

**The Children's Commissioner's response to the
Department for Education consultation on proposals
to improve 16-19 school and college performance
measures**

July 2026

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Summary of consultation

The Department for Education (DfE) is consulting on proposed changes to the 16-19 performance measures they publish, which are uploaded online allowing parents, students and policymakers to compare schools and colleges based on standardised measures.

The publication of performance measures enables parents and young people to make informed choices about their education. The measures also act as accountability measures for schools and colleges and may drive their practices.

This response from the Children's Commissioner aims to highlight that performance measures should enable child-centred education practices and outcomes. It focuses on consultation questions about the proposals which are focused on:

- Making 16-19 performance measures more consistent and comprehensive
- 16-19 English and maths progress measure and qualification achievement rates

Consultation response

Making 16-19 performance measures more consistent and comprehensive

Q.11 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? Please explain your views.

Agree. The post-16 education landscape is complex and consistent performance measures for learners at the same level across schools, colleges and multi-academy trusts will assist young people and families to make informed decisions about their education pathway.

Children and young people consistently tell the Commissioner they want to know more about vocational pathways. Establishing headline measures of performance that can work across all 16-19 learners studying at the same level is one way to encourage more equal status, attention and knowledge of different pathways available to young people including T and V levels.

Measures that work across all 16-19 learners at the same level will also help strengthen accountability across all parts of the post-16 education system.

Q.12 What aspects do you think are most valuable to include in such measures and why?

The existing inclusions of attainment, progress and retention are all valuable. It is worth noting that children and young people tell the Commissioner that getting a job is one of their top priorities, and biggest worry. Therefore, the value in including destinations for young people is also clear.

We know the education system is increasingly required to understand the full context of young people's lives and the support they need to engage and attain. Other aspects of education settings children and young people value include whether they feel safe at their education setting, have fun

things to do, and have access to the support they need. The department may wish to consider if there is scope for these measures to be included.

The Commissioner has repeatedly highlighted her concern about the children missing out on their right to education and that school attendance needs to be a priority for all services and professionals working with children. In the Commissioner's School and College Census of almost 19,000 schools and colleges, attendance was one of the biggest concerns for many secondary schools (63%), colleges (67%) and primary schools (44%). For those aged 16-19, we also know that that transition from school to post-16 can be difficult for young people, and there are some who struggle with the transition, which can be reflected in attendance. Addressing attendance is a complex issue, with context differences across different post-16 institutions. For this reason, while attendance is not a performance measure per se, it is one of the most essential accountability measures, and the DfE should set out a pathway to inclusion of attendance as a headline measure. The Commissioner has recently used her statutory powers to request data from colleges on attendance, and will publish findings; it is important that the findings from this research inform inclusion of attendance as headline measure.

Q.13 If you are a student or parent, what information matters to you most when deciding on a school or college for 16-19 study?

Children have told the Commissioner that they want to be at their local school, with their friends and teachers. Nationally representative polling of UK young people by the Commissioner in April 2026 shows that their number one concern for the future is getting a good job, and education settings have a crucial role to play providing careers support and opportunities to engage in the world of work.

As highlighted later on in our answer to Question 24, it is important for any information to be published in a format accessible to all and understandable by young people, so they can meaningfully use it when making decisions about their post-16 education.

Q.15 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? Please explain your views

Yes – strongly agree with this aim. As outlined in our answer to Question 11, efforts to encourage consistency in information, knowledge, understanding, and parity of esteem across academic, vocational and technical pathways is welcomed. Consistency across these measures should not lose the ability to break down by qualification type, however. For instance, children doing T-Levels should be able to see that the college they are considering has strong outcomes for T-Levels.

Q.17 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?)

As noted in the consultation document, students entered for L1 qualifications differ from other cohorts. They are more likely to have SEND, and the majority of pupils whose highest qualification is entry level have SEN support or an EHCP. The consultation goes on to claim that this group “may have quite different end goals from their peers at level 2 and above”. If both these things are true – that this is a relatively vulnerable cohort and that they have different end goals from other students – then the DfE should consult with these students and understand what they are looking to get out of the qualifications, and this should be reflected in performance measures.

Alongside this, pass rates and destinations should be reported, to ensure that these entry level qualifications are both providing students with attainable qualifications and providing a path to either further study or the key skills needed for employment and independence.

There is one area of significant concern regarding Level 1 qualifications, however. The Government has proposed a new Level 1 ‘Stepping Stone’ qualification in mathematics. This is a welcome development,

and the rationale behind the introduction of such a qualification – to build confidence and establish a baseline of core knowledge – is a good one.

This qualification, however, must be a true stepping stone, and cannot become the end goal for students. The success of a stepping stone qualification is not just how many students pass it, but rather how many go on to take the next step.

As such, there should be a performance measurement for L1 Mathematics that focuses on student journeys as well as performance, with reported data on:

- How many students are entered the qualification and their demographics
- How many students pass the qualification and their demographics
- How many students go on to be entered into L2 maths qualifications and their demographics
- How many students pass those L2 maths qualifications within two academic years of passing L1 and their demographics

Improving English and maths progress measures and qualification achievement rates

Q.18 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?

Strongly agree.

Fewer than half of pupils entered for November resits pass, and the culture of resits in further education is not a positive one. Repeated resits can be difficult for students going through them, and children have told the Commissioner about their difficulties with resits already as part of her current survey The Big Future. Children have told the Commissioner the process of repeatedly being entered for resits was demoralising, especially when their challenges with the subject stemmed from their SEND.

Colleges are the experts on when their students are ready to resit exams, and while there must be a clear expectation and accountability for passing English and Maths, colleges must have the flexibility to work with their learners and enter them when they are ready.

However, scrutiny of the system is important, and the DfE should make all possible endeavours to ensure that the data collection and reporting for resits is kept as regular as possible, so that external analysis of how many young people are entered for resits, how many times they are entered, and whether they pass or not, can all continue to be monitored and year-by-year comparisons made.

Q.19 Is removing the non-entry penalty in the English and maths progress measures likely to impact exam entry practice?

Removal of the non-entry penalty seems likely to impact exam entry practice.

This would be a positive outcome, as set out in our response to Question 18.

Q.21 Do you agree with amending the cap on outcomes below prior attainment from -1 to -2?

Somewhat agree. The incentive structure delivered by the accountability system should offer clear reward for providers that are consistently providing additional value, and penalise those who are not. While regression can be the result of difficult circumstances, the job of providers is to ensure that students, no matter their circumstances or background, get the support they need to progress. Providers should be empowered totally when it comes to examination entry. They know their students best, they know how long they will need to work with them to get them ready to pass exams, and that is why we support the removal of the non-entry penalty.

This greater freedom, however, must come with greater responsibility, and we think the introduction of the cap amendment is a good mechanism to deliver this; we would welcome evaluation of the impact introducing these changes in tandem has on exam entry timing and children's progress

Q.22 What behaviours and practices might amending the cap from -1 to - 2 support and are there any risks we should be aware of?

Children who underperform in prior attainment, especially by -2, may do so because of poor teaching. They may also do so because of life circumstances – bereavement, disruption to education, frequent moving. As highlighted in the Children’s Commissioner’s report *The Children’s Plan*, these are factors that England’s educational landscape is not equipped to understand. While recognising the need for accountability, we draw DfE’s attention to two risks from a child-centred perspective.

1. There is a real danger of filtering at the point of enrolment. If providers face a -2 penalty for students who regress, there will be significant incentives to avoid enrolling young people perceived as high risk of underperformance. This would be deeply damaging for children who most need post-16 support.
2. We have minor concerns about off-rolling. Any increased penalty programme creates clear incentives to get children who either are underperforming, or are likely to underperform, off the roll rather than supporting them within an appropriate English and maths programme.

DfE must monitor these risks closely, particularly for children with SEND and those from disadvantaged backgrounds. We recommend that any guidance accompanying this change explicitly prohibits the use of performance measure concerns as a basis for enrolment decisions, and that Ofsted is alert to these practices during inspection.

Q.23 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. The changes to the non-entry penalty should be implemented as quickly as is feasible.

Q.24 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?

Strongly agree.

The publication of progress score breakdowns by prior attainment is essential to a strong and functioning accountability system. Transparency in accountability data is essential to protect the consumer interests of children.

Currently, headline progress scores can mask significant disparities within a provider's cohort. A strong average score may conceal poor outcomes for students who arrived at 16-19 with the lowest prior attainment; in other words, precisely the young people who most need effective support. Without disaggregated data, no set of actors in the sector, including children themselves, can properly assess how well providers are serving their most vulnerable learners.

Breakdowns by prior attainment group will help identify providers that consistently add value for lower-attaining students and those that do not. The accountability system should pressure these institutions to improve their provision for lower-attaining students where value is not being added.

DfE should also publish breakdowns by disadvantage status and SEND alongside prior attainment breakdowns. A child with GCSE grade 2 in maths who also has an EHCP faces a very different set of challenges from a peer with the same grade but no identified additional needs.

Finally, as increased political and policy attention is paid to the outcomes of young people in the labour market and concerns around NEET status, ensuring that young people are informed consumers in the education market is essential. Progress scores should be published in a format accessible to all and understandable by young people, so they can meaningfully use it when making decisions about their post-16 education.

Q.25 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?

DfE should consider giving greater weight in the progress measure to improvements made by the lowest prior attainers, rewarding providers who invest most intensively in this cohort and achieve level 2 outcomes with them.

The introduction of stepping-stone qualifications offers one model for this. DfE could focus on those with Grade 2 and below who go on to achieve an L1 and then L2 qualification, with credit given for both the L1 and L2, and L1 progress measures suggested elsewhere ensuring progression accountability.

These pupils should also be the targets of additional focus at the inspection and data level. Ofsted should be asked to apply particular scrutiny to how providers support their lowest-attaining English and maths students, with clear consequences where ambition for this group is found to be lacking, and granular attainment data alongside progress scores, showing the proportion of lowest prior attainers who ultimately achieve level 2 at each provider would create powerful accountability for whether providers are genuinely closing gaps for the children who need additional support most.



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