

Response ID ANON-9SM9-9Y9V-K

Submitted to **Primary school pupil assessment: Rochford Review recommendations**

Submitted on **2017-06-22 13:19:59**

Introduction

1 What is your name?

Name:

Ian Noon

2 What is your email address?

Email:

ian.noon@ndcs.org.uk

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 assessment arrangements

Rochford Review final recommendations

Future arrangements as proposed by the Rochford Review

6 If the statutory requirement to assess pupils using P scales was removed, would any important information no longer be available to you?

Yes

Please explain your reasoning and provide any further evidence we should take into account.:

The proposal is to replace P scales P4-8 with 2 standards entry to expected and emerging to expected. These are broad standards and, without P scales, it would be important to be able to show how progress within these standards can be demonstrated to avoid the risk of some pupils being at these standards for some considerable time. It is possible that in the absence of P scales, commercial providers may enter the market with small step indicators of progress which may have similarities with P scales

Lack of emphasis given to communication (speaking and listening) in the Pre-key Stage standards:

The P-scales have 2 sections (speaking and listening) devoted to the developing communication of the child – aspects which are crucial to success in the teaching and learning environment for any learner and also for future life skills. The Pre-Key Stage Standards do not include these aspects in the English standards (only reading and writing) while reference to communication skills would be dissipated throughout the 7 aspects, making it difficult (if not impossible) to track with the rigour that it should have.

Therefore, given that speech, language and communication are perhaps the most significant building blocks for teaching, learning and life skills, the National Deaf Children's Society would ask that these aspects be reported on and therefore included in the statutory assessment requirements. This would require adding these aspects to the seven aspects as a discrete communication aspect and including communication (speaking and listening) in the three proposed Pre-Key Stage Standards for English.

Comparative data:

We acknowledge that there was some room for improvement in the P-scales; however, they did produce comparative data which allowed for a level of quality assurance within schools, between schools; across local authorities and nationally. We would suggest that removing this level of protection of standards could be construed as treating children working at the non-subject levels less favourably than their peers working at Foundation level and above in the Key Stages.

7 In your opinion, are the pre-key stage standards clear and easy to understand?

No

If you answered no, which of the bulleted statements lack sufficient clarity to enable an effective teacher assessment to be carried out? Please explain why. :

The National Deaf Children's Society finds that most of the standards are quite clear but there is a potential for confusion and lack of fairness in the pre-key Stage 2 reading standards as follows:

- The early development standards in reading (bullets 2,3,4) are largely distinguished from the growing development standards (bullets 1,2) by the use of 'many' in the former and 'most' in the latter. It would be helpful to qualify these terms as different teachers may well have different interpretations of these two terms.

In the guidance, teachers are directed towards the spelling appendix for years 1 and 2, which includes exception words. Therefore, it should be possible to express 'many' and 'most' as a percentage of the number cited in these lists and, if desired, with an addition of, for example, 5-10 words from the specific phonics scheme used in the child's school.

- In foundation standard (bullet 3) and Early (bullets 3 and 4), a book is required that is 'closely matched' to the child's GPC knowledge. We assume that this book will not be known to the child; however, it is important to state whether or not this is the case.

- In Foundation (bullet 4) and Early (bullet 5), reference is made to a 'familiar book that is read to them,' we would like clarification on the use of the word 'familiar' as it could mean a book that had been read and discussed with them in class 5-plus times if it is a favourite or may have just been read once. In order to gain consistency in these standards, it is important to define the term 'familiar.'

We have also noted similar areas of potential confusion/ different interpretation in the pre-key stage 2 writing standards:

- the use of 'most' in Foundation bullet 3; early standard bullets 1 and 3 and Growing bullet 1.
- the use of 'many' in Growing bullets 2 and 3
- the use of 'some' in Growing bullet 4.

Similar comments apply to the pre-key stage 1 standards:

- in writing, foundation bullet 3 uses 'most'
- whether or not the choice of book for reading in bullet 3 is already known to the child or is an unseen text
- in reading clarification on what is meant by a 'book that is familiar' in bullet 4.

8 Do the pre-key stage standards support and encourage progression on to the statutory national curriculum tests for pupils who are able to do so?

No

Please explain your reasoning and describe how the pre-key stage standards could be improved to support and encourage progression on to the statutory national curriculum tests.:

The names of the pre-key stage standards and effects on progression:

The descriptive names of the standards covered by the interim assessment frameworks have names that clearly show progression, i.e. working towards the expected standard; working at the expected standard and working at greater depth within the expected standard. Such names clearly give a feeling of movement and progression whereas, the National Deaf Children's Society is concerned that the names within the pre-key stage standards do not provide the same feeling of progression – foundation; early development and growing development and then when they reach the interim assessment framework, they are still just 'working towards the expected standard.' It feels like a very long haul as all the names of these standards could almost be synonyms. In addition, many children will take quite some time to achieve all these stages and so it is important that the attainment of each stage should give them a feeling of success and encourage further progression.

More on progression:

As noted above, many children working on the pre-key stage standards will take some time to achieve each standard and so to keep them motivated, it will be important for them to feel progression by breaking each element of the standard into smaller pieces. This will usually be done by individual schools or by commercial companies as happened in the case of the P-scales; however, it will be important to highlight this information as guidance for schools and teachers.

Assessment for pupils not engaged in subject-specific learning

9 Do you agree that statutory assessment should focus on cognition and learning?

No

Please explain your reasoning and, if applicable, describe what should be assessed instead or in addition to cognition and learning, and why. :

Inclusion of speech, language and communication:

The National Deaf Children's Society acknowledges that cognition and learning is an important focus; however, would argue that all teaching and learning is hugely dependent on the development of effective speech, language and communication skills. Therefore, we would ask that inclusion be given to this area as an additional discrete aspect. A fuller argument for our request is given in our response to question 1 under our paragraph entitled 'Lack of emphasis given communication in the pre-key stage standards.'

We also believe that to obtain a holistic picture of the child the remaining two areas identified by the SEND COP should also be included as they have significant effects on the criteria for engagement – social, emotional, mental health and sensory/physical.

Assessment for pupils not engaged in subject-specific learning

10 Do you agree that assessing against the seven areas of engagement listed above is the right model to be used in the statutory assessment of these pupils?

No

Please explain your reasoning and, if applicable, provide details of robust alternative methods for the assessment of cognition of learning, or other SEND areas of need, which the department should explore.:

Concerns regarding 7 areas:

- The National Deaf Children's Society accepts that the 7 areas of engagement provide a useful approach to assessing or rather observing the engagement of a child, especially those children working at levels 1-3 of the P-scales. However, at the moment, only a broad definition of each area is given and so teachers and other educators may have very different ideas when using these 7 areas as a statutory assessment. If they are to be used as such, we would suggest that each area should have a set of criteria (not linear as we accept that children do not necessarily develop in that way) and / or clear guidelines about what to look for and the type of evidence to be gathered over time.

We would acknowledge the exceeding usefulness of these 7 areas when preparing a programme of learning / development for these children using the Engagement Profile and Scale developed during the CLDD research project. Using the tool in this way should certainly encourage progression in learning, but, without clearer criteria, it seems to be a very subjective instrument for reporting on a child.

- As highlighted in our responses to questions 1 and 4 above, we believe that only using these 7 areas does not give sufficient emphasis to the very important development of speech and language and communication skills. These skills facilitate access to teaching and learning, are the building blocks for literacy and underpin social and emotional development and independence. Such is the importance to a child's life chances that these skills should also be included in the statutory above

- We are concerned that the early learning in specific subjects (Reading; Writing; Speaking; Listening; Mathematics - using and applying mathematics, number, shape, space and measures) at levels 4-8 in the current p-scales is not part of the statutory assessment and is not currently included in the pre-key stage standards. These aspects are very much part of cognition and learning and given the fact that children can have 'spiky' profiles, such learning should be recorded as complementary information to the 7 areas as part of cognition and learning or the pre-key stage standards could be extended to include them or perhaps scales 4-8 (with some additions/ revision) could be split between the 7 areas and pre-key stage standards.

11 Do you believe that assessing pupils against the seven areas of engagement for cognition and learning would give parents and carers meaningful information about their child's attainment and progress?

No

Please explain your reasoning and provide any further evidence we should take into account.:

They are 7 areas of engagement so they show the levels of the pupil's engagement which is important, but they are not measures of what the pupil has learnt and attained. We believe that a simple verbal report on the 7 areas would give some information but parents usually want to know that there is progress and this could be quite difficult to demonstrate without some form of:

- criteria (e.g. measuring changes in the duration and frequency of engagement in the 7 areas)
- visual evidence
- assessment towards achieving clear meaningful (to the child) learning objectives
- recognition if the child is showing some signs of early learning a subject.

We also believe that parents would want information on the 3 other areas of need as outlined in SEND Code of Practice in order to have a holistic picture of their child's progress.

12 If you did not agree that statutory assessment should only focus on cognition and learning, do you think that the seven areas of engagement would be useful in assessing the other areas of need as outlined in the 'SEND Code of Practice: 0-25 years' (communication and interaction; social, emotional and mental health; sensory and/or physical)?

Yes

Please explain your reasoning and, if applicable, describe which other areas should be assessed and why.:

The National Deaf Children's Society believes the 7 areas of engagement could add another dimension to the other information that would be gathered from the areas of need in the SEND COP from education and the other professionals involved with the child.

Assessment for pupils not engaged in subject-specific learning

13 For those working in educational settings, if the government accepted the recommendation that schools should decide the best way to assess the seven engagement areas of cognition and learning, would you be able to assess pupils against the seven areas using the guidance provided in the Rochford Review's final report?

No

Please explain your reasoning and describe what additional support you might need in order to make these assessments? :

The National Deaf Children's Society accepts all the 7 principles given on page 22 of the Rochford Review's final report, but does not believe that this is sufficient

guidance for schools to generate effective and rigorous assessment protocols for each child. Exemplar materials and case studies will be needed to give support to settings.

Reporting assessment data

14 The Rochford Review recommends that schools should not be required to submit assessment information to the department for pupils not engaged in subject-specific learning. Do you agree with this recommendation?

No

Please explain your reasoning and provide any further evidence we should take into account:

The National Deaf Children's Society can understand why the Rochford Review panel made this recommendation as they wanted to give more freedom to schools to develop their own curriculum and assessments for children not engaged in subject specific learning. However, such freedom needs to be tempered with accountability to ensure that the settings are providing the most effective approaches so that these children are, in fact, making progress. DfE also needs to consider why one group of disabled children are treated differently from other children and whether this is compatible with equality duties under the Equality Act. There is a risk that children with a subject of a less robust reporting and accountability mechanism will lose out against other children (i.e. there is a risk if special schools have to report the progress of pupils currently at P4-P8 but not those at P1-3 then there is an incentive to prioritise the former over the latter).

Implementation

15 How can we ensure that ITT and CPD provision adequately supports those who work in schools with the assessment of pupils who are not working at the standard of national curriculum tests? What kind of training, materials and support would be helpful?

How can we ensure that ITT and CPD provision adequately supports those who work in schools with the assessment of pupils who are not working at the standard of national curriculum tests? What kind of training, materials and support would be helpful?:

The National Deaf Children's Society believe that this group of pupils requires a very skilled assessment and that many teachers, particularly those working in mainstream schools, will require a large amount of CPD as the assessment is not only crucial to progress for each child but could also be unique to each child. To be absolutely successful, it would require team around the child (including parents/ carers) approaches as well as a wide knowledge of the different assessments and observations that should be made at both the formative and summative levels.

We believe that before P-scales are replaced, there would need to be:

- structured, intensive (not just one session, possibly a minimum of 3-4 sessions / tutorials) input in the form of face-to-face sessions or web-based tuition which explained the philosophy of the approach, the pedagogy before the more practical information, skills (e.g. structured observation) and resources are introduced
- information about the different types and ranges of SEND and how they can interact
- a bank of videos that can be accessed of actual scenarios with different SEND and age groups
- access to specialist knowledge either online or through specialist teachers / other professionals in the area
- examples of reporting to parents / carers
- examples of the setting of realistic, yet stretching, expectations, outcomes and learning objectives.

We would suggest that all teachers in ITT would benefit from this intensive input as assessment for this particular group of children is perhaps the most challenging and, if understood for them, it will help these future teachers to provide effective assessment for all children.

16 The Review suggests that schools should work collaboratively across different types of educational settings. How could schools best be supported to share good practice?

The Review suggests that schools should work collaboratively across different types of educational settings. How could schools best be supported to share good practice? :

Schools need to share training and work together in moderation exercises especially mainstream teachers may just have one pupil with complex learning difficulties and disabilities who could feel unsupported.

17 Would additional guidance for the statutory assessment of pupils who are not yet working at the standard of national curriculum tests and who have English as an additional language be helpful?

Yes

Please explain your reasoning and, if applicable, describe what areas the guidance should cover? :

Implementation

18 What steps could we take to reduce any burdens on those involved in the statutory assessment of pupils not yet working at the standard of national curriculum tests?

What steps could we take to reduce any burdens on those involved in the statutory assessment of pupils not yet working at the standard of national curriculum tests? :

We believe that the approach suggested, in its initial stages, will be very time consuming if it is going to be properly understood in order to gain commitment from teachers. However, once established and working effectively (resulting in well-designed learning programmes with children making progress) teachers could find that their assessments and teaching are more complementary and streamlined and so eventually be less burdensome in terms of planning time.

Equalities

19 Do you think that any of these 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.:

20 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.

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