reflect what is usually understood as per the Council of Europe and EC definitions.
- The idea of including all these subjects under one learning area will result in the erosion of the identity of the subjects involved.
- The main way Citizenship Education will be developed as an extracurricular activity is through the participation in student's councils, which are however not mentioned as part of the Democratic principles. There must be reference to other methods of active participation.
- Of major concern is the modular model presented. How are lessons to be divided in all subject areas concerned?
- History has not been given its due importance when the country depends so much on the tourism industry.
- The proposed reduction in the number of Geography lessons will sacrifice part of the content which does not fall in the area of citizenship education. Essential elements of the subject will be left out.

- Citizenship Education will be allocated two lessons per week to include History, Geography, Social Studies, PSHE. How can these subjects be given the importance they deserve? Furthermore, Geography and Social Studies have not been included as option subjects in the English version but are present in the Maltese version!
- European Studies features as an option subject but at the same time it is not included in Citizenship Education
- The issue of the Environment (featured mostly in Geography) is not well addressed. There should be more reference to the environment considering that this is being given so much importance in various policies. It is worth mentioning that no questions referred to the environment in the last state annual exam papers of Years 4 and 5.

Learning Area – Languages

- Reduction in the number of lessons in foreign languages gives rise to alarm and concern. The proposal of three lessons per week (presently 4 lessons weekly) in the NCF will amount to a reduction of about 60 lessons in the first two years in the secondary sector resulting in units of study being left out from the present syllabus. This is in contrast with the emphasis on language provisions at EU level.
- The proposed reduction in the number of lessons in foreign languages is also in contrast with the amended syllabi of form 1 which were based on 4 lessons weekly. If syllabi remain the same there will be cramming to finish the content.
- Lessons are being planned to follow a student-centred and differentiated learning approach. This is more time consuming since learning takes place through discovery and students need more time (and not less) to assimilate a new language to which they are not exposed in their everyday life.
- No measures have been put forward to determine the level to be reached at the end of Form 5 (SEC) for students to move on to higher education. This needs to be addressed taking into account the number of lessons proposed.
- The proposal to provide English Literature as an optional subject, together with changes in the present provision of Literature Appreciation inevitably portray the message that literature is no longer an essential element of language teaching.
- In primary schools, students who are weak in Maltese and English should be given extra support in these core languages rather than being introduced to another language.
- The language awareness programme proposed in primary schools and consisting of eight - 30 minute introductory sessions per year does not serve as a language basis course. At most it makes students aware of the different languages available at the secondary sector.

- There is a contradictory message being provided by the increased provision of foreign languages awareness in primary and the proposals to decrease the number of lessons in foreign languages in secondary schools.

Learning Area – Technology Education

- There are no details about the effect of Engineering on Design and Technology. There seems to be overlap in content of the two subjects. Will Design and Technology be amalgamated with ICT? Will the food and textiles components be part of Home Economics?

General Concerns about Learning Areas

- How are the subjects going to work together when falling under different learning areas? Who is going to be responsible to ensure that such learning areas are covered in the different subjects? Modular setting for certain subjects is not adequately explained in the document.
- What principles will determine any increase or decrease in the amount of lessons in a given subject? Who will be consulted?
- Maltese cultural exposure has been reduced in the NCF which will result in further loss of national identity.
- How are teachers of different subjects going to work together to ensure that there is a common line of thought and no overlap between one subject and another?
- Why are Curriculum managers mentioned? Will this be a new grade similar to Service Managers? Is it in line with the present agreement?
- The proposed changes in the number of lessons per subject together with changes in sciences will inevitably lead to teacher deployment but will it lead to teacher redundancy? The latter is unacceptable.
- Concern expressed by teachers of Physics, a significant number of whom studied Mathematics, Physics and not other science subjects. How will these teachers be deployed? Retraining in science will prove difficult for teachers whose background is in Physics and Mathematics.
- All syllabi have to be revised to be in line with the principles of the curriculum. This revision must take into account the professional expertise of teachers and not be a prescription (as is presently being done with form 1 syllabi).
- Learner-centred learning (Principle 4 of the NCF) requires a complete review of current syllabi including SEC. At present syllabi are too vast and teachers are forced to focus more on exams rather than students' needs.
- First Aid training and Animal Awareness should form part of NCF throughout the three cycles – early years, primary and secondary. These are essential when one considers fatalities, animal abuse and cruelty

- Proposed reviews should be carried out by personnel who have the necessary years of experience in the sector they are reviewing. Seniority and track record are a major factor in selecting the right personnel to carry out these reviews.
- There is concern over the modular method of teaching proposed. This modular strategy does not specify the number of lessons allocated to each subject in Citizenship Education and Health Education
- The reintroduction of Accounts and Economics is an acknowledgement of the requests that have been made by the Union and teachers in the past years. This will provide a level playing field for students attending state and those attending the non-state sector. However Accounts and Economics do not really feature as part of any component in the Learning Areas. Entrepreneurship is a cross-curricular theme rather than a learning area and this is in contrast with current national policies to introduce further financial services.
- In a society increasingly influenced by media and technology there is no mention of media education
- How will learning outcomes and achievement levels be implemented? Implementation dates, time allocation and training schedules have not been included in the NCF. These will require further discussion.
- The introduction of Vocational subjects can threaten the existence of existing subjects especially since there is a considerable overlap between Vocational subjects, Design and Technology, HE and ICT.
- Is the MATSEC board going to revise papers according to changes in syllabi and the philosophy of NCF?

7. Assessment, monitoring and evaluation

- Vast syllabi make assessment-related tasks impossible. There should be adequate time allocation (part of teaching loads) to perform assessment-related tasks. More support would also be required to carry out assessment as teachers cannot perform a multitude of tasks in the classroom including handling mixed ability and students with different needs.
- The present system of summative assessment is already time consuming and taxing on the system. The drive towards formative assessment should be founded on adequate time allocation to perform these tasks.
- Self assessment is based on the assumption that all learners have a high level of psychological maturity and intelligence. This is in sharp contrast with the reality of mixed ability classes and could clearly favour above average students.

- It is doubtful whether 'soft' assessment measures are conducive to success in a highly competitive labour market.
- Alternative forms of assessment for students with an IEP sound incompatible with the principles of inclusion.
- Achievement levels require discussion with the Union which must be carried out before they start being referred to in a haphazard mode.

8. The three cycles – early years, primary and secondary

- More teamwork is needed between the Kindergarten and Year 1 to have a smoother transition. This is not facilitated by the present duties of KGA and early years' primary school teachers who need to constantly monitor their class.
- Following the reduction in the entry age for Kindergarten pupils from three years to two years nine months, what kind of assistance is going to be provided to the KGA who will be facing added difficulties particularly during toileting?
- The recommended timetable for Primary Years, especially with regards to PSD is very ambiguous. How is time going to be shared with other subjects like Social Studies, where Health and Citizenship topics overlap? How much time will be allocated for PSD lessons per week? Are there plans to start teaching PSD in the early years like years 1, 2 and 3?
- Checklists are very time consuming and should be done by the Literacy Support Teacher who has more time with the individual student. It would be impossible for the class teacher to fill checklists in the presence of the other students.
- The primary syllabi are rather overloaded especially in years 4, 5 and 6, and can't be covered in the stipulated time.
- The Statementing Board is taking too long to statement children with the consequence of long waiting lists and reviews are needed from time to time.
- The NCF fails to address the issue of a reduction in the number of students per class in view of differentiated teaching, formative assessment and other provisions. How can all students receive the highest individual attention possible in large groups?
- The NCF will result in increased paperwork at all levels but no time allocation to perform these duties has been mentioned.

- There is no mention of adequate provision for children of returned migrants, refugees or students who do not understand Maltese, English or both. These realities together with the different educational levels and student with increased social problems are proving to be difficult to handle without adequate provision and support. These require added human resources and funding.

9. Other Issues

- There is too much load on the teacher to fulfil all that is required from this framework. The NCF is proposing a less prescriptive methodology, where in practice the items which are already being implemented are leaving educators without any professional freedom which is paramount in their development.
- The newly amended form1 syllabi revealed that creativity and the possibility of self-realization of the teacher have been removed. The teacher is just an instrument of information transfer. The syllabus is for some kind of “standard ability student”, with no consideration of gifted students or under achievers. The amended form 1 syllabi are highly demanding and prescriptive.
- There is deep concern about the criteria of the newly introduced subjects, the validity of these criteria and in what way are the new subjects going to be timetabled. There is also concern about the modular system particularly when it comes to the necessary coordination to ensure continuity, and the added work to teach a different module every term.
- There is little reference to career guidance and only issues pertaining to academic careers are addressed. Career guidance is much needed especially in the final years of primary and secondary schooling.
- Gender balance is always an issue in curricula and the resulting syllabi. However, until there is a move towards coeducational systems (which has not been tackled in the NCF), the curriculum must recognize the existing differences between girls' and boys' secondary schools. Educators know that educational provisions need to be adapted according to gender. The one size fits all which goes against the objectives of the NCF must not be the curricular approach with regards to gender differences.
- Discipline issues have been completely omitted. Discipline is even more critical now with the introduction of mixed ability classes and larger schools. A framework for practical and effective disciplinary measures added to the strengthening of the current pastoral set-up are much needed.

- Modular settings are not adequately explained in the NCF. The modular approach may entail a very superficial teaching of the subjects concerned.
- The NCF makes reference to the use of new technologies. To date there is however little information about the E-Learning Platform and how is it going to affect the duties of teaching grades. Furthermore, given the importance of these technology tools, there are still teaching grades (KGA, LSA and teaching grades in the Church Schools) who have not been provided with laptops.
- Vocational subjects require further discussions as their introduction can be seen as a softer option, thus attracting large number of students.
- Is the job description of an LSA going to be changed? If changed to a teacher assistant, what training is planned to be given to all concerned to reach the required professional level? Is this in line with the agreement?
- The peripatetic teacher has been referred to as being of support to the class teacher. Peripatetic teachers should remain in charge of the class during the delivery of their particular subject as they are specialists in that particular area and therefore able to deliver the subject better. Furthermore peripatetic time has been reduced from 90 min to 75 min. (as per time tables presented) and this will certainly affect the present provision.
- The changes proposed will result in educators being deployed to fit the framework and not the framework adjusted to fit the real needs of schools.
- There is little reference to the post secondary sector whilst at the same time the NCF speaks about seamless transitions. Will the qualifications required at post secondary and tertiary levels be revised in view of the philosophy of the NCF?
- When comparing the Maltese and English version of the documents, there are clear differences indicating that the translation lacked adequate proof reading. There are even contradictory messages portrayed by the two versions such as geography options included in one version but not in the other.
- There are common grounds between the philosophy underlying the reform carried out in the 70's and the present reform.
- There is lack of demarcation between mainstream and special education.
- There is lack of clarity regarding the quality of support services being proposed.
- There is a change in focus of success criteria.
- There is no reference to schools specialising in particular areas like Sports, Technology, Trades and ICT whilst at the same time a specialised school for sports was announced by government during the last Budget speech.

- The term 'examinations' is avoided in the text.
- There is no reference or provision for co-educational systems.
- The NCF seems to assume that all students receive support from home. Students should be able to learn independently of home support.
- A number of new proposals will result in further overloading of work on teaching grades.
- The NCF is not addressing social problems such as poverty, lack of access to technology, lack of family care, and the close tie of these issues to absenteeism, low attainment and retention rates.
- The introduction of new technologies requires time and this must clearly be reflected in timetables any syllabi. Lesson duration is reduced especially due to the time required to connect laptops, load software and connect to the internet. If five minutes are required to carry out this procedure every single lesson, this means that 15 to 40 minutes could be lost (no teaching done) during a particular day.

10. Conclusion

The Union acknowledges the work done during the past three years by the committee established to revise the curriculum. It also notes the willingness and commitment of the Ministry of Education, Employment and the Family to involve the Union in the final phase, namely the realisation of the NCF.

Although consultation was widespread, the whole process was vitiated since the consultation process did not involve all teaching grades (such as support teachers), resembled a propaganda exercise, and since some changes proposed have already been imposed (such as the form 1 syllabi).

The changes proposed in the NCF cannot be taken in isolation. The Maltese educational system is undergoing a series of reforms and new reforms are being introduced before the outcomes of previously introduced reforms are duly studied. This may result in a system with too many variables and it would be difficult to determine the cause of possible symptoms that will emerge in the coming years. The pace of reforms is therefore fundamental. Furthermore a major reform like the NCF requires added financial resources together with the necessary human resources and physical facilities in all schools. Such major reforms should not be initiated unless there is adequate investment.

It is hoped that this document will be translated in a National Curriculum Framework that is truly owned by all educators for the benefit of all students as:

"Ultimately the success or otherwise of the process will be determined by the extent of the on-going commitment of all stake holders in their unstinting efforts to ensure that the proposals can be successfully translated into daily classroom practices."(Document 1, pg 30)