



Department
for Education

Consultation Response Form

Consultation closing date: 18 December 2014

Your comments must reach us by that date

**Performance descriptors for use in key
stage 1 and 2 statutory teacher assessment
for 2015 / 2016**

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

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: Pauline Cue, Secretary	
Please tick if you are responding on behalf of your organisation.	<input type="checkbox"/>
Name of Organisation (if applicable): Association for Achievement and Improvement through Assessment (AAIA)	

Address: aaiasecretary@aaia.org.uk

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 Gov.uk 'Contact Us' page.

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

Teacher

Parent

School

Governor

Local Authority

Other X

Please Specify: Professional association for anyone with an interest in or responsibility for educational assessment

1 Do the names of the draft performance descriptors allow teachers and parents to understand the meaning of, and differentiate between, each performance descriptor?

If no, please provide details.

Yes

No X

Not Sure

Comments:

The distinction between 'working below national standard' and 'working towards national standard' is unclear and will require explanation to parents. Likewise, the distinction between 'working at national standard' and 'mastery' is confusing. The implication is that 'working at national standard' does not involve mastery of what has been learnt, when a fundamental principle of the new curriculum is that as many pupils as possible should master key skills and concepts as defined in the curriculum.

The justification for the proposed 'mastery' descriptors is questionable. Where pupils are 'working at national standard' but can utilize and apply their understanding and skills in a wider range of contexts than might normally be expected, this is better left as something to share with parents and the next teacher or school rather than attempting to capture this in further descriptors. **The use of a fifth descriptor for Writing at the end of Key Stage 2 is especially problematic and without justification.**

If a range of descriptors/standards is to be used, then the same words and the same range of descriptors should be used for each subject at both key stages. These words need to be easily understood by parents – for example, 'above standard', 'at the standard', 'not yet at the standard'. Alternatively, 'Emerging', 'Expected', 'Exceeding' could be used, as these are the terms that parents will be familiar with from the EYFS assessment. This would improve consistency. If there is a need to break down the 'below' category, the use of 'close to the national standard', 'not yet at...' would be preferable.

For a small proportion of pupils, it is likely that they will be 'working below national standard' at the ends of both Key Stage 1 and key Stage 2 despite the fact that they will have made significant progress in their own terms. Although schools will be able to mitigate the negative effects of this to some extent in the way that they report to parents, the terminology is unhelpful and not supportive of the engagement of these pupils with the educational process.

Having descriptors reflecting a range of outcomes in the way proposed, there is a

danger that under-expectations for a substantial proportion of pupils (those 'working below' or 'working towards' national standards) will be perpetuated. This was a criticism of the previous system of levels, made by the current government amongst others. The implementation of the performance descriptors will need to be managed in a way that avoids this danger. The new system will need to encourage an approach of high expectation for all, the rationale on which this government's curriculum reforms is based.

2 Are the performance descriptors spaced effectively across the range of pupils' performance to support accurate and consistent judgements?

If no, please provide details.

Yes

No

Not Sure

Comments:

If the intention is to make end of key stage assessments as inclusive as possible, the descriptors for lower attaining pupils are only partially successful. There will be some pupils, working beyond P8 in the P Scales but who do not yet have attainment in line with 'working below national expectations', whose attainment will not be adequately described. This is partially acknowledged in the consultation, but to say that such pupils 'will be given a code' suggests that the proposed system is primarily a data capture exercise, rather than a system to clearly and specifically reflect pupils' educational outcomes.

It is unclear why an additional descriptor has been included for Writing at the end of Key Stage 2. Together with single descriptors for Science at the end of Key Stage 1 and for Mathematics, Reading and Science at the end of Key Stage 2, this gives an impression of a system that is unnecessarily complicated and lacking in coherence. It will be confusing for parents.

A consistent system across subjects and key stages is essential. As already stated in response to question 1, if a range of descriptors/standards is to be used, then the same words and the same range of descriptors should be used for each subject at both key stages. These words need to be easily understood by parents – for example, 'above standard', 'at the standard', 'not yet at the standard'. Alternatively, 'Emerging', 'Expected', 'Exceeding' could be used, as these are the terms that parents will be familiar with from the EYFS assessment. This would improve consistency. If there is a need to break down the 'below' category, the use of 'close to the national standard', 'not yet at...' would be preferable.

It is difficult to avoid the conclusion that where a number of descriptors are proposed for a subject area, this is primarily for data analysis purposes, i.e. to provide data for

floor standards and analysing progress. The use of a number of descriptors/standards could undermine the rationale of the new curriculum, i.e. high expectations for all in relation to core learning outcomes.

3 In your opinion, are the performance descriptors clear and easy to understand?

If no, which bullets lack sufficient clarity to allow for effective teacher assessment?

Yes

No X

Not Sure

Comments:

A full understanding of the descriptors is dependent on comprehensive exemplification materials. The consultation indicates that nationally developed exemplification materials will be made available. These will be essential to support teachers and moderators in using the descriptors. **Exemplification materials need to cover all 'descriptors/standards' at both key stages not just 'working at national standard' to ensure clarity of attainment.**

There are substantial issues about how the descriptors can be used to make assessments. If the intention is that they should be used on a 'best fit' basis (the consultation refers to pupils having attained the 'majority' of a descriptor), this raises questions about the extent to which a pupil has attained the content of a descriptor. Does 'majority' mean 50%+, 75%, 80% or more? There will inevitably be 'borderline' pupils where a judgement of which descriptor most appropriately describes their attainment will be problematic. The risk is that pupils' attainment will be described in a generalised way, in a similar way to levels. Outcomes will be unclear to parents, next teachers and receiving schools. The alternative is to require that pupils attain all elements of a descriptor if they are to be described as having attained that descriptor. This is clearly more challenging but would result in assessments that are clearer and more specific, and would be in sympathy with the idea that the National Curriculum programmes of study contain the core knowledge and skills that as many pupils as possible should have attained by the end of a key stage.

The descriptors are sometimes unnecessarily repetitive. For example, 'regards reading as an enjoyable activity' appears in the descriptors for 'working below', 'working towards' and 'working at national standards'. While it is clearly desirable that pupils enjoy reading, there is little point in repeating this for each descriptor. Assessments of 'regards reading as an enjoyable activity' would also be difficult to moderate.

In some statements the language is ambiguous e.g. '*solve problems*', '*solve more complex problems*', '*national standards are embedded*' in mastery statements about measurement (p15).

This vagueness is also found in the writing statements as the performance descriptors use adverbs, or similar nuances of language that serve to make judgements vague and unhelpful when deciding upon which best describes a child's writing. For example:

- Writing demonstrates *some features* of the given form, as appropriate to audience, purpose and context, *arising from* discussion of models of *writing with similar structure, vocabulary and grammar*.
- Writing demonstrates features of selected form, as appropriate to audience, purpose and context, *drawn from* discussion of models of *similar writing and the recording of ideas from pupils' own reading*.

This recreates a new threshold issue previously encountered with levels, particularly if assessments are subsequently used as a progress accountability measure in the way that levels came to be used.

Additionally statements such as '*a range of punctuation mostly accurately*', '*a range of punctuation*' '*a full range of punctuation*' are open to different interpretations.

Other statements cause concern about approaches to the teaching of reading. '*Accurately reads aloud age appropriate texts with phonic knowledge in which additional strategies are not required*'. This could be misinterpreted that these children should only be reading decodable books. Whilst phonic knowledge is important, reading involves the process of linking visual perception with cognitive skills (language, comprehension and processes)

4 In your opinion, does the content of the performance descriptors adequately reflect the national curriculum programmes of study?

If no, please state what amendments are required.

Yes	No X	Not Sure
<p>Comments:</p> <p>It is regrettable that there is no performance descriptor(s) for Spoken language. This is of fundamental importance to pupils' progress not just in English but in all areas of the curriculum. Communication and language has justifiable prominence in the curriculum and in assessment for the Early Years Foundation Stage, and this should continue to be the case for Key Stage 1 and Key Stage 2.</p> <p>As noted in response to question 1, a fundamental principle of the new curriculum is that as many pupils as possible should master key skills and concepts as defined in the curriculum. In their attempt to cover the content of the programmes of study, the descriptors are lengthy and detailed but lack an emphasis on depth of learning and the application of skills.</p> <p>It is worth noting that these descriptors are not entirely in line with the National Curriculum. The statutory programme of study for Key Stage 1 Mathematics includes mental, concrete apparatus and pictorial methods for adding and subtracting two-digit numbers but does not include a formal written method; this is statutory in Key Stage 2 not Key Stage 1. However, formal written methods have been included in the performance descriptor for Key Stage 1 and this is of concern and at odds with the stated intent of the new curriculum, which is that pupils are expected to have their knowledge and understanding of the Key Stage 1 curriculum deepened and not accelerated into Key Stage 2 programmes of study. This is, after all, intended to be a mastery curriculum.</p> <p>A main aim of the National Curriculum in Mathematics is to achieve 'fluency' in Mathematics but this now appears under the mastery statements. This suggests that the national standard could appear lower than expected.</p> <p>In mathematics there are some inconsistencies with the content of the national curriculum - for example, percentages in Key Stage 1 geometry on p 13.</p>		

5 Should any element of the performance descriptors be weighted (i.e. should any element be considered more important or less important than others?).

If yes, please detail which performance descriptor(s), which element(s) and why.

Yes	No X	Not Sure
<p>Comments:</p> <p>In the response to question 2, the issue was raised about how the descriptors are to be used to make judgements and the extent to which pupils would need to show attainment across the content of any given descriptor/standard. Without clarification of this issue, it is difficult to comment on how weightings could apply. If certain aspects of the curriculum are to be given greater emphasis then clear guidance will be required. If all aspects are of equal importance, then this must be made explicit.</p> <p>Specifically in relation to Writing, there is concern about the number of sections focusing on the technical aspects of grammar, punctuation and spelling. If composition (broadly the first section at Key Stage 1 and the first two at Key Stage 2) is not given due prominence, it could easily be overwhelmed during assessment and moderation by the other sections. Guidance on the use of the Writing descriptors will be necessary to avoid this danger.</p> <p>Weightings add unnecessary complexity. If specific elements of the curriculum are considered to have particular importance, this should be reflected in the curriculum itself and this in turn will be reflected in the extent to which these elements are described in and assessed through the performance descriptors.</p>		

6 If you have any further comments regarding the performance descriptors, please provide details. For example, is there further supporting information that would be helpful in understanding and using the performance descriptors?



Comments:

While the status and contribution of teacher assessment to the new assessment arrangements is welcome, some important issues remain unresolved.

The use of a number of descriptors/standards appears to be driven by the demands of data for floor targets and progress measures rather than by the requirements for a system for expressing attainment clearly that contributes to planning, teaching and learning. The danger is that having a range of descriptors for a given subject area could perpetuate under-expectation for a substantial proportion of children, in a similar way to the out-going system.

A fundamental problem with levels was the way in which they were used as labels for children, capping expectations. One of the reasons for getting rid of levels was because they distracted attention from specific assessments of what a child can or cannot do. The proposed new system re-creates those problems.

It is also likely that schools will end up using these labels as part of a tracking system, and re-create another of the problems experienced with levels. These descriptors appear to be a new system of levels but by another name.

The use of the term 'mastery' to describe performance that is in some way 'beyond' national standards is mistaken as it implies that mastery is not required to attain the national standard. The use of five descriptors/standards for Writing at Key Stage 2 is particularly problematic in this respect and adds to an overall impression of incoherence, with differing numbers of descriptors/standards across subjects and key stages. There are also concerns about how the descriptors will be used to make assessments, with the danger of perpetuating the problems of 'best fit' judgements for which levels have been criticised.

There is a danger that moderation will become more onerous for both teachers and moderators, with insufficient time available to look at evidence across descriptors/standards that are detailed and lengthy.

Will exemplification materials be available in time for teachers to engage with these

before having to make judgements?

At the start of each descriptor/standard, reference is made to 'sufficient evidence'. The meaning of this will require clarification in subsequent guidance, for example, applying their skills and understanding independently over time and across a range of contexts.

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?

Yes /	No
-------	----

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 use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please contact Aileen Shaw, DfE Consultation Coordinator, tel: 0370 000 2288 / email: aileen.shaw@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 18 December 2014

Send by post to:

Rashida Akbar/Jennifer Conlon
Department for Education
Assessment Policy Team
Level 2
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: PerformanceDescriptor.consultation@education.gsi.gov.uk