

**FUNDAMENTAL REVIEW OF  
GCSES AND A LEVELS**

**CONSULTATION ON PROPOSED  
RECOMMENDATIONS**

**Consultation Response  
Booklet**

Comments and responses should be submitted by **20 December 2013** to:

Assessment & Qualifications Team  
Department of Education Rathgael  
House  
43 Balloo Road  
Rathgill  
BANGOR BT19  
7PR

### Section A - General Information

Please Enter:

Your Name

**Gerry Murphy Northern Secretary, INTO.**

Your Gender

Male

Female

Your Age

0-18

19-25

26-45

46-60

60+

Your Organisation Type

Not Applicable

School/College

Training Provider

Higher Education Institute

Awarding Organisation

### Section A - General Information

	<input type="checkbox"/> Student/Learner <input type="checkbox"/> Parent/Carer <input type="checkbox"/> Employer <input checked="" type="checkbox"/> Representative group/Interest Group <input type="checkbox"/> Government Body/Organisation (national and local) <input type="checkbox"/> Other (including General Public)
Your Organisation Name	<b>Irish National Teachers' Organisation</b>
School Reference Number (if applicable)	
Representative Group	<input type="checkbox"/> Learned Body / Subject expert group <input type="checkbox"/> Equalities group <input checked="" type="checkbox"/> Unions <input type="checkbox"/> Sector Skills Council (SSC) <input type="checkbox"/> QAA <input type="checkbox"/> UCAS

### Section A - General Information

Other voluntary or community group

None of the above

Would you like us to treat your response as confidential

The Department may make responses available on the website [www.deni.gov.uk](http://www.deni.gov.uk), although contact names and addresses would be removed.

Please note that under the Freedom of Information Act (2000) (Annex A) your response may be made available, on request, to the public.

If you would prefer your response to remain confidential, please tick this box

Yes

## Section B – Overview

The following is taken from CCEA's Executive Summary.

1. There is an opportunity to consider what is best for the future of qualifications in the north of Ireland. Regulatory collaboration where qualifications are shared, with joint-country regulation of qualifications continuing where flexibility will allow.
2. Changes made to similar qualifications in other jurisdictions should be kept under review, in particular, the risk of damage to the perception of our qualifications as a consequence of changes elsewhere or unsubstantiated claims that explicitly undermine confidence in GCSEs and A levels.
3. A qualifications system should be capable of stretching learners and differentiating between them whilst, at the same time, being inclusive and recognising the achievement of all young people.
4. It is important that qualifications are designed in such a way that the assessment of a subject is mapped onto content and appropriately supports pedagogy.
5. In addition, qualifications should support the development of a wide range of skills not all of which can be assessed through written examinations.
6. There is a need for flexibility in GCSE and A level qualifications' design to meet the needs of as wide a range of learners as possible and individual subject requirements.
7. There is a need for our young people to develop wider employability skills.
8. Both GCSEs and A levels should be retained (in the short term) with revisions to reflect the needs of our education policy and the economy. This would allow the strengths of the qualifications to be developed and changes to be made which support the focus of our curriculum and reflect the needs of employers and higher education.
9. The Review makes recommendations about how GCSEs and A levels might be taken forward, and also how the focus on improvements in literacy, numeracy and ICT skills could be supported by the qualifications system.
10. This Review reflects opinions about the need for short-term arrangements as well as an imperative to take a longer-term view of the qualifications system here. If necessary, this may include consideration of a system which is independent from – although demonstrably comparable with – neighbouring jurisdictions.
11. It is important that a qualifications system provides opportunities for every young person to achieve his or her potential. Recommendations have been made to develop, support and value alternative qualifications routes.

12. The portability and currency of qualifications taken by learners in the north of Ireland must be assured. Work should be undertaken to ensure young people here have qualifications that will take them wherever they wish to go.
13. In the longer term the sustainability of this strategy will have to be considered, taking account of changes being made to the qualifications in England and Wales and discussions on the use of the qualifications' brand names.
14. The opportunity should be taken to learn from international best practice and consider how this can be taken forward to promote continuous improvement in our qualifications system.

## Section C – Your Views

### Question 1 (Main thrust of CCEA's report):

To what extent are you broadly supportive of the main thrust of the CCEA report that the current examinations system in the north of Ireland is generally fit for purpose and that no significant or radical changes are required, at least in the short term?

Strongly Agree	Agree	Disagree	Strongly Disagree	No view
	√			

Please provide comments or reasons to support your answer:

**INTO agrees that the current system is generally fit for purpose but that there is too much of a focus on traditional GCSE subjects. There needs to be more allowance made for vocationally-based learning in other areas, such as BTEC.**

### Question 2 (GCSEs / A levels):

To what extent do you agree with the recommendations relating to GCSEs / A levels as set out below?

Strongly Agree	Agree	Disagree	Strongly Disagree	No view
	√			

Please provide comments or reasons to support your answer including where there are recommendations with which you disagree:

**INTO broadly agrees with the recommendations but, in relation to Point 15, the Organisation would not want to see any increase in the breadth of current internal marking by teachers, as this would have implications for teacher workload.**

**It has already been well established that particular subjects have a valid, internally-marked component.**

### GCSEs and A levels

Rec #	Description
2.	GCSE and A levels should be retained with amendments to reflect the needs of the north of Ireland education policy and our economy.
3.	Changes in England and Wales should be kept under review and discussions about the use of GCSE and A Level 'brand' names should take place.
12.	GCSEs and A levels should have modular or linear assessment that is appropriate for the subject and needs of the learner.
15.	GCSEs and A levels should have internal assessment where this is the most valid method of assessing skills integral to specific subject requirements.

16.	The internal assessment process should be reviewed to improve quality assurance procedures where needed.
37.	GCSEs and A levels should allow learners to develop the skills valued by further and higher education to support continuing learning. In revising the qualifications the opportunity should be taken: a) at GCSE – to incorporate, alongside the required subject knowledge, the progression of the skills embedded in the revised curriculum at Key Stages 1 to 3; and b) at A level – to incorporate independent learning, creative thinking and problem-solving skills.
38.	GCSEs and A levels should have the support of local employers in their development.
39.	GCSEs and A levels should facilitate young people in developing the wider knowledge and skills for working life.

### **GCSES**

<b>Rec #</b>	<b>Description</b>
13.	GCSEs, where modular, should have only one re-sit opportunity per unit and require 40% of assessment to be taken at the end of the course.
17.	GCSEs should have tiered examination papers, or a similar assessment model, where there is a need for this due to the nature of the subject.
27.	The current 60% weighting for controlled assessment in GCSE English/English Language should be reduced to no more than 40% in the revised qualification.
32.	GCSE qualifications should be retained at Level 1 and Level 2.
33.	The qualifications should: a) have subject content which reflects the needs of the north of Ireland; b) be aligned to the principles of the Entitlement Framework (EF); c) support progression, in their delivery, of the Cross-Curricular Skills of Communication (Literacy), Using Mathematics (Numeracy) and Using ICT (ICT); and d) support progression, in their delivery, of the other skills of Problem-Solving, Self-Management and Working with Others.
34.	GCSE qualifications should identify opportunities for links between subjects to connect learning and support the development of transferability of skills.
35.	A programme of work should be undertaken to promote GCSE qualifications in the north of Ireland

### **A Levels**

<b>Rec #</b>	<b>Description</b>
14.	A levels, where modular, should have examinations available in June only, with only one re-sit opportunity per unit.
41.	GCE A level qualifications should be retained as the main qualification taken at Level 3. They should be similar in demand to A levels offered in England and Wales with variation where necessary to meet the needs of learners in the north of Ireland
42.	AS should be retained as part of the A level qualification.

### Question 3 (Non-General / Vocational Qualifications):

To what extent do you agree with the recommendations relating to Non—General / Vocational Qualifications as set out below?

Strongly Agree	Agree	Disagree	Strongly Disagree	No view
√				

- a) Please provide comments or reasons to support your answer including where there are recommendations with which you disagree:

**INTO believes that there needs to be more breadth in our examination options to cater for the needs of all of our students and to meet the growing demand from industry for skills-based training. The current system does not take sufficient account of the growing trend among schools for vocationally-based subjects and portfolio-based assessment. Examination Boards in England and Wales offer options that are much broader and suitable for students who do not wish to take traditional subjects. Such students cannot achieve success within our current assessment arrangements. Options worth exploring include Cambridge nationals/technicals, BTEC and diploma courses.**

Rec #	Description
20.	High quality non-general and vocational qualifications should be made available to all 14–18 year old learners in the north of Ireland including those whose needs are not met by GCSEs and A levels.
21.	A programme should be undertaken to promote the value of non-general qualifications.
22.	The current qualifications provision should be strengthened with options for those who do not wish to take A levels.

### Question 4 (Literacy, Numeracy and ICT):

To what extent do you agree with the recommendations relating to Literacy, Numeracy and ICT as set out below?

Strongly Agree	Agree	Disagree	Strongly Disagree	No view
			√	

Please provide comments or reasons to support your answer including where there are recommendations with which you disagree:

**INTO has already expressed serious misgivings about the current arrangements for the assessment of Literacy, Numeracy and ICT here. INTO would be deeply concerned about any further development of the arrangements into GCSE, as such a move could potentially compound the problems. INTO agrees that literacy, numeracy and ICT skills need to be further developed, but would call on DE to await the imminent consultation on the OECD report on assessment, before taking any further steps in this direction.**

Rec #	Description
24.	GCSEs in English, mathematics and ICT should support progression from the
	Levels of Progression in Communication, Using Mathematics and Using ICT at Key Stage 3.
25.	Rigorous, competency-model skills qualifications at Levels 1 and 2, to recognise achievement in Literacy, Numeracy and ICT, should be developed.
26.	Consideration should be given to the streamlining of the GCSE English and GCSE English Language subject offer to one GCSE in the subject area. This should support progression from Communication in Key Stage 3 and develop the literacy skills of learners.
28.	Further consideration should be given to the development of a second GCSE Mathematics qualification. This should include a core qualification focusing on mathematical capability that reflects the needs to be able to use mathematics at a high level in daily life; complemented by a qualification relating to mathematical concepts for those intending further study in subjects which will require this level of knowledge.
29.	A more specialised, systems-based, GCSE IT qualification should be developed.
30.	The current GCSE ICT qualification should remain to prepare young people for the world of work. It should focus on practical elements of ICT and develop problem-solving skills and an appreciation of real-life applications.
31.	A level qualifications should support the development of literacy, numeracy and ICT skills where appropriate to the subject.

### Question 5 (Accountability / Regulation):

To what extent do you agree with the recommendations relating to Accountability / Regulation as set out below?

Strongly Agree	Agree	Disagree	Strongly Disagree	No view
	√			

Please provide comments or reasons to support your answer including where there are recommendations with which you disagree:

**INTO believes that Points 5 to 9 are crucial. It is of vital importance that qualifications gained here are fully comparable to those in the Republic of Ireland and in GB. The Republic of Ireland currently grants limited acceptance to NI qualifications, which receive full acceptance in GB. There needs to be full portability across these islands.**

### Regulation

Rec #	Description
5.	Work should be undertaken by the Regulators in England, Wales and the north of Ireland to identify flexibility in the three-country qualifications criteria to allow jurisdictional differences to be accommodated in qualification revision.
6.	Where qualifications are being shared by two jurisdictions or offered in the north of Ireland only, the Regulators should work to review the current qualifications criteria and subject criteria to facilitate the future development and accreditation of qualifications.
7.	The Department of Education and CCEA, in its Regulation capacity, should work
	with partners to ensure the comparability of qualifications taken by learners in the north of Ireland with similar qualifications taken elsewhere.
8.	Work on benchmarking GCSE and A level qualifications should be carried out to ensure rigour and comparability with qualifications taken in other jurisdictions.
9.	A review of the regulation and quality assurance of qualifications available in the north of Ireland should be undertaken to support our GCSE and A level qualifications.

## **Accountability**

<b>Rec #</b>	<b>Description</b>
11.	Accountability measures should be broader and considered holistically across the system. Achievement by some should not be referred to as 'good' as it infers that other achievement is not.

### **Question 6 (Policy / Strategy):**

To what extent do you agree with the recommendations relating to Policy / Strategy as set out below?

Strongly Agree	Agree	Disagree	Strongly Disagree	No view
	√			

Please provide comments or reasons to support your answer including where there are recommendations with which you disagree:

**INTO believes that Point 23 requires further clarification to avoid any confusion with the current 'Nationals', provided by OCR.**

**INTO fully supports Points 43, 46 and 47. Maximising choice and flexibility is needed and the Organisation would like to see this extended to the selection of examining boards.**

<b>Rec #</b>	<b>Description</b>
1.	Qualifications taken by learners in the north of Ireland should reflect the education policy and context in this jurisdiction.
4.	Qualifications' revision should be undertaken on the basis of short- and longer-term considerations.
10.	The qualifications system in the north of Ireland should facilitate and encourage the engagement and motivation of all learners. It should recognise and reward a range of achievement and provide valid information about attainment.
18.	A strategy for 14–19 education should be developed as a matter of urgency. This should consider all aspects of education, including qualifications; ensuring provision is seamless and provides maximum choice and flexibility.
19.	All students should have the opportunity to develop the knowledge and skills required for further study and working life and, in line with the Entitlement Framework, should have access to qualifications that offer appropriate routes of progression.
23.	Consideration should be given to a credit-based qualification approach to engage learners working below GCSE level. Currently this could consist of

Rec #	Description
	accredited, credit-based qualifications which facilitate learners meeting the requirements of the statutory curriculum. In the design of this approach, consideration should be given to the Nationals Levels 1–4 model being introduced in Scotland.
36.	Qualifications should have the support of local further and higher education institutions in their development.
40.	Consideration should be given to developing a mechanism to complement the A level subject offer and to support the value that employers and FHE put on skills development and enrichment programmes post-16.
43.	Work should begin on the longer-term vision for learning, assessment and qualifications in the north of Ireland at ages 14 to 18. In considering what the system should look like ten years from now, qualifications, systems and experiences from the UK, Ireland and internationally should be explored, as well as lessons from academic research into qualifications and assessment.
44.	Proposals for a longer-term qualifications system for the north of Ireland should be developed over a period of at least three-years. Opportunities for working with other jurisdictions should be considered.
45.	Any system should be aligned with internationally recognised best practice.
46.	Proposals should be trialled, tested and evaluated with a view to subsequent implementation in a longer timeframe which is appropriate for all users.
47.	At GCSE level this should incorporate consideration of both developing/aligning with an alternative 14–16 qualification system and the removal of high-stakes external assessment at age 16.
48.	At post-16 the rigour, portability and currency of qualifications must be ensured.
49.	Changes proposed for the longer-term future of qualifications in the north of Ireland should be allowed to be fully embedded before periodic evaluation and review begin.

### Question 7 (Longer term work / Parallels with other qualification systems):

We would welcome your views on what the qualifications system should look like in ten years from now. The 14 to 19 qualifications system here is very different to the one in Scotland or the south of Ireland where there is much more teacher based assessment at age 16 and qualifications have more breadth and less depth at 18. In terms of potential longer term aspects of change, to what extent would you agree with the following:

Description	Strongly Agree	Agree	Disagree	Strongly Disagree	No view
1. There should be no change – status quo should be maintained				√	
2. There should be some change but not significant (in line with CCEA's Report)		√			
3. There is no longer a need for high-stakes examinations at age 16, due to the vast majority of				√	

Description	Strongly Agree	Agree	Disagree	Strongly Disagree	No view
learners now staying on at school / FE college					
4. Assessment at age 16 should be largely internal (conducted by the teacher) with the information used to inform future qualification routes			√		
5. Choice at 18 should be wider and less focused than at present e.g. studying a wider range of qualifications with less depth than A level – to keep options open for learners		√			
6. There should be radical change – a completely new model			√		
7. Other proposal (please specify)					

Please provide comments or reasons to support your answer:

**INTO believes that movement to a completely new model is neither desirable nor required. We simply need to update the current model and make it fit for the 21<sup>st</sup> century.**

**Qualifications need to be flexible, attainable by students who have varying learning styles, acceptable for entry to universities and the world of work and portable, on a world-wide basis.**

### Question 8

To what extent do you agree that the review recommendations ensure our qualifications will have the confidence of learners, educational institutions and employers across these islands and beyond?

Strongly Agree	Agree	Disagree	Strongly Disagree	No view
√				

Please provide comments or reasons to support your answer:

**Question 9 (Section 75(1):**

Are there any particular concerns you would have regarding differential impact on Section 75 (1) categories? i.e.

- Religious Belief
- Political Opinion
- Racial Group
- Age
- Marital Status
- Sexual Orientation
- Men and Women generally
- People with a disability and those without
- People with dependants and those without

Yes    No

Please provide comments or reasons to support your answer:

**We must ensure that any new system is sufficiently flexible to accommodate the needs of all students. It is also essential to ensure equality of esteem for qualifications and to end the hierarchical view of academic and vocational qualifications.**

**Question 10 (Section 75 (2):**

Are there any particular concerns you would have regarding differential impact on Section 75 (2) (Good Relations) categories? i.e.

- Religious Belief
- Political Opinion
- Racial Group

Yes    No

Please provide comments or reasons to support your answer:

**Question 11 (Final Comments):**  
Any other comments?

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

## ANNEX A

### **FREEDOM OF INFORMATION ACT 2000 – CONFIDENTIALITY OF CONSULTATIONS**

The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

The Freedom of Information Act gives the public a right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- the Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- the Department should not agree to hold information received from third parties "in confidence" which is not confidential in nature;
- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses please contact the Information Commissioner's Office (or see web site at: <http://www.informationcommissioner.gov.uk/>).