

AQA consultation response

16-19 Performance measures

July 2026

Executive summary

AQA is an independent education charity, providing high quality assessments that are fair, reliable and support students. Today, we're the largest provider of academic qualifications taught in schools and colleges. We set and mark exam papers for over half of all GCSEs and A-levels taken every year. Our qualifications are internationally recognised and taught in more than 40 countries around the world, and they're highly valued by employers and universities. And we have recently announced ambitious plans to develop and deliver all the new post-16 qualifications being introduced as part of the post-16 reforms in England, in collaboration with Training Qualifications UK (TQUK), part of the AQA Group.

Our response emphasises that accountability measures, qualifications and funding arrangements are closely interconnected and should be considered together. While national performance measures can support transparency and comparison, there are limits to their ability to create a skills system that responds to labour market needs. National measures should therefore be complemented by locally relevant intelligence that reflects regional priorities, employer demand and local economic circumstances.

We broadly support reforms to English and maths performance measures, including removing the non-entry penalty and improving reporting of learner progress. These changes could reduce incentives for premature exam entry and support more learner-centred approaches to assessment. However, they also risk encouraging delayed entry, lower participation in resits and more cautious provider behaviour. It is therefore important that accountability reforms are aligned with wider changes to qualifications, progression pathways and funding requirements.

Finally, we support efforts to simplify retention measures and better recognise positive progression, including movement into apprenticeships. However, simplification should not come at the expense of transparency. Throughout the consultation, we stress the importance of ensuring that reforms do not have unintended consequences for learners with lower prior attainment, students with SEND, or providers serving more disadvantaged communities, and that accountability measures continue to support flexible, learner-centred progression routes.

Below are our answers to the consultation questions to which we responded substantively.

1. We intend to establish headline measures of performance that can work across all 16-19 learners studying at the same level. Do you agree with this aim?

AGREE

A consistent set of headline measures across learners studying at the same level would improve transparency in a system that is currently uneven and fragmented. Qualifications are inter-linked with curriculum and accountability. All three need to be examined together, or risk creating unintended consequences.

However, the value of consistency depends on how far it accommodates the diversity of provision at 16–19. Provision is becoming more varied, with a growing mix of academic and vocational pathways and increasing movement between them. The introduction of new V levels, sitting alongside A-levels, and new ‘stepping stone’ qualifications means that there will be a potentially complicated interaction between the new VQs and existing qualifications, both academic and vocational.

A single approach risks flattening important differences. At this phase, student choice is driven more by course offer than by performance tables – the reason for this is there are very different types of provision available in FE, and no National Curriculum to follow. It is therefore very different to comparing which secondary school a year 6 might go to. Broadly speaking, funding rules often shape FE provider behaviour more than accountability metrics, and this is generally positive as it means that performance metrics do not distort provision.

The key test is therefore not technical consistency but behavioural impact. Measures should not narrow provision, discourage pathway movement, or create incentives to prioritise particular qualification types or particular students. Bringing academic and technical study together into a clearer framework could encourage students to take a more mixed programme of study. However, other approaches may have more value, like improved advertising and information on post-16 pathways.

2. What aspects do you think are most valuable to include in such measures and why?

The most valuable elements are those that balance rigour with breadth. Attainment and progress remain core but should not dominate at the expense of broader learning outcomes. Destinations are useful in principle but need careful handling given time lags and external factors beyond provider control; e.g. earnings are shaped by several factors not related to the quality of course such as local labour market conditions, wider economic growth/recession, industry expansion/contraction. To make destinations or earning data an accountability metric would require colleges to be able to adapt courses to needs of the labour market quickly.

Recognition of mixed programmes is important to reflect the direction of travel towards more balanced academic and vocational pathways. There is also a case for ensuring that established academic qualifications remain valued within the system, alongside newer vocational routes.

3. Are there any other ways performance measures could be improved to support our aims for a targeted, data-driven skills system which is responsive to labour market needs?

There are limits to what performance measures can achieve in creating a skills system that is genuinely responsive to labour market needs. Skills systems are shaped not only by data, but by long-term economic planning, employer engagement and local labour market conditions.

There is a risk that an over-reliance on national metrics creates a false sense of precision. Labour market demand can be volatile, outcomes are influenced by factors beyond providers' control, and lagged destination or earnings data can misrepresent current performance (both positively and negatively).

We therefore see a distinction between national accountability measures and locally relevant intelligence. National performance measures should provide a consistent basis for transparency, comparison and intervention. However, providers should also be able to demonstrate success against locally agreed priorities, particularly in areas with devolved skills responsibilities such as Mayoral Combined Authorities.

This could include measures linked to priority sectors, local progression pathways or regional workforce needs. Such measures should complement, rather than replace, national accountability measures. In this way, performance data can support a more responsive skills system without placing unrealistic expectations on national metrics alone.

Ultimately, accountability can support system planning, but it cannot substitute for it.

4. At level three, we intend to have consistency in headline performance measures across A Levels, T Levels and V Levels, measuring the same things about them (eg attainment, progress, destinations). Do you agree with this aim?

AGREE

Consistency helps improve the equivalent value between academic and vocational routes and can address perceptions that vocational qualifications are lower status. However, measures should:

- Reflect differences in purpose, rather than force equivalence
- Avoid incentivising “approved” combinations of subjects or pathways
- Preserve flexibility for mixed programmes and not penalise institutions if students make risky choices eg choose a third or fourth A-level which they are unlikely to do well at but have a genuine interest in.

The system should measure choices, not attempt to shape them through implicit preferences, influence institutions, and in turn incentivise/encourage them to limit or shape student choices.

- 5. To what extent do you agree with the following: ‘DfE should aim to produce performance measures for level 2 Occupational Certificates and Foundation Certificates that are broadly consistent for both pathways, and with measures used for level 3 qualifications’? This would mean using similar performance measures for each qualification type and level (e.g. attainment and progress).**

NEUTRAL

Broad consistency is sensible, but the design challenge is significant. The two pathways have distinct purposes:

- Occupational certificates: progression into employment
- Foundation certificates: progression to Level 3

Applying identical measures risks missing this distinction. In particular:

- Foundation certificates are typically one-year programmes, creating timing issues in performance reporting. This would mean that the same student could be counted twice.
- Simple attainment measures are unlikely to reflect success meaningfully

Progression is likely to be more appropriate, but this introduces lag and attribution challenges. The core risk is perverse incentives linked to programme length or reporting cycles, given the different length of courses in the 16-19 sector.

With occupational certificates, the risks of dropout are high. It may be more appropriate with these to prioritise achievement of the qualification regardless of grade (unlike V Levels where grade matters).

- 6. If we were to introduce new performance measures for students taking qualifications at level 1 and entry level, what would suitable measures of performance be (e.g. should we focus on achievement, attainment, progression to other levels or destinations?)**

Caution is needed. There is not a clear case for inclusion in headline performance tables. This is a highly diverse cohort, often including learners with SEND and varied outcomes (e.g. life skills, supported employment).

Standard measures risk being:

- Too blunt to capture success meaningfully
- Distorting provider decision-making

There is a strong case for leaving detailed evaluation to providers, rather than imposing national metrics. The issue is that success in the FE sector is varied and often cannot be easily quantified.

7. Do you agree with removing the non-entry penalty in the English and maths progress measures for students who have only been with a provider for one year? Please explain your views.

AGREE

We broadly support removing the non-entry penalty for students in their first year, as current arrangements appear to incentivise premature resit entry, particularly into the November series. Many students are entered before they are ready, contributing to low pass rates and a 'resit cycle' that does not support genuine progress.

The proposals would enable educators to focus on delivering content to their students, rather than focusing on repeated assessments, which we know can significantly add to workload. Resit students can arrive at FE colleges with low morale and feelings of being a failure. Targeting interventions at students' needs, rather than blanket entrance for resits, means students have more chance to make progress in the areas they need, rather than entering for a GCSE exam that they may struggle to get a Grade 4 in.

Under the proposals, providers may move away from blanket entry practices, such as routine November resits, and instead make more individualised decisions about when students are ready to attempt assessment. In this sense, the proposal could support a more learner-centred approach, particularly where short programmes do not provide sufficient time for meaningful progression to be demonstrated through an exam.

However, the proposal involves a genuine policy trade-off. While it may reduce incentives for blanket November resit entry, it could also weaken incentives to enter some learners at all, particularly on shorter programmes where providers judge the likelihood of success to be low. In effect, the system risks shifting from encouraging premature entry to encouraging delayed or non-entry. A mitigation for this would be a measure which shows 'value add' in learner attainment/progress, or a penalising mechanism for those providers with high non-entry rates, or high levels of dropout; while ensuring any mechanism did not penalise good, learner-centred practice which was simply taking the appropriate amount of time.

There would be a benefit of aligning the timings of introducing these new measures with the introduction of the new level 1 stepping stone qualifications, meaning that there is an alternative qualification for those learners who are not ready for GCSE which can give them both an achievement and measure progression towards GCSE.

8. Is removing the non-entry penalty in the English and maths progress measures likely to impact exam entry practice? Please explain your answer.

VERY LIKELY

We are likely to see a substantial reduction in entries for GCSE Maths and English from FE Colleges, which will impact entries, with a knock-on impact for awarding organisation's financial planning and stability. Some FE colleges may be overly cautious in holding learners back from resitting their GCSE, for fear of them not achieving their Grade 4. For providers delivering one-year or shorter programmes, there may be a greater tendency not to enter some students for qualifications at all, particularly where the likelihood of success is low within the available timeframe. In addition, providers may adopt a more cautious approach to entry decisions, holding students back until they are confident of success. While this may

reduce premature entry, it could also limit opportunities for some learners to attempt progression, particularly for more marginal or complex cohorts.

Further diversification in the types of courses offered (e.g. the introduction of new ‘stepping stone’ qualifications) could impact exam entry practices as colleges move towards these qualifications, rather than entering for GCSE resits.

FE leaders we have engaged with have raised concerns about the purpose and intended role of the new qualifications. Clarity is needed on the policy objective, the learners these qualifications are designed to support, and how they are expected to sit alongside GCSE resits and other English and maths pathways. Without this clarity, there is a risk of creating a new resit cycle within stepping stone qualifications, particularly for learners whose starting points mean that even level 1 may not be immediately appropriate. There is more information available in our May 2026 response to the 16 to 19 Level 1 English and maths qualification consultation, available at: <https://www.aqa.org.uk/files/4d28ca08-d35f-49f0-a17c-71572b85fb66/da6dba8709661038723ff4a91ec3a42c9ca546b1.pdf>

A key issue is that behaviour is driven jointly by performance measures and the Condition of Funding. Removing the penalty may mitigate some perverse incentives, but without wider alignment there remains a risk of unintended consequences.

9. What other behaviours and practices might removing the non-entry penalty in the English and maths progress measures support and are there any risks we should be aware of?

Removal of the non-entry penalty may lead to a range of behavioural changes in one-year provision, some of which reflect more appropriate alignment between teaching, assessment and learner readiness.

However, there are also risks associated with this increased flexibility. For providers delivering one-year or shorter programmes, there may be a greater tendency not to enter some students for qualifications at all, particularly where the likelihood of success is low within the available timeframe. In addition, providers may adopt a more cautious approach to entry decisions, holding students back until they are confident of success. While this may reduce premature entry, it could also limit opportunities for some learners to attempt progression, particularly for more marginal or complex cohorts.

The changes may also influence decisions about qualification pathways. Providers may place lower-level pathways where these are perceived to offer a more realistic route to progression within a limited period of study. This could reflect a more appropriate match to learner starting points, but also raises the possibility of different expectations emerging for different groups of students.

Overall, these behaviours reflect rational responses to the interaction between accountability measures, funding requirements, and the practical constraints of delivering English and maths in short programmes. Increased flexibility could lead to greater flexibility across providers, with variable approaches to entry, progression, and expectations for learners based on their needs.

10. Do you agree with amending the cap on outcomes below prior attainment from -1 to -2?

AGREE

We offer cautious support for this proposal. Extending the cap to -2 would provide a clearer and more accurate reflection of cases where students achieve substantially lower outcomes than their prior attainment, which is not fully captured under the current system. It may also help to discourage premature or inappropriate exam entry, including practices where students are entered before they are ready in order to secure short-term gains.

However, this support is conditional on recognising the potential for uneven impacts. The stronger negative signal may disproportionately affect providers working with more challenging cohorts, or those operating within constrained delivery models. There is a risk that the proposal increases pressure without sufficiently distinguishing between poor practice and providers making reasonable professional judgements in difficult circumstances.

11. What behaviours and practices might amending the cap from -1 to -2 support and are there any risks we should be aware of?

Amending the cap has the potential to shift provider behaviour in constructive ways. In particular, it may reduce incentives for repeated or premature resit entry, including automatic enrolment into early exam series where students are not ready. By strengthening the consequences of negative outcomes, the measure may encourage more deliberate and evidence-based decisions about when students are entered, rather than a “rolling the dice” approach.

At the same time, the proposal carries clear risks. The stronger penalty may amplify both positive and negative behaviours, acting as a catalyst for change but not necessarily in a consistent direction. Providers may become more risk-averse, delaying entry, limiting opportunities for students to attempt progression, or placing greater emphasis on lower-level qualifications to manage accountability exposure. There is also a risk that some providers are disproportionately affected due to their intake or operating context, rather than the quality of their provision.

Overall, while the proposal may help reduce some known distortions in current entry practices, its impact is likely to be uneven. Careful monitoring will be needed to ensure that it does not inadvertently narrow curriculum offer, reduce ambition for certain learners, or disadvantage providers working in more challenging circumstances.

12. Do you agree with the timeline for implementing changes to the non-entry penalty and the cap in the English and maths progress measures, for first publication in spring 2029?

NEUTRAL

We have no strong objections to the proposed implementation timeline in isolation. The timeframe appears broadly sufficient for providers to understand and adapt to the methodological changes.

However, the effectiveness of the timeline will depend on alignment with wider reforms to English and maths, particularly the introduction of new level 1 “stepping stone” qualifications and any changes to qualification pathways. At present, it is not clear how these different reforms will interact in practice, or

whether they will be implemented in a coordinated way. There is also a need to consider how the proposed timeline interacts with shorter programmes. Many FE learners study at level 2 on one-year programmes, while some apprenticeships, including newer foundation apprenticeships, may last less than a year. It is therefore important to clarify whether learners on shorter courses would remain subject to appropriate English and maths requirements, and whether any unintended gaps could arise for learners who are not in full-time FE provision or who complete shorter programmes. From conversations we have had with FE leaders, they raised concerns that the system is becoming increasingly disjointed, with multiple overlapping changes that are not clearly sequenced from their perspective.

On that basis, while the proposed timeline for these measures is not itself a significant issue, there is a need for the accountability changes to be included in future iterations of the 16-19 implementation plan, to show how everything fits together and provide consistency and clarity for the sector. Without this, there is a risk that providers are making decisions in an uncertain policy environment, which could lead to unintended behaviours or inconsistent practice as different elements of reform come into effect at different times.

13. To what extent do you agree that we should publish additional progress score breakdowns by prior attainment, in addition to the headline metrics?

AGREE

We support the publication of additional progress score breakdowns by prior attainment, as this would provide a more transparent and nuanced picture of provider performance. In particular, disaggregating outcomes for learners with lower prior attainment could help ensure that the progress of these groups is better recognised, rather than being obscured within headline averages. This aligns with the broader aim of making measures more representative of real student progress.

However, the value of these breakdowns will depend on how clearly they reflect the range of qualification pathways available to learners, particularly below grade 4. It is currently unclear how different routes, such as GCSE resits, Functional Skills qualifications, and proposed level 1 “stepping stone” qualifications, will be captured and compared within the measure. Without clarity on this, there is a risk that the data does not fully capture meaningful progress for some groups.

There is also a risk that greater segmentation could reinforce different expectations for different cohorts if not carefully interpreted. While improved transparency is welcome, it will be important that the presentation of this data supports high expectations for all learners and does not inadvertently encourage a narrowing of ambition.

14. For students with the lowest English and maths prior attainment, how can we best recognise their progress toward level 2 achievement within the English and maths progress measures?

Recognising the progress of students with the lowest prior attainment requires a broader view of progression than a simple focus on attainment at level 2. For many learners in this group, particularly those on shorter or more complex programmes, meaningful progress may occur in stages and may not be fully reflected through GCSE outcomes alone.

There was a strong view that the system needs to more clearly recognise progression through intermediate steps, including level 1 qualifications and future “stepping stone” routes. Ensuring that these pathways are appropriately valued within performance measures would provide a more accurate reflection of the progress being made by these learners and avoid creating incentives to focus disproportionately on those closest to achieving grade 4.

However, there is currently a lack of clarity about how these different pathways will interact within the system, and whether progress through them will be consistently recognised. Without a more joined-up approach, there is a risk that measures continue to underrepresent the progress of learners with the lowest starting points.

15. In the Post 16 Education and Skills White Paper, the Government committed to examining whether it could be made clearer whether achievement in the QARs comes from a student achieving a higher grade than they previously held. How do you think we could do this?

There is a clear case for improving transparency in how Qualification Achievement Rates (QARs) are presented. Current measures do not distinguish between students who improve on their prior attainment and those who achieve the same or a lower grade. As a result, the measure risks obscuring meaningful progress and may give an incomplete picture of provider performance.

One option would be to present attainment and progress as complementary but distinct metrics. For example, reporting overall achievement rates alongside a clear indicator of the proportion of students who achieve a higher grade than they previously held would provide a more balanced and informative view. This would retain the value of QARs as a measure of completion and attainment, while making visible the extent to which providers are supporting genuine progression.

However, improved reporting alone is unlikely to drive substantial changes in behaviour unless it is clearly understood and used within the accountability system. In practice, such information may be more influential for internal provider decision-making, such as exam entry and curriculum planning, than for external audiences such as students. Care should therefore be taken to ensure that any changes to presentation are aligned with broader accountability incentives, rather than treated as a purely technical adjustment.

16. How do the current English and maths measures (including the level 1 and level 2 achievement data) influence provider decisions about qualification pathways, curriculum planning, and exam entry for students subject to the maths and English condition of funding? (We are particularly interested in how you balance progress, readiness for assessment, and qualification choice).

Current English and maths measures, together with the Condition of Funding, shape provider attitudes in how they make decisions on exam entry, curriculum planning and qualification pathways. They can support progression to level 2 but can also encourage premature or repeated resit entry where providers are balancing learner readiness against accountability and funding expectations.

These incentives can also affect qualification choice. Where measures imply equivalence between qualifications with different purposes or levels of demand, providers may prioritise routes that optimise performance outcomes rather than those that best meet learners’ needs. Historical examples, such as European Computer Driving Licence (ECDL) being allocated the same performance table points as a

GCSE, or the 5 A*-C GCSEs which led to schools focusing on the children at risk of not getting a grade C at the expense of others, show how accountability incentives can shape provision.

This risk appears less acute in the proposed 16–19 landscape, as V Levels are not intended to be lower-demand alternatives to A Levels, and Level 2 certificates do not have a direct academic equivalent in most post-16 provision. The main issue is therefore not gaming through easier equivalences but ensuring that measures reflect qualification purpose and do not distort pathway choice.

A further consideration is how measures apply to shorter programmes. Many FE learners study at level 2 on one-year courses, and some apprenticeships, including foundation apprenticeships, may last less than a year. It will be important to clarify whether learners on these routes remain subject to appropriate English and maths requirements, and how gaps in coverage would be avoided.

Overall, any changes should consider how performance measures and funding requirements operate together. Providers are making decisions within a constrained system, not responding to accountability metrics in isolation. The aim should be to support timely, learner-centred entry and progression decisions. This is most likely to be achieved through measures that recognise genuine progress towards level 2, allow flexibility in assessment timing where learners are not yet ready, and use greater transparency around entry and progression patterns rather than creating strong incentives for premature entry, delayed entry or inappropriate qualification pathways.

17. Do you agree that we should use the ‘Retained and assessed’ measure as the headline measure of retention at 16-19, and stop publishing the ‘retained’ and ‘retained and returned’ measures?

Yes but with conditions.

We support the use of the ‘retained and assessed’ measure as the headline measure, as it provides a clearer and more readily understandable indicator of whether learners remain on programme and achieve an assessment outcome. However, this simplification should not come at the expense of important information about learner pathways and provider performance.

In particular, the measure risks obscuring the reality of 16-19 study programmes, especially in further education where non-linear journeys, transfers between courses, and changes in qualification pathways are relatively common. Learners may move between qualifications or providers for legitimate educational reasons and still progress successfully, yet a single headline measure may present these outcomes as poor retention. There is a risk that providers supporting flexible and learner-centred pathways could therefore be unfairly disadvantaged.

We therefore support the proposal on the condition that the existing ‘retained’ and ‘retained and returned’ measures remain available as supporting data for providers, regulators and analysts. The headline measure should be accompanied by appropriate contextual information and methodological guidance to ensure it is not interpreted as a complete picture of learner retention or institutional effectiveness. A single headline measure can improve clarity, but it should not remove the nuance needed to understand complex learner journeys across the sector.

18. Are there any other methodological changes to the ‘Retained and assessed’ measure that we should consider, including counting movement into apprenticeships as ‘out of scope’?

We support counting movement into apprenticeships as out of scope where this represents a genuine positive progression outcome for the learner. Entering an apprenticeship is often a successful destination rather than a retention failure, and the methodology should recognise this accordingly.

However, the criteria for identifying such progression should be clear, transparent and consistently applied across providers and qualification types. Any exclusions from the retention measure should be based on robust evidence of progression rather than assumptions about learner destinations.

More broadly, we encourage the Department to consider whether the methodology adequately reflects the increasingly diverse and flexible pathways available to 16-19 learners. Learners may legitimately move between qualification types, providers or programmes as their aspirations and circumstances change. Where these transitions result in positive educational or employment outcomes, the methodology should seek to recognise them rather than categorising them solely as a loss from the original programme.

At the same time, safeguards are needed to minimise the risk of unintended consequences. Any approach that removes learners from the measure should be designed in a way that prevents inconsistent reporting, reclassification of outcomes, or incentives to game performance measures. The focus should remain on accurately reflecting learner journeys and outcomes rather than improving headline metrics. A methodology that balances simplicity with an accurate representation of progression will provide more meaningful information for learners, providers and policymakers.

19. If we change the methodology of the ‘Retained and assessed’ measure so that students moving into apprenticeships are out of scope, what might the risks and implications of this be? How might we mitigate these risks?

There are some risks around the loss of visibility over early dropout vs positive transfer. Some students may change courses as a positive move towards more suitable courses; these learners/providers should not be disadvantaged through the metrics. To create a truly flexible, adaptive system, this flexibility should be encouraged.

Gaming of the system through reclassification of courses in order that they meet the assessment requirements while not providing high quality, flexible courses is also a potential risk. The new metrics may also reduce diagnostic value for providers and regulators, rather than enhance it.

Treating movement into apprenticeships as out of scope risks losing important details about different student journeys, particularly the distinction between early dropout and planned progression. This could reduce the usefulness of the measure for understanding provider performance.

To mitigate this, any move to simplify the headline measure should be accompanied by continued publication of underlying data on student movements, including how many transfer into apprenticeships and when. Without this, the measure becomes clearer but less informative.

There is also a risk of inconsistent classification, particularly where the line between progression and non-completion is unclear. This could create incentives for providers to categorise outcomes in ways that are more favourable. Clear and consistent definitions of what counts as progression into an apprenticeship are therefore important, alongside monitoring of how the measure operates in practice.

Overall, simplification is reasonable, but should not come at the expense of transparency about student pathways.

20. Are there any risks that the proposed changes could unfairly impact on certain types of provider or on certain groups of students (e.g. those from disadvantaged backgrounds, those with SEND)?

There are a number of risks that the proposed changes could have uneven impacts on different groups of students and types of provider. These risks are particularly relevant to the removal of the non-entry penalty (Q18-20) and the extension of the negative progress cap (Q21-22).

One key risk relates to students with SEND and those with the lowest prior attainment. Increased flexibility around exam entry, combined with stronger consequences for negative outcomes, may encourage more cautious decisions about when learners are entered for assessment. While this may reduce premature entry, it could also lead to delays in entry for some groups where there is uncertainty about their likelihood of achieving a pass. Over time, this risks reducing opportunities to demonstrate progress and contributing to lower expectations for some learners. Providers may also respond by steering some learners towards lower-level or alternative pathways, which may sometimes be appropriate but could also reinforce different expectations for different groups.

Providers working with more disadvantaged cohorts or larger proportions of students with SEND may be disproportionately affected. The stronger negative signal introduced by the revised cap does not distinguish between providers operating in different contexts, creating a risk of additional accountability pressure for those supporting learners furthest from level 2 achievement.

More broadly, FE leaders have highlighted to us concerns that accountability measures, qualification reforms, including proposed level 1 "stepping stone" qualifications, and funding arrangements are not yet clearly aligned. Without a more joined-up approach, there is a risk that these reforms interact in ways that create unintended consequences for learners requiring more tailored or longer-term support.

Mainstream schools tend to focus on qualification outcomes because of accountability pressures. The performance framework should seek to balance this and avoid creating incentives that narrow learner pathways or opportunities.