



Department
for Education

Consultation Response Form

Consultation closing date: 11 October 2013
Your comments must reach us by that date

**Primary assessment and accountability
under the new national curriculum**

If you would prefer to respond online to this consultation please use the following link: www.education.gov.uk/consultation/

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.	<input type="checkbox"/>
Reason for confidentiality:	

Name: Alayne Öztürk	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): United Kingdom Literacy Association (UKLA)	
Address: University of Leicester, University Road, Leicester LE1 7RH.	

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the department's ['Contact Us'](#) page.

Please mark the box below that best describes you as a respondent.

<input type="checkbox"/> Primary school head teacher	<input type="checkbox"/> Primary school teacher	<input type="checkbox"/> Secondary school head teacher
<input type="checkbox"/> Secondary school teacher	<input type="checkbox"/> Other education professional	<input type="checkbox"/> Local authority
<input type="checkbox"/> Governor	<input type="checkbox"/> Parent / carer	<input checked="" type="checkbox"/> Professional association
<input type="checkbox"/> Pupils	<input type="checkbox"/> Other	

Please Specify:

United Kingdom Literacy Association (UKLA).

Teacher assessment and reporting to parents

1 Will these principles underpin an effective curriculum and assessment system?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

The principles assume that the National Curriculum (NC) in place contains a comprehensive set of end of key stage expectations against which children's progress can be assessed. There are several major problems:

- Assessment and curriculum are inextricably interlinked, so assessment and curriculum issues should be looked at together.
- The question is founded on the premise that there will be an effective curriculum. Responses to the proposed NC framework from various subject associations indicate that this is not likely to be the case.
- There is no indication of which elements of the NC would count as 'the end of key stage expectations' and no rationale for selection of specific elements.
- As the DfE makes clear, the NC is only a part of the broader school curriculum. Thus, end of key stage expectations are limited to a selection from the NC which is only a strand in the school curriculum. This will mean a reduction of aspects of learning from the overall school curriculum and a variable set of expectations from school to school.
- The NC does not enable, encourage or value important affective aspects of learning (engagement, motivation to learn, for example), nor understanding of ways of learning in a wide range of curricular areas. Indeed it will limit teaching innovation and effectiveness.
- The NC reflects a view of learning as based on discrete knowledge. The NC is likely to lower standards by undermining innovation and engagement, simply focusing on a reductive approach to knowledge transfer rather than engaged learning.
- The principles and rationale do not reflect the recommendations as a whole from the report by Lord Bew which stated: 'We would like to see a greater emphasis on teacher assessment within statutory assessment' (p.9). Lord Bew's report sees teacher assessment as being central to summative assessment. These principles sideline teacher assessment to formative purposes only.
- If schools are to develop their own assessment and tracking systems, it is not clear how clear comparisons of progress between schools will be made within key stages for accountability purposes.
- The commensurability of standards will be an issue. There needs to be a rigorous mechanism put in place for this.
- The proposed assessments/tests are not to be tiered, but claim to be equally challenging for all children. What will this mean for the lower ability child, or for those children for whom English is an additional language (EAL)? Will they be offered additional support?

The recent OECD report *Synergies for Better Learning: an international perspective on evaluation and assessment (2013)* sets out policy directions which are relevant here. Derived from reviews of assessment and evaluation practice in OECD countries, including the most highly performing jurisdictions, the report includes the following key points of relevance:

- Integrating student assessment and school evaluation in a single framework which 'articulates ways to achieve coherence between its different components.
- Using measures of performance that are broad enough to capture the whole range of student learning objectives.

The current proposals do not adequately reflect these criteria.

2 a) What other good examples of assessment practice we can share more widely?

Comments:

Without knowledge of what data will count under the new accountability arrangements it is difficult to cite good examples of effective assessment practice. It is important to learn from history, what worked well and what did not.

With that caveat the following examples could be considered:

The current Foundation Stage profile is the basis upon which a national system of ongoing assessment could be built. It is comprehensive and, crucially, based on close observations over time, rather than a snapshot of one moment in time. However, it is important that such assessments should not be too onerous.

The approach outlined in the book *Creating Learning without Limits (2012)* by Swann, Peacock, Hart and Drummond and practically carried out by The Wroxham School, Potters Bar.

The CLPE Reading and Writing scale.

2 b) Is there additional support we can provide for schools?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

A nationally recommended process for tracking pupil progress is needed. The abolition of levels and their non-replacement puts schools in a very difficult position. Because there will be no way of making national comparisons, schools will find it difficult to know whether they are on track to meet Ofsted progress measures, and Ofsted inspection time will be taken up in discussions around the tracking processes used by the school, their accuracy and their effectiveness. This will detract from Ofsted inspection of teaching and learning. A national system would prevent all this uncertainty and could be developed in partnership with teacher associations, educational experts, Ofsted and government.

The DfE supported the development of Expert Groups (by the then Teaching Agency) to support the implementation of the new NC in the different subject areas, drawing on the expertise of the subject associations and CPRT amongst others. We would recommend the setting up of an assessment expert group to develop guidance in this area.

National curriculum tests in English, mathematics and science**3 Does a scaled score, decile ranking and value-added measure provide useful information from national curriculum tests?**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

UKLA would like some clarity about the terms used in this document: *assessment*, *test* and *check* are used. There are also many unanswered questions, such as: What is the purpose of this question? What evidence is there that the proposed measures are effective? Will this be useful information and, if so, for whom?

The rationale for these proposals is unconvincing and there is no evidence that they would lead to higher standards or that any high performing jurisdictions have similar systems. In addition, the lack of information about the new tests: how they will be constructed, administered and the criteria by which they will be marked, means that it is impossible to give an informed response to this question.

However, it should be noted that the suggestion to use deciles is particularly problematic and unnecessary. Scores will inevitably cluster around the mean and the differences between deciles will be a matter of a point or two. This will give no useful data about pupils' capabilities compared with their peers and will be particularly damaging to motivation and engagement of pupils as they transfer to secondary school.

Mathematically, at the macro level, the information would not be helpful. If the aim is to have 85% of children 'secondary ready', where do the deciles fit in? What will it

achieve? How will it improve anything?

What happens to the 15% not 'secondary ready'?

Before implementing scaled scores and decile ranking, the impact upon teaching and learning must be considered. At the very least a pilot study should be conducted and extensively monitored, particularly the effect upon children's motivation to learn and their self-esteem.

UKLA is concerned about the potential negative effect of labelling children in the lower decile that would ensue. Research is very clear that this has a negative effect on attainment (Hall et al., 2004; Hart et al., 2004; Reay, 2006 and Reay & Wiliam, 1999). This is likely to result in damaging outcomes for children, which employers will not like. How will Tom (cited in the case study 4.13) get a C at GCSE?

Hall, K., Collins, J., Benjamin, S., Nind, M. & Sheehy, K. (2004) SATurated models of pupildom: assessment and inclusion/exclusion. *British Educational Research Journal*, Vol 30, 6: 801-818.

Hart, S. Dixon, A, Drummond MJ & McIntyre, D. (2004) *Learning Without Limits*, Maidenhead: Open University Press.

Reay, D. (2006) 'I'm not seen as one of the clever children': consulting primary school pupils about the social conditions of learning. *Educational Review*, Vol 58, 2:171-181.

Reay, D. & Wiliam, D. (1999) 'I'll be a nothing': structure, agency and the construction of identity through assessment. *British Educational Research Journal*, Vol 25, 3: 343-354.

There is also cause for concern about the way the information about deciles will be reported in the national media. Will we have horror stories in the press that only 10% of pupils get into the highest decile, alongside recommendations that teachers are failing to get more pupils into the top deciles? The adoption of deciles would feed into inaccurate and misleading 'reportage' by the least responsible press.

Baselines to measure progress

4 Should we continue to measure progress from the end of key stage 1, using internally-marked national curriculum tests?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

The current tests inform overall teacher assessment and are externally moderated. This system should remain and is in line with Lord Bew's recommendations regarding teacher assessment as part of statutory assessment.

With the abolition of levels, the KS1 tests that inform teacher assessment will inevitably change. However the current process which results in well informed and moderated assessments which can be used for both formative and summative purposes should remain.

5 If end of key stage 1 national curriculum test results are used as the baseline to measure progress, should school-level results be published?

Yes

No

Not Sure

Comments:

The arguments for not publishing this data still stand. Such a practice labels children, and particularly disadvantages children with SEN and EAL.

6 Should we introduce a baseline check at the start of reception?

Yes

No

Not Sure

Comments:

There is already a revised Foundation Stage Profile in place which provides a range of evidence about children's attainment through the whole of the Foundation Stage. The introduction of a new 'check' implies that the EYFS profile could become non statutory, therefore diminishing the status of the Nursery and pre-school EYFS curriculum. The nature of such a check should be made clear by the DfE. Is the proposed check a form of ability screening / cognitive test? If so, the DfE should justify its adoption and explain who would benefit from such a test.

The beginning of Reception is a strange time to 'check' as it is not at the end of a period of learning.

The word 'check' is not defined and should be made explicit before any judgement can be made. 'Check' implies, quick, easy and narrow. It is crucial that judgements of children are not made on such a basis. It would be unfair and inaccurate. Assessing children immediately they enter a new environment can be problematic: confident children for whom the classroom has many links with their home life can appear 'bright'. Less confident children where those links are not so strong do not show what they can do quite as readily and can then be labelled as 'lower ability'. An early assessment is also likely to discriminate against younger children and pupils who are at an early stage of acquiring English. In addition, there would need to be other baseline checks for children entering school at different times.

At the very least any baseline assessment should be based on observations made over time and later on during the Reception year.

A very narrow baseline check, dealing principally with literacy and numeracy, which then forms part of the accountability process is likely to have negative consequences on the curriculum – 'teaching to the check'.

In addition the use of the information generated by the check is not clear in the documentation. What judgements would be made? How would the information be used over time? No decision should be made until these details are made available for discussion and response.

There is a flawed assumption that any base level assessment can reliably capture future attainment. Children are not pre-programmed to develop in necessarily consistent and predictable ways; on the contrary, individual development can vary in pace and extent, particularly in the early years. Low scores based on a single Reception baseline test could all too easily lead to depressed expectations and determine children's futures based on unreliable information. If the new EYFS profile is not judged to be rigorous enough it is not logical to think that, for example, IQ cognitive style tests are more reliable than sustained professional observation over time.

If a Reception baseline check is implemented from September 2015 it will provide

measures for Y6 in May 2022. Will schools be tempted to start drawing progress comparisons year on year before then? It is a long term slow burn option for school accountability. There is scant evidence that other countries test their 5 year olds in this way. What evidence is DfE drawing on to show that such an approach helps or hinders children's progress? If there is no evidence for such an approach aiding attainment, it should not be considered.

What plans are in place for advice to be given to teachers / families to show them how to help those children who achieve a low score at baseline?

7 Should we allow schools to choose from a range of commercially-available assessments?

Yes No Not Sure

Comments:

The real question here should be: How can we make sure that assessments are valid, reliable and comparable? The quality assurance of commercially available systems would be crucially important and comparability across each separate set of assessments assured. This is likely to be a time consuming and expensive process.

Before the EYFS was introduced, baseline assessments proliferated and there was little if any commensurability of standards. Does the DfE want this to become the situation again?

Assessments should not be publisher-led. It is essential that there are quality assurance procedures in place, to ensure that assessment does not become market-force led.

8 Should we make the baseline check optional?

Yes No Not Sure

Comments:

It is impossible to make an informed comment as we have not seen it!

We already have a baseline assessment system so there is no need to introduce a new one.

A further point here is about definitions. What is meant by 'check' as distinct from 'assessment'?

Accountability

9 Do you have any comments about these proposals for the Department's floor standards?

Comments:

- DfE need to take into account 'slippage' in performance over the summer holidays.
- There is an assumption that the standards are right.
- The *'current system of levels will be removed and not replaced'*. The DfE rationale is the recommendation of the Expert Panel. This action appears unrelated to the original rationale and in fact runs counter to it. The Expert Panel were concerned about low expectations, ranking and limited aspiration. These recommendations do nothing to change this, indeed could exacerbate the problem.
- *'We believe that the single most important outcome that any primary school should strive to achieve is making sure as many of its pupils as possible are 'secondary ready' by the time they leave'*. There is an overriding assumption that the sole purpose of primary education is to make children 'secondary ready'. What is meant by 'secondary ready'? The tests for 11 year olds will only look at a small number of aspects of mathematics and English. This is a very narrow definition of what it means to be 'secondary ready' even if that could be argued to be an aim for primary education. It implies that the only task of primary schools is to prepare children for secondary school. Such a view is reductive and will lead to a lowering of standards. The aims of the Cambridge Primary Review give a much more balanced view and, importantly, one which would lead to higher educational standards.
- The narrowness of the focus for testing will not be sufficient to determine whether a pupil is 'secondary ready' however that might be defined. It will tell secondary schools little about performance in other aspects of English and mathematics, nothing about performance in other important areas of learning,

nor about attitudes, engagement and motivation to learn – equally important for success at secondary level and beyond.

- We must not ‘allow children to fall behind’; much of the assessment agenda is predicated on the belief that primary teaching is to blame for not aiming high enough for pupils. Where is the evidence of teachers who sit back and ‘allow’ children to fail?
- The proposals imply that the reason some children do not succeed at secondary school is due to failings within the teaching in the primary sector. Has anyone examined evidence about KS3 teaching and lack of progress in secondary rather than blaming 4c attainment?
- ‘*The current expectation of Level 4 in English and mathematics does not guarantee secondary readiness*’ – what about those children who receive excellent primary education that enables them to achieve 4c but who then do not continue to experience the levels of expert teaching they need to continue this trajectory? Even by this document’s admission nearly 50% of those who do not achieve 4b in both maths and English still go on to achieve 5 A-C grades.
- Is there a higher status given to ‘attainment’ over ‘progress’? There are mixed messages within the document – do progress measures only come into play when schools need to excuse low attainment?
- ‘*All schools should aim for at least 85% of their pupils to reach the secondary ready standard*’. There is no mention of provision for those 15% of children who do not meet this standard. When will plans for those children be published?
- The proposals will ensure that the high stakes of the tests at the end of KS2 are significantly increased. Evidence from the Cambridge Primary Review demonstrates that high stakes testing has negative effects on the curriculum, as well as the motivation and well-being of pupils and their teachers.
- These proposals are not genuinely about ensuring that pupils succeed at their schooling; they are intended to hold schools to account utilising a disastrously narrow set of criteria. If schools are to be held to account, then judgements need to be based on a much wider view. Do these suggestions for accountability suggest that the DfE regards Ofsted judgements as not robust and reliable?
- The proposals take no account of the variation in school intakes and local demographics. If accurate judgements (rather than punitive measures) are the aim, then these variations will need to be taken into account.
- There are cost and organisational implications for the dissemination of new assessment and accountability arrangements. What steps are DfE planning to take to ensure that all schools operate to a common system?

10 If we take a baseline from the start of reception, should end of key stage 1 national curriculum tests become non-statutory for all-through primary schools?

Yes No Not Sure

Comments:
There should be consistency across the system.

11 Should we include an average point score measure in floor standards?

Yes No Not Sure

Comments:
This is an impossible question to answer until there are more details on how this will be calculated, and what it will be based on.

It is likely that the aggregation of scaled scores on KS2 tests would be an appropriate measure of attainment at school level, since this avoids the negative effects of school targets that focus on particular levels.

As current average point scores are based on levels a new system of averaging would need to be developed and consulted on.

12 Are there any other measures we should prioritise in performance tables?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:
There is no need for any more performance tables.

Performance is not what assessment should be about. Assessment should inform learning.

Recognising the attainment and progress of all pupils

13 What data could be published to hold schools (including special schools) accountable for the attainment and progress of the lowest-attaining pupils?

Comments:
What would be the purpose of publishing such data?

Progress for children with significant special needs should be (based on current best practice) assessed on a case by case basis. Data should be detailed and specific to the individual.

To publish special school data could also have safeguarding issues as individual children may be able to be identified.

Retaining p-scales seems the most sensible course of action. To ensure Special Schools are held accountable, regular visits by Ofsted inspectors would be the fairest way of doing this so that the specific needs of the pupils can be taken into account.

We need a clear definition of what is meant by *'the lowest-attaining pupils'*. Is it children with SEN, EAL, those on the borders of expected levels or some other category?

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.	
E-mail address for acknowledgement:	

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 11 October 2013

Send by post to
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