

## Government response to the consultation on primary assessment

On Thursday 14<sup>th</sup> September the government published its response to the consultation on primary assessment. NAHT submitted a detailed response to the consultation as well as engaging directly with the Department for Education and Standards and Testing Agency regarding the proposals over the past months. The table below sets out our summary and analysis of the [government response](#).

Consultation proposals	NAHT said	Government response	NAHT's view
<p><b>The early years foundation stage and profile</b></p> <p>The consultation confirmed that the EYFSP will remain a statutory assessment for future years, but sought views on improving it.</p>	<ul style="list-style-type: none"> <li>• NAHT supported the government consultation proposal that the Early Years Foundation Stage Profile (EYFSP) should be retained.</li> <li>• Concerns have arisen around how the data from the EYFSP is used: it was not designed as a baseline or to judge school performance, and so must not be used as such.</li> <li>• NAHT supported the development of additional categories for children who are working below the 'emerging' category to provide opportunities to demonstrate the progress and outcomes for these children.</li> <li>• NAHT argued that significant steps must be taken to reduce the workload and time burden involved in administering the EYFSP including the level of evidence currently expected.</li> <li>• NAHT members identified a need to improve both the consistency and</li> </ul>	<p>Any changes will come into effect from 2020-2021 academic year</p> <p><b>Early Learning Goals</b></p> <ul style="list-style-type: none"> <li>• The 7 areas of assessment remain unchanged and the current number of ELG's will be retained but DfE will explore whether it is feasible to reduce the number which are assessed.</li> <li>• Descriptors for a typical level of development against the ELG's will be made clearer and brought more into line with KS1.</li> </ul> <p><b>EEE categorisation</b></p> <ul style="list-style-type: none"> <li>• The purpose of EYFSP has never been to hold individual schools to account and this will not change.</li> <li>• Existing EEE categories will be retained but DfE will review whether it is right to introduce an additional band within "emerging".</li> <li>• The descriptors underpinning these scales will be clarified.</li> </ul>	<p>The government has listened to NAHT and these decisions align with our submission.</p> <p>NAHT will continue to engage with DfE on the improvements to the EYFS and Profile. We want to ensure that an additional band is added within the "emerging" category to ensure that the progress and achievements of all children are being captured. The proposals to align the ELG's more with KS1 could have a negative impact on the EYFS and we will want to ensure that this is not the case.</p>

	<p>effectiveness of the EYFSP moderation process and the need for those administering the EYFSP to have access to high quality, funded training.</p>	<p><b>Workload</b></p> <ul style="list-style-type: none"> <li>All guidance for administering EYFSP will be reviewed and the requirements for evidence will be made clear.</li> </ul> <p><b>Moderation</b></p> <ul style="list-style-type: none"> <li>Guidance related to moderation will be reviewed and DfE will explore the feasibility of moderating a limited number of ELGs.</li> </ul>	
<p><b>The best starting point for measuring progress in primary school</b></p> <p>Any progress measure needs a reliable baseline, a starting point from which progress will be calculated. The options presented in the consultation were:</p> <p>Option 1: Capture more progress through the primary phase by moving the starting point for measuring progress to the reception year</p> <p>Option 2: An improved key stage 1 baseline</p>	<ul style="list-style-type: none"> <li>NAHT cautiously supported the introduction of a new baseline assessment in the reception year, if that is accompanied by the removal of statutory assessments at the end of key stage 1 (KS1).</li> <li>It is imperative that any new baseline in reception should not take on the high stakes nature of the current tests at KS1 and key stage 2 (KS2).</li> <li>NAHT members do have concerns about the introduction of a new baseline at the start of school, particularly in the aftermath of the recent attempt to introduce a reception baseline, and these concerns must be addressed if such a baseline is to be supported.</li> <li>Any new baseline in the reception year should be provided by a single, nationally agreed provider to avoid a repetition of the problems experienced in 2015/16.</li> <li>NAHT is concerned that the focus of such a baseline should go beyond a narrow range of skills related to literacy and numeracy and supports the inclusion of a</li> </ul>	<ul style="list-style-type: none"> <li>DfE intend to develop a new baseline, to conduct a large scale pilot and evaluation and introduce in Autumn 2020.</li> <li>There will be a single supplier.</li> <li>There will be continued engagement with stakeholders throughout the design process and at key sign off points in the development of the assessment.</li> <li>DfE express a commitment to ensuring it is high quality, age appropriate, that schools have necessary training, guidance and support and that child's experience is positive.</li> <li>DfE will work with experts to develop rules around progress measures including the minimum cohort size and minimum proportion of pupils who need to have been at the same school from reception to year 6.</li> <li>The baseline will focus on skills which can be reliably assessed and correlate with the end of KS2 – this will include early literacy and numeracy skills. They will explore ways in which it would also be</li> </ul>	<p>NAHT is pleased with the approach demonstrated by government here. They have addressed, or shown they are aware of, the concerns of our members and potential pitfalls of a baseline assessment in reception.</p> <p>NAHT will need to see how this develops over the coming months and is keen to ensure that some of our members are involved in the pilot.</p> <p>We will work with the government to ensure that the new baseline is designed properly, and will provide useful information for schools whilst avoiding unnecessary burdens on teachers or anxiety for young children.</p>

	<p>broader range of skills and behaviours, which have an impact on the progress children make.</p>	<p>possible to assess some form of self-regulation.</p> <ul style="list-style-type: none"> <li>• DfE are clear about the limited purpose and use of the data – it is to establish pupils’ prior attainment as a starting point for progress measures; NOT to judge/label/track individual pupil progress or set targets or predict KS2 attainment; NOT to measure performance in EY or hold EY practitioners to account; NOT to determine inspection outcomes or what improvement action is needed.</li> </ul>	
<p><b>Interim years</b></p> <p>Any new baseline assessment would not be in place before the 2019 to 2020 academic year. Up until this point, the consultation proposed continuing to use key stage 1 teacher assessment data as the baseline for the cohorts of pupils who will be completing primary school before that time.</p> <p>The consultation also proposed making end-of-key stage 1 assessments non-statutory for all-through primary schools once a new baseline in reception has become established.</p>	<ul style="list-style-type: none"> <li>• NAHT supported the proposal to continue to use KS1 teacher assessment data as the baseline for measuring progress in the interim years before a new measure in reception is in place.</li> <li>• There are areas of KS1 assessment which should be improved for this interim period.</li> <li>• With the introduction of a new assessment in the reception year to provide the baseline for a progress measure for school accountability, NAHT argued that there is absolutely no reason why statutory assessment at KS1 should be retained.</li> </ul>	<ul style="list-style-type: none"> <li>• Government will make KS1 assessments non-statutory as soon as the baseline in reception has become established in 2022/2023.</li> <li>• The current requirements for schools to report on pupil performance and attainment at the end of KS1 will be retained.</li> <li>• To support schools, optional end of KS1 tests will be made available for schools to use as they see fit and DfE will explore making these available through a national assessment bank which could also contain other materials to support schools’ on-going assessment.</li> <li>• KS1 assessment data will be periodically sampled from a small representative sample of primary schools – this data will not be attributable to specific schools nor used to hold schools to account.</li> </ul>	<p>The government response reflects what NAHT called for in our submission to the consultation. They are committed to making KS1 non-statutory once the baseline in reception is in place and NAHT has always been clear this is a step which will take several years to achieve.</p> <p>NAHT will continue to work to ensure that this commitment comes to fruition.</p>

<p><b>School types – infant, middle and junior schools</b></p> <p>The consultation specifically asked what would be the most effective accountability arrangements for infant, middle and junior schools' progress measures.</p>	<ul style="list-style-type: none"> <li>• NAHT said that the most effective and fair progress measure for all schools with primary aged pupils is a reception to Year 6 measure.</li> <li>• It is inherently unfair to suggest that a minority of pupils, attending schools which are not all-through primaries, will be required to undertake additional statutory assessments at the end of KS1. Such a decision may also have an impact on admissions, particularly to infant schools.</li> <li>• A national assessment bank which provides non-statutory standardised assessments may be particularly beneficial to these schools in evidencing the progress of their pupils.</li> </ul>	<ul style="list-style-type: none"> <li>• The government recognise a lack of consensus on this issue and concludes that there is no obvious simple answer. They believe it is right to take some more time to consider the best approach and will announce a settled position by January 2018.</li> </ul>	<p>NAHT argued that reception to year 6 was the best measure for all school types. In taking more time to consider their response the government will be engaging with stakeholders further and this includes NAHT. We will continue to press for this outcome and are encouraged that the government have acknowledged our concerns about retaining KS1 tests for pupils in these school types.</p>
<p><b>Collection of teacher assessment data at the end of key stage 2</b></p> <p>Should the department 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?</p>	<ul style="list-style-type: none"> <li>• NAHT questioned the purpose of collecting teacher assessment data when it appears not to be used in any purposeful way by the DfE and only the test results are used in performance measures for accountability.</li> <li>• If this statutory obligation were to cease, those teacher assessment frameworks for English reading and Maths should become non-statutory.</li> <li>• It is imperative that removing statutory teacher assessment in English reading and Maths at KS2 does not undermine</li> </ul>	<ul style="list-style-type: none"> <li>• The statutory requirement to report KS2 teacher assessment data in reading and Maths will be removed from the 2018/19 academic year.</li> <li>• The response makes clear that this does not undermine the fundamental importance of the on-going teacher assessment which takes place in the classroom throughout a pupil's time at primary school.</li> <li>• A statutory duty to report teacher assessment using the pre-key stage standards for pupils working below the standard of the tests will remain.</li> </ul>	<p>The government response aligns with NAHT's approach to this issue. We are pleased that the importance of teacher assessment has been recognised whilst removing the statutory requirement to report TA data.</p>

	<p>the primacy of teacher assessment in supporting pupil progress.</p> <ul style="list-style-type: none"> <li>• NAHT believes that a strong focus on assessment from initial teacher training (ITT) through to ongoing CPD for established teachers and school leaders must be a national priority in order to continue to improve the effectiveness of day to day assessment across all schools.</li> </ul>		
<p><b>Key stage 1 English grammar, punctuation and spelling test</b></p> <p>Should the key stage 1 English grammar, punctuation and spelling test remain non-statutory beyond the 2016 to 2017 academic year, with test papers available for teachers to use as they see fit?</p>	<ul style="list-style-type: none"> <li>• NAHT agreed with the proposal that the KS1 English grammar, punctuation and spelling (GPS) test should remain non-statutory and argued that this should be extended to include the KS2 GPS test.</li> </ul>	<ul style="list-style-type: none"> <li>• The KS1 GPS test will remain non-statutory and optional test materials will continue to be made available for schools to use.</li> </ul>	<p>This is the outcome proposed by NAHT in our submission. However, we argued that KS2 GPS should also be non-statutory and will continue to campaign for this to happen.</p>
<p><b>Multiplication tables check</b></p> <p>The Government plan to introduce a national multiplication tables check from the 2018/19 academic year. The consultation asked at what point in key stage 2 the multiplication tables check should be administered and</p>	<ul style="list-style-type: none"> <li>• NAHT does not support the implementation of a multiplication tables check for the whole cohort of pupils at any point in KS2.</li> <li>• NAHT is concerned that this is an example of an additional test being introduced on the basis of political ideology, without a clear evidence base that it is required.</li> </ul>	<ul style="list-style-type: none"> <li>• The check will take place at the end of year 4 which corresponds with the point in the National Curriculum when pupils are expected to know their times tables.</li> <li>• It is designed to place minimal burden on schools and teachers – there will be a window for administering the test; there is no requirement that the whole class does it at the same time; it is online; there are</li> </ul>	<p>NAHT will continue to oppose the implementation of a multiplication tables check and it is hugely disappointing that the government are still intent on its introduction. This won't tell school leaders anything they don't already know and although school results won't be published, the stakes of this</p>

<p>how it can be implemented in a way that balances burdens on schools with benefit to pupils.</p>		<p>instant results and there is no additional data submission for teachers.</p> <ul style="list-style-type: none"> <li>• A pilot will take place in 2018/19 and the check will become statutory for 2019/20.</li> <li>• Data will be published at national and LA level.</li> <li>• RSC's and Ofsted will be able to access school data (in the same way they have access to phonics data).</li> </ul>	<p>test will be raised because Ofsted and RSC's will have access to the results.</p>
<p><b>Teacher assessment of English writing</b></p> <p>The consultation proposed moving to a 'best fit' approach coupled with a review the 'pupil can' statements within the writing frameworks. This change would apply to the assessment of writing at both key stage 1 and key stage 2, potentially for the 2017 to 2018 academic year. The consultation also asks for evidence of alternative approaches to the assessment of English writing and of any effective models of moderation or standardisation of teacher assessment that the Department for Education should explore.</p>	<ul style="list-style-type: none"> <li>• In our survey on the primary assessment consultation proposals, 96% of 751 respondents agreed to some extent that the teacher assessment of writing should change to a best fit approach.</li> <li>• In the same survey 95% of 751 respondents agreed to some extent that significant changes are needed to the interim teacher assessment framework for English writing, to better reflect the balance between creative and technical aspects.</li> <li>• There are substantial concerns that grammar, punctuation and spelling are, in effect, "double counted" for pupils at KS2 with the statutory GPS test and the majority of "I can" statements in the writing teacher assessment framework also focused on technical aspects of writing.</li> <li>• NAHT believes that the "secure fit" approach to the assessment of writing is leading to unfair assessments of pupil's attainment and progress. This, in turn, is</li> </ul>	<ul style="list-style-type: none"> <li>• A more flexible approach to the assessment of writing will be introduced in 2017/18.</li> <li>• The "pupil can" statements for writing have been subjected to a comprehensive evaluation and as a result have been revised at KS1 and KS2.</li> <li>• The interim pre key stage standards for writing have also been revised and the same more flexible approach to writing will apply.</li> <li>• Updated exemplification materials in writing will be published later in the Autumn term.</li> <li>• The frameworks for reading, Maths and science have also reviewed. They will stay the same for both KS1 and KS2 in 2017/18. Updated frameworks in reading and Maths at KS1, and science at KS1 and KS2, will be published for use in 2018/19 onwards.</li> <li>• The frameworks for use in 2017/18 have been published: <a href="#">KS1 TA frameworks</a></li> </ul>	<p>NAHT campaigning has had a significant impact on this. Our work has ensured that the government has clearly understood the criticisms of the secure fit approach and previous "pupil can" statements. As a result of this influence, the government has introduced significant and positive changes for 2017/18 with a more flexible approach to the assessment of writing for all pupils and a better balance of composition, creative and technical in the "pupil can" statements.</p> <p>It is right that the revised frameworks for reading, Maths and science are introduced next academic year.</p>

	<p>leading to the creation of unreliable data on school performance in writing.</p>	<p><a href="#">KS2 TA frameworks</a>  <a href="#">KS1 pre-key stage standards</a>  <a href="#">KS2 pre-key stage standards</a></p>	<p>NAHT will continue to work with the DfE on the guidance and exemplification materials to support the new approach. We will be pressing for these to be published by Autumn half term.</p>
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Useful links:

[Primary assessment in England: government response](#)

[Primary assessment in England: impact assessment](#)

[KS1 pre-key stage standards](#)

[KS2 pre-key stage standards](#)

[KS1 TA frameworks](#)

[KS2 TA frameworks](#)