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View your response

Personal Details

- Please tick if you want us to keep your response confidential.
- Please tick if you are responding on behalf of an organisation.
- Please tick if we can contact you in the future.
- Please tick if you would like us to acknowledge your response.
- Please tick if you would like us to inform you when the consultation results are published.

Respondent Information Questions

Please insert an 'x' into one of the following boxes which best describes you as a respondent.

- Local authority
- Teacher
- Parent or carer
- Headteacher or school leader
- Governor
- National representative body

- Pupil
- Other (please specify)

Please Specify: The Association for Achievement and Improvement through Assessment is a national body for all those with a professional interest in assessment, whether in schools, LAs, academy chains or independent consultants.

If you indicated that you are a teacher, headteacher, school leader or governor, please indicate what type of school

- Local authority maintained school
- Academy school or academy chain
- College, FE or HE institution
- Special school
- Alternative provision or pupil referral unit (PRU)
- Other (please specify)

Please Specify:

Consultation Questions

1

Do you think the revised Schools Causing Concern guidance describes clearly the powers, processes and responsibilities for intervening in underperforming maintained schools? Please specify any elements you think require further clarification.

- Yes
- No
- Not Sure
- *No Response*

Comments:

2

Chapter 3 of the Schools Causing Concern guidance proposes how RSCs should make decisions about what action should be taken in schools that meet the coasting definition. Do you think that the described approach and process is appropriate?

- Yes
- No

- Not Sure
- *No Response*

Comments:

3

Chapter 3 explains that RSCs could use their discretion to decide not to intervene where a coasting school is supporting its pupils well, but has fallen within the coasting definition because of its circumstances or pupil characteristics. Do you agree that this is appropriate? The guidance is not intended to be exhaustive, but please specify if there are other such circumstances or factors you think should be mentioned in the guidance that currently are not.

- Yes
- No
- Not Sure
- *No Response*

Comments: They should have discretion because it would be impossible to specify every circumstance which might arise.

4

Chapter 4 describes what may constitute low standards of performance and what factors local authorities and RSCs may take into consideration to identify this, for the purpose of issuing a performance standards and safety warning notice. Do you agree with the factors listed which may indicate that a warning notice may be necessary?

- Yes
- No
- Not Sure
- *No Response*

Comments: Disagree with the detail around a "coasting school" requiring intervention, using the proposed definition of "coasting". The definition states that a coasting school is one where pupils are not fulfilling their potential. It should be noted that whether or not pupils are "fulfilling their potential" is a subjective statement and that the data measures proposed to define this are not necessarily fit for purpose. (See response to questions 7-12 below)

5

Chapter 5 describes the specific powers of local authorities and RSCs (using the powers of the Secretary of State) in schools eligible for intervention. Are the respective responsibilities, and the interactions between the local authority and RSC powers, sufficiently clear?

- Yes
- No
- Not Sure
- *No Response*

Comments:

6

Do you have any other comments on the revised Schools Causing Concern guidance?

Answer: No

7

Do you agree that the three principles (explored in paragraphs 16-20) underlying our coasting definition are the right ones?

- Yes
- No
- Not Sure
- *No Response*

Comments: Whilst it is right that three years of data are taken into account rather than focusing on a single year, there are issues with the thresholds outlined, for example: - the primary attainment measure of 85% is particularly high, especially in the context of a small school. (The proposal does not appear to make exceptions for small cohorts). In many smaller schools, just one or two pupils not attaining the expected standard would take the cohort-level figure to below 85% - the progress measures for 2014 and 2015 are based on national median figures for pupils making expected progress. This is by definition a norm-referenced measure where it is statistically impossible for all schools to appear successful. The fact that the median is used, rather than the overall national proportion (which is lower) makes this all the more challenging - the progress measure for 2016 (primary) refers to 'sufficient progress' in all three core subject areas - this is a substantial change from 2014 and 2015, where strong progress in any one area would be sufficient to take a school out of the coasting status. The reasons for this change in approach have not been explored or justified. The Progress 8 measure (secondary) is also a norm-referenced figure and therefore, however successful our schools are, there will always be, by definition, a proportion of schools whose results are below this figure. This does not mean that pupils are failing to fulfil their potential. A measure should be devised where it is at least mathematically possible that all schools can succeed. Progress 8 will disadvantage schools where there are pupils for whom it would be more appropriate that they follow a more vocational pathway. The measures set out for both primary and secondary schools will unfairly disadvantage pupils with Special Educational Needs or Disabilities. It is therefore essential that the 'coasting'™ label is not applied to special schools, and furthermore, some account should be taken of pupils with SEND in mainstream schools.

8

Should the definition of a coasting school be where data shows that, over a three year period, the school is failing to ensure that pupils reach their full potential?

- Yes
- No
- Not Sure
- *No Response*

Comments: It is impossible to define what any pupil's "full potential" may be. However the concept is defined, the measures used should be ones where it is mathematically possible that all pupils can achieve it. It does not seem that this is the case under the proposed measures. The progress measures are clearly norm-referenced, so by definition not all pupils can achieve "sufficient progress" and no information has been made publicly available about the precise methodology for determining the expected level of attainment for primary schools in 2016. If the "expected standard" is determined by analysing the national results after the tests have been taken, and considering them in terms of the statistical "bell-curve", then again it seems highly likely that the standard will be defined such that not all pupils can achieve it.

9 a)

Should the proposed interim definition for coasting in 2014 and 2015 be based on the accountability measures for those years, against which schools were held to account?

- Yes
 - No
 - Not Sure
 - *No Response*
-

9 b)

If so, are the thresholds right? Alternatively should the new 2016 accountability measures be applied retrospectively for 2014 and 2015?

Answer: It would be very unfair to penalise schools retrospectively using a measure which they did not know about at the time. However, the thresholds are not right. The use of national medians for progress seems divisive, when they are so much higher than the national mean averages. For example in 2015, 94% pupils nationally made "expected progress" in writing (primary) but the median figure used for determining both coasting schools and schools below floor standards is 97%. The secondary floor target measure in 2015 for schools which opted for the new measure builds in a proviso that they must be below -0.5 in Progress 8 (not below the median) and even then the result must be statistically significant. This would help iron out anomalies caused by small cohorts.

10 a)

Should coasting standards be applied to special schools?

- Yes
 - No
 - Not Sure
 - *No Response*
-

10 b)

Can this be data driven – if so, what metric could be used? What other indicators might be used?

Answer: It would be completely inappropriate to have coasting standards for special schools, given the specific needs of their pupils, which will be very variable. Also these schools are often very small, so each pupil contributes a large percentage to the total.

11 a)

Should coasting standards be applied to Pupil Referral Units?

- Yes
 - No
 - Not Sure
 - *No Response*
-

11 b)

Can this be data driven – if so, what metric could be used? What other indicators might be used?

Answer: This would seem inappropriate given the nature of pupils'™ time in PRUs - holding schools to account over progress made across a 5-year period, when some pupils will have spent a relatively short amount of time in that setting is inappropriate. Again, these units are also often very small.

12 a)

Is our proposed approach for schools that chose to opt in early to Progress 8 in 2015 – that the more favourable of the two coasting definitions be applied – the right one?

- Yes
 - No
 - Not Sure
 - *No Response*
-

12 b)

If not, what is the fairest way of defining coasting for these schools in 2015 and why?

Answer:
