

Response ID ANON-6FQ1-TWXR-K

Submitted to **Primary assessment in England**

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Ministerial Foreword

Introduction

1 What is your name?

Name:

Ian Noon

2 What is your email address?

Email:

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3 What is your organisation?

Organisation:

National Deaf Children's Society

4 Which of these categories best describes your role?

Categories:

Representative organisation - SEND

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.:

We believe that the profile could be improved by adding further guidance around early learning goals (ELG) that encompass communication.

Deaf children may show initial delay in their development of communication skills which could affect their progress in many areas of the ELGs.

As is currently noted in the EYFS statutory framework Statement 3:

'A child whose outcome for 'Speaking' is at the 'emerging' level may also show emerging attainment for those other ELGs with a significant communication element.' These include: • self-confidence and self-awareness • managing feelings and behaviour • understanding • shape, space and measures • people and communities • knowledge of the world'.

In light of this potential for delay, it is important that any unexpected pattern of attainment is discussed and used in planning of the support for deaf children. More specific information on this area in the profile and the implications for deaf children would therefore be welcomed.

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.:

An outcome of 'emerging' 'expecting' and 'achieving' covers a very wide range of levels of learning and development, and the terminology has been reported negatively by parents as labelling their deaf children at an early age.

Although there is clarity that a child who is attaining 'expected' is in line with national expectations, the 'bands' of emerging and exceeding are, by definition, potentially wider. A scoring system could help resolve this.

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.:

The observatory methodology now used is very time consuming and could be streamlined. However, changing to a simple test might disadvantage those deaf or other SEND children who did not show a uniform level of attainment over all the strands and needed deeper investigation into their outcomes and future need for support. Therefore, whilst we would support streamlining of the methodology, we believe that the observatory methodology should continue to be used.

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.:

Benchmarking case studies, deaf awareness information and specific video examples of children with a hearing loss could be offered to all moderators, with special relevance to those going into schools with resource bases or special schools for children with hearing loss. The National Deaf Children's Society would be happy to help support the development of such resources.

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.:

We would support a baseline assessment but only if the assessment is suitably holistic. Reception year is very early to ascertain children's levels without a very holistic, observatory approach, especially those with a disability who might find it harder to engage in a one off specified test. It is to be hoped that if the baseline was moved to reception year then this would be the type of testing used.

A baseline check would be just a snapshot compared to the embedded process of observation that the EYFS supports.

We share the concerns expressed by others that a one-off baseline check would not reflect how young children learn and may not provide an accurate picture or quality information about developmental stage. It is likely that it would test a body of knowledge on a particular date rather than the qualities, attitudes, dispositions and skills that young children develop over time in the early years.

Equally, given its current critical purpose, the EYFS profile should not be dispensed with in favour of an assessment that sole or main purpose is to provide a baseline for accountability purposes

The EYFS is designed to meet specific purposes set out in section 2 of the STA's EYFS handbook 2017. There is a need to consider whether using the EYFS as a baseline for school accountability and indeed school funding (via the lower priori attainment measure) would change the nature and approach of the assessment and compromise its ability to deliver against the current purpose set out in the 2017 Handbook. It is also important to bear in mind:

- the fact that it is completely undifferentiated at the 'emerging' level and so will lump together all the children who don't get expected levels, that is 32.7% of all children, or 30.7% if you just count the areas that contribute towards the 'good level of development' (2016 data).
- the extent to which it is suitable as a baseline: it is contributed to by different providers, should be contributed to by parents and, for children who don't make expected levels, there should be further consideration of where they are up to, in terms of Development Matters (or the Outcomes) and further exploration of whether they have SEN. It is, in effect a consensual approach which could be put at risk by giving it also a primary accountability function against it.

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.:

It is important to have a starting point that captures the ability of the children at the beginning of their exposure to that particular teaching environment. This could be placed within the first half term as with the previous policy rather than later in reception year.

For many children with a hearing loss, it is important to have an early baseline measurement to show to families as well as schools the extent of small steps improvement throughout their school pathway. However, few children with a hearing loss start the EYFS in reception year, with many schools having a nursery class, or the children attending private and voluntary settings. It would be important to ensure that a measurement for these children was noted in some way.

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.:

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.:

Teacher assessment data has been shown to be very effective when assessing children with SEND who present with idiosyncratic levels of attainment, and who also might find it difficult to engage in a specific, one off testing situation. We therefore believe it should continue to be used.

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.:

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.:

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?

Not Answered

Please write your response in this box.:

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?

Not Answered

Please write your response in this box.:

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.

Not Answered

Please write your response in this box.:

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.:

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.:

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.

Not Answered

Please write your response in this box.:

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.:

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.:

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.:

We appreciate and support the Department's commitment to including children with SEND especially those who are deaf. However, after discussion with Teachers of the Deaf and parents of deaf children it is important to consider concerns that have arisen in reference to proposals on current testing:

- At present there is still a concentration on phonics especially blending and reading aloud. This can be difficult for deaf children who communicate orally, who may have both expressive and receptive difficulties with language, as well as signing children who would use signed supported English. Several teachers reported that with the extra time allowed, the KS1 reading assessment with breaks, actually took over two days to complete – with some deaf children becoming upset and unwilling to continue.
- There are several instances, especially in the Pre Stage frameworks where the concentration on listening, and the linguistic production of phonics, would seem to completely override the usefulness of assessment results for children with a hearing loss.
- A concern of Teachers of the Deaf is the use of the statements by schools as learning goals in their planning and therefore narrowing and limiting the amount of time the learners have for placing skills in the wider context. Deaf children miss out on a great deal of incidental learning due to their SEND, and concentration on these statements is having a narrowing effect on the curriculum.
- Concerns were also raised about uncertainty about special arrangements available at each level, especially with support for the phonic element of the reading. More detailed information with perhaps case study examples would be appreciated.

For these reasons, we believe there is a potential for the proposals to have a disproportionate negative impact on deaf and other disabled children.

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.:

As set out earlier, we believe that more detailed information and guidance to professionals on the assessment arrangements for deaf children would be helpful. The National Deaf Children's Society would be happy to work with DfE and the STA on this.

In terms of advancing equality of opportunity, it would be helpful if data was collected on all children with a disability. Currently, data is only collected on those who have formally recorded as having a special educational need. In many areas, we find that children with the same needs can be categorised as having a SEN, whilst others are not. We therefore believe that data should be collected instead on all children who have a disability.

A failure to collect data on all disabled children, with a breakdown by type of disability, means that it would be unnecessarily harder for the Department to identify any adverse impact and so identify how they could better advance equality of opportunity.