



**Section 75  
Audit of Inequalities  
*and*  
Equality Draft Action Plan 2011 – 2013**

**Consultation Document  
April 2011**

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## 1. Introduction

This document is presented by the Northern Ireland Council for the Curriculum, Examinations and Assessment (CCEA). It reports the outcome of the Audit of Inequalities conducted by CCEA and the proposed Section 75 Equality Action Plan 2011-2013.

Copies of this document are available on the CCEA website [www.ccea.org.uk](http://www.ccea.org.uk). Documentation will be made available on request in alternative formats such as Braille, large print and audio CD.

You may wish to use the attached pro forma (Appendix 2) as a focus for your response on our Action Plan, or if you prefer, we would also welcome your comments on any specific area or more general areas by post, email (detailed below) or phone. We will also be happy to meet with you in person.

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**Consultation on this document will last from 7<sup>th</sup> April 2011 to 27<sup>th</sup> June 2011.**

## 2. Background

### 2.1. The Equality Commission's requirement and guidance

Section 75 is part of the Northern Ireland Act 1998. It requires public authorities in carrying out their functions to have due regard to the need to promote equality of opportunity between the nine equality categories of persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation, men and women generally, persons with a disability and persons without, persons with dependants and persons without. It also requires them to have regard to the desirability of promoting good relation between persons of different religious belief, political opinion and racial group.

The Equality Commission wrote to CCEA on 1<sup>st</sup> February 2011 requesting the submission of a revised Section 75 Equality Scheme by 1<sup>st</sup> August 2011.

In its 2010 document entitled 'Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities' the Commission explains that an equality scheme is "a document which outlines a public authority's arrangements for complying with its Section 75 obligations." The guide also provides details on the form and key elements of the scheme. The Commission issued a model scheme for adaptation and adoption by public authorities. CCEA's equality scheme now presented for consultation is based on this model scheme.

In the 2010 guidance, the Commission also recommends that public authorities develop an Action Plan, detailing action measures relevant to a public authority's functions, to promote equality of opportunity and good relations and address inequalities for the Section 75 categories.

The guidance further recommends that public authorities undertake an Audit of Inequalities to inform the development of their plans. The audit should comprise a systematic review and analysis of potential inequalities which exist for service users and those affected by a public authority's policies.

### 2.2. How CCEA conducted the Audit of Inequalities

As part of this process, units within each directorate examined their core functions with respect to the Section 75 groups.

The following steps were undertaken in the development of the Audit of Inequalities:

- **December 2010:** As part of the second tranche of submissions members of CCEA's Equality Team were invited by the Equality Commission to attend an Equality Awareness Session. The

session covered the development of the new/revised Equality Scheme and the Audit of Inequalities and associated Action Plan.

- **February 2011:** Members of the Equality Team met with representatives from various business units within each directorate to start to identify potential inequalities associated with the delivery of their specific function(s). This included examining what was in place and identifying what needed to be undertaken.
- **February/March 2011:** Members of the Equality Team met with representatives from business units to review progress and to evaluate work to date.
- **March 2011:** Action plans were finalised by the relevant business units, which included agreed outcomes and timescales.

Final document prepared for presentation to TMT and Council.

## **2.2 Sources of information used**

In its 'Statement on Key Inequalities in Northern Ireland', the Equality Commission considered the following 6 broad areas, which it believes must be addressed if we are to progress towards realising equality of opportunity in Northern Ireland Society:

- Education;
- Employment;
- Health and Social Care;
- Housing;
- Participation in Civic and Public Life;
- Prejudice.

As a focus for our audit, we concentrated on the inequalities highlighted in relation to Educational Achievement and Employment.

Various other pieces of data, research and information were used and examples of these are listed below. This list is not exhaustive; it illustrates the range of on-going research and evaluation regarding potential inequalities:

### **Internal sources**

- Article 55 Return;
- Disability Action Plan;
- Annual Progress Reports to the Equality Commissions;
- Temporary Staff Analysis Report;
- Overall GCE Examination Statistics – Summer 2010;
- Overall GCSE Examination Statistics – Summer 2010;
- Learning and Development Policy;
- Reward and Recognition Policy;

- Guidance on the Evaluation of Tenders;
- Northern Ireland Summary for Schools: End of Key Stage Assessment Outcomes 2009/10;
- Curriculum Resources Research Summary Report - October 2010
- Assessment Tasks Evaluation March 2011;
- Research Report on the Consultation on future CCEA Qualifications Provision for Learners with SEN - February 2011;
- Research Report on the Proposed Assessment and Moderation Arrangements for the NI Curriculum - January 2011;
- Research Report on Awareness raising sessions on Q Levels (Prerequisite Skills) Future Plans Evaluation of Pilot work planned for September 2011;
- Section 75 and equality questions were asked in Key Stage 3 test papers when they were statutory. Last survey conducted in 2008;
- Final Evaluation Report on the implementation of InCAS computer-based assessments in Irish Medium Schools 2008/2009;
- Irish Medium Support Materials and Resources for Primary Schools Questionnaire - February 2011 - Report April 11;
- Research Report on Irish Medium Support Materials - August 2009;
- Research on Irish Qualification Paper Translation;
- Evaluation of the manageability of InCAS for pupils with Special Educational Needs (SEN) - January 2011;
- Final Evaluation Report on the implementation of InCAS computer-based assessments and the Annual Pupil Profile Report in Primary Schools during the transitional year 2007/2008;
- Computer Based Assessment Desktop Research Report - September 2010;
- Suitability of InCAS assessments for Year 5 pupils with SEN - January 2008;
- Final Evaluation Report on the second implementation year of the InCAS computer-based assessments in 2008/2009;
- CCEA English as an Additional Language (EAL) Report 2008 (external report).

### **External sources**

- Audit of Inequalities – an overview of the statistics, the sources and current social trends: an introductory guidance document – October 2010;
- The Prevalence of Disability and Activity Limitation amongst adults and children living in private households in Northern Ireland – NISRA July 2007;
- Qualifications and Destinations of Northern Ireland School Leavers 2008/9 – Department of Education;
- Labour Force Survey: July to September 2010 – DETI;
- Northern Ireland Annual Survey of Hours and Earnings 2010;
- shOUT – YouthNet, December 2003;
- Every School a Good School (ESAGS) 2009;
- Together Towards Improvement – Special 2010.

### **3. The Organisation and description of functions**

#### **3.1 Who we are and what we do**

CCEA is responsible for a wide range of functions, which include:

- To keep under review all aspects of the curriculum, examinations and assessment;
- To advise the Department of Education on matters concerned with the curriculum, examinations, assessment and external qualifications;
- To publish and distribute, or secure or assist the publication and distribution of, information relating to the curriculum, examinations and assessment;
- To carry out statutory consultations;
- To develop and publish criteria for the accreditation of relevant external qualifications;
- To accredit appropriate qualifications;
- To conduct examinations and assessments, ensuring that standards are recognised as equivalent to the standards examinations and assessments conducted by other bodies or authorities exercising similar functions elsewhere in the United Kingdom;
- To produce, or secure or assist in the production of, teaching materials in connection with the curriculum and assessment;
- To carry out such other activities as the Department of Education may direct in connection with its other statutory functions.

Section 75 is mainstreamed across all of CCEA's business areas. Directors and Business Managers are responsible for ensuring that Section 75 obligations are taken into account in development and implementing policy.

Day to day responsibility for driving forward implementation within CCEA lies with its Equality Team. This team is committed to working closely with business units to ensure best practice is followed.

CCEA has four directorates, which are subdivided into business units. Their main functions are outlined below.

#### **3.2 Description of functions**

##### **Chief Executive Directorate**

###### ***MarComms:***

- Supporting the corporate plan objectives through marketing and communications planning, implementation and evaluation;
- Driving the planning and implementation process of marketing and communications for products and services;
- Ensuring effective communications with customers and stakeholders on all Curriculum and Qualifications Programmes;
- Ensuring a process of transparent and open communications with staff.

***Qualification and Skills Accreditation:***

- Ensuring quality of examinations provision and fairness for candidates in order that the users of qualifications, mainly employers and Higher Education, have confidence in the awards made.

The work of the Unit covers:

- Developing accreditation criteria and accreditation of qualifications when the criteria are met;
- Monitoring of awarding bodies to ensure the quality with their operations and that procedures used are in line with agreed regulatory code(s);
- Maintaining standards over time and across awarding bodies.

**Corporate Services Directorate**

***Business Assurance:***

- Providing confidence to the Chief Executive, customers and stakeholders that CCEA meets all statutory and regulatory requirements;
- Ensuring processes and systems are in place that are fit for purpose and which provide value for money;
- Driving and managing systems and standards that encourage review of all aspects of the business leading to measurable improvement against performance indicators.

***Facilities:***

- Providing fit for purpose office and warehouse accommodation for the organisation on three sites;
- Providing fit for purpose catering and meeting support to the organisation in support of its primary objectives;
- Ensuring that CCEA meets its statutory obligations in relation to Health and Safety, the environment and its people.

***Financial Services:***

- Ensuring CCEA stays within 2% of its allocated funding;
- Implementing robust financial controls;
- Adhering to procurement and other financial legislation and policies;
- Embedding concepts of accountability and value for money;
- Ensuring managers receive timely, relevant financial information and guidance;
- Timely publication of an unqualified Annual Report;
- Timely submission of a costed Operational Plan;
- Timely and error free payment of staff, examiners and suppliers;
- sourcing of adequate investment funding



**ICT Services:**

- Providing and managing the ICT operations and e-services infrastructure – voice and data communications - LAN, intranet and extranet facilities, data capture and storage, data processing, printing;
- Developing and supporting business applications by providing business analysis, systems analysis, process analysis, and programming skills; to deliver transferring, transforming and innovative business solutions;
- Providing a quality ICT Services function by delivering in a continuous improvement environment measured against external assessed standards such as ITIL.

**Multimedia:**

This unit incorporates editorial, copyright, print production and multimedia services.

- Providing consultation, guidance and production services for Curriculum and Examination support materials turning ideas into final products that add value to the teaching and learning process;
- Adding quality to productions by incorporating editorial services that delivers content that is accessible and meets the needs of the intended readers, in plain English;
- Delivering innovation in the way we communicate with our stakeholders by managing the CCEA website and associated web resources, ensuring compliance with international standards;
- Creating software tools and resources that will maximise the impact of educational technology; this includes online examinations and assessment, e-portfolios and web-based learning resources, DVD and printed resources;
- Developing partnerships with external organisations who wish to develop curriculum based resources;
- Researching developments in educational technology in this changing environment to deliver effective decision making and value for money.

**People Services and Equality:**

- Ensuring business units are appropriately resourced;
- Managing the risk of legal challenge regarding employment issues;
- Developing organisational capability: leadership development; skills; performance management; team development; reward and recognition;
- Maintaining CCEA's position as a great place to work (Learning Culture, Health and Safety, Health at Work Programme, People Improvement Plan, Best Practice Policies);
- Developing and improving HR services and, in particular, e-services (including transactional efficiency and on-line delivery) for employees, contracts for services.

## **Education Strategy Directorate**

### ***Curriculum, Assessment and Reporting (CAR):***

- Supporting schools, including the Irish Medium (IM) and Special Educational Needs (SEN) sectors;
- Providing guidance, support and resources for teachers in Northern Ireland in relation to the implementation of the Curriculum arrangements;
- Providing guidance, support, resources and training for teachers in Northern Ireland in relation to the implementation of the Assessment and Reporting arrangements;
- Providing advice to the Department of Education in relation to its Curriculum, Assessment and Reporting policy development.

## **Qualifications Directorate**

### ***ACETS:***

- Providing skills-based, vocationally-related, life-long learning qualifications and endorsed schemes for a range of customers;
- Ensuring that the qualifications offered meet all regulatory requirements and as appropriate sector-skills needs and DE/DEL strategic objectives;
- Striving to develop innovative assessment systems and processes maximising the use of new technologies;
- Delivering high quality customised support to its full range of customers.

### ***Assessment Administration:***

- Processing of Entry Level qualifications;
- Processing of Key Skills;
- Processing of Essential Skills;
- Administration of Online Assessment for Languages (OAL);
- Administration and processing of ACETS qualifications;
- Administration of Key Stage 3 Tests and Key Stage 1 and 2 Statutory Assessment;
- Key Skills;
- Essential Skills.

### ***Distribution:***

- Providing a confidential and non-confidential dispatch service to centres, processing customer orders from CCEA sales catalogue and maintaining the warehouse storage facility in Mallusk.

***Entries Results and Certification:***

- Processing Examination Entries;
- Publishing Base and Standing Data;
- Processing Marks and Awarding outcomes;
- Examinations data processing;
- Printing and issuing Statements of Results;
- Examination Certificates;
- Provision of a past results service.

***Examinations:***

- Managing the accuracy and delivery of GCE and GCSE qualifications across the four main key technical processes:
  - Question paper development;
  - Marking;
  - Moderation;
  - Awarding of grades.

The Unit is also responsible for:

- Specification Development and revision;
- The development of support/guidance materials to accompany specifications;
- Market share growth at both GCE and GCSE;
- Modernisation of examinations related activity.

***Examinations and Assessment Administration:***

- Contracting Examiners and Moderators;
- Provision of invigilators;
- Provision of centre information including Administration Handbook;
- Special Requirements and Special Arrangements;
- Enquiry about Results Services;
- Access to Scripts;
- Meeting Support;
- Centre Inspection Service.

***Exams Processing:***

- Processing GCSE and GCE scripts and marks;
- Processing coursework and coursework adjustments;
- Scheduling visits for moderators and examiners;
- Preparation of coursework and script materials for meetings;
- Arrangements for Agreement Trials and Portfolio Clinics.

***Exams Technical Support:***

- Principally supports the Examinations Unit in delivering accurate Entry Level Qualifications (ELQ), GCE and GCSE awards for each of the key examination cycles that take place each year in November, January, March and June.

The Unit is also responsible for:

- Co-ordinating the technical aspects of specification development and revision;
- Providing technical input to modernisation initiatives;
- Providing, interpreting and quality assuring technical data used in post results activities such as appeals, queries, and enquiries about results;
- Co-ordinating on annual basis and to agreed schedule scrutinies, code monitoring and comparability exercises.

***Qualifications Operations Support:***

- Providing document production, administration, events and meeting support to staff within education-related business units.

***Question Paper Production:***

- Co-ordinating the production and printing of both standard and special version papers and mark schemes and undertaking quality checks to ensure that papers are error free and delivered at the correct time to centres.

***Research and Statistics:***

- Providing high quality statistical analysis, market share information, research and evaluation to ensure independent policy advice to management, accurate awarding of examinations and assessments, and informed management decisions in support of the development of products, markets and services.

## 4. Key Findings of the Audit

During the auditing process a number of potential inequalities and opportunities for better promoting equality and good relations were identified across several of our business units and their functions.

### Curriculum, Assessment and Reporting (CAR)

Description of function	Potential inequality	What is already done	Proposed actions and priorities
Statutory Curriculum: Access to Curriculum	<p>A revised Northern Ireland Curriculum was implemented in schools on a rolling basis from September 2007.</p> <p>Potential inequalities relate to the following:</p> <ul style="list-style-type: none"> <li>• Potential implicit inequalities re the statutory curriculum, e.g. content, learning styles etc;</li> <li>• Issues of access for Special Educational Needs (SEN) pupils – require adaptation;</li> <li>• Access for Irish Medium (IM) pupils – need for adaptation and provision of resources;</li> <li>• Access for Newcomer and Traveller children.</li> </ul>	<p>Ongoing research and consultation in formation of statutory curriculum.</p> <p>Statutory curriculum is designed to be flexible, to include a range of learning approaches and to be adaptable to specific needs of pupils and schools.</p> <p>Severe Learning Difficulties (SLD) pupils can be exempted from curriculum. A range of SEN resources developed by CCEA for Profound and Multiple Learning Difficulties (PMLD), SLD, Moderate Learning Difficulties (MLD) pupils.</p> <p>IM version of Primary Curriculum available. A range of IM resources translated/ adapted/developed by CCEA.</p>	<p>Continue to consider needs and provide guidance for pupils with SEN, including the following:</p> <ul style="list-style-type: none"> <li>• Thinking Skills and Personal Capabilities for SEN;</li> <li>• Emotional and behavioural difficulties;</li> <li>• Hearing and visually impaired;</li> <li>• Access to ICT (assisted devices) for SEN pupils.</li> </ul>

		Research conducted on access to curriculum for English as an Additional Language (EAL)/Newcomer children.	
Curriculum Resources and Support	<p>CCEA produces a range of support and guidance materials for the revised NI Curriculum.</p> <p>Potential inequalities relate to the following:</p> <ul style="list-style-type: none"> <li>• Ensuring that resources do not include implicit bias in terms of Section 75 groups;</li> <li>• Provision of suitably adapted resources for SEN, IM to ensure equality of provision for these groups;</li> <li>• Ensuring enough curricular support materials available in Irish for IM schools supporting both literacy and numeracy.</li> </ul>	<p>All CCEA resources are designed to be flexible and adaptable to needs and to promote a range of active learning strategies.</p> <p>A range of resources are targeted at promoting mutual understanding and diversity.</p> <p>A range of SEN resources developed by CCEA for PMLD, SLD, MLD pupils.</p> <p>Provision of guidance for Gifted and talented pupils.</p> <p>A wide range of support materials produced by CCEA in English have been translated and adapted for IM schools. A number of bespoke IM materials have been developed.</p>	<p>Continue to provide guidance and resources for pupils with SEN.</p> <p>IM support programme to continue work in partnership with IM sector to identify needs and priorities in IM sector and to produce support materials accordingly. There will be an emphasis on bespoke resources as well as online interactive resources.</p>

<p>Statutory Assessment/ Accreditation</p>	<p>Schools are required to assess and report annually pupils' progress in the areas of learning, the cross-curricular skills and the thinking skills and personal capabilities.</p> <p>Potential inequalities relate to the following:</p> <ul style="list-style-type: none"> <li>• Inequality of performance, e.g. according to gender, social-economic background, religion;</li> <li>• Access and equivalent provision for pupils with SEN;</li> <li>• Equivalent provision for pupils educated through IM.</li> </ul>	<p>Introduction of teacher assessment and classroom-based assessment activities will permit flexibility of provision.</p> <p>Pupils with SLD are exempt from statutory assessment. Other pupils may have specific exemptions if stated.</p> <p>Development of non-statutory assessment guidance and frameworks for pupils with SLD and PMLD.</p> <p>Access for pupils with MLD to assessment tasks and exemplification of work. Trialling of tasks and population of exemplification database underway.</p> <p>Concurrent development of assessment in IM. Assessment materials provided and adapted for IM pupils.</p>	<p>New assessment arrangements to be introduced in 2012/13.</p> <p>Evaluation of work to date to inform ongoing developments re assessment for SEN, including:</p> <ul style="list-style-type: none"> <li>• Thinking Skills and Personal Capabilities Frameworks;</li> <li>• Framework for assessment of Using ICT;</li> <li>• Foundation Stage/SEN SLD and MLD: provision of Non Statutory Guidance;</li> </ul> <p>Continued concurrent development of assessment for IM.</p>
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<p>Statutory Computer-based Assessment</p>	<p>All pupils in Years 4-7 are required to be assessed using a designated computer-based method in the autumn term of each year.</p> <p>Potential inequalities relate to the following:</p> <ul style="list-style-type: none"> <li>• Pupils with Special Educational Needs (SEN);</li> <li>• Irish Medium.</li> </ul>	<p>SLD pupils are exempt from assessment.</p> <p>In depth research and evaluation conducted with teachers of pupils with specific categories of SEN. Modes of research included 'face-to-face' focus groups and online questionnaires.</p> <p>Provision of all assessments in Irish with the exception of the optional Developed Ability module.</p> <p>SEN and IM included in specification for replacement tool from 2012.</p>	<p>Consideration to be given to the recommendations in the report produced by CCEA Research and Statistics Unit 'Evaluation of the manageability of InCAS for pupils with a Special Educational Need' January 2011.</p> <p>Consideration to be given to providing Developed Ability assessment in Irish Medium in the future.</p> <p>Ensure access for SEN and IM pupils in replacement tool from 2012.</p>
<p>Irish Medium Qualifications Support</p>	<p>CCEA provides IM versions of qualifications, translating examination papers, scripts and resources as required.</p> <p>Potential inequalities relate to the following:</p> <ul style="list-style-type: none"> <li>• Ensuring adequate number of textbooks available in Irish supporting qualifications, particularly at GCSE, disadvantage IM</li> </ul>	<p>4 textbooks and 2 workbooks have been translated into Irish. A range of various materials supporting KS3 and GCSE has been translated into Irish.</p> <p>Regular monthly meetings have been established between Coláiste Feirste to discuss and resolve issues.</p>	<p>Statement of User Requirements to be drawn up between Coláiste Feirste and CCEA in order to identify needs and priorities with a view to agreeing a full agreed costed programme of support.</p> <p>CCEA's Qualifications Directorate to endeavour to recruit full complement of IM examiners in order to eliminate translating scripts into English.</p>



	<p>pupils;</p> <ul style="list-style-type: none"><li>• Ensuring no disadvantage for IM pupils when exam scripts translated into English for marking.</li></ul>		
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## Qualification and Skills Accreditation

Description of function	Potential inequality	Proposed actions and priorities
Qualifications development	We consult with key stakeholders where we intend to develop criteria for new qualification(s) or where there is to be a review of existing qualification(s). Consultation will include an equality/access dimension. In consultation there is a potential for imbalance, for example in the sample selected- this could be with the type(s) of schools involved. With the recent review of Occupational Studies a potential for gender imbalance was signalled to us by some schools.	<ul style="list-style-type: none"> <li>▪ Access/equality issues included within consultation and in any recommendation(s) to awarding organisations about specification development.</li> <li>▪ Comprehensive and informed communication with centres about any piloting/development work being undertaken</li> <li>▪ Matrix approach used in consultation to ensure feedback about pilot/development proposals is balanced and fair.</li> </ul>
European Qualifications framework (EQF)	Work is currently being undertaken by CCEA to support Northern Ireland's contribution to UK response to EQF developments. One aspect of the implementation is around the adoption of European policy on the inclusion of EQF levels on learner certificates. If this measure were not to be adopted across the board with awarding organisations it could lead to inequality in relation to mobility within EU member states.	Engagement of all awarding organisations in consultation has been promoted and a communication plan and common activities developed to ensure opportunity for participation of all awarding bodies in EQF development work.

## ACETS

Description of function	Potential inequality	Proposed actions and priorities
Development, accreditation and delivery of vocational and skills-based qualifications.	Perceived lack of appropriate qualifications provision for SEN sector.	Following informal feedback from SEN schools CCEA Awarding Body set up a sector advisory group to identify appropriate provision. On the recommendation of the group CCEA consulted with the sector during 2010. CCEA's response to the findings of the consultation is due to be identified during early Spring 2011 and it is anticipated that CCEA will publish these during late Spring/early summer 2011.

## MarComms

Description of function	Potential inequality	Proposed actions and priorities
Communications	CCEA's current Communications Policy does not include a section on equality.	Policy is currently under review.
	CCEA news releases are not available in Irish/Ulster Scots.	Review capacity and resources available to deliver this service and develop appropriate plan of action.

## Examinations

Description of function	Potential inequality		Proposed actions and priorities
	What is already done	Potential improvements	
<b>Specification Development</b>	As part of the development process of the revised GCE and GCSE specifications, an equality panel was established to review the specifications. The purpose was to identify potential barriers to learners within the specifications and accessibility issues. Issues raised by the panel were logged and given due consideration by relevant subject officer.	No retrospective review on the presence of inequalities was conducted on the developed GCE specifications after the full award of the qualification in summer 2010. The GCSE specifications developed for first teaching September 2009 will also be fully awarded in summer 2011. A post development evaluation of the specifications in terms of fair access and equality should be implemented. This would inform CCEA as to the effectiveness and success of its measures during the development stage to address inequalities.	This evaluation should be conducted when the full two year cycle of the new GCSE specifications draws to a close.

<p><b>Entitlement Framework</b></p>	<p>Market research conducted in June 2010 on ability of existing qualifications to meet the needs of learners. New qualifications were proposed on the strength of this. Development is currently underway.</p>	<p>The specifications developed will be subject to the same process regarding the assurance of equality and fair access as those previously developed in 2008-2010.</p>	<p>As above</p>
<p><b>Question Paper Writing</b></p>	<p>Fair Access by Design document was produced by the regulatory authorities in 2005, updated in 2010.</p>	<p>No audit is carried out to ensure that this document is mediated to new examiners or forms part of training for examining teams. A presentation outlining the regulatory guidelines is available in the Examinations Unit but does not form part of a formal training pack either for new subject officers or examining teams.</p>	<p>The presentation on the Fair Access by Design document will be incorporated into a QPP training pack for subject officers and examining teams, especially new examiners.</p>

<b>QPP documentation</b>	QPP reports completed by senior examiners and revisers are designed to ensure that examining teams create papers which meet the requirements of the specification and are accessible in language used.	The reports do not, at present, make specific reference to equality issues in the question papers.	This should be redressed in order to ensure that issues of equality have been considered in the development of question papers. All documentation will be amended to reflect the guidelines set out in the Fair Access by Design document published by Ofqual.
<b>Quality of live question papers</b>	Question Paper comment log. This logs teachers' concerns regarding the question paper sat by their candidates. The information it captures may be relevant to accessibility and equality issues on question papers.	No formal tabling of the QPP comments log at Question Paper Evaluation Committee (QPEC) meetings. Such a move would provide information to the QPEC on previous issues around previous papers and help inform future question development.	To be included on QPEC agendas in future.

<p><b>Support Events and materials for teachers/pupils</b></p>	<p>CCEA support events are free of charge so there is no inequality on grounds of ability to pay. For larger entry subjects CCEA events are located over a wide geographical spread so there is equality of opportunity on the grounds of geographical accessibility. For those teachers unable to attend events, centre visits are also available. CCEA support materials are also provided free of charge.</p>	<p>Whilst no issues on CCEA's support materials and events have been identified to date, a formal set of guidelines around same is recommended to ensure equality in this area.</p>	<p>Guidelines/procedures on equality in the development and provision of support need to be established</p>
<p><b>Ensuring Specifications and accompanying support material are engaging learners of all socio- economic backgrounds, genders and ethnicity</b></p>	<p>Work to date has concentrated on ensuring provision for and inclusion of disability groups in specification development.</p>	<p>The evaluation of the revised specifications and accompanying support material should address in part their effectiveness in the inclusion of socio - economic groups ethnic groups and genders.</p>	<p>Research to be conducted on this issue with the conclusion of the full two year cycle of the GCSE specifications. Research should also be conducted on how inclusive the support material provided by CCEA is for learners.</p>

<b>Marking of scripts in Irish Medium</b>	The Examinations Unit has placed priority on contracting Irish Medium examiners. There are measures in place to engage Irish Medium examiners: for example, advertising in Irish publications, approaching all secondary schools in the Republic of Ireland, attendance at a major Irish Medium conference in March 2011.	The examinations unit recognises the need to continue to endeavour to contract the full complement of Irish Medium examiners.	Continue to proactively engage Irish Medium examiners.
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## People Services and Equality

*Proposed actions and priorities are taking into account DE guidelines.*

Description of function	Potential inequality	Proposed actions and priorities
Recruitment	Posts are not advertised to enable flexible working arrangements.	To be considered at business case level.
Contracts	Vacancy control was introduced to protect existing employees during the implementation of the Review of Public Administration (RPA). However, due to changing timeframes and Fixed Term Contract (FTC) regulations, there is a potential inequality regarding existing staff.	Ongoing analysis of data and consideration of a review of relevant policies.
Reward	Potential inconsistencies regarding Performance Related Pay (PRP)/bonus payments for specialist and other posts.	Analyse data and consider a review of relevant policies.
Reward	Different timescale to progress within pay scales.	Analyse data and consider a review of relevant policies.
Reward	Potential inconsistencies regarding person to holder arrangements.	Analyse data and consider a review of relevant policies.
Contract for Services	Contract for services providers are currently not monitored.	All contract for service providers to be monitored.
Contract for Services	Potentially inconsistent processes for differing types of contract for services providers.	Review current processes and need for centralised appointment unit.

## **5. Structure of the Action Plan**

The Action Plan is focussed on functional areas, as this is the way we propose to promote equality of opportunity and good relations (Appendix 1).

During the audit, there were a number of potential inequalities highlighted. For each functional area, key potential inequalities are summarised followed by the proposed actions, intended outcomes, performance indicators and timelines. Responsibility for delivery lies with the respective Director and Business Manager.

## **6. Monitoring and Review of the Action Plan**

CCEA's Equality Team will monitor and review the Action Plan on a quarterly basis with the relevant business manager/representative. In addition, an annual report will provide an update on the progress we have made. This will form part of our Annual Review on Progress on Section 75 implementation to the Equality Commission and will be published on the CCEA website.

Collating information on progress will allow us to review our initial Action Plan. Taking account of any new developments, we will then decide whether we need to make any adjustments to our plan.

The Executive's budget decision may have an impact on our Action Plan.

## Draft Action Plan 2011-2013

### Curriculum, Assessment and Reporting (CAR) Business Unit

The work of the CAR Unit is dependent upon the following:

- Department of Education (DE) formulation of policy and legislation in relation to curriculum, assessment and reporting;
- DE approval of annual costed work programmes and associated business cases;
- Funding from DE.

The actions and timescales contained within the following action plan for CAR are therefore subject to all necessary approvals.

	Action Point	Intended Outcome	Performance Indicator	Timescales
1	<p><b>Statutory Curriculum: Access</b></p> <p>Continue to consider needs and provide guidance for pupils with SEN, including the following:</p> <ul style="list-style-type: none"> <li>• Thinking Skills and Personal Capabilities for SEN;</li> <li>• Emotional and behavioural difficulties;</li> <li>• Hearing and visually impaired;</li> <li>• Access to ICT (assisted devices) for SEN pupils.</li> </ul>	<p>All pupils have equality of access to NI Curriculum.</p> <p>Suitable guidance is provided for teachers of pupils with specific needs.</p>	<p>Evaluation of guidance indicates sector approval.</p>	<p>Ongoing</p>

<p>2</p>	<p><b>Curriculum Resources and Support</b></p> <p>Continue to provide guidance and resources for pupils with SEN.</p> <p>Irish Medium (IM) support programme to continue work in partnership with IM sector to identify needs and priorities in IM sector and to produce support materials accordingly. There will be an emphasis on bespoke resources as well as online interactive resources.</p>	<p>SEN sector has range of suitable resources available to support curriculum.</p> <p>IM sector has range of suitable resources available to support statutory curriculum.</p>	<p>Materials and resources are provided in hard copy and/or online. Evaluation demonstrates sector approval.</p> <p>Materials and resources are provided in hard copy and/or online. Evaluation demonstrates sector approval.</p>	<p>Ongoing</p> <p>Ongoing</p>
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<p>3</p>	<p><b>Statutory Assessment/ Accreditation</b></p> <p>New assessment arrangements to be introduced 2012/13.</p> <p>Evaluation of work to date to inform ongoing developments re assessment for SEN, including:</p> <ul style="list-style-type: none"> <li>• Thinking Skills and Personal Capabilities Frameworks;</li> <li>• Framework for assessment of Using ICT;</li> <li>• Foundation Stage/SEN SLD and MLD: provision of Non Statutory Guidance.</li> </ul> <p>Continued concurrent development of assessment for IM.</p>	<p>New assessment arrangements, to be introduced 2012/13, provide equality of access and outcomes.</p> <p>Statutory assessment guidance and resources include MLD materials.</p> <p>Non-statutory assessment guidance is provided for pupils with SEN (SLD etc) to ensure continuity and consistency with mainstream.</p> <p>Statutory assessment guidance and resources include materials for IM pupils.</p>	<p>End of key stage data.</p> <p>Materials and resources are provided in hard copy and/or online in time for introduction of new arrangements.</p> <p>Materials and resources are provided in hard copy and/or online in time for introduction of new arrangements.</p> <p>Materials and resources are provided in hard copy and/or online in time for introduction of new arrangements.</p>	<p>June 2013 and following</p> <p>September 2012 and ongoing</p> <p>September 2012 and ongoing</p> <p>September 2012 and ongoing</p>
<p>4</p>	<p><b>Statutory Computer- based Assessment</b></p> <p>Consideration to be given to the recommendations in the report produced by CCEA Research and Statistics Unit 'Evaluation of the manageability of InCAS for pupils with a Special Educational Need' January 2011.</p>	<p>New assessment tool includes provision and adaptation for pupils with SEN.</p>	<p>Evaluation indicates new assessment tool successfully implemented, including provision and adaptation for pupils with SEN.</p>	<p>December 2012</p>

**Appendix 1**

	<p>Consideration to be given to providing Developed Ability assessment in Irish Medium in the future.</p>	<p>New assessment tool includes IM literacy and numeracy assessments.</p>	<p>Evaluation indicates new assessment tool successfully implemented, including provision for IM pupils.</p>	<p>December 2012</p>
5	<p><b>Irish Medium Qualifications Support</b></p> <p>Statement of User Requirements to be drawn up between Colaiste Feirste and CCEA in order to identify needs and priorities with a view to agreeing a full agreed costed programme of support.</p> <p>CCEA's Qualifications Directorate to endeavour to contract full complement of IM examiners in order to eliminate translating scripts into English.</p>	<p>IM post-primary school has sufficient resources to support qualifications.</p> <p>No IM scripts require translation into English for marking process.</p>	<p>SOUR agreed by Colaiste Feirste and CCEA. Costed work programme agreed by DE. Resources produced for priority areas.</p> <p>At least 1 expert examiner with Irish Medium for every subject.</p>	<p>Initially March 2012 for priority areas.</p>

## Examinations Business Unit

	<b>Action Point</b>	<b>Intended Outcome</b>	<b>Performance Indicator</b>	<b>Timescale</b>
1	Fair Access by Design (FabyD) document to be incorporated into formal training pack for new examiners/officers. Audit kept of this.	All personnel involved in specification development and QPP would have training in FabyD to fulfil regulatory requirements.	All personnel aware of FabyD and incorporating its guidelines into work produced. Audit will enable CCEA to monitor implementation of same.	Dec 2011
2	FabyD not referred to in QPP documentation. QPP documentation to change to reflect FabyD.	All examining teams to record that this document has been considered when developing question papers. To be part of the checklist on QPP forms.	All examining teams aware of FabyD and incorporating its guidelines into question papers produced. Ensures quality question papers for learners.	Dec 2011
3	Evaluation of processes to be conducted to ensure equality in specification development. CCEA has included disability groups as part of equality review in specification development but some additional measures need put in place which reflect educational research on how qualifications can be more inclusive on the basis of, for example, gender or socio economic grounds.	To provide reassurance to CCEA that its measures to ensure equality in specification development are fit for purpose, that CCEA specifications are inclusive and enable all learners to fulfil their potential.	The evaluation informs CCEA on how the revised specifications have impacted on all learners and if issues around inclusion are identified.	Sept 2011- Dec 2011
4	Procedure in place on production of support materials and events to ensure equality of access and opportunity for all teachers and learners.	CCEA's procedures around development and accessibility of support ensure the organisation is above reproach in equality of access and opportunity.	Teachers/parents and learners are satisfied that no candidate has an advantage over another in the support available to them.	Dec 2011



## Appendix 1

5	QPP documentation changed to incorporate Comments on Question Paper log.	CCEA will ensure that the comments made on Question Papers in respect of accessibility in previous series are carried forward to inform the next series.	The number of Question Paper comments in respect of accessibility will diminish.	Dec 2011
6	Contracting of Irish Medium examiners.	Full complement of number of Irish Medium examiners to mark all Irish Medium scripts in the original medium of Irish.	At least one expert examiner with Irish Medium for every subject.	On-going

### MarComms Business Unit

	<b>Action Point</b>	<b>Intended Outcome</b>	<b>Performance Indicator</b>	<b>Timescale</b>
1	Insert duties on equality into CCEA Communications Policy.	Demonstrable commitment to equality issues in CCEA internal and external communications.	Reviewed CCEA Communications Policy agreed by TMT.	April 2011
2	Identify if resources are available to produce at least some news releases in Irish/Ulster Scots.	A more inclusive CCEA communications strategy.	Review and findings presented to Director of Corporate Services.	June 2011

## Qualifications and Skills Accreditation (QSA)

	<b>Action Point</b>	<b>Intended Outcome</b>	<b>Performance Indicator</b>	<b>Timescale</b>
1	Qualification development and advice.	Equality of opportunity for participation in Pilot work.	QSA - Evaluation of pilot participation (Comment to be added by CCEA R&S).	On-going for a variety of pilot and projects during 2011/12
2	European Qualifications Framework (EQF).	Equality of opportunity for Awarding Bodies to participate in using EQF level on certificates.	Project outcome to review awarding body participation.	March 2012
3	Participation of Irish medium schools in Foundation Learning Tier (FLT) project.	Provision of FLT Qualifications and Credit Framework (QCF) units to be available in Irish Medium (TBA).	Evaluation of project.	Interim report May 2012 and final report Sept 2013

## ACETS Business Unit

	<b>Action Point</b>	<b>Intended Outcome</b>	<b>Performance Indicator</b>	<b>Timescale</b>
1	Address perceived lack of appropriate qualifications provision for SEN sector.	Identify, develop and offer appropriate provision.	The ACETS team will identify, develop and offer appropriate provision in light of the recommendations of its Council.	It is anticipated that recommendations will be formulated during early Spring 2011. The timescale for the development of future provision will then be determined.

**People Services and Equality**  
**Actions take account of DE guidelines.**

	Action Point	Intended Outcome	Performance Indicator	Timescale
<b>Overall analysis of internal workforce</b>				
1.	Not all Section 75 data monitored at present.	To analyse on a regular basis Section 75 data across the organisation to identify any potential equalities	Monitoring and analysis of Section 75 data for existing workforce. The analysis to include equality groups by grade, access to part-time working, access to learning and development etc.	August 2012
<b>Recruitment</b>				
2.	The majority of posts are advertised on a full time basis, potentially limiting the inclusion of some groups.	To attract a wide pool of applicants. The potential for each post to be advertised on a flexible basis to be considered at business case level.	Monitoring of recruitment data.	August 2012
3.	Posts are advertised internally firstly before external advertising, potentially limiting the inclusion of some groups in the initial recruitment pool.	To attract a representative pool of applicants for all vacancies.	Monitoring of recruitment data and review of relevant policies. Noting current limitations regarding vacancy control.	August 2012
<b>Contracts</b>				
4.	Vacancy control and the Fixed Term Contract regulations regulations will potentially lead to differing treatment of staff on FTCs with and without substantive posts.	Fair management of all fixed term contracts within legal guidelines.	Analyse data and consider a review of relevant policies.	Ongoing

## Appendix 1

<b>Reward</b>				
5.	Potential inconsistencies regarding PRP and bonus payments.	Fair management of PRP and bonus payments.	Analyse data and consider a review of relevant policies. This will include a consideration of the need for an equal pay audit.	August 2013
6.	Different timescale to progress within pay scales (i.e. some pay bands are longer than others)	Review to confirm if time to progress within pay scales leads to any issues regarding equality.	Analyse data and consider a review of relevant policies. This will include a consideration of the need for an equal pay audit.	August 2013
7.	Potential inconsistencies regarding person to holder arrangements	Review to confirm if person to holder arrangements lead to any issues regarding equality.	Analyse data and consider a review of relevant policies. This will include a consideration of the need for an equal pay audit.	August 2013
<b>Contract for Services</b>				
8.	No monitoring or equality data regarding contract for services providers.	To attract and engage a diverse range of contract for services providers.	Commence monitoring. Analysis of data and consider review of relevant policies.	August 2012
9.	Potentially inconsistent processes.	Fair and consistent processes.	Review of current processes and identify best practice and inconsistencies. Review need for centralised contracting unit.	August 2012

## Consultation Response Pro forma

### Equality Action Plan

You may wish to use this pro forma as a focus for your response on our Action Plan, or if you prefer, we would also welcome your comments on any specific area or more general areas by post, email (detailed below) or phone. We will also be happy to meet with you in person.

**By post:** Equality Team  
 People Services and Equality  
 CCEA  
 29 Clarendon Road  
 Clarendon Dock  
 Belfast  
 BT1 3BG

**By email:** equalityteam@ccea.org.uk

**By phone:** 028 90261200 ext 2687 or 2700

Please note that CCEA will, under the Freedom of Information Act (2000), make public any responses received. Summary responses will be published. In limited circumstances we will consider requests for confidentiality but this cannot be guaranteed.

So that we can acknowledge receipt of your comments, please fill in your name and address or that of your organisation. You may withhold this information if you wish, but we will not be able to acknowledge receipt of your comments.

<b>Name:</b>	
<b>Position:</b>	
<b>Organisation:</b>	
<b>Address:</b>	


**I am responding (please tick):**

- As an individual
- On behalf of an organisation

**Are there any actions not identified in the Action Plan which you feel should be included? If so, please outline these and advise why you feel they should be included.**



**Are there any actions identified in the Action Plan which you feel should not be included? If so, please outline these and advise why you feel they should not be included.**



Please add here any general comments you wish to make.

If you prefer a different method of consultation please indicate your preference below:

Face to face

Written

Other

Thank you for completing this consultation pro forma.

## List of Abbreviations

<b>Abbreviation</b>	<b>Meaning</b>
<b>AB</b>	Awarding Body
<b>DE</b>	Department of Education
<b>EAL</b>	English as an additional language
<b>EQF</b>	European Qualifications Framework
<b>EU</b>	European Union
<b>FabyD</b>	Fair Access by Design
<b>FLT</b>	Foundation Learning Tier
<b>FTC</b>	Fixed Term Contract
<b>ICT</b>	Information and Communications Technology
<b>IM</b>	Irish Medium
<b>InCAS</b>	Interactive Computerised Assessment System
<b>ITIL</b>	Information Technology Infrastructure Library
<b>MLD</b>	Moderate learning difficulties
<b>LAN</b>	Local Area Network
<b>PMLD</b>	Profound and multiple learning difficulties
<b>QCF</b>	Qualifications and Credit Framework
<b>QP</b>	Question Paper
<b>QPEC</b>	Question Paper Evaluation Committee
<b>QPP</b>	Question Paper Production
<b>RPA</b>	Review of Public Administration
<b>SEN</b>	Special Educational Needs
<b>SLD</b>	Severe learning difficulties
<b>SOUR</b>	Statement of User Requirements
<b>TMT</b>	Top Management Team