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To: Post-Primary and Special Schools

Rathgael House
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Dear Principal,

CONSULTATION ON PROPOSED CHANGES TO QUALIFICATIONS PERFORMANCE MEASURES

The Department of Education (the Department) would like to hear your views on proposed changes to qualifications performance measures. If you would like to submit your views, please do so by Friday 25 October 2024 using the following survey link:

<https://consultations.nidirect.gov.uk/de/consultation-on-proposed-changes-to-qualifications>

Background

The focus of the consultation is on proposed changes to how qualifications are counted for system level performance measures.

Northern Ireland has an open market for qualifications, which means that schools may choose to offer qualifications from a range of awarding organisations across the UK which must be approved by the Department for teaching in schools in Northern Ireland to ensure alignment of qualifications and curriculum. All qualifications approved for use in Northern Ireland schools are recorded in the Northern Ireland Entitlement

Framework Qualifications Accreditation Number (NIEFQAN) file¹. Inclusion of a qualification on the NIEFQAN file confirms that the qualification is approved for delivery in Northern Ireland schools. However, it is a matter for schools to be satisfied that the qualifications they propose to offer meet the needs of their pupils, supports their progression and facilitates delivery of the broader curriculum.

Since the introduction of the Entitlement Framework there has been an increased uptake of non-GCSE and non-A level qualifications in order to meet the requirement that at least one third of qualifications offered in a school must be applied qualifications. However, performance measures designed to collect data on outcomes at the end of Key Stage 4 and Year 14 continued to be expressed in terms of outcomes in GCSEs and A levels. A system was subsequently adopted that allows outcomes data on qualifications of different size and grade structures to be captured and reported in line with the existing performance indicators.

As outlined in our annual qualifications approvals circular, performance measures are not intended to indicate how these qualifications will be viewed for employment and/or further/higher education purposes. They are purely a statistical tool to capture data to facilitate measurement of system level outcomes.

The Department's Statistics and Research Team previously worked with C2k to develop the current system which is based largely on one that was already in place in England. The system, which was introduced in the 2009/10 academic year, means that qualifications other than GCSEs and A levels can be incorporated into the various performance indicators. **Annex A** shows how performance points are calculated at present.

Currently performance points are awarded to qualifications based on the number of guided learning hours (GLH), the qualification level (e.g. level 2 or level 3) and grading. This facilitates the capture of data across a range of qualifications of differing sizes and with different grading scales for the purpose of reporting against existing performance indicators.

¹ See <https://www.education-ni.gov.uk/publications/niefqan>.

Since the introduction of the performance system a number of unintended impacts have been identified. This consultation highlights the unintended consequences of the current qualifications related performance measures and sets out proposed changes that will more accurately and fairly reflect qualification outcomes in schools.

Proposed Changes

Pass/Fail Graded Qualifications

There are over fifty level 2 qualifications on the NIEFQAN file that do not have a differentiated grading scale but are awarded as either pass or fail. The current performance points tables allocate the same number of points for a pass in one of these qualifications as a grade B at GCSE, i.e. 46 performance points. This is not aligned with the points awarded for other qualifications such as BTECs where a pass is allocated the same points as a grade C at GCSE. Some learners and parents have, on occasions, assumed that the grade B for system level performance points purposes will be recognised as a grade B for progression to employment or other education settings and this is not always the case. For example, post-16 settings (schools and colleges), Higher Education Institutions or employers may not accept them as being equivalent as a GCSE grade B where there is a requirement to have achieved that grade specifically for employment or education admissions purposes.

The Department is proposing that for **all level 2 qualifications**, the performance points allocated to a pass grade should be the same as the points awarded for a Grade C at GCSE because this is a level 2 pass at GCSE. This would mean that for qualifications graded pass/fail, a pass grade would attract the same points as a Grade C at GCSE (instead of a grade B as at present). This would be consistent with the points awarded for a pass in other level 2 qualifications such as BTECs.

It should be noted that this proposed change would not affect outcomes awarding in these qualifications. The points system is entirely independent of the awarding and grading process of qualifications. It would therefore not affect the pupils who would still be awarded their qualifications. Employers or other educational institutions are

already aware of the relative value of these qualifications and the different skills being assessed, therefore it is our expectation that how these qualifications are valued by those who use them for admissions or recruitment purposes will not change. It would also not impact the system level outcomes for schools as we count the percentage of GCSE (or equivalent) level two passes (i.e. A*-C) so these qualifications will still be counted in that overall figure.

Size equivalency of Qualifications

Over the duration of two years of each qualification, a GCSE requires 120 guided learning hours (GLH) while an A level (AS and A2 combined) requires 360 GLH. This is the number of hours it is expected to take a teacher to deliver the content within each specification.

Other qualifications vary in size in terms of GLH requirements in their specifications therefore, to facilitate the capture of outcomes data in the terms expressed in performance measures, a table, in use in England up to 2014, was adopted for use in Northern Ireland. This table sets out bands of GLHs with a read-across indicating how qualifications within each band should be counted in relation to GCSE or A levels. (See **Annex A**, table 1).

While most single level 2 qualifications match the 120 GLHs for a GCSE, the table indicates that qualifications with only 90 GLH could attract the same performance points as one GCSE. Furthermore, some schools currently deliver qualifications that are counted as two, three or four GCSE equivalents. However, the bands do not require these qualifications to have multiples of the guided learning hours required for one GCSE (i.e. 120 GLH). For example, two GCSEs require 240 GLH, but other level 2 qualifications only have to have between 145 and 234 GLH to be counted as a size 2. This raises a fairness issue and the situation needs to be rebalanced to provide a fair reflection of the teaching time required (by the specification) for each qualification.

In addition to issues of fairness and the accuracy of the information and analyses derived from the system level data, allocating a size equivalency to a qualification that is greater than the number of hours required to deliver the same number of GCSEs

may be misleading to pupils and their parents, particularly in terms of how the qualification will be viewed by employers or other educational institutions. The Department is aware of circumstances where pupils have tried to use a single large size qualification (currently counted as the equivalent in size to 4 GCSEs for reporting against performance indicators) as part of meeting the admissions requirements for post-16 study, but the qualification was not accepted as equivalent to 4 GCSEs for admission purposes.

The Department is proposing that, in order to be fair to teachers and pupils, the current system of bands of GLHs should be replaced with a system that counts qualifications in terms of whole equivalents of GCSEs or A levels - see **Annex B**. In this case, a qualification would only count as one GCSE if its specification required a minimum of 120 GLHs, and a minimum of 240 GLHs would be required to be counted as the equivalent of two GCSEs. Similarly, level three qualifications would only count in multiples of 360 GLHs.

We are aware that there are some GCSE short courses delivered in schools which are currently counted as half of a GCSE – that arrangement will continue to apply.

Capping of How Qualifications are Counted

At Key Stage 4 the Department considers a qualification with a size equivalence greater than 3 GCSEs to be 'large size, and for post-16 a large size qualification is greater in size than 2 A levels. Use of large size qualifications has increased in recent years and the Department has expressed concerns to schools (in the annual qualifications approval circular) about how the use of these qualifications may impact on a school's ability to deliver a broadly based and balanced curriculum to all pupils, as required by legislation. Use of these qualifications has the effect of narrowing the curriculum for those pupils taking them, particularly at level 3. It may also limit future pathway choices for progression. As the Independent Review of Education (2023) noted:

"A principle guiding our vision of the use of qualifications is that qualifications offered in Northern Ireland should be part of routes that equip learners to fulfil their potential and continue their education or progress to (or in) a worthwhile job.

Routes involving academic and/or “vocational” qualifications should be available to all learners and, as far as possible, qualification choices... should not rule out options for them in the future.”²

To address the concern about the narrowing effect these qualifications have on the curriculum delivered to pupils who take them, the Department proposes to set a cap of a maximum of a size 2 (i.e. equivalent in size to either 2 GCSEs or 2 A levels) for reporting against performance indicators. Schools may deliver these larger sized qualifications (if approved by exception by the Department), but they will only attract performance points for the equivalent of up to a maximum of two GCSEs per qualification at Key Stage 4, or two A Levels at post-16.

Capping qualifications’ size for system level performance measures reflects the Department’s view and the legislative position that, in selecting qualifications for delivery as part of the school’s curricular offer, schools should ensure breadth and balance in the curriculum and keep open career options and alternative pathways as long as possible. Our aim is to ensure that schools comply with the statutory duty to deliver a broadly based curriculum as set out in Article 4(2) of the 2006 Education (Northern Ireland) Order.

Timing of Proposed Changes

As decisions on qualifications currently being delivered in schools (including those starting in September 2024) were taken in good faith on the basis of the performance measures in place at the time, we do not propose to apply these changes to any qualifications started before September 2025. The changes would apply to qualifications started from September 2025 onwards, with the new performance points being allocated on completion of those courses in 2027.

Next Steps

We would like to hear your views and ask you to respond using the above link. If you have any access issues, please contact us at the email address at the head of this letter.

² Paragraph 4.127, Volume 2 of The Independent Review of Education in Northern Ireland - <https://www.independentreviewofeducation.org.uk/key-documents/investing-better-future>.

The consultation will close at 11.59pm on Friday 25 October 2024. Following consideration of responses, the final decision on implementation of these changes will be communicated through the annual Qualifications Approval circular, which we hope to issue by the end of November 2024 to facilitate curricular planning for the following academic year.

Yours sincerely

A handwritten signature in grey ink that reads "Karen McCullough".

KAREN McCULLOUGH
Director of Qualifications, 14-19 Strategy and Youth Work Policy

Enc. Annex A – Current Performance Measures
Annex B – Proposed Revised Size Bands