# Draft Response Consultation on proposed changes to CCEA entry level

**CONTROLLED SCHOOLS’ SUPPORT COUNCIL**

Consultation on proposed changes to CCEA entry level, vocationally related and occupational studies qualifications for January and summer 2021

**1.0 Introduction**

The Controlled Schools’ Support Council (CSSC) was set up in September 2016 to represent and support the interests of the controlled sector in Northern Ireland. To date 95% of controlled schools have chosen to register with CSSC.

The controlled sector is:

* large – it accounts for 49% of all schools and caters for over 144,719 children, making it the largest education sector in Northern Ireland
* diverse – providing education across all school types – nursery, primary, secondary, grammar and special schools. Within this, controlled integrated and controlled Irish Medium schools are included
* inclusive – providing education for children of all faiths and none (62% of pupils define as Protestant, 10% Catholic, and 28% ‘other’) and over a two fifths of newcomer pupils in Northern Ireland.

The Controlled Schools’ Support Council (CSSC) welcomes the opportunity to respond to this consultation paper. It acknowledges the difficult context within which schools, staff, pupils/students are working presently and the need for the Council for the Curriculum, Examinations and Assessment (CCEA) to look at how best to adapt qualifications during 2020/21 to take account of current public health requirements, lost learning time, potential further disruption and to reduce the burden of assessment on students.

CSSC is very much aware of the variety of settings within which the qualifications are offered – mainstream schools, special schools, colleges etc. As a council, representing the largest sector of schools, this response seeks to respond in such a way as to evaluate, affirm and enhance the opportunities for change and so make things better for young people and their teachers.

**2.0 Method**

Please note this is an officer response. Within the timescale made available for response, CSSC has attempted to ground its comments by consulting with a number of controlled schools. CSSC would record its appreciation to those schools who took the time to discuss these important issues. Whilst CSSC is confident that it has represented the views of stakeholders within the timescale available, it has not been able to solicit views from the student/pupil body.

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**3.0 The Response**

This short paper makes some general comments at the outset and thereafter will respond to the consultation under the headings provided:

Public Health Adaptations

* Assessment Arrangements and
* Equality

The response itself will take a high level view of the proposed framework and will comment on all 3 qualification types together regarding the proposed changes.

It is recognized and expected that schools and colleges will respond to the detail of the respective units through their Heads of Subject/Department.

**4.0 General Comments**

* CSSC recognizes that the timescale for communicating and implementing the proposals is very narrow. However it welcomes the opportunity for stakeholders to express their views on the proposed changes. It is vital that the final decisions regarding the proposals are communicated to schools and colleges as quickly as possible. They report that already a 3-4 week delay has occurred. Therefore there is a need to respond to schools to enable them to implement and teach the qualifications within the timescale that remains.
* Furthermore there exists an uneasiness within schools/colleges regarding any further changes brought about by a deterioration in the present environmental context. It is expected that as the environmental context changes so will the requirements of the qualifications. If this occurs then a speedy response and communication with the schools and colleges is imperative. Taking a student-centred approach to such matters and one which recognizes the demands and professionalism of staff will enable the effective delivery of qualifications in the best interests of all stakeholders.
* Many of the individual subjects/units and qualifications upon which CCEA is consulting, place an emphasis on the development of skills within a vocational or work-based context. Because of the restrictions placed upon schools through the social distancing measures and other PHA advisories, best learning situations will not be able to be implemented and will impact upon the learning for some students who ‘learn best by doing’ It is also important to note that some students develop skills over time – and these within various contexts. Therefore some controlled schools request that consideration be given to the opportunity to predict student performance over the duration of the taught qualification. In addition this might be helpful if a further deterioration in the environment necessitated more stringent changes to the delivery of the qualification.

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* Awarding of qualifications which are valid and reliable is dependent upon the context in which the qualifications are being taken. It may not be possible to compare the same award from two different contexts. It is obvious that the
* environmental context has changed over time and the methods of assessment, due to the present public health advice, have also changed.
* However it remains vital that the ‘spirit’ of the qualifications with an emphasis on skills development remains central and that there is not an undue shift in emphasis to the acquisition of knowledge and understanding, thus diminishing the skill domain. The value and character of these qualifications should not be undermined. This view was expressed strongly by controlled schools contacted and in particular special schools who emphasized ‘the learning by doing’ aspects of these qualifications.
* It is with this in mind that schools are concerned that students will be able to, and confident enough, to identify future pathways leading from these qualifications. Students need to be reassured that after these qualifications they will be able to take appropriate development areas/course pathways.
* Schools also noted that the delivery of these courses varies according to settings. Some students attend high schools, others special schools, and others further education colleges – and indeed some will attend more than one centre. This highlights the need for equality of opportunity across settings and for ‘uniformity’ of assessment modes.

**5.0 Public Health Adaptations**

* CSSC welcomes the range of public health adaptations across the suite of qualifications under consultation. It recognizes the difficult context within which schools/colleges, staff and students are operating and supports these changes to enable teaching and learning to be appropriate to programme needs and health and wellbeing of students and staff.
* CSSC also notes that these adaptations will only apply to students who will be awarded the full qualifications in January, March and Summer 2021. It deems this to be appropriate but urges CCEA to keep the situation under review and make further changes to accommodate to the necessities of new public health advice. This may well necessitate a reduction in course content.
* Whilst endeavouring to maintain the width of the qualification units, on occasions there are reductions in course content. Controlled schools are largely content with this development.

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* The adaptations also provide examples of additional/alternative learning and teaching activities eg shopping online; role play. These are welcomed given the public health considerations.
* It was highlighted by controlled schools that some of the adaptations are not explicit enough. Care should be taken to fully explain the nature of the task described. Eg Contemporary Cuisine – Occupational Studies p18.
* Under the present circumstances replacing ‘visiting moderation’ with ‘product moderation’ submitted to CCEA is welcomed by controlled schools. However this may slow down unit delivery.
* Controlled schools have expressed concern that the expected time taken to deliver the qualification remains too long. Bearing in mind that the start to the school year was delayed, that schools were unclear as to the requirements of class size; that teaching and learning strategies may be protracted – schools anticipated that the overall course length be reduced now.
* Concerns were also expressed regarding the use of teacher demonstration and modelling. Since these qualifications are skills-based it is difficult to understand how watching a technique/skill enables a student to develop the skill. (Viz. Occupational Studies Technology and Design Unit 40, 41, 42. p12.)

**6.0 Assessment Arrangements**

* Within the context of the present Covid-19 environment CSSC believes that the difficulties caused by social distancing regarding course delivery and assessment have been largely mitigated by the proposals for change in Entry Level, Vocationally Related and Occupational Studies.
* In line with key regulation objectives CSSC affirms that ‘learners……should have the opportunity to receive fair results, and as far as possible, not be disadvantaged by the longer term impact of the current public health crisis…’ and believes that the proposals, whilst there are some concerns, deliver as far as possible in the interest of the learners.
* It is acknowledged that the width of the courses have been maintained with little or no reduction in content but that a reasonable approach to assessment has been suggested with levels being submitted for all units studied and the school determines the units for moderation by CCEA. Some concern was expressed regarding the thoroughness with which schools might deliver the non-moderated units.
* As stated previously some controlled schools were concerned that the course remains too long given the present circumstances. Some schools questioned their ability to teach the course within the given timescale.
* To enable course progression and coherence controlled schools agreed and welcomed that the qualifications were awarded on all units.

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* Whilst many units moved from oral to a written type of assessment, care needs to be taken that this does not result in a diminished pupil performance. CSSC recognizes that these awards are primarily skill-based. Therefore the assessment of progress should emphasise skill progression. This is recognized as a weakness of the changes being suggested, but schools also recognize that it is a necessary consequence of the environment in which we operate presently. or this reason CSSC is sympathetic with the changes even though the validity of the assessment is stretched. CSSC recognizes that it important to err on the side of the best interests of the student.

**7.0 Positives identified by controlled schools**

There was overwhelming support for:

* Reduction in assessment requirements
* Maintaining the breadth of courses and assessment
* Adherence to public health advice
* Return to, ‘as far as possible’, public examinations to secure public support for the examination system
* Support for the professionalism of staff to enable the assessment of students/pupils
* Reduction in the burden of assessment on students in the interests of their health and well being
* Employment of a wide range of alternative assessment procedures.

**8.0 Potential Issues identified by controlled schools**

* Ensuring a base level of knowledge, understanding and skills to enable progression to further study and employment
* Maintaining reliability and validity of assessment compared to previous years
* Ensuring the ‘spirit’ of the qualifications are secured without promoting bias towards written knowledge and understanding in order to provide assessment opportunities
* A reduction in ‘face to face’ teaching/hands–on interaction for pupils who require it may not enable normal skill development
* Time and ability to carry out tasks safely and to the desired levels
* Special schools were particularly concerned that any move away from ‘learning by doing” would militate against their students and therefore the success of students in these qualifications would be reduced

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* Difficulties in differentiating between Levels – Level 1, Level 2. Pass, Merit Distinction and Distinction\*- given the type of assessment available
* Financial Issues – Controlled schools are fearful of the extra financial costs emanating from these required changes. Principally this will be caused by additional staffing costs caused by a reduction in class sizes to ensure the safety of pupils is maintained. Additionally, costs may be incurred due to a revision of resources in line with new learning and teaching and assessment procedures. This was significant in relation to comments made by special schools
* Controlled schools were seeking the use of predicted grades to offset further disruption and delays in awarding results
* Staff were seeking a more flexible approach to the setting of moderation dates. Given the late start to teaching, a moderation date set further back would provide additional teaching time
* insight into how loss of learning will be assessed as a result of temporary or multiple periods of isolation or class down time.

**9.0 Equality**

In general CSSC agrees with the equality impact carried out by CCEA regarding the proposals.

However CSSC would draw attention to the needs of children with special educational needs/learning difficulties. Given the change of assessment techniques it would be vital that the students are not disadvantaged by a swing to assessment based on knowledge and understanding.

**10.0 Conclusion**

CSSC welcomes the proposed changes to CCEA Entry Level, Vocationally Related and Occupational Studies.

CSSC has commented on various aspects of the proposals and trusts that they are helpful as CCEA moves forward.

CSSC would impress on CCEA to make a considered and prompt decision which would be forwarded to schools as soon as possible so that planning for learning and teaching can be expedited. It would further emphasise that the professional judgement of teaching staff/lecturers be utilized to inform assessment especially at a time when the future is unpredictable.