

# AQA response

Department for Education Key stage 4 performance measures and targeted RISE extension government consultation 2026

May 2026

## **Question 11: How far do you agree that these changes to the Progress 8 model strike a better balance between breadth and flexibility compared with the current P8?**

AQA supports the decision to retain the three familiar headline measures of Progress 8, Attainment 8 and the percentage of students achieving grade 5 or above in English and maths. Together these provide a clear picture of student achievement. They are widely understood by school leaders and wider stakeholders and maintain transparency across the system.

We agree that the proposed changes to the Progress 8 model strike a better balance between breadth and flexibility than the current structure. The existing EBacc measures have constrained student choice, and the proposed model is likely to give schools more freedom to design pathways that match learners' aspirations and maintain breadth across the curriculum.

We welcome the inclusion of Religious Studies in the humanities slot as this creates greater subject parity and reflects the diverse ways learners engage with humanities education. We also welcome the proposal to allow creative subjects to contribute within the breadth slots. This is an important step in rebalancing the accountability system and acknowledging the educational and cultural value of the arts.

However, we are concerned about the status of modern foreign languages (MFL) under the proposed model. With MFL positioned as just one option within a broader set of three breadth slots there is a high risk that uptake will decline. Reducing its prominence in performance measures may inadvertently weaken an area where uptake is already fragile. We suggest that any impact of these changes on MFL uptake be considered alongside the introduction of a Stepped Language qualification, progress on MFL teacher recruitment and retention and any other substantive policy changes aimed at strengthening language provision in England.

Overall, we agree that the proposed changes represent a meaningful improvement in balancing ambition, breadth and choice. We encourage continued monitoring of subject uptake, particularly in MFL to ensure that the reformed model supports a genuinely broad and ambitious curriculum for all students.

## **Question 12: What are your views on the inclusion of a fourth category (science) for breadth slots 5 and 6?**

**[Do not support inclusion of a fourth category].**

AQA does not support adding a science category to the breadth slots alongside languages, humanities and creative subjects.

While optional science specialism is a potential benefit of a fourth category, we believe it would lead to more risks than benefits within the current KS4 structure.

Students who wish to pursue greater depth of study in science already have established pathways; attainment and progress of students who study more than 2 science qualifications are already be recognised via the 'science' and 'choice' slots, giving a maximum of 4 out of 8 slots available to science (i.e. triple science + computer science), with the additional option of Design and Technology counting within a breadth slot.

We would be concerned that introducing science into the breadth category could undermine the intention of promoting wider curriculum breadth. Performance measures can have significant, sometimes unintended, consequences for school timetabling and subject availability. In smaller centres especially, this additional category could lead to the narrowing of options in languages, humanities and creative subjects, reducing the genuine breadth of opportunity that the proposed updates to performance measures are designed to support.

**Question 13: Do you agree that Progress 8 should allow technical awards in the breadth and choice slots, with a maximum of two across all slots? [Agree].**

AQA agrees that allowing technical awards within the breadth and choice slots is in the best interests of KS4 students, and we support the proposal to cap these at a maximum of two.

Ideally, GCSEs and technical awards should sit alongside each other and support different aspects of students' learning, rather than creating an either/or choice.

However, this policy choice creates a clear trade-off that should be acknowledged. In some subject areas, particularly in smaller centres or where there is limited staffing and timetabling flexibility, schools may feel compelled to choose between offering GCSEs and technical qualifications in certain areas. For example, it may not be manageable for a centre to offer both GCSE Drama and a technical award in Performing Arts, or GCSE Music alongside a technical award in music practice. Where technical routes are perceived as more appropriate for a significant proportion of a cohort, schools may choose these over GCSE equivalents and this could result in a reduction in GCSE uptake to levels that make some specifications unviable for awarding organisations.

If the decision is taken to maintain the current academic nature of creative GCSEs while also expanding access to technical awards, the result of this may mean that some GCSEs in overlapping subject areas could become unsustainable. We would welcome further discussion on how best to manage these trade-offs to protect both student choice and the long-term sustainability of the qualification landscape.

**Question 14: Do you have any comments on the minor methodological adjustment?**

AQA has no concerns with the proposed minor methodological adjustment to Progress 8 and supports the intention to improve the clarity and accessibility of reporting for schools, parents and wider stakeholders.

Despite the change, confidence intervals around point estimates of Progress 8 scores should still be presented in underlying data tables accessible to researchers, to enable the continuity of any longitudinal research which may be utilising it.

**Question 15: Do you have any other comments on the proposed changes?**

AQA would welcome the potential for broader recognition of additional qualifications such as our Higher or Extended Project Qualifications.

Including high value qualifications like the HPQ and EPQ could strengthen the overall balance of study by recognising independent research skills and rewarding the depth of learning that many students choose to pursue alongside their GCSEs.

This would support a more ambitious and rounded curriculum offer and better reflect the diverse ways students demonstrate capability beyond their core subjects. Schools, colleges, students and FE/HE value these qualifications and their inclusion in accountability measures would make it easier for schools and colleges to offer them to a wider cohort.

**Question 16: What are your views on introducing a ‘best-fit’ progress measure for pupils with low prior attainment?**

AQA supports the intention behind a best-fit progress measure as it offers a fairer and more accurate way to recognise the achievement of pupils with low prior attainment.

However, should this be introduced it will be important to monitor how schools implement and use the measure to ensure that flexibility does not unintentionally lower expectations or lead to inconsistent or inappropriate curriculum provision for these pupils. It’s important that any measures introduced are done with the overall intention of removing some of the current disincentives on schools to admit low attaining / disadvantaged / SEND pupils.

While the intention of the best fit measure is to give schools confidence to offer an ambitious curriculum without being penalised for empty slots, in practice schools may decide to enter some pupils for fewer qualifications.

We recommend that a ‘best-fit’ measure should be accompanied by guidance which demonstrates how this option can be used proportionately in line with the needs of lower attaining students and whilst still allowing 8+ GCSE or equivalent qualifications. In addition, it should be ensured that there is clarity and transparency over who is making the decision about the number of subjects taken. This should be done as part of a joint conversation between schools and parents/carers to ensure that decisions are taken with students and parents and represent the best educational interests of the student.

**Question 17: What (if any) impact do you think an additional best-fit progress measure (alongside Progress 8) would have on the qualifications for which schools enter low prior attainers?**

Schools will continue to focus on ensuring that students make strong progress in English and maths, not only because these subjects contribute significantly to performance measures, but because achieving secure outcomes in these subjects has clear long-term benefits for students.

For LPA students a lighter qualification load can create a more manageable and supportive learning environment that reduces unnecessary pressures, enables them to stay engaged and allows them to focus on the subjects that matter most for their progression. If implemented well, it might also support more SEND students being able to thrive in mainstream schools.

The measure also aligns well with their SEND objectives of more SEND pupils being able to thrive in mainstream schools.

**Question 18: The government's ambition is that the vast majority of pupils will take at least 8 qualifications at KS4, but what considerations would be important in deciding which pupils would be likely to study fewer than 8 qualifications?**

Decisions about whether a student should take fewer than eight qualifications should be based on a holistic assessment of a student's needs, strengths and wellbeing.

For some students, a full suite of eight GCSEs may leave too little time for the targeted support they need to make secure progress in English and maths or other subjects that are meaningful to the student. It is also important to consider the impact of workload and assessment demands on students' wellbeing. For some LPA or SEND students, the volume of content and number of exam papers associated with eight GCSEs can be overwhelming. A lighter qualification load may provide a more manageable and supportive curriculum that enables students to remain engaged and achieve meaningful outcomes.

Other key considerations include the nature and complexity of any SEND needs, the level of curriculum access the student can sustain, how additional learning time will be used to benefit them and whether a reduced programme genuinely supports future long-term progression.

Schools should ensure that decisions are always made in the best interests of the student, include parents or carers in decision making, and that ambition and breadth are maintained wherever feasible.

**Question 19: Should this measure be visible to schools only, or also visible to parents and the wider public?**

AQA agrees that this measure should be visible and that visibility should extend to both schools and parents.

As outlined in earlier responses, transparency and a shared understanding between schools and parents are essential to ensuring that student wellbeing is protected and ideally, strengthened through this measure. Visibility also serves a wider public interest: it highlights the value schools add in a priority area and supports parents and carers to make informed, evidence-based decisions about their child's education.

However, it is important that any published data cannot be used to identify individual students. If the measure is made public, it must be accompanied by clear explainers and careful messaging to avoid unintended consequences, including undue pressure on schools or shifts in behaviour that could undermine the intent of the measure.

**Question 20: Do you think there is merit in an adaptation to this proposal that includes science as a required subject for pupils entered for 5 or more GCSEs/other approved qualifications?**

AQA does not support the proposed adaptation to this proposal to make science a compulsory subject for students entered for five or more GCSEs or equivalent qualifications. This risks adding unnecessary complexity to the new measure.

Progress 8 already effectively reinforces the importance of science, with 96% of KS4 students currently taking at least two science GCSEs.

That said, any unintended consequences of the measure, whether for science or other subjects, should be monitored, and the methodology reviewed if needed.

**Question 30: Do you believe the proposed changes (any or all) will have a specific impact on particular groups of learners or staff because of their protected characteristics? Please explain the impact, specifying which proposal your response relates to.**

Overall, we do not anticipate that the proposed changes will have a direct or disproportionate impact on learners or staff on the basis of protected characteristics.

However, some proposals may have indirect effects that intersect with protected characteristics, particularly where these correlate with disadvantage, SEND or patterns of subject uptake. For example, pupils with SEND or lower prior attainment, groups that include higher proportions of pupils with certain protected characteristics, may be more likely to be considered for a reduced qualification load under the best-fit progress measure. While this flexibility can be beneficial when used appropriately, it will be important to ensure that decisions are made on the basis of individual need rather than assumptions linked to protected characteristics.

Similarly, changes to Progress 8 subject groupings may affect subjects with uneven demographic participation. For instance, modern foreign languages and some creative subjects have known gender and ethnicity patterns in uptake. Any shifts in school entry behaviour could therefore have indirect implications for some groups of learners.

For staff, the proposals may place additional demands on SEND teams and pastoral leads, who already support a number of pupils with protected characteristics. Clear guidance and proportionate expectations will be essential to avoid exacerbating workload pressures.

We recommend that the Department continues to monitor participation and outcomes across protected groups to ensure that the reforms support equity and do not unintentionally reinforce existing disparities.

**Question 31: Are there any risks that the proposed changes could unfairly impact on certain types of schools or on certain groups of pupils (e.g. those from disadvantaged backgrounds, those with SEND)? Please explain the impact, specifying which proposal your response relates to.**

Changes to Progress 8 subject groupings may impact smaller schools, rural schools, or those with limited staffing flexibility. These schools may find it harder to maintain breadth in languages, humanities and creative subjects, which could disproportionately affect pupils in areas with fewer alternative providers.

The introduction of a best-fit progress measure may lead to variation in the number of qualifications pupils are entered for. Without clear safeguards, there is a risk that some LAP pupils, particularly those from disadvantaged backgrounds or those with SEND, could be entered for fewer qualifications than their peers, even where they are capable of a broader curriculum. This could then inadvertently lead to narrow future progression routes.

Should these changes be introduced, we would encourage the Department to monitor impacts across school types and pupil groups, ensuring that accountability measures support improvement without entrenching existing inequalities.

**Question 32: Do you have any suggestions for how any potential negative impacts on particular groups of learners or staff could be mitigated, or positive effects enhanced?**

Several mitigations would help ensure that the reforms support equity and avoid unintended consequences.

We welcome the retention of Progress 8, which provides an important safeguard against the over use of the best fit measure. 2024 Ofqual data on the number of GCSEs taken by 16-year-olds, in England shows that 68% of 16-year-olds are entered for eight or more qualifications, and 83% for seven or more ([link](#)). Maintaining Progress 8 as the primary accountability measure helps preserve this breadth and reduces the risk that flexibility is used in ways that unintentionally or unnecessarily narrow students' opportunities.

Clear, proportionate guidance will be essential for decisions about reduced qualification loads. This guidance should set out which stakeholders should be involved in determining whether a reduced programme is appropriate, including the school, the parent or carer, and the student, to ensure decisions are transparent, ambitious and genuinely in the learner's best interests. This would guard against assumptions being made about groups of students and help maintain high expectations.

Monitoring of entry patterns should be strengthened, including how many pupils take fewer than eight qualifications, with data disaggregated by disadvantage, SEND and school type. This will help identify any emerging inequities early and ensure that flexibility is being used proportionately.

Support for smaller or resource-constrained schools will also be important, particularly to maintain breadth in subjects where staffing is already fragile, such as languages and creative disciplines. Without this, pupils in certain areas may face a narrower curriculum offer through no fault of their own.

Any additional expectations placed on SEND and pastoral teams should be carefully scoped to avoid unnecessary workload. Where possible, processes should build on existing systems rather than introduce new layers of documentation.

Finally, published data should be handled responsibly, with safeguards to prevent identification of individuals or very small groups. Ongoing evaluation of subject uptake and qualification patterns will help ensure that the reformed accountability system continues to support breadth, ambition and fairness for all pupils.

**Question 33: What impact do you think the proposed changes will have on staff workload or wellbeing? Please explain the impact, specifying which proposal your response relates to.**

If implemented well, and in a targeted way, there is the potential that policy changes in this area could reduce staff workload and improve wellbeing by not having to allocate time and resource into placing students into subjects that they're not well suited for.

We would however guard against introducing any changes which would increase staff workload e.g. more forms and paperwork to fill in to justify or give reasons for decisions made about students. Any changes need to be meaningful and ensure that they help students, rather than adding bureaucracy or additional documentation requirements to teacher workload.

**Question 34: Are there particular types of schools or particular staff roles (e.g. subject leads, SEN coordinators) that may be disproportionately impacted by these changes? Please explain the impact, specifying which proposal your response relates to.**

Some staff groups are likely to feel the impact of these proposals more strongly than others. SENDCos and pastoral teams may carry much of the responsibility for decisions about reduced qualification loads for LAP students and for coordinating conversations with students and families.

This could increase workload, although the additional flexibility may also be empowering if the guidance is clear and supports professional judgement rather than adding new administrative layers.

Smaller schools or those with limited staffing flexibility may also be disproportionately affected by changes to Progress 8 subject groupings, as maintaining breadth in languages, humanities and creative subjects can be more challenging in these contexts.

Careful implementation and proportionate expectations will be essential to ensure that workload remains manageable and that the benefits of increased flexibility are realised across different school contexts.

**Question 35: Do you have any suggestions for how we can minimise any negative impacts on wellbeing?**

As noted in our response to Q34, there is the potential that changes in this area could result in an increase in workload for some e.g. SENDCos and Pastoral teams.

As part of the consultation process, we recommend taking into consideration how these changes will be used as part of Ofsted inspections. Our suggestion would be that any data obtained as part of the process is used in a proportional way, in line with the objectives of the measure and not used as a method by which to scrutinise and inform Ofsted judgements.

Teachers and parents/carers also all need to be involved in collective conversations and consultations to ensure that decision-making is consultative, and students and parents feel involved and not 'done to' through any decisions made.

It's unclear in the information provided who the ultimate decision-maker is in these proposed changes. We recommended that this is made clear and guidance is provided so that all stakeholders have a clear understanding.