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Submitted to **Primary assessment in England**

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Ministerial Foreword

Introduction

1 What is your name?

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3 What is your organisation?

Organisation:

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4 Which of these categories best describes your role?

Categories:

Subject association

5 Would you like us to keep your responses confidential?

No

Reason for confidentiality:

Current system: statutory assessment in key stages 1 and 2

Preparing children to succeed at school

6 The EYFSP measures a child's development against the ELGs set out in the EYFS statutory framework. Should the profile be improved to better assess a child's knowledge, skill, understanding and level of development at the end of the early years? If so, please describe which elements could be added, removed or modified.

Please write your response in this box.:

The fundamental strength of the early years curriculum is its breadth and since the introduction of the EYFS, this breadth has encouraged teachers to develop their practice across all of the areas of learning. The Profile is an integral part of the EYFS and has contributed to the impact of the EYFS. Any changes to the Profile should therefore be made with care. We would not support any reduction in its scope or the introduction of any form of testing. Assessments of the ELGs in the prime areas of learning should be given more weighting, as children's development in these areas is fundamental to their learning in the specific areas. Since changes in 2013 to the Literacy & Maths Early Learning Goals (ELGs), there is greater challenge for children to attain the expected standards in Writing and Number. These are now not aligned to the Early Years Outcomes for 40-60+ months that represent the expected level of development for children in Reception classes, and are unrealistically high. They do not dovetail effectively into the current year 1 curriculum.

ELG 12 (Shape, Space and Measures) is very broad and also does not dovetail appropriately with the year 1 curriculum. A further breakdown of mathematical skills to be assessed and some further development of the exemplification would support teacher assessment for the Profile.

The ELG for Technology does not now reflect many children's skills and understanding in this area.

Best-fit judgements can only be made by looking across a range of criteria and using the evidence accumulated over time to make a judgement about which one most accurately describes a child's attainment for each goal. While the age-related bands in the Early Years Outcomes are non-statutory, teachers use these in making best-fit judgements for the Profile when deciding whether a child should be assessed as expected or emergent. Any review and update of the Profile should include a parallel review of the age-related bands that are variable in their alignment with the ELGs.

There is a similar issue in relation to the use of the exceeding statements for best-fit judgements. In some cases, these are unclear and narrow in content. A review of exceeding statements would therefore be welcome.

7 The EYFSP currently provides an assessment as to whether a child is 'emerging, expecting or exceeding' the level of development in each ELG. Is this categorisation the right approach? Is it the right approach for children with SEND?

Please write your response in this box.:

For most children, this approach is appropriate. However, it remains problematic for some children with special educational needs, as an assessment of 'emerging' does not adequately reflect their attainments. Typically, teachers of children with special needs make their assessments using the age-related bands of the Early Years Outcomes, even though these are non-statutory. These provide more differentiated assessments and more meaningful information to support

transition into Key Stage 1 for children who have not attained the expected levels of development. As stated in the response to Q1, a review of the content and status of the age-related bands is necessary. Consideration should be given also as to how the Rochford report's recommendations for 'the assessment of pupils with SEND not engaged in subject-specific learning against the seven aspects of cognition and learning' could be utilised.

Early years foundation stage profile: workload

8 What steps could we take to reduce the workload and time burden on those involved in administering the EYFSP?

Please write your response in this box.:

Using the Profile appropriately, employing sound EYFS principles, does not incur workload and time burdens. The Profile judgements made at the end of the EYFS represent a summation of an on-going process of learning and teaching running through the EYFS/Reception. EYFS teachers do not 'administer' the EYFSP; it is a teacher assessment based on the outcomes of teaching, learning, observation and assessment over time.

Similarly, moderation does not constitute a workload demand if the Profile is used in the appropriate way. See response to question 4.

Where workload issues arise, these are due to the inappropriate gathering of excessive amounts of evidence – something that the Profile Handbook specifically advises against. They also arise from teachers being required to enter information into school tracking systems in a way that is not meaningful, and which often requires the age-related bands to be used in a manner for which they were never designed. This reflects a fundamental misunderstanding of the nature of children's learning.

An Ofsted 'Myth Buster' about EYFS assessment would give schools confidence to take a sensible and manageable approach to evidence gathering and sharing with parents.

We would resist any temptation to reduce the scope of the Profile in a quest to reduce workload. We value what we assess and it is important that the holistic nature of EYFS education is protected and valued.

Early years foundation stage profile: moderation

9 How could we improve the consistency and effectiveness of the EYFSP moderation process whilst reducing burdens?

Please write your response in this box.:

The purpose of moderation is to give assurance that consistent and accurate assessments are being made. It also fulfils a further and fundamental purpose in that it provides a rich professional development opportunity for teachers playing an important part in developing teachers' understanding and practice in delivering the EYFS. (Also referred to in the response to question 1). The EYFSP moderation process works well as it stands currently. The combination of LA, cluster and internal moderation is a driver for consistency and confidence. However, the withdrawal of funding for statutory cluster meetings/training may have a negative impact on the effectiveness and accuracy of EYFSP assessment judgments.

If early years assessment and the Profile are implemented in the appropriate way (see response to question 3), moderation does not constitute a burden and the above benefits would be lost if it was reduced in any way. Indeed, funding for LA moderation meetings is essential, in addition to maintaining funding to ensure at least 25% EYFSP 1-to-1 moderation visits for all schools on a 4-year cycle. This should also include schools with NQTs or inexperienced Reception teachers and any schools nominated by their school improvement partners or local authority, where there are anomalies in results or poor practice.

A review and further development of the exemplification materials would be appropriate, including exemplification for exceeding judgements, particularly in reading, writing and maths, linked to NC Y1 expectations.

The best starting point for measuring progress in primary school

10 Any form of progress measure requires a starting point. Do you agree that it is best to move to a baseline assessment in reception to cover the time a child is in primary school (reception to key stage 2)? If you agree, then please tell us what you think the key characteristics of a baseline assessment in reception should be. If you do not agree, then please explain why.

Please write your response in this box.:

There are number of inherent problems with the proposed progress measure:

- The current National Curriculum was introduced on the basis of a rationale that as many children as possible should reach new and challenging end of key stage outcomes ('High expectations for all' Report by the Expert Panel for the National Curriculum Review December 2011). The use of a progress measure carries the implication that children's end of key stage outcomes will continue to vary substantially, thus undermining this rationale.
- Despite attempts to overcome it, there will always be a perverse incentive to depress baseline assessments in order to maximise indications of subsequent progress. This leads to inaccurate and inconsistent assessment that is not useful in supporting learning and teaching.

- There is scepticism about a system that will 'baseline' children and then put mothball that information away for 7 years. This raises the question of how long it will take to collect credible progress data – up to 10 years?

A number of our members have noted the concerns of the House of Commons Education Committee Report on Primary Assessment (April 2017) that said the DfE must evaluate the 'harmful consequences' of introducing any new baseline tests for reception pupils and that this should involve early years experts and practitioners and look at impacts on pupil wellbeing and teaching and learning: 'It (any baseline) should be designed as a diagnostic tool to help teachers identify pupils' needs and must avoid shifting negative consequences of high stakes accountability to early years.'

If a Reception baseline were introduced, it must not be a test nor should it replicate the narrow tablet-based baselines systems of 2015. It needs to be in the spirit of the Early Excellence baseline, i.e. rooted in observation and teacher assessment. However, it is difficult to see what such an assessment would yield that teachers cannot already obtain from the effective use of the EYFS and the use of the Early Years Outcomes. Clearly, it would also be an additional demand on Reception teachers.

If a baseline is introduced to give a measure of progress by the end of Key Stage 2, it should take place in year 1 at the point when children are ready to commence learning in the National Curriculum, and against which their outcomes will be assessed.

11 If we were to introduce a reception baseline, at what point in the reception year do you think it should be administered? In particular, we are interested in the impact on schools, pupils and teaching of administering the assessment at different times.

Please write your response in this box.:

There are a number of practical problems with a baseline early in the Reception year:

- As children are not required to start reception until the term after they are 5, many children join reception at different points throughout the year; some even start in year 1.
- Most children receive some form of staggered start into the reception year, which varies from school to school.
- Some children's parents opt to have their child attend part time until they reach statutory school age whilst others are full time from September.
- Some parents opt to apply for a delayed entry into Reception. This has been actively encouraged by ministers and taken up by significant numbers of parents. These children start reception a whole year older than their peers.

A baseline later in the Reception year would be problematic as it is at this point that teachers are focusing on the completion of the Profile. A baseline towards the end of the year would clash with the Profile.

We have argued for the retention of the Profile. Two statutory assessments within a year for the youngest children in the school, even if content and administration of these were in line with good early years practice, would be unacceptable. This is a time when teachers should be concentrating on building relationships with children and their parents and establishing the foundations for future learning.

12 Our view is that it would be difficult to change key stage 1 assessment in order that it could be used as the baseline for progress in the long term. If you disagree, what could be done to improve the key stage 1 assessments so that they would be sufficiently detailed, and trusted as a fair and robust baseline?

Please write your response in this box.:

With regard to DfE finding it difficult to make changes to KS1 in order for it to serve as a baseline, these difficulties would be exacerbated by moving the baseline into reception that has a different curriculum. If it is the DfE's view that it would be difficult to change assessment in KS1, then we would challenge the implied assumption that this would be "easier" somehow in the reception year, three years earlier.

Key Stage 1 has been assessed through a process of teacher assessment alone (informed by the use of tests) since 2005. There has been much time and considerable resources invested in developing teachers' consistency and accuracy in making judgements. As a result judgements over the years have become reliable and robust. The change in 2016 from a 'best fit' system to a 'secure fit' system may have led to some a degree of initial inconsistency but we believe that in 2017 teachers have a much better understanding of the process. However the 'secure fit' approach does have its limitations. For example, a child may produce writing of very good quality in terms of sentence and text structure, but if they have dyslexia they may struggle to meet the spelling standards and cannot be given credit for the strengths within their writing. We feel that a system that allows a bit more flexibility than the current 'secure fit' would be preferable and more equitable.

The Key Stage 1 tests provide a useful additional element to the assessment process. We do not feel that it would be appropriate to use the tests alone as a basis for measuring progress across Key Stage 2. Instead, a statistical model using a combination of test results and teacher assessment could provide a more robust baseline. Care would need to be taken to minimise the stress on these children (and teachers) caused by the Key Stage 1 tests. We would argue strongly against a test-only model at Key Stage 1 as it is an inappropriate approach to assessing young children.

The best starting point for measuring progress in primary school: interim years

13 If we were to introduce a new reception baseline measure, do you agree that we should continue to use key stage 1 teacher assessment data as the baseline for measuring progress in the interim years before a new measure was in place? If you disagree, what do you think we should use as the baseline instead?

Please write your response in this box.:

It is agreed that Key Stage 1 teacher assessment data, rigorously moderated, should continue to be used as the baseline for measuring progress in the interim years. However, as mentioned in the response to question 7, a combination of Key Stage 1 test and teacher assessment data might be a more robust baseline from which to measure progress.

To base progress on tests alone, administered at the end of Year 2, raises the stakes of this assessment to an extent that is detrimental. Furthermore, the test for Grammar, Punctuation and Spelling is not a good proxy for children's overall writing ability, and therefore would not be suitable for the purpose of measuring progress.

It should be borne in mind that using the tests exclusively would not only raise the stakes of the assessment but probably have distorting effects on curriculum delivery, as it would place undue emphasis on those elements that are tested. This is an additional reason for not relying on the Grammar, Punctuation and Spelling test, as it would lead to the teaching of writing skills being sidelined .

The role of key stage 1 statutory assessments

14 If a baseline assessment is introduced in reception, in the longer term, would you favour removing the statutory requirement for all-through primary schools to administer assessments at the end of key stage 1?

Please write your response in this box.:

We consider that statutory end of key stage assessment should continue, given that it is distinct key stage. However, it could be 'lighter touch' than currently, though some moderation should be retained. For example, there could be a return to a previous model, where there was a choice of tasks that teachers could

administer, to integrate with their curriculum. There should not be high-stakes tests at Key Stage 1. Tests marked internally to inform teacher assessment judgements are more appropriate for this age group.

Monitoring national standards at key stage 1

Measuring progress in different types of school

15 If we were to introduce a reception baseline to enable the creation of reception to key stage 2 progress measures for all-through primaries, what would be the most effective accountability arrangements for infant, middle and junior schools' progress measures?

Please write your response in this box.:

By retaining an end of Key Stage 1 assessment, infant schools can be held to account over the progress their children make.

To hold junior and middle schools to account effectively, an assessment on entry to those schools would seem appropriate, for example, a set of tests to be administered during the September of Year 3 for junior schools. Any comparative progress measure would then need to focus just on that particular group of schools, with the same starting points. We believe head teachers of those schools would feel it fairer if their progress data were based on an entry assessment that took place within their setting and if the comparisons made were only with schools of the same category.

A proportionate assessment system

16 Do you think that the department should remove the statutory obligation to carry out teacher assessment in English reading and mathematics at key stage 2, when only test data is used in performance measures?

No

Please write your response in this box.:

Statutory teacher assessments should be made and valued for reasons other than whether or not they contribute to performance measures. Statutory teacher assessment in reading and mathematics should be maintained for the following reasons:

- Teacher assessments are made on the basis of cumulative evidence, gathered over time and have a fundamentally different evidence base to tests where outcomes depend solely upon pupils' performance at specific points in time.
- They can also assess aspects of the curriculum/learning that tests cannot – for example, many of the aspects of the expected standard in the Key Stage 2 ITAF.
- The inclusion of teacher assessments in the statutory requirements also conveys a strong message about the value attached to teachers' own professional judgements.
- In addition, teacher assessment is a very useful back-up in the case of, for example, pupils who missed a test due to absence or those who underperformed in a test due to external factors.

However, reading and mathematics teacher assessment would be more useful if it had a Greater Depth standard, not simply an Expected Standard.

Key stage 1 English grammar, punctuation and spelling test

17 Do you agree that the key stage 1 English grammar, punctuation and spelling test should remain non-statutory beyond the 2016 to 2017 academic year, with test papers available for teachers to use as they see fit?

Yes

Please write your response in this box.:

Yes, this should remain non-statutory. It should be noted that performance in a grammar test is not a proxy for the ability to write well. The main focus of the assessment should be on producing good quality writing.

Multiplication tables check

18 At what point in key stage 2 do you think the multiplication tables check should be administered? Please explain the basis for your views.

At the end of year 4

Please write your response in this box.:

The assumption within this section of the consultation is that a multiplication tables check is needed in order for teachers in schools to know whether children have learnt their tables well enough or need further support. Teachers in the vast majority of schools already administer their own multiplication tables checks in their own classes on a regular basis and know which children have mastered their tables and which of them needs to spend more time mastering them. It is not necessary to implement a national test if its aim is to act as a screening check rather than as an extra accountability measure.

The test should be optional not statutory and test outcomes should not be published or used in accountability measures.

Furthermore, the introduction of this multiplication tables check could be detrimental to the quality of the teaching and learning of mathematics in primary schools. A high-stakes assessment, i.e. one which is then used in accountability measures or by Ofsted, inevitably distorts classroom practice, as teachers are encouraged to devote more time to teaching the skills that will be tested. In this case, this means spending time practising multiplication tables at the expense of teaching other important aspects of mathematics. It is important that primary school pupils learn to problem-solve, take risks and be creative in mathematics. Quick-fire multiplication tests can reinforce a notion that being good at maths is all about being fast at recalling facts. In turn, this may reinforce a fixed mindset and detract from pupils' willingness to engage in more complex problem-solving tasks.

If the ministers are intent on introducing a multiplication tables test, it would seem sensible to administer it at a separate time to the already busy test period in Year 6; during Year 4 or 5 would seem more appropriate. This would provide a useful check, allowing time for intervention to address underperformance or any barriers to learning and time for children to consolidate and apply their knowledge.

19 How can we ensure that the multiplication tables check is implemented in a way that balances burdens on schools with benefit to pupils?

Please write your response in this box.:

The burden on schools could be minimised if, for example, the test was a web-based activity. However, this would need to be very carefully designed. If it was to be a computer-based assessment, with children being encouraged to answer the questions as quickly as possible, there is potential for mistakes to be made – mis-typing or clicking on the wrong answer – which would result in an incorrect view of a child’s knowledge.

There are many small rural schools in the country with outdated and/or insufficient computer hardware, not to mention intermittent and unreliable broadband access. Any online system must take account of these very real and acute problems.

In terms of benefiting pupils, it would be useful if the results were reported to schools not just as overall scores, but gave information about the particular multiplication tables in which each child scored well and where they need more focus. As noted in the response to question 13, the benefit to pupils is questionable as schools’ own testing and assessment give the required information. The test outcomes should not be published or used in accountability measures.

Reducing burdens within the primary assessment system

20 Are there additional ways, in the context of the proposed statutory assessments, that the administration of statutory assessments in primary schools could be improved to reduce burdens?

Please write your response in this box.:

The burden of writing teacher assessment could be reduced by rethinking which particular criteria have been included within the ITAFs. We would suggest that DfE seek views across stakeholders regarding a more appropriate teacher assessment framework. Given that the framework does not attempt to capture every skill taught within the National Curriculum, decisions have obviously been made about which skills are vital for inclusion within the framework. Some of these decisions seem very questionable, for example the requirement for children in Year 2 to be able to write a grammatically correct exclamation sentence. Consistency at Key Stage 2 could also be enhanced by giving further consideration to the statements for ‘Greater Depth’. The difficulties arising this year with the moderators’ standardisation test would suggest that there are too few ‘pupil can’ statements for Greater Depth and that they are too open to interpretation. The GPS test should be non statutory at both KS1 and KS2; these aspects should be assessed within writing. Consideration should be given to:

- Reading and Mathematics tests being brought in line with KS1 and used to inform and validate teacher assessment with teacher assessment reported.
- KS2 tests being marked internally and used to inform teacher assessment, as in KS1.

Improving end-of-key stage statutory teacher assessment

21 Do you agree that the statutory assessment of writing should afford teachers greater flexibility in determining a pupil’s overall standard of attainment than is currently the case? Please give reasons for your answer.

Yes

Please write your response in this box.:

Yes. The current “secure fit” system does not properly reflect the overall quality of writing, because it requires a “tick-box” approach to ensuring every child has included every aspect from the Teacher Assessment Framework in his/her writing. This has led to a formulaic approach, where children are encouraged to include a whole range of grammatical elements in every piece of writing, regardless of how appropriate they may be to the context.

Furthermore, the current system is discriminatory against pupils with dyslexia. It would seem appropriate to consider the skills that will be most needed in the workplace and wider contexts when these children are adults. Almost all writing already takes place using computers, with features such as spell-checking being the norm. We should be preparing children for the world in which they will live.

Where children can produce really good quality writing, with well-constructed sentences and paragraphs, it does not seem appropriate to penalise these children if they have a specific difficulty with spelling. Spelling is an important skill, but it seems counter-intuitive that the current assessment system does not allow children to independently use technology to help them correct their own spelling mistakes.

The notion of a “secure fit” system is not in itself the problem – provided the decisions made about which criteria must be included are appropriate. Indeed we acknowledge that the “secure fit” approach has yielded some benefits, such as higher expectations of grammatical accuracy and more rigorous teaching of spelling. However, the statements are skewed towards the technical features and should include statements that value the creative process. The balance between technical and creative writing should be reconsidered, as this does not give appropriate value to the creative purpose of writing in which it is important to engage and enthuse a reader.

Likewise, a “best fit” approach is not perfect. It would need to be coupled with very clear guidance about how to make judgements accurately and consistently. Perhaps a system in which some elements were essential (‘secure fit’) but other elements were assessed on a ‘best fit’ approach would combine the best of both systems. The reason levels were abandoned was because there were gaps within the system, which led to questions about the reliability of some data. Care should be taken in making changes to ensure that change is positive and reduces stress rather than increasing stress.

Supporting and strengthening the assessment of English writing

22 Please give details of any robust alternative approaches to the assessment of English writing, which the Department for Education should explore.

Please write your response in this box.:

It is important that there be an agreed set of criteria about what makes good quality writing, and that all teachers assess to the same criteria. However, there should be scope within the system to acknowledge strengths and weaknesses within a child's writing. A system that assesses children's writing across a broad range of tasks, rather than based on one-off pieces, is more robust.

There are current issues around the amount of independent, extended opportunities pupils have to write in a range of genre for a range of purposes. There is such a focus on teaching to the test that this is constricting the curriculum and is leading to a focus on writing outcomes rather than the process of writing. There is often insufficient evidence of redrafting and editing.

Comparative judgement may at first seem appealing as a time-saving approach, but there is a danger that snap decisions are based on very superficial elements, such as the standard of handwriting, rather than based on the quality of the writing, effect on the reader etc.

Ranking is a subjective and instinctive activity that is influenced by what people think. The process of moderation allows a careful, benchmarked, checking exercise for assessment. Teacher assessment and moderation could be further supported by more exemplification statements/materials with a "secure fit" being the objective.

The DfE should address the disparities between the expectations at the end of KS2 and those within KS3.

It is also important to ensure that the assessment of writing does not penalise children who can achieve everything but do not spell well.

Alternative approaches to moderation

23 Please give details of any effective models of moderation or standardisation of teacher assessment that the Department for Education should explore.

Please write your response in this box.:

There is already a significant amount of "moderating" activity taking place, both within schools and across clusters of schools. Peer-to-peer approaches of writing moderation can work well, provided the adults involved have received sufficient training in understanding and applying the assessment criteria and have access to good quality exemplification of the standards. They allow schools to share practice, benchmark judgements and to celebrate outcomes. There needs to be a quality assurance process that checks that in locally organised moderation meetings, assessments are being benchmarked against national standards.

Current STA exemplification of writing is useful inasmuch as it explains where children have met the standard, but could be improved if it also better explained the reasons why the child has not met the standard above.

There could be mandatory cluster moderation with a qualified moderator facilitating the meeting and checking and where necessary, challenging the accuracy of teacher assessment. This would provide a suitable quality assurance of teacher assessment. Without a moderator quality assuring the process, there would be too much subjectivity in teacher assessment.

The role of a local authority moderator adds rigour and checks and balances to teacher assessment. In our experience, where conducted professionally, external moderation visits are very much valued as good professional development for teachers. However, this aspect of moderation is more effective when the visits take place earlier in the academic year, giving teachers time to act on advice before making their final assessments.

Equalities

24 Do you think that any of our proposals could have a disproportionate impact, positive or negative, on specific students, in particular those with 'relevant protected characteristics' (including disability, gender, race and religion or belief)? Please provide evidence to support your response.

Please write your response in this box.:

As already explained in question 16, the current system is discriminatory against children with dyslexia. There could be a negative impact on pupils with special educational needs who have creativity but lack technical expertise. There are some pupils with an impairment that means they are unable to meet the "I Can" statements as they are presented.

It could also be argued that it discriminates against children who are new to learning the English language. It is not uncommon to find evidence that a child with English as an additional language has acquired a very good grasp of the English language, except for one or two minor quirks of the language, such as the spelling of some phonically irregular words or the formation of the past tense of an irregular verb. The current system prevents such children from achieving the expected standard, whereas a more flexible approach would be more equitable.

Great care also needs to be taken that statutory assessment does not unfairly penalise pupils from different socio-economic or cultural backgrounds, for example through the subject matter of texts used in a reading assessment, or the contexts used for mathematical problems.

Similar considerations apply in relation to early years assessments. If the specific areas are assessed too early/inappropriately, this actively disadvantages children who are learning EAL; those who have moved from abroad and may not have accessed any education due to cultural differences and school start ages; and those children with identified needs who may always be behind their peers in the specific areas.

25 How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity? Please provide evidence to support your response.

Please write your response in this box.:

Extensive trialling of test materials should reveal cultural biases within the domain of the test. Where children of certain backgrounds are routinely underperforming compared with their peers, it is important that questions are asked about the assessment system itself to determine whether it inherently favours children of middle-class backgrounds. For example, there currently exists a wide achievement gap between the performance of disadvantaged pupils and their peers, and this gap is taken to mean that schools need to do more to raise the achievement of the disadvantaged pupils. This is undoubtedly so, but perhaps the question should also be asked as to whether some of this gap can be explained by an assessment system that children from disadvantaged backgrounds find more difficult to access.