

Consultation Response: The Future of CCEA GCSEs, AS Levels and A Levels

Introduction

The Royal College of Speech and Language Therapists Northern Ireland (RCSLT NI) is the professional body for speech and language therapists and is committed to ensuring that all children and young people with Speech, Language and Communication Needs (SLCN) can access education on an equitable basis.

We welcome the Department of Education's focus on reducing assessment burden and enhancing deeper learning in its consultation **"The Future of CCEA GCSEs, AS Levels and A Levels"**. In this response, we review each proposal in the consultation and evaluate its potential impact on learners with SLCN. We provide evidence-based insights and recommendations to ensure any changes promote accessibility, inclusion, and equity for young people with communication needs.

We would welcome the opportunity to discuss the content of this submission with the Department.

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Background

Speech, language and communication skills are essential building blocks for literacy, numeracy and overall learning, development and emotional wellbeing.

Over 10% of children and young people in the UK have some form of long-term communication need which impacts on their daily life (Norbury et al, 2017).

This does not include children who are not typically developing in the domain of SLCN, but with the correct support will develop in line with their peers. However, the impact of any SLCN, short or long-term can have detrimental impacts on our children and young people in a range of areas including:

Education

- A two-year-old's language development can strongly predict their reading skills on entry into school, as well as their later attainment (Snowling et al., 2011).
- Children with DLD have poor play skills in comparison with their peers (Short et al., 2020).
- Literacy difficulties are more prevalent in children with SLCN (Drockell and Howell., 2015).
- In English and Maths GCSEs, 9.8% of pupils with SLCN achieve pass grades vs 42.4% of their peers (Department of Education England, 2020).

Mental Health

- Children with SLCN in the preschool, early and primary years are approximately twice as likely to develop social, emotional, and mental health difficulties as children with typical language development when followed up over time (Yew & O'Kearney, 2013).
- Children with vocabulary difficulties at age five are three times more likely to have mental health problems in adulthood (Law et al., 2009).
- 81% of children with emotional behavioural disorders have significant language difficulties (Hollo et al., 2014).
- People with SLCN are six times more likely to experience clinical levels of anxiety and three times more likely to have clinical depression (Conti-Ramsden and Botting, 2008).

Youth Justice

- Up to 60% of young people in the youth justice estate have communication difficulties with 46-47% of these in the poor or very poor range. Many of these individuals have experienced poverty and adverse childhood experiences (Bryan et al., 2007).
- Males with SLCN are four times more likely to engage in antisocial behaviour with higher rates of arrests and convictions (Brownlie et al., 2004).

Family Life

- Children with SLCN have a lower quality of life at age 9, in comparison with their peers (Eadie et al., 2018).
- Caregivers of neurodivergent children (which include some SLCN) are more likely to experience clinically significant levels of stress, poor mental health, financial hardship, and negative relationships (D'Arcy et al., 2023).

Prospects

- Vocabulary difficulties at age five are associated with poor literacy in adulthood (Johnson et al., 2010).

- Children with SLCN are at higher risk of expulsion from school, particularly secondary education, and less likely to advance to further education (Clegg et al., 2009).
- Adults with SLCN are twice as likely to go over a year without employment (Law et al., 2009).

Young Person in Care

- Children in care experience SLCN, although, these are often overlooked and not acted on compared to the emotional difficulties these children face, despite the prevalence rates being similar - at 26% and 24% respectively. (Chambers et al., 2010).
- 90% of care leavers were found to have below-average language abilities and over 60% met the criteria for DLD with difficulties in literacy, developmental disorders, and social, emotional, and mental health concerns (Clegg, 2021).

Economy

- 14% of children aged three were considered at risk of developing language difficulties. The lifetime economic costs of unsupported language skills in these UK children are estimated to be around £330 million. The cost is calculated from reduced lifetime income, the pressure on special education needs, mental health services, and possible related costs due to association with criminal justice services (Pro Bono Economics, 2021).

Health inequalities

- It is important to understand that SLCN can, at times, be due to reduced developmental opportunities in the child's family and educational environment which limit the child's learning of language. These reduced developmental opportunities are commonly linked to social disadvantage. In areas of social disadvantage around 50% of children start school with delayed language and other identified communication needs, indeed, some local studies have found this to be significantly higher in Northern Ireland. (Johnson et al., 2010 & the Institute of Health Equity, 2020).

Notably, *around 1 in 10* children have long-term SLCN, yet only about 20% of students with identified SLCN currently achieve a pass (grade 4 or above) in English and Maths GCSEs, compared to 64% of all students. These stark statistics underline why qualification reforms must be designed with the needs of SLCN learners in mind. RCSLT NI response is grounded in our values of

inclusion, person-centred support, and evidence-based practice, and we are grateful for the opportunity to contribute our perspective.

Proposal 1: Shared GCSE and A-Level Branding & Maintaining Standards

Summary of Proposal: The Department proposes that CCEA should continue to use the familiar GCSE and GCE A-Level “brands” for its qualifications, ensuring they remain understood and recognised by schools, employers, and higher education providers. This is intended to maintain clarity and confidence in the standard of CCEA awards, given that GCSE and A-Level titles are well-known nationally and internationally.

Implications for SLCN Learners: We support this proposal, as retaining the established qualification names helps avoid confusion for learners and families, especially important for those with communication needs who may struggle with complex or inconsistent terminology. Clear and consistent branding means that students with SLCN won’t face additional barriers in explaining their qualifications to others. Maintaining widely recognised standards also ensures that these students’ achievements carry full credibility when they progress to employment or further study. For young people with SLCN, who often already face challenges in transitions, their qualifications must be easily understood and valued by next-stage institutions.

Recommendations:

- **Maintain Clarity:** Continue using “GCSE” and “A-Level” names as proposed. Provide straightforward, accessible information to students and parents (in plain language and alternative formats where needed) explaining that CCEA’s GCSEs and A-Levels remain equivalent in standard to those elsewhere. This will reassure learners with SLCN and their families that they are not being disadvantaged by a change in naming or standards.
- **Inclusive Standards:** In maintaining standards, ensure that inclusion is upheld – i.e. high standards with appropriate access arrangements and reasonable adjustments for SLCN. “Maintaining standards” should never be misinterpreted to mean limiting accommodations; rather, quality and fairness demand that exams accurately measure ability without being confounded by a student’s disability or communication difficulty. We recommend CCEA continue to follow guidance on accessible assessment

design and have been liaising with them to use clear language and avoid unnecessary complexity in exam papers so that upholding standards is in line with fair access for all.

- **Monitoring Recognition:** As changes roll out, monitor any feedback from colleges/universities regarding recognition of CCEA qualifications. Should any confusion arise, additional communications may be needed. RCSLT NI can help disseminate information through our networks to ensure the value of these qualifications, for all learners, including those with SLCN is well understood.

In summary, RCSLT NI **supports Proposal 1**. Retaining GCSE/A-Level branding will preserve the portability of NI qualifications, which benefits all students including those with SLCN. We stress that maintaining high standards must be coupled with maintaining (and strengthening) inclusive practices in assessment.

Proposal 2: Qualification Content (Depth vs Breadth)

Summary of Proposal: The Department proposes to **reduce the overall content** in each CCEA GCSE and A-Level specification, to relieve pressure on teachers and students and allow more time for deep learning of key concepts. This content streamlining must preserve the integrity of qualifications and support progression, but address concerns that currently “content-heavy” specs leave insufficient time for truly embedding understanding.

Implications for SLCN Learners: RCSLT NI welcomes the emphasis on deeper learning over superficial content coverage. Students with SLCN often benefit from a curriculum that prioritises understanding, critical thinking, and skill development rather than sheer volume of information. Many learners with language disorders or communication difficulties require more time to grasp and process concepts; reducing curricular content load can grant teachers the flexibility to reinforce vocabulary and meaning, check understanding, and use multi-sensory teaching approaches, all of which support SLCN students’ learning. Indeed, educational research suggests that “deeper learning” strategies (focusing on critical thinking, problem-solving and applied understanding) can improve outcomes and narrow achievement gaps. By trimming extraneous or overly advanced content, teachers can delve into core concepts with varied techniques (visual supports, repetition, practical examples) that benefit those with language processing needs.

However, we caution that how this reduction is implemented is crucial. Learners with SLCN need the right content to be taught in accessible ways, not simply “less” content. If key foundational knowledge (for example, in literacy or numeracy) were lost due to content cuts, it could harm SLCN students who rely on explicit teaching of basics. Likewise, SLCN learners often struggle to infer missing information, so curricula must remain coherent and well-sequenced even if leaner. The goal should be to **reduce overload without reducing the opportunity** for these students to build knowledge.

Recommendations:

- **Prioritise Language-Rich Key Content:** In reviewing specifications, identify the most important concepts and ensure these include a strong foundation in language and communication skills where relevant. For example, in subjects like English, focus on depth in understanding texts and expressing ideas (vital for SLCN learners’ development) rather than breadth of literature covered. In science or history, prioritise mastery of core terminology and concepts, with support for language comprehension. Removing superfluous detail is positive, but do not cut definitions or explanations that SLCN students rely on.
- **Allow Time for Reinforcement:** With fewer topics to cover, teachers should be encouraged (through guidance and training) to use freed-up time for reinforcing and revisiting concepts in diverse ways. Students with SLCN often require repetition and multiple modalities (e.g. spoken explanation, visuals, hands-on activities) to fully embed learning. We recommend that the Department issue guidance highlighting that the intent of content reduction is to enable richer teaching methods and individual support, not to simply finish the syllabus early. This will help ensure the change truly benefits learners with SLCN by allowing teaching at a pace that meets their needs.
- **Teacher Training in Differentiation:** Deeper learning for SLCN students will only be achieved if teachers are equipped to adapt their pedagogy. We echo the call from our counterparts in England in the recent Curriculum and Assessment Review for evidence-led guidance on curricular and pedagogical adaptation for SEND. Northern Ireland should likewise support its teachers with training on differentiating instruction and using communication-friendly strategies (such as pre-teaching

vocabulary, simplifying language while retaining rigour in content, using gesture and visual aids). As noted in RCSLT's response to that review, improved access to specialist support (e.g. Speech and Language Therapists (SLT) working with schools) and ongoing CPD in inclusive teaching are essential to complement any curriculum changes.

- **Maintain Pathways for Progression:** Ensure that reduced content does not inadvertently remove topics that are prerequisites for higher study in a subject. For example, if an A-Level topic is removed at GCSE, consider how students with SLCN (who might need clear bridging of concepts) will be supported to transition. It may be that some content is moved to higher levels rather than eliminated. RCSLT NI would be concerned if students with SLCN faced a larger leap in knowledge at the next stage because too much foundational content was stripped out earlier. We advise close liaison with further/higher education to strike the right balance in content adjustments.

Overall, RCSLT NI **supports Proposal 2's** intent. Reducing overloaded content can **positively impact SLCN learners** by lowering cognitive load and freeing time for solidifying understanding. To realise these benefits, implementation must be accompanied by training and resources that help teachers deliver an inclusive, language-rich curriculum. We are happy to assist in developing guidance to maximise accessibility of curriculum content for those with SLCN.

Proposal 3: Reducing the Number of Assessments per Qualification

Summary of Proposal: The Department proposes to **reduce the overall number of assessment units** for each CCEA GCSE and A-Level. Many qualifications have accumulated multiple exam papers or units (often due to modular structures), and stakeholders feel this contributes to assessment burden and stress. The Department suggests that, in most subjects, there is no strong educational justification for having more than **two assessments** (e.g. exam papers) per qualification. Therefore, it is proposed to limit the number of assessments to a maximum of two, except in special cases where more might be essential to cover all assessment objectives (such as perhaps very diverse skill sets in a subject). This change aims to lighten the load on students and teachers, who currently face a high volume of marking and exam preparation.

Implications for SLCN Learners: RCSLT NI broadly welcomes the reduction in the number of high-stakes assessments, as it could lessen the stress and anxiety that many learners and particularly those with SLCN, experience. Research consistently shows that test anxiety can significantly lower students' performance, and children with special educational needs (including communication needs) are more likely to experience elevated exam anxiety and academic stress. Sitting numerous exams in a short period can be overwhelming for a student with language processing difficulties or social communication challenges. Reducing the count of exams may allow these learners to focus their revision and mental energy on fewer assessment events, hopefully improving their performance and well-being. It may also free up teaching time (fewer mock exams, less frequent revision sessions), which can be used for guided practice or intervention for those who need additional help (like SLCN students).

However, we also caution about the potential unintended consequences of compressing assessments. If, for example, a qualification currently has three exam papers and this is reduced to two, each remaining paper might become longer or cover more content. An extended exam paper could be very demanding for students with SLCN, many of whom struggle with concentration, working memory, or fatigue. A student with a language difficulty may find a 2-hour paper far harder to sustain attention through than two 1-hour papers, even if the total examined content is similar. This is especially pertinent for those who receive exam access arrangements such as extra time. A 25% time extension on a single long paper means an even longer continuous period they must focus and write, potentially exacerbating fatigue. We note that the consultation document itself acknowledges the risk that fewer units could lead to longer exams or less content being assessed. There is a balance to be struck to ensure that "reducing number of assessments" truly reduces assessment burden and does not simply shift the burden into a different form (e.g. one long exam).

Additionally, fewer assessment opportunities mean each exam carries more weight. For learners who have inconsistent performance due to their SLCN (for instance, a student with high social anxiety might underperform on a particular day), having only one or two chances to demonstrate their knowledge is high stakes. In a modular system, a weaker performance in one unit might be balanced by another; in a single-exam system, a 'bad day' can be catastrophic. This could disproportionately affect those with communication needs who might be more

vulnerable to fluctuations in performance (due to anxiety, communication overload, etc.).

Recommendations:

- **Limit Exam Lengths:** When consolidating assessments, set reasonable limits on how long any single paper can last, to avoid extremely lengthy exams. We suggest that if two units are to cover what was previously three, the total time is not simply merged. Breaking an exam into sections with a supervised break, or scheduling two papers on different days, could mitigate fatigue. This is especially important for candidates with SLCN, who often benefit from short breaks to recharge their attention and manage stress. The principle should be that fewer exams should not mean longer exams. If necessary, allow an additional assessment unit in a subject where the only alternative is a single paper of excessive length (this might be one of the “specific excepted cases” mentioned).
- **Ensure Diverse Question Formats:** With fewer assessments, each exam might cover a broader range of skills. Use a variety of question types (not just long essays) so that students with different communication strengths have multiple ways to show their knowledge. For example, include some short-answer or supported-structure questions alongside open essays in humanities exams, this can benefit SLCN learners who might know content but struggle with organising extended writing. A diversity of assessment methods within the two papers can partially compensate for having fewer overall opportunities.
- **Maintain Access Arrangements Rigorously:** Fewer exams place even greater importance on quality access arrangements. There must be no reduction in the provision of language modifiers, modified language papers, readers, scribes, extra time, rest breaks, etc., for eligible students with SLCN and other disabilities, in fact, these supports become more crucial when there are only one or two chances. We recommend CCEA work closely with the Joint Council for Qualifications (JCQ) to ensure all permissible accommodations are well-communicated to schools and effectively in place. Additionally, consider whether any new forms of support are warranted when exams are consolidated (for instance, more flexible scheduling or splitting of a paper over sessions for certain

students). The system should be ready to be innovative, so that “fewer assessments” does not disadvantage those with particular needs.

- **Continuous Assessment Elements:** Although the general direction is to reduce assessments, we encourage retaining low-stakes continuous assessments (like class tests or formative tasks) as part of teaching practice (not necessarily counting toward final grades, but to inform teaching). Learners with SLCN benefit from ongoing feedback and multiple ways to practice the retrieval of knowledge. Teachers should be supported to give these opportunities even if formal units are fewer. In other words, decouple “fewer summative assessments” from the frequency of feedback opportunities. This will help SLCN students build confidence gradually, so that when the big exam comes, they are not caught by surprise.
- **Data Monitoring:** After implementation, monitor performance of students with SEN/SLCN in the new system. If analysis shows that outcome gaps widen (for example, if the proportion of SLCN students achieving passes drops further when units are reduced), that will signal a need to adjust the approach. One mitigation could be to allow certain students to take an optional additional assessment or resit (perhaps akin to the way GCSE English and Maths can be retaken in November for those who need). Careful analysis will tell if the reform is truly “empowering all students to thrive” as intended or if adjustments are needed for equity.

On balance, RCSLT NI **agrees with the aim of Proposal 3**, reducing assessment load can benefit young people with SLCN by decreasing stress and giving more time for learning. Our recommendations above are intended to ensure that, in execution, this positive intent translates into genuine burden reduction without unintended drawbacks for those learners. We believe with thoughtful design of exam structure and support, the move to fewer assessments can indeed make qualifications more accessible and less pressurised for students with SLCN.

Proposal 4: Reducing or Removing Controlled/Internal Assessments

Summary of Proposal: The Department proposes to **reduce or eliminate the use of controlled assessments (internal coursework) in CCEA specifications wherever possible**. This reflects feedback that coursework components often create a significant workload for teachers and students and sometimes duplicate

content assessed in exams. The Department notes that, except where an internal assessment is truly essential to measure a skill, most qualifications could rely on exams alone. By removing controlled assessments from most GCSEs and A-Levels, the aim is to reduce the burden on learners and teachers, streamline assessment, and align NI more closely with practice in other jurisdictions (e.g., England's move away from coursework in many subjects). For example, the consultation explicitly proposes **removing all controlled assessments from GCSE English Language** as they were seen to overlap with examined content and inflate workload. Generally, coursework would be retained only in cases where it is the only valid way to assess key skills (certain practical or performance subjects).

Implications for SLCN Learners: We approach this proposal with cautious optimism. On one hand, internal coursework can be a double-edged sword for students with SLCN. Some learners with communication needs thrive with coursework because it offers them more time and a familiar environment to demonstrate their skills. For instance, a student with expressive language difficulties might produce a much better piece of written work over several days of coursework than under exam pressure. Similarly, a pupil with high social anxiety might prefer submitting a recorded presentation rather than performing oral answers in a timed exam. Coursework can allow the use of assistive technology (like speech-to-text software) and input from support staff (within the rules) that help level the playing field for those with disabilities. From this perspective, removing coursework could remove a safety net or alternative avenue for some SLCN students to show their abilities.

On the other hand, coursework can also pose challenges: managing long-term assignments requires organisational and language skills that some SLCN learners find difficult without substantial support. There may be communication barriers in understanding complex task instructions or in seeking help outside the structured exam setting. Some students with SLCN have reported that extended coursework actually prolongs stress (compared to a short exam) and that unclear expectations in coursework can be confusing. Additionally, we appreciate that teachers often spend extra time scaffolding coursework for students who struggle with independent work, time which not all students may receive equally. We note the Department's point that controlled tasks sometimes duplicate exam content; if that's the case, doing them in class *and* in exam is redundant effort that could tire students needlessly.

Considering these factors, RCSLT NI sees merit in **reducing coursework where it is not adding distinct value**. For many academic subjects, well-designed exams (with proper accommodations) can assess knowledge and understanding without needing an internal project. Removing controlled assessments could indeed lighten the ongoing workload and allow students with SLCN to focus their strategies (e.g., using extra time, practising past papers) on a single mode of assessment. It could also reduce the scenario of “assessment fatigue” where a student with SLCN must juggle multiple formats (written exam, oral presentation, practical portfolio) for one subject. Simplifying this to a primarily exam-focused assessment might reduce cognitive switching and confusion.

However, we **strongly urge** that where an internal or practical component *is* essential to capture an important skill, it should be retained (and adequately supported). The consultation document itself acknowledges that some skills – e.g. speaking in languages, practical experimentation in science, artistic performance – may require alternative assessment modes. We would add that for students with certain SLCN profiles, alternative assessment formats can sometimes better showcase their learning. For example, a student with dyslexia (difficulty with writing) but strong oral skills might do better with an oral presentation component; conversely, a student with a speech, language or communication disorder might benefit from being able to submit a written coursework piece instead of an oral exam. A rigid “exam-only” regime in all subjects could disadvantage those at the extremes of communication needs.

Recommendations:

- **Apply a Case-by-Case Lens:** Do not implement a blanket elimination of coursework without evaluating each subject’s goals and student needs. RCSLT NI recommends that CCEA convene expert groups (including SEN specialists and teachers) to determine for each specification whether a controlled assessment is truly non-essential. If it is essential for covering certain skills (e.g. oral language use, sustained investigative work, creative expression), then it should be retained in a streamlined form rather than dropped. For example, while GCSE English Language writing tasks might be examinable on paper, a drama performance or art portfolio is inherently practical and should remain coursework-based with proper moderation.

- **Improve Design of Any Retained Coursework:** Where coursework is kept, its design should be reviewed to maximise accessibility. Clear, simplified instructions, breaking tasks into milestones, and providing exemplars can help all students and especially those with SLCN. Teachers should be encouraged to explicitly teach the skills needed to approach coursework (how to research, how to structure an essay, etc.) rather than assume students just “pick it up”. This aligns with an inclusive teaching approach, making expectations transparent benefiting learners with language difficulties who might not infer requirements.
- **Permit Adaptive Formats:** We recommend flexibility in how students evidence learning, especially for those with SLCN. If formal coursework is removed, consider whether students with additional needs could be assessed through alternative formats as a reasonable adjustment. For instance, if a history GCSE drops its coursework essay component in favour of an exam-only model, a student with a severe writing impairment might be allowed to do an oral history report as an exception, assessed against the same criteria. This would require careful policy development, but it could reconcile the removal of coursework with the need to accommodate individual differences. It aligns with the principle of Universal Design for Learning, which encourages multiple means of expression for students to show what they know. Even if Universal Design for Learning is not explicitly in policy, the spirit can be reflected through flexible assessment arrangements.
- **Support During Transition:** The sudden removal of coursework may be a big adjustment for some current learners, particularly those who chose certain subjects expecting a coursework component (where they might excel). To mitigate this, ensure a fair transition plan. Current Year 11–13 students should not be unfairly disadvantaged by changes in the middle of their course. Communicate clearly how and when coursework will be phased out. Also, provide guidance to schools on preparing students, for example, if English coursework is removed, teachers might need to incorporate more practice of exam writing skills during class to build up those competencies in SLCN students who relied on coursework before.
- **Lighten the Load, Not Remove Skill Practice:** We interpret “removing controlled assessments” as removing the summative assessment element,

but teachers should still incorporate practical, spoken, or project-based learning in the curriculum. For example, even if GCSE English Language will no longer count a speaking task towards the grade, **we strongly advocate that schools continue to develop students' speaking and listening skills through rich classroom activities.** Indeed, the consultation's Proposal 5 on English (discussed below) suggests schools will endorse that students had opportunities to build speaking skills, albeit without formal grading. RCSLT NI fully supports this principle: SLCN students need frequent opportunities to practice communication in low-stakes settings to build competence and confidence. Thus, the removal of assessed coursework should not result in a barren, exam-only classroom experience. Coursework can still be done as practice or formative assessment, without contributing to final marks. We recommend the Department reinforce this message that learning experiences must remain broad (even if formal assessments narrow), for the benefit of all learners including those with SLCN.

In conclusion, RCSLT NI **agrees in part with Proposal 4**, unnecessary duplication and overuse of controlled assessments can indeed overburden learners and teachers and scaling them back should have benefits. Our key condition is that vital skills (especially communication skills) are not lost in the process. Through careful subject-by-subject consideration and continued support for developing practical and communication abilities in the classroom, we believe it's possible to reduce coursework while still promoting **accessible, balanced assessment** for students with speech, language and communication needs.

Proposal 5: Subject-Specific Qualification Changes

(This section addresses particular changes proposed in the consultation for specific subjects or groups of subjects. We provide targeted commentary on each, from the perspective of SLCN learners.)

GCSE English Language (Controlled Assessment & Oracy)

Proposal: Remove the **controlled assessments** currently part of GCSE English Language, and **reform the Speaking and Listening component.** The Department proposes that effective speaking and listening should remain “a central feature” of the GCSE course, but **without a formal assessed**

component. Instead of a graded speaking exam or prescribed tasks, schools would **be required to endorse** that students have had opportunities to develop speaking and listening skills through varied activities, removing the need for a formal assessment of oracy.

Impact on SLCN: We acknowledge the rationale for these changes. School leaders indicated that the controlled assessments in English Language were time-consuming and often duplicated other parts of the qualification. Removing those coursework tasks (likely pieces of writing done under controlled conditions) could free up considerable teaching time, which can be redirected to teaching core communication skills. This benefits students with SLCN, as they often need extra instructional time for literacy and language development. We support the elimination of redundant assessments if critical skills are still assessed elsewhere or robustly taught.

The more significant change is the shift in how **Speaking and Listening** is treated. The consultation suggests moving from formal assessment of oracy to an endorsement model, where the school confirms each student was given chances to build these skills. This mirrors the approach taken in England's GCSEs (where Spoken Language is assessed by teachers and reported separately as a pass/fail endorsement rather than contributing to the GCSE grade). There are pros and cons to this approach for SLCN learners:

- On the positive side, **removing a high stakes speaking exam** can reduce stress for students with speech, language or communication disorders. A formal oral examination or presentation can be extremely daunting for someone with a stammer, developmental language disorder, or selective mutism. The pressure to perform one's speaking skills for a grade could be counterproductive, potentially exacerbating anxiety and hindering true communication. In this sense, decoupling oracy from the GCSE grade might encourage a more supportive, low-pressure environment to practice speaking. Teachers can integrate speaking activities creatively without the tight constraints of exam board assessment criteria, which were described as "overly prescriptive in their delivery and assessment". This flexibility could lead to more meaningful oracy experiences in the classroom, tailored to individual student needs (for instance, allowing a pupil with SLCN to participate in a small-group discussion rather than a formal speech, and still count that as skill-building). We also note that an

endorsement approach means a student with severe communication difficulties could still earn their GCSE English Language qualification if they participate in speaking opportunities, without the fear of “failing” a speaking exam. In short, this can be a **more inclusive model**.

- However, a potential downside is the **risk of de-prioritising oracy**. If speaking/listening is not formally assessed or doesn't contribute to the grade, schools and students might (implicitly or explicitly) treat it as less important. We have seen in practice that when something “doesn't count,” it may be neglected, which would be detrimental to learners with SLCN who need deliberate support with communication. Oracy is a foundational life skill: as highlighted in the recent curriculum review in England, strong speaking and listening skills are linked to improved learning, employment prospects, and even health outcomes. The RCSLT NI was encouraged by the emphasis on oracy in that review, including a broad definition of oracy encompassing non-verbal communication and AAC. We would not want NI's system to inadvertently send the message that oracy is an afterthought.

Recommendations:

- **Ensure a Robust Oracy Framework:** If formal speaking exams are removed, the Department should provide clear guidance or a **framework for oracy education** within GCSE English. This could outline what a quality speaking and listening program looks like (e.g. debates, presentations, group discussions, use of communication supports, etc.) and define the teacher's role in developing these skills. The goal is to guarantee that every student, including those with SLCN, genuinely improves their communication skills during the course. We suggest looking to the work of groups like Voice 21 and the Oracy All-Party Parliamentary Group, as well as RCSLT's own collaboration on oracy, to adopt an **inclusive definition of oracy** (not just formal speech-making, but all forms of spoken communication, including dialogic teaching and augmentative communication). Schools should be encouraged to embed oracy across the curriculum, not solely in English class.
- **Inclusive Opportunities and Endorsement:** The endorsement should require that a range of speaking and listening activities were offered to the student. For SLCN learners, variety is key, some might shine in a one-

to-one conversation or using assistive communication devices, even if they struggle to present to a large group. Teachers should be given freedom to arrange alternative formats (for example, a video speech for a child with anxiety, or use of signing for a deaf student) to fulfil the requirement. We recommend that when the Department asks schools to endorse students' oracy experience, it also provides examples of what counts, including adaptations for students with communication needs. This will promote equity: a student who communicates primarily through a communication device or sign language, for instance, should absolutely be considered as having met the speaking/listening component if that is how they participate.

- **Recognition of Achievement in Oracy:** Although not graded, consider ways to acknowledge students' development in speaking and listening. For example, the endorsement could be more nuanced than a binary "completed or not", perhaps a brief statement on the certificate, or a record of skills demonstrated (akin to how music exams list the pieces performed). Another idea is to implement an **oracy award or diploma** alongside GCSEs. RCSLT NI would be happy to support initiatives that celebrate progress in communication skills. This is especially motivating for SLCN students who might struggle academically but make huge strides in their personal communication, that growth should be recognised to boost their confidence.
- **Teacher Support and Training:** The success of a non-assessed oracy component rests entirely on teachers' commitment and skill in delivering it. We urge investment in training teachers to understand how to teach and facilitate oracy, including strategies for learners with SLCN. Many secondary teachers have not had training in developing students' spoken language (traditionally, focus is on content and written exams). RCSLT NI can assist by sharing our expertise in communication-friendly classrooms and advising on resources so that teachers feel equipped, rather than seeing the oracy element as an onerous add-on. The oracy framework mentioned above should come with practical professional development.
- **Monitor Impact on SLCN Students:** After moving to the endorsement model, the Department should gather feedback from schools, students (including those with SLCN), and external moderators to ensure that

speaking and listening is still being taken seriously. If there are signs of de-prioritisation, further steps (possibly including a modest weighting of oracy in future) might need consideration. For instance, one compromise could be to have a separate certification of Communication Skills alongside GCSEs. We note that the RCSLT highly values oracy, as stated, it has profound impact on students' life outcomes, and developing it should remain a **core goal of education**. Any reform must keep that principle front and centre.

In summary, RCSLT **supports the removal of overly rigid speaking exams** in GCSE English, as this can reduce anxiety for SLCN learners and allow more flexible, ongoing development of communication skills. We stress, however, that **speaking and listening must remain a high priority** in practice. We call on the Department to actively promote a culture where improving every child's communication is seen as integral to English, not a secondary objective, even if it isn't formally examined. With guidance and training, we believe teachers can nurture these vital skills in a way that benefits all students, especially those with communication needs, without the need for a summative assessment component.

Modern Languages (GCSE Speaking and Listening)

Proposal: Unlike English, for Modern Foreign Languages (MFL) the Department proposes that **speaking and listening assessments remain part of GCSE and continue to contribute to the final grade**. The importance of oral communication for language acquisition is acknowledged, speaking and understanding spoken language are fundamental to achieving fluency in any additional language. In other words, whereas English oracy might be handled via endorsement, in MFL the oral exam and listening exam would continue as graded components, ensuring those skills are formally assessed.

Impact on SLCN: We agree that in the context of learning a foreign language, evaluating speaking and listening abilities is appropriate. From a pedagogical perspective, omitting speaking from an MFL grade could send the wrong message and might undermine teaching those skills. For students with SLCN, this decision has nuanced implications:

Positively, it maintains an incentive for schools to **teach and support oral skills** in language classes. Young people with SLCN can benefit from learning another

language if taught inclusively, it can reinforce understanding of language structures and promote social skills through interactive practice. Keeping speaking as part of the grade means teachers are likely to devote time to oral practice, which, if scaffolded properly, can benefit SLCN students (e.g. using multimodal techniques, role-play, visual cues to teach speaking). It ensures a well-rounded approach to language learning rather than focusing only on reading/writing to the detriment of communication.

However, we must consider that some SLCN learners will find an MFL speaking exam very challenging. Issues might include pronunciation difficulties (for those with speech sound disorders or hearing impairments), word-finding or sentence formulation problems (for those with developmental language disorder), or extreme anxiety speaking in a non-native tongue (which can be magnified for those who already have communication anxiety in their first language). The grading of these components means such students will need specific support and accommodations to succeed.

Recommendations:

- **Accessible Format for Oral Exams:** CCEA should ensure that the format of MFL speaking assessments is as accessible as possible. This could involve allowing extra preparation time, letting students choose between formats (for example, a presentation vs. an interview, if both elicit the needed language skills), or even permitting use of visual prompts to support those with language processing issues. The rubrics should focus on communication in the foreign language, not penalise general speech characteristics. For instance, a student who stammers or has unclear speech in any language should be marked on how well they convey meaning in French/Spanish/etc., not on fluency of speech delivery. Examiners must be trained to distinguish language proficiency from speech impairments. We recommend an explicit statement in examiner guidance that a speech, language or communication disorder in the candidate's first language should not be treated as a lack of ability in the foreign language. Reasonable adjustments (such as a private exam setting for a student with high anxiety or use of assistive communication technology if applicable) should be readily available.
- **Prepare Students with SLCN:** Modern language teachers should be aware of the specific challenges SLCN students might face. Strategies from

speech & language therapy can be extremely useful in MFL teaching, for example, using repetitive multi-sensory learning for vocabulary (hearing it, seeing it, saying it), teaching the phonology of the new language explicitly, and giving plenty of low-pressure speaking opportunities before the exam scenario. We advise that training or resource packs be provided to MFL departments on inclusive language teaching techniques. There is published guidance on identifying and supporting SLCN in the classroom, which can be adapted to the MFL context. Teachers might also coordinate with SLTs for advice on individual students (e.g., how to handle a student's stammer during oral exams, often techniques like not rushing the student and not finishing their sentences are recommended).

- **Flexible Pathways:** While we support maintaining the full language skill set in GCSE MFL, we also recognize that some students with severe SLCN simply may not be able to successfully complete a spoken language assessment in another tongue. It is important that such students are not forced into an insurmountable situation. Schools should have flexibility in the curriculum, for example, students with significant communication disabilities might pursue an alternative qualification (like a life skills language course or a different subject) if a traditional MFL GCSE isn't suitable, without this reflecting negatively on the school. The proposed **NIDE diploma** (discussed later) should consider how these requirements apply to students with significant SEND. If a modern language is mandated as one of the broad areas, there should be an exception or substitution route for those with acute communication barriers (for example, taking a communication skills course or a sign language qualification could be an alternative way to fulfil the spirit of learning a "language" for a student with DLD or autism who cannot cope with French). We recommend the Department explicitly acknowledge such flexibility to reassure families.
- **Promote Cultural/Linguistic Inclusivity:** Some SLCN learners come from bilingual backgrounds or have differing language profiles (e.g., a student who uses British Sign Language as their primary language). The MFL curriculum can acknowledge and celebrate these linguistic skills too. Perhaps students could complete the speaking/listening assessment in a community language if available. Ensuring the overall system values all

forms of language communication will make SLCN students (who might already feel behind in English) more motivated in languages.

In short, RCSLT NI **supports the continued assessment of speaking and listening in MFL**, provided that these assessments are executed in a way that is fair and supportive for students with communication needs. Communication is the heart of language learning, we want SLCN learners to have the chance to develop new languages, and to be assessed in a manner that recognises their efforts and abilities, not just their difficulties. With proper accommodations and teaching strategies, most SLCN students can successfully engage with MFL, and we should uphold high expectations while providing the right help.

Science (Practical Skills Assessment)

Proposal: Remove the contribution of **practical skill assessments** to final grades in science GCSEs and A-Levels. The Department proposes that, instead of marked coursework or practical exams, students must still **complete a set number of practical experiments** which are **signed off by the teacher**, but these will not be graded. This aligns with the approach in England, where practical work is mandatory but reported via an endorsement at A-Level (pass/fail) and tested indirectly through written exam questions rather than a separate practical mark. The intention is to prevent practical science from becoming a “contrived exercise” done only for points, and instead refocus on exploratory learning and allow a wider variety of experiments (including learning from mistakes) without the pressure of each being assessed.

Impact on SLCN: We acknowledge some clear benefits for SLCN (and indeed all) learners in this change. Science practicals can be intensive cognitive and communicative events, students must follow multi-step verbal instructions, often read and write simultaneously (during an experiment and write-up), and sometimes orally communicate findings. When these practical experiments are formally assessed, students with SLCN can be at a disadvantage purely due to the format. For example, difficulty with reading instructions quickly could derail an assessed experiment, even if the student understands the science content. By not grading the practical performance, we alleviate the immediate time pressure and performance anxiety. Teachers can give more **focus to teaching practical skills as a learning experience** rather than as tests. This likely means SLCN students will get more attempts at experiments, the chance to repeat procedures they found confusing, and the freedom to ask for clarifications or

use support tools (like visual checklists or lab demonstration videos) without worrying about losing marks. It transforms practical work into a safer space for learning by doing, which is very positive for those who need extra processing time or alternate explanations.

Additionally, decoupling practical experiment assessment from grades might encourage more **collaborative and communicative learning** in science. Often, when practical experiments are assessed, each student must work alone under exam conditions. Without that, teachers might allow group work or pair work in experiments, where students with SLCN can learn from peers and practice scientific vocabulary in a less pressured context. This social aspect can enhance understanding and improve communication skills in a content area (science discourse), which aligns with communication-rich education that RCSLT NI advocates.

However, one concern is that if practical skills are not directly counted, some students (and possibly schools) might undervalue them. We would not want to see a reduction in the time allocated to hands-on science or a slip into purely theoretical teaching. That would disadvantage all learners, especially those with SLCN who often benefit from kinaesthetic, concrete learning experiences that practical experiments provide. The proposal does mandate completing a set number of practical experiments, which is welcomed, but ensuring those are high-quality experiences will be key. Teachers will still need to mark something related to practical experiments (even if not a separate paper, the written exams will include questions about practical techniques). Thus, students must still learn these skills deeply.

For SLCN students, another consideration is how their understanding of practical work will be assessed instead, presumably through written exam questions about experiments. If practical experiments aren't graded, the onus is on the written exams to capture practical understanding. It is crucial that those exam questions are phrased accessibly (e.g. not too much complex wording) or SLCN students might struggle to show what they learned from the practical experiments. We strongly support the Department's intent to allow NI schools to also use other boards' science A-Levels if desired meaning CCEA aligning with the common approach may widen choices. But whichever board, the accessibility of exam papers is paramount.

Recommendations:

- Maintain Emphasis on Practical Experiments in Teaching:** The Department should clearly communicate to schools that practical science is still compulsory and essential. The “sign-off” requirement must be enforced such that every student, including those with SEN/SLCN, engages in the experiments. No student should be opted out because it’s not graded, on the contrary, practical experiments are an excellent way for SLCN learners to experience science in a concrete way. We recommend issuing guidelines on the range and type of experiments to ensure breadth. Possibly, an audit mechanism could be introduced where a sample of schools are asked to evidence that practical experiments were done (though we note teachers’ workload concerns; the intent isn’t to over-bureaucratise, just to keep practical work valued).
- Inclusive Laboratory Experience:** Science teachers should adopt inclusive strategies during practical experiment assessments. For example, providing written instructions and pictorial diagrams, pre-teaching key scientific terms (so students recognize them during the experiment), and using assistive lab equipment if needed (like larger print measuring scales, text-to-speech for instructions, etc.). Students with communication difficulties might also benefit from roles in group experiments (one student might be the “reader” of instructions, another the “recorder” of data, etc., allowing each to contribute according to strength). Though not graded, these experiences build scientific communication skills, such as describing observations, which are valuable. We encourage collaboration between science educators and learning support staff/SLTs to design these inclusive practical sessions.
- Adjust Exam Questions on Practical’s:** Since knowledge of practical skills will be assessed via written exams, we reiterate the importance of accessible exam design. Ofqual’s new guidance (which CCEA can draw on) stresses using clear language and avoiding unnecessary complexity. Science exam questions that refer to experiments should be carefully reviewed to ensure the language and context are not barriers. For example, a question might describe an experiment scenario, if that description is too verbose or uses convoluted syntax, a student with SLCN might get lost even if they know the science. We advise involving experts in language accessibility (such as specialist teachers or SLTs) in the review of science exam papers, to apply “plain English” principles while retaining

scientific accuracy. This will help all students demonstrate their practical understanding fairly.

- **Alternate Demonstrations of Practical Competence:** In exceptional cases, a student with a disability might be unable to perform certain experiments (e.g., a student with a physical disability or severe motor planning issues). The sign-off model should accommodate such situations compassionately, perhaps the student can observe and explain rather than physically carry out an experiment and still be signed off as having engaged. Flexibility here ensures no one is penalised. The endorsement could note if adaptations were used, without stigma. What matters is the student gaining the experimental concepts. For SLCN students, if expressive language is a barrier, a teacher might accept non-verbal demonstration of understanding (pointing, selecting answers, etc.) when signing off skills. The process should be about certifying that the student has experienced the practical learning, not about a rigid test.
- **Alignment with Skills for Life:** We suggest linking the practical endorsement to broader skills development like problem-solving, teamwork, and communication in scientific contexts. Teachers can explicitly highlight these soft skills during labs. For instance, have students practice writing a short lab report or presenting their findings to the class (without marks attached), this gives SLCN students practice in structured communication with content they've just engaged in physically, which can reinforce both their scientific and linguistic abilities. Removing grading pressure might encourage more innovative communication activities around practical's (like science fairs or poster presentations). The Department could promote such enriching activities in its guidance as examples of good practice.

Overall, RCSLT NI **supports Proposal 5's science changes**. It recognises that **hands-on learning** is critical and that high-stakes assessment can distort its educational value. By adopting a model where practical work is compulsory but not scored, NI can improve the quality of science education and make it more accessible. Our focus is to ensure that in implementation, students with SLCN fully participate in practical experiment assessments and can effectively demonstrate their knowledge in alternative ways. We believe this approach can

reduce stress and better engage SLCN learners in science, an outcome we strongly welcome, as science should be for everyone.

Irish-Medium and Irish Language Qualifications

Proposal: The Department proposes introducing a **separate GCE A-Level “Gaeilge” qualification** tailored for students educated through the medium of Irish. Currently, CCEA offers two GCSEs: **Irish (as a subject)** for students in English-medium schools learning Irish as a foreign language, and **Gaeilge** for students in Irish-medium schools (where Irish is the language of instruction). At A-Level, however, there has been only a single “Irish” A-Level (suited to second-language learners). Stakeholders have identified a gap: native-level Irish speakers in Irish-medium education do not have an A-Level that reflects their proficiency and academic experience in Irish. The proposal is to create an A-Level Gaeilge analogous to the GCSE, allowing those students to demonstrate advanced skills in Irish (their immersion language). This would be distinct from the A-Level Irish for learners, thereby recognizing the different context and level of fluency of Irish-medium students.

Impact on SLCN: RCSLT NI supports linguistic and educational equity, and we see this proposal as a positive move for inclusivity in the broad sense. Students from Irish-medium schools, including those with SLCN, deserve access to qualifications that reflect their education and strengths. From an SLCN perspective specifically, a tailored A-Level Gaeilge could be beneficial because it allows bilingual students with SLCN to potentially perform to their strengths. For example, a pupil who has SLCN but has been taught in Irish may find it easier to express complex ideas in Irish than in English. Offering a qualification in the language they’re most comfortable with could enable them to showcase knowledge without the additional barrier of switching languages. We know that SLCN manifests across languages, but individuals often have uneven profiles, some may have richer vocabulary or confidence in one language over another. Providing an A-Level path in Irish-medium could thus **open opportunities** for some SLCN students to achieve higher than they might in an English exam, by leveraging their first language (in an immersion context).

Moreover, having parallel qualifications (Irish vs Gaeilge) means assessments can be appropriately pitched. The new A-Level Gaeilge presumably would

include literature and content appropriate for native-level candidates. This avoids scenarios where fluent speakers (including those with SLCN) might previously have been under-stimulated or conversely where second-language learners were overwhelmed. Tailoring content and expectations to the learner group is a principle that resonates with SLCN support, it's about meeting students at their level.

One consideration is to ensure that the **assessment in A-Level Gaeilge is designed to be inclusive of those with SLCN**, just as we aim for in English. An Irish-medium student with, say, dyslexia or developmental language disorder in Irish should have the same access arrangements and supportive accommodations in their Gaeilge A-Level as anyone would in English. Establishing a new qualification is a chance to “build it in” from the start: clear language in exam questions (in Irish), options for responding orally vs. written if needed, etc., should mirror best practice in any language.

Recommendations:

- **Develop Qualifications in Consultation with Practitioners:** We recommend involving Irish-medium educators and engaging with experts such as Irish speaking SLTs in developing the new A-Level Gaeilge specification. They can advise on expected language competencies for immersion pupils and how to make the exam accessible at source. For instance, consideration can be given to the vocabulary load in exam papers, while these students are fluent, technical exam jargon could still confuse (just as in English). Ensuring **plain language** principles are applied in Irish will benefit any candidates with language processing difficulties.
- **Parental Communication:** Many parents of SLCN children in Irish-medium education are English-dominant. The introduction of a new qualification should be clearly explained to all stakeholders in both languages, so that parents can support their children's choices. Emphasize the advantages, e.g., a student with SLCN can choose the path (Gaeilge vs Irish) that suits their linguistic profile. If a student in Irish-medium school has severe difficulties in Irish (some SLCN kids in immersion might prefer English), they might opt to take the second-language Irish A-Level instead. The system should be flexible and parent/pupil choice informed.

- **Ensure Parity of Esteem:** It will be important that universities and employers understand that A-Level Gaeilge is equivalent in rigour to A-Level Irish (and A-Level French, etc.). No SLCN student should be disadvantaged by perceptions that one is lesser; in fact, being fully bilingual is an asset. We trust the Department will promote recognition of the new qualification. RCSLT NI would echo that students gaining an A-Level through Irish have demonstrated high-level communication skills in two languages, which is impressive, any underlying SLCN they have had to work through makes it more so.
- **Resource Support for Irish-Medium Pupils with SLCN:** This is slightly tangential to the consultation question, but relevant: delivering curriculum in Irish for SLCN learners requires additional resources (like support materials in Irish, language development programs in Irish). The more the system encourages Irish-medium advancement (like this new A-Level), the more we need to ensure equitable support services in that medium. We encourage the Department to continue strengthening support for Irish-medium SLCN identification and intervention, in tandem with qualification development.

In conclusion, RCSLT NI **supports Proposal 5's introduction of an A-Level Gaeilge**. It promotes inclusivity for the Irish-medium community and provides a tailored avenue for students, including those with communication needs, to demonstrate their abilities in their language of education. We are enthusiastic about any measure that values bilingual communication skills and recommend thoughtful implementation to maximise its success and accessibility.

Proposal 6: GCSE Grading Scale Alignment (Move to 9–1)

Summary of Proposal: The Department proposes to **align CCEA's GCSE grading scale with the 9–1 system used in England**. Currently, CCEA awards GCSE grades on an eight-grade A*–G scale (with an extra C* in Northern Ireland), while England uses nine numerical grades (9 = high, 1 = low). This difference can cause confusion for stakeholders and a lack of clarity in comparing results. Aligning to 9–1 would mean Northern Ireland's GCSEs use the same grading labels as the majority of GCSEs in the UK, improving portability and understanding of the results across borders. The proposal is essentially a **change in labelling**, not necessarily a change in standards, though details such as grade boundaries and the fate of the C* would need to be determined.

Implications for SLCN Learners: Changing the grading scale does not directly alter teaching, content, or student support, so one might assume minimal impact on SLCN students specifically. We largely agree that this alignment is an administrative improvement for clarity. It means, for instance, that an employer in England will immediately recognise a NI student's "Grade 5" or "Grade 9" in GCSE without needing conversion charts. This can prevent miscommunication that might disadvantage a student with SLCN who might not be able to easily self-explain the old grading differences in an interview or personal statement. In that sense, uniformity is helpful. It "levels the playing field" in perception of qualifications.

From a communication standpoint, some SLCN students (especially those with learning difficulties) might initially find the new numeric grades confusing if they have grown up with letters. But since the change will apply to all and presumably be introduced with clear communication, we don't foresee major issues. It will be important to explain to all students (and parents) what the new grades mean in simple terms, for instance, that 9 is roughly equivalent to A*, 4 is about a C, etc. For students with SLCN, especially those who are anxious or literal, this reassurance and clarity is key. Otherwise, a student might feel confused in a way that could increase anxiety.

One positive opportunity is that the numeric scale has more granularity at the top end (8 and 9 vs just A*), which might better recognise achievement of some students with SLCN who excel in certain areas. Conversely, the removal of grade G (if 1 becomes the lowest) might compress the bottom, but all jurisdictions have dealt with that; foundation tiering or other methods ensure the weakest students still get a grade. We should ensure that the **full range of achievement** is representable; no student with SLCN who works hard should end up with "unclassified" simply due to scale compression.

Recommendations:

- **Accessible Communication of the Change:** The rollout to 9–1 grading should include accessible information materials, for example, infographics, comparisons, FAQs, presented in **plain language**. These should be distributed to schools to share with pupils. For learners with SLCN, consider producing an Easy Read guide (using simple sentences and symbols) explaining why the grading system is changing and what the

numbers mean. The more transparently this is done, the less anxiety or confusion it will cause.

- Stakeholder Education:** Similarly, ensure that colleges, employers, and training providers in NI and beyond are fully briefed on the new grading. While in England 9–1 is now familiar, the presence of a C* in NI's old system was unique; communications should clarify that under 9–1, that nuance is gone and how it maps. This is more a policy point, but it does indirectly affect SLCN students, we wouldn't want a student with SLCN to have to be in a position of explaining their grade to an employer who is unaware. Official communications can prevent awkward situations that rely on the student's own advocacy (which might be hard for someone with a communication difficulty).
- Maintain Standards and Support at Grade Boundaries:** Changing labels must not come with any reduction in support for borderline students (e.g., those aiming for the key threshold of "4" which will likely equate to the old C). In fact, this is an opportunity to re-emphasise that a certain level (likely 4) is considered a "standard pass." We know only ~20% of students with SLCN currently achieve passes in English/Math. The new system's success should be measured by improvement in such outcomes, not just implemented and forgotten. So, alongside the grading switch, the Department might bolster interventions at KS4 for struggling learners (many of whom have underlying SLCN). That goes beyond grading, but it's relevant, the clarity of 9–1 should help target support (e.g., "we need to get these students from a 3 to a 4"). We urge continued focus on **closing the gap** for SLCN learners under the new grading regime.
- Consider Grade Descriptors with Inclusivity in Mind:** If new grade descriptors or exemplars are developed to define what a student at Grade 2, 5, 8 etc. can do, ensure they include aspects that resonate with a range of learners. For example, descriptors might mention the quality of written communication, if so, be cautious that it doesn't inadvertently penalise those with dyslexia or SLCN (whose knowledge might surpass their writing fluency). A descriptor could, for instance, focus on clarity of expression of ideas rather than technical accuracy for certain grades, giving a fair chance to students who express knowledge differently. This is a subtle point, but inclusive thinking at every stage will help.

RCSLT NI **supports Proposal 6** on moving to a 9–1 grading scale. We see it as a commonsense alignment that will simplify understanding of NI qualifications. Our main input is to implement this change with **good communication and support**, ensuring everyone, especially students with communication challenges, understands the new system and trusts it. Done properly, this change should have neutral or slightly positive effects on SLCN learners (through clearer recognition of their achievements across the UK). We stand ready to help disseminate information or advice from a communication-friendly perspective.

Proposal 7: GCSE Structure – Modular to Linear

Summary of Proposal: The Department proposes to **change most CCEA GCSEs from a modular structure to a linear structure** (i.e., all exams taken at the end of the course). Specifically: **(a)** for the majority of GCSE subjects, remove the mid-course units and have students assessed only at the end of the two-year course; **(b)** however, **retain an option for modular exams in GCSE English Language and GCSE Mathematics**, given the fundamental importance of these subjects and the desire to support students in attaining them (modularity in English/Math could allow multiple entry points or resit opportunities). In essence, except for English and Maths (and perhaps any subject explicitly deemed better suited to modular assessment), GCSEs would follow the model of a two-year uninterrupted study culminating in final exams, rather than the current practice of some subjects having units examined in Year 11 and Year 12.

Implications for SLCN Learners: This proposal has both potential benefits and drawbacks for learners with SLCN.

On the positive side, a linear system **reduces the frequency of exam stress**. As noted earlier, it is uncommon internationally for students to face major exams every year from ages 15–18. The current modular setup in NI means many students have high-stakes assessments in Year 11 (some GCSE units), Year 12 (GCSE final or remaining units), then Year 13 (AS levels), and Year 14 (A2 levels). This continuous cycle can be exhausting, especially for students with SLCN who may take longer to recuperate from the cognitive load of exams or who may struggle with constantly switching between learning mode and exam prep mode. Moving to linear GCSEs means Year 11 could be free of external exams, giving SLCN students more time to **focus on learning, consolidation, and skill-building** in that year. It could also reduce fragmented teaching; under modular schemes, teachers often rush to cover content by Christmas of Year 12 for the

January modules or similar, which might sacrifice deep learning. A linear approach dovetails with Proposal 2 (deeper learning), more time to solidify foundation in Year 11 before intense revision in Year 12. This could benefit SLCN learners who need that longer runway to absorb vocabulary and concepts.

Additionally, fewer exam sessions mean fewer instances of exam anxiety triggers. A student with SLCN who possibly has co-occurring anxiety or neurodiversity might cope better knowing all exams are at one period, rather than living in a constant cycle of preparing for one exam after another. They can mentally prepare for the end-of-course exams with support, rather than repeatedly spiking in anxiety each year.

However, the **challenges** include the higher stakes of a linear system. All-or-nothing exams at the end put immense importance on performance during that short window. If a student with SLCN has a bad day or health issue during finals, there's no earlier unit score to cushion it. The decision to keep English and Maths modular is wise, as those are crucial passes and often difficult for SLCN learners (particularly English). We strongly support **retaining modular options for English Language and Mathematics**. This will allow, for example, a student with language difficulties to take part of their English exam early or re-sit if needed, improving their chance to eventually secure a good grade. Those two subjects are gateway qualifications for many paths; any flexibility we can give there (multiple attempts, splitting content into bite-sized exams) is likely to help SLCN learners succeed where they otherwise might not on a single try.

For other subjects, though, SLCN students who struggle with memory or cumulative learning might find it daunting to retain two years of content. Many SLCN learners benefit from modular approaches because it compartmentalises knowledge and provides feedback loops. Under modular systems, a student could learn from their AS or GCSE unit results and adjust strategies or get support for weaknesses in the next round. Linear removes that mid-course feedback mechanism. Teachers will need to find ways to replicate it internally – e.g., thorough mock exams, perhaps an internal Year 11 final exam, so that students and teachers know how well the student is doing and can intervene early if needed.

Recommendations:

- **Enhanced Monitoring and Feedback:** In a linear GCSE model, schools should implement robust internal assessments (that are low stakes but high feedback) at appropriate points. For example, a comprehensive end-of-Year-11 exam or project could identify which students (including those with undiagnosed SLCN) are struggling significantly, while there's still a year to go. The Department might provide sample assessment materials or diagnostics for this purpose. Particularly in literacy-heavy subjects, early identification of issues is crucial. A student with, say, an unrecognized language comprehension problem might flounder if this only becomes evident at the final exam. We suggest the Department support schools with tools to monitor progress in a linear system, ensuring no learner "falls through the cracks" quietly until it's too late.
- **Targeted Support in Year 12:** With finals at the end, Year 12 becomes even more important. We recommend funnelling additional support (perhaps through the Engage programme or SEN funding) into Year 12 for students who were flagged in Year 11. This might include specialist literacy support, SLT interventions in school, study skills coaching, etc. For SLCN students, explicitly teaching revision strategies and coping mechanisms for a large exam load is essential. For instance, how to make mind maps, how to use past papers, how to manage exam time, these can be taught and practiced. The Department could encourage schools to run "skills weeks" or have SLTs/learning mentors work with SLCN students on these aspects well ahead of the exam period.
- **Modular Option Pathways:** We applaud the retention of modularity in English and Maths; we wonder if any other subjects might warrant an exception "if the nature of the subject is better suited to modular assessment". Perhaps subjects that are very content-heavy (like history) or that naturally divide (like double award science, which could still be linear within but split between subjects) might benefit from flexibility. We suggest keeping an open mind, if evidence emerges that certain groups of students (especially those with SEN) see declines in performance in some subjects after going linear, consider reintroducing an optional unit or a staged assessment. The policy should allow adjustments based on feedback.

- **Communication with Students:** Make sure students and families understand the structural change. SLCN students might not automatically grasp what “linear” entails for their study patterns. Schools should guide them on pacing themselves over two years, not expecting an external exam in Year 11, etc. There might be a tendency for some students to become complacent in Year 11 (“no exams this year, so less pressure”). That year must be used well to build foundational knowledge. Communicating the importance of continuous learning (even without immediate exams) is important.
- **Safety Nets for Vulnerable Learners:** We must plan for those who, for whatever reason (health, personal circumstance, SLCN), cannot perform to their ability in a linear exam at the end. Perhaps the introduction of the **NIDE diploma** (see Proposal 9) will offer an alternate certification that recognizes their learning. If a student completes courses but fails the final exams, could they still get some credit? We encourage exploring a system of unit certificates or credit banking as a fallback. For example, even if formal GCSEs are linear, perhaps a student could sit some units as an external candidate and get unit results as evidence of partial attainment. This is outside the main design, but thinking compassionately, it would provide an avenue for a student with, say, extreme exam anxiety or a communication disability that makes formal exams very hard, to still have something to show for their efforts.

RCSLT NI **supports Proposal 7(a)** for the general move to linear GCSEs, as it aligns with reducing continuous assessment burden and could foster deeper learning. We give this support on the condition that strong scaffolding and monitoring are in place to protect students with SLCN from being disadvantaged by the “all-at-once” nature of final exams. We **strongly agree with Proposal 7(b)** to keep modular options for GCSE English Language and Maths, this is a prudent and inclusive measure. In fact, we see it as an example of using flexibility to ensure key qualifications are accessible. By implementing these changes carefully and with the above safeguards, the new structure can work well for learners with SLCN, providing them more teaching time and less relentless exam stress while still enabling success in core subjects.

Proposal 8: A-Level Structure – Linear A-Levels and Removal of AS Qualifications

Summary of Proposal: The Department proposes to **change CCEA's GCE A-Levels from a modular (AS/A2) structure to a fully linear structure**. Key elements: **(a)** All CCEA A-Level courses would be linear, with students examined at the end of two years (Year 14) on the whole A-Level content. **(b)** CCEA would **no longer offer stand-alone AS qualifications**; that is, AS Levels (which are currently taken at end of Year 13 and can serve as a qualification on their own or as the first half of an A-Level) would be phased out. The rationale given includes low demand for stand-alone AS entries and the desire to reclaim teaching time (since preparing for AS exams in Year 13 can detract from A2 study). **(c)** In making A-Levels linear, CCEA also proposes to **reduce the number of assessment units** in A-Levels (similar to Proposal 3) to avoid an excessive load in final exams. Essentially, this mirrors the post-2015 system in England, where A-Levels became linear and AS marks no longer contribute to the final A-Level (though AS exists as a separate lesser qualification).

Implications for SLCN Learners: This proposal is quite significant as it changes the post-16 landscape. For SLCN students, A-Levels can be particularly challenging, these courses involve higher-level analytical language, large volumes of reading, and independence in study, which may strain their communication and executive function skills. Removing AS Levels has mixed implications:

On one hand, the linear A-Level means **one fewer set of public exams** (no AS in Year 13). As with GCSEs, this reduction in exam frequency can lower stress and allow a steadier pace in Year 13. Students can devote the whole first year to learning without the disruption of high-stakes exams in May/June of Lower Sixth. This could benefit those with SLCN as they have more time to adjust to the complexity of A-Level material and improve over four terms before being examined. The consultation points out that more teaching time would be available and fewer exams overall, which aligns with reducing assessment burden. Provided schools still do internal exams to gauge progress, a linear A-Level might reduce "teaching to the test" at the halfway point and instead encourage more thorough mastery (which is good for SLCN students who often need that extra time and iterative learning).

However, the removal of stand-alone AS qualifications does remove a **safety net and an early achievement**. For many years, AS Levels have provided students (including those who might not complete Year 14) with a certification of their

Year 13 learning. For a student with SLCN who finds A-Levels too challenging by the end or who, for example, might need to leave education at 17 for health or personal reasons, an AS qualification at least recognised what they accomplished. Without AS, these students could end up with nothing official if they don't go the full course. That is a concern from an equity standpoint, it could disproportionately affect those with SEN/SLCN who sometimes progress at different rates or might choose to step back after one year if the environment is not meeting their needs.

Additionally, having AS results has traditionally helped students gauge whether to continue a subject to A2 or drop it. A student with SLCN might discover through AS that, say, two of their subjects are manageable but one is exceedingly hard; they could then decide to focus on the two and maybe take an extra year or a different qualification for the third. In a no-AS world, that discovery might come only via internal exams or, worst case, at final A-Level exams when it's too late. It puts more onus on teacher predictions and student self-assessment to make mid-course adjustments, which could be less clear-cut.

That said, England's experience shows many schools still offer internal "AS-style" exams at end of Year 12 even if not externally recognised, to inform predicted grades for university applications. We expect NI schools will do similarly if AS is removed. The difference: those internal exams won't yield a certificate. For SLCN students who apply to university, not having AS grades isn't a huge issue if everyone is in the same boat, university offers will be based on predicted A2 grades and GCSEs. But for those not headed to university or those who might struggle to complete A-Levels, we should think about alternate qualifications (e.g., vocational courses, or as the consultation floats, a broader diploma concept).

Recommendations:

- **Consider an "Exit Award" or Alternative for Year 13 Completers:** If AS qualifications go away, perhaps introduce an official acknowledgment for students who successfully complete Year 13 content. Maybe this is where the **NIDE (Northern Ireland Diploma of Education)** or similar could have a component that recognizes one year of post-16 study (like a Level 3 Certificate). Alternatively, encourage uptake of other one-year qualifications (like a Certificate in Applied subjects or an Extended Project Qualification) alongside A-Levels so that students have something by end

of Year 13. This would particularly help students who, due to SLCN or other difficulties, decide not to continue to Year 14, they would at least have a formal qualification reflecting their partial completion. We recommend the Department explore mechanisms so that “no AS” doesn’t equal “nothing to show if you leave after one year.”

- **Strong Guidance and Mentoring:** Without AS grades, schools should strengthen their student guidance in Year 13. Regular mentoring meetings to discuss progress in each subject will be important. Teachers will need to give very honest feedback to students with SLCN about how they are coping and whether dropping/adding subjects or changing levels (e.g., to a BTEC) would be wise. It might even be beneficial for CCEA to offer an optional “benchmark assessment” at end of Year 13, not a full AS, but maybe a standardized test or extended project – that could help students self-evaluate. This is just a thought; schools may prefer autonomy in doing their own. The key point is that SLCN students shouldn’t drift into Year 14 with little chance of success because there was no checkpoint.
- **A-Level Exam Design for Linear Structure:** As A-Levels become linear, ensure the **number of exam papers is limited (as proposed)** and the scheduling is reasonable. A-Level exams are rigorous and long. For students with SLCN who might have exam accommodations and reasonable adjustments, the exam period can be very draining. If all subjects have their finals in the same window, consider spacing them out to avoid clustering (coordination at the timetable level). Also, with linear A-Levels, there might be more synoptic papers, we recommend that accessibility principles apply here too (clear language, scaffolded questions from basic to advanced). We reiterate the importance of not making any single paper too long. If a subject would naturally have, say, 4 hours of exams, it’s better to have two 2-hour papers than one 4-hour marathon, from an SLCN perspective. The proposal already mentions reducing number of assessments, which we interpret as likely a max of 2 papers per A-Level subject, we support that as a sensible limit.
- **Retain Resit Opportunities:** In the current modular system, students could resit AS units or even A2 units to improve. In a linear world, formal resits might shift to retaking the entire A-Level exam the following year. That’s a big deal if you only did poorly in one paper. To mitigate this, we

suggest CCEA consider allowing a form of resit at component level, e.g., if a student narrowly fails one subject, perhaps they can retake just one exam paper of it in the next exam series to try to pass (rather than all papers). This is how GCSE resits work normally (you retake the whole exam). For A-Level it's tricky since they're linear, but perhaps offering a January exam session for A-Levels in key subjects could be life-changing for some students (similar to how in the past January modules existed). Even a limited pilot of this for crucial subjects or for those just below a grade could help those with SLCN who might have underperformed due to temporary issues. We recognize logistical challenges but raising the idea for consideration in an inclusion context.

- **Alignment with Universities:** Communicate with higher education that NI will be moving to no AS. English universities are used to this now, but Irish and NI universities should be clear that predicted grades and GCSEs will carry more weight. SLCN students often have profiles where they might underperform in timed exams but excel in coursework or practicals (which A-Levels have less of now). Universities could be encouraged to consider **contextual information** for students with declared disabilities or SLCN, for example, strong teacher references or personal statements explaining a dip in exam performance should be given due weight. This isn't directly the Department's policy, but the Department can liaise with the Department for Economy (for HE admissions) to champion fair access.

RCSLT NI **understands the rationale for Proposal 8** and sees potential benefits in reducing assessment load and increasing teaching time at A-Level. We support moving to linear A-Levels with extreme caution. The loss of AS level as a qualification is our primary concern; it can be mitigated by alternative certifications and strong student support structures. We recommend careful monitoring of the first cohorts: are more students dropping out in Year 14? Are certain groups (like those with SLCN or other SEN) disproportionately affected? Data on outcomes for these students should be tracked and, if negative trends appear, we should be ready to adjust (perhaps reintroduce AS in some form or bolster other pathways). Ultimately, our goal is that students with speech, language and communication needs can thrive in post-16 education and attain qualifications that reflect their abilities. If linear A-Levels with no AS can be implemented in a way that still allows that, we will welcome the reduction in pressure it brings.

Proposal 9: Future Northern Ireland Diploma of Education (NIDE)

Summary of Proposal: The Department is seeking views on a recommendation (from the Strategic Review of the Curriculum) to develop a new overarching **Northern Ireland Diploma of Education (NIDE)**, awarded at the end of Key Stage 4 (around age 16). This diploma would serve as a broader certification alongside (or incorporating) GCSEs, aiming to ensure students study a **broad, balanced curriculum** and avoid undue narrowing of subject choices. The consultation outlines a possible structure for NIDE, which would require achievement in several components:

- A Level 2 qualification in Literacy (likely English Language or equivalent) and Numeracy (Maths or equivalent).
- Full completion of a new KS4 **Careers, Employability and Personal Development (CEP)** programme.
- At least one Level 2 qualification in sciences/technology (Sciences, Design & Tech, Computing, or Digital Tech).
- At least one Level 2 qualification in a humanities or arts subject (History, Geography, Citizenship, Modern Language, Music, Drama, or Art).

In essence, NIDE appears to be a **“breadth certificate”**, somewhat akin to the English Baccalaureate concept or the Welsh Baccalaureate, but with NI tailoring (notably including arts and a personal development program as core parts). It would recognise students who engage in a wide range of learning rather than specialising too early.

Implications for SLCN Learners: RCSLT NI strongly supports an educational framework that values a wide range of skills and knowledge for all learners. For students with SLCN, a broad curriculum is particularly beneficial. They often need opportunities to find their strengths, maybe a pupil struggles with the language-heavy demands of history but excels in art or digital technology; a diploma like NIDE would give weight to that art or tech achievement as part of a rounded profile, instead of only focusing on traditional academic cores. Requiring a balance ensures that schools do not inadvertently steer students with difficulties entirely away from areas like modern languages or humanities, which, while challenging, provide important language and thinking experiences. If implemented thoughtfully, NIDE could encourage schools to support SLCN learners to access all areas of the curriculum, not just place them in a narrow

path assumed to be “easier.” Inclusion means enabling participation in a full breadth of subjects, possibly with accommodations, NIDE could be a vehicle that motivates that inclusion.

The inclusion of a **Careers, Employability and Personal Development (CEP)** program as a diploma component is very positive. Many young people with SLCN need explicit teaching in communication skills for work, social interaction, self-advocacy, and independent living, all of which could be covered in a well-designed CEP curriculum. If CEP involves things like teamwork projects, presentations, CV writing, mock interviews, etc., it’s a chance for young people with SLCN to practice real-world communication in a guided setting. We would urge that **communication skills development** be a prominent part of CEP. Also, personal development could include learning about one’s own communication needs (for those with identified SLCN, understanding their needs and how to ask for accommodations is empowering).

Potential challenges: If not executed flexibly, a diploma could risk being another hurdle. For instance, if a student with DLD cannot pass a modern language GCSE, would that mean they fail to get the diploma even if they have passed all other aspects expected? We must ensure the structure has built-in flexibility or alternative routes. The wording “one or more from [list]” suggests choice, which is welcomed, they don’t have to do all those areas, just at least one from each category. That should accommodate preferences and strengths as that flexibility will help many SLCN learners.

Another consideration: how will the diploma be **awarded and valued**? If a student meets 3 of the 4 criteria but not all, do they get nothing? Or a partial credit? It would be discouraging if a student who, for example, passes everything except the science category ends up with “no diploma” despite doing well elsewhere. Many learners with SLCN will have ‘spiky profiles’, strong in some subjects, weak in others. Perhaps a tiered award (merit, pass, etc.) or a system where you can still achieve the diploma with one category at Level 1 for example could be devised. It will be important not to inadvertently label students as “failures” if they excel in most but fall short in one area due to their disability.

Recommendations:

- **Design for Inclusivity and Flexibility:** NIDE should be built with differentiation in mind. Provide alternative pathways to fulfil each

component. For instance, Literacy might normally mean GCSE English Language, but for a student with significant language difficulties perhaps an Essential Skills Communication Level 2 or a functional English qualification could count. Similarly, Numeracy could be GCSE Maths or an applied maths cert. Modern Language could be any language (including sign language qualifications, or for some Newcomer students their native language GCSE). Science could be single Science or a BTEC Science. The aim is broad learning, not a rigid set of specific exams. We encourage the Department to consult SEN experts in finalising what qualifications satisfy NIDE requirements, to ensure students with various needs have a fair route.

- **Support to Achieve the Diploma:** Schools will need to guide students to take the mix of subjects required. SLCN students might require reasonable adjustments to engage in each area (e.g., maybe a quiet drama class environment if group work is challenging, or use of technology in a language class for translation support). Provide schools with advice on how to help SEN students succeed across the curriculum, not by exemption but through adaptation. RCSLT NI has promoted the concept of communication-friendly schools, where teaching in all subjects is made accessible (for example, science teachers simplifying language without losing content). Adopting such universal design approaches will help more students meet the NIDE criteria. The Department could incorporate training on inclusive pedagogies in each subject as part of rolling out the diploma expectations.
- **Assessment of CEP:** The Careers/Employability/PD part likely won't be a GCSE but perhaps a portfolio or teacher assessment. We recommend that within this, **communication skills** be explicitly assessed and supported. For example, one outcome could be "The student can deliver a short presentation or participate in a discussion about a topic of personal interest", with the understanding that for some this might be via assistive technology or other modes. If such an element exists, it could fill the gap left by removing formal speaking assessment in English. It would show that the system still values oracy and interpersonal communication (which are top employability skills). We can help develop appropriate, SLCN-friendly assessment criteria for this, ensuring it recognizes growth from each student's starting point rather than a one-size standard.

- **Avoid One-Size-Fits-All Pass/Fail:** Consider implementing the NIDE in a way that **acknowledges partial achievements**. Perhaps there could be a “Diploma with distinction” if all components at strong passes, “Diploma” if all components met at basic level, and maybe a “Diploma transcript” or certificate of unit completion if not all components are met. This way a student is still recognized for what they did achieve (maybe they got the literacy, numeracy, and CEP, but missed the humanities, they’d have those noted). We would not want to recreate the situation from decades ago of the old School Certificate where missing in one subject meant failing the whole, that was harsh on many, including those with specific learning difficulties. A more modular recognition within the diploma can motivate students to do their best in each area without fear that one weak link nullifies everything.
- **Value and Promotion of the Diploma:** RCSLT NI would like to see the NIDE, if introduced, genuinely valued by colleges, employers, and post-16 providers. We encourage the Department to engage with those stakeholders, so the diploma is recognised as a mark of a well-rounded education. For young people with SLCN who might not accumulate a string of top grades, having the diploma (even at a basic pass level) could be a testament that they have a broad competence and readiness for next steps. It should thus complement GCSE grades, not be seen as second-rate. Perhaps it could be used in performance measures for schools to encourage uptake.

In summary, RCSLT NI **supports the concept of the Northern Ireland Diploma of Education** and agrees that consideration should be given to its introduction structured as outlined. We believe a broad curriculum is in the best interests of all learners and that the NIDE could drive positive inclusive practices. We emphasize that the diploma must be implemented with **flexibility and support** so that learners with SLCN can fulfil its requirements and have their achievements celebrated. By including a diverse range of subjects and a personal development program, NIDE has the potential to produce more well-rounded, communicatively competent young people, which aligns perfectly with RCSLT NI vision of a society that values communication for all.

Conclusion

The RCSLT NI thanks the Department of Education for the opportunity to respond to this comprehensive consultation on CCEA's GCSE, AS, and A-Level reforms. Overall, we are encouraged by the direction of travel, prioritising depth of learning, reducing unnecessary assessment burden, and innovating in qualifications frameworks, and we believe these changes can, with careful implementation, greatly benefit learners with speech, language and communication needs. Throughout our response, we have highlighted the importance of **accessibility** and **inclusion**: from designing clear exam papers, to training teachers in adaptive teaching for SEND to ensuring all students continue to develop vital communication and oracy skills within the new structures.

In moving forward, we recommend that the Department continues to engage with experts in special educational needs and communication, including RCSLT NI and its members, during the detailed planning and rollout of these proposals. RCSLT NI is keen to support the development of guidance, teacher training materials, or further equality considerations to make these qualification reforms a success for every student. We also urge robust evaluation as changes are implemented, specifically monitoring outcomes for students with SLCN and other SEN, to ensure that achievement gaps are narrowing, not widening.

Northern Ireland has an opportunity to lead in creating a qualifications system that not only maintains high standards and credibility but also **embraces diversity and inclusion** at its core. Such a system would truly “empower all students to thrive and succeed”, as the Minister’s vision states. We are optimistic that, with the recommendations we and others have provided, these reforms can be honed to achieve that goal. RCSLT NI remains committed to working collaboratively with the education sector to support young people with communication needs. Their voices, skills, and successes deserve to be cultivated and recognised within our qualification’s framework.