

Government response to the consultation on the Rochford Review recommendations

NAHT submitted a detailed response to the consultation on the Rochford Review recommendations. The table below sets out our analysis of the [government response](#).

1. Inclusive Assessment

Recommendation	NAHT said	Government response	Additional information	NAHT's view
<p><u>Recommendation 1:</u> The removal of the statutory requirement to assess pupils using P scales.</p> <p><u>Recommendation 2:</u> The interim pre-key stage standards for pupils working below the standard of national curriculum tests are made permanent and extended to include all pupils engaged in subject-specific learning.</p>	<p>Overall, NAHT supported the review's principle that the assessment for pupils working below the standard of the national curriculum should align with the new national curriculum.</p> <p>However, we set out our view that further work was required to achieve effective implementation of the removal of P scales.</p> <p>Teachers and leaders argued strongly that existing assessment arrangements for writing failed to provide sufficient flexibility to</p>	<p>Government accepts the Rochford Review recommendation and will remove the requirement to assess pupils engaged in subject-specific learning using P scales from the 2018 to 2019 academic year onwards.</p> <p>Government will accept the recommendation that the interim pre-key stage standards are made permanent and extended to cover all pupils engaged in subject-specific learning.</p> <p>The government response to the parallel 'Primary assessment in England' consultation sets out that, from the 2017 to 2018 academic</p>	<p>Teachers should continue to assess these pupils using P scales in the 2017 to 2018 academic year, while government takes forward the necessary changes to legislation.</p> <p>To give schools adequate time to prepare for these changes, this recommendation will take effect from the 2018 to 2019 academic year onwards.</p> <p>Mainstream teacher assessment frameworks in writing have been reviewed and revised versions for use from 2017 to 2018 published. This has been mirrored with the publication of interim pre-key stage standards in</p>	<p><u>Right decisions:</u></p> <p>Government has listened: we endorse the decision to undertake a review of the pre-key stage standards, involving curriculum and assessment experts from the Special mainstream sectors; and the decision to pilot peer to peer moderation.</p> <p>The decision to apply the more flexible approach to the assessment of English writing to the pre-key stage standards is the right one (the newly published interim pre-key stage standards can be found here – interim pre-KS1 and interim pre-KS2).</p>

	<p>properly recognise pupils achievements.</p> <p>The terminology of the pre-key stage standards should be positive statements of what pupils can do.</p> <p>Government must ensure that health and social care services are integrated with the work of schools, and properly resourced.</p>	<p>year onwards, there will be a more flexible approach of assessing English writing. This change will also apply when it comes to assessing pupils against the interim pre-key stage standards in writing.</p> <p>A review of the pre-key stage standards will take place involving curriculum and assessment experts, teachers, school leaders (mainstream and special) and inclusion experts in order to reflect on the feedback gathered through the consultation exercise.</p> <p>‘Emerging’ and ‘entry’ standards that were proposed by the Review in their final report are included, and will be introduced from the 2018 to 2019 academic year onwards.</p> <p>A suite of supporting exemplification materials to be used alongside the final pre-key stage standards from the 2018 to 2019 academic year onwards.</p>	<p>writing, for use in the 2017 to 2018 academic year, meaning that the interim pre-key stage standards align with the teacher assessment frameworks.</p> <p>Only pupils that are working at the standard that is currently assessed using the interim pre-key stage standards should be assessed using these interim pre-key stage standards in 2017 to 2018.</p> <p>Pupils who are currently assessed using P scales but are engaged in subject-specific learning (broadly those currently working at P4 to P8) should only be assessed using the pre-key stage standards from the 2018 to 2019 year onwards, once the additional standards proposed by the Review have been introduced.</p> <p>The final pre-key stage standards, including the additional standards for all</p>	<p><u>But, more to do:</u></p> <p>However, we regret the missed opportunity to adopt more positive terminology for the pre-key stage standards that capture the achievement of pupils, rather than labelling them as being ‘below’ a standard by varying degrees.</p> <p>Government still needs to act on the better integration of health and social care providers that is required to deliver the specialist and therapeutic services that pupils and young people with SEND require.</p> <p>We believe sufficient funded CPD should be provided to ensure that the new system is well planned and swiftly embedded.</p>
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		DfE intend to pilot a peer-to-peer approach to moderation in the 2017 to 2018 academic year for both mainstream and pre-key stage assessment. If this pilot is successful DfE intend to trial it for pre-key stage standards in 2018-19.	pupils who are engaged in subject-specific learning but not working at the standard of national curriculum tests, will be published for use the beginning of from the 2018 to 2019 academic year.	
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2. Assessment for pupils not engaged in subject specific learning

Recommendation	NAHT said	Government response	Additional information	NAHT's view
<u>Recommendation 3:</u> Schools assess pupils' development in all four areas of need outlined in the SEND Code of Practice, but statutory assessment for pupils who are not engaged in subject-specific learning should be limited to the area of cognition and learning.	<p>NAHT agreed with the Rochford review that assessment for these pupils should focus on cognition and learning and agreed that there should be statutory assessment, but that this should not be used as a proxy for accountability.</p> <p>We said that government needed to take note of the non-linear nature of progress made by these pupils, and that the other</p>	<p>Government accepts the principle set out by the Rochford Review that statutory assessment of pupils not engaged in subject-specific learning should primarily focus on the areas of cognition and learning.</p> <p>A pilot will be undertaken during 2017 to 2018 academic year, before taking any final decisions on whether to implement this approach on a statutory basis</p>	<p>The response recognises concerns raised by some respondents to the consultation the 7 areas of engagement, were not originally designed as a statutory assessment tool, and that it is relatively untested in its proposed form.</p> <p>If the pilot is successful, changes would take effect from the 2019 to 2020 academic year onwards, following amendment to the</p>	<p><u>Right decisions:</u></p> <p>Government is right to focus on cognition and learning for statutory assessment.</p> <p>We welcome the recognition that progress for these students is often non-linear; and the department's recognition that the other areas of need remain central to provision for students not engaged in subject</p>

<p><u>Recommendation 4:</u> There should be a statutory duty to assess pupils not engaged in subject-specific learning against the following 7 aspects of cognition and learning and report this to parents and carers: responsiveness; curiosity; discovery; anticipation; persistence; initiation; and investigation.</p> <p><u>Recommendation 5:</u> Following recommendation 4, schools should decide their own approach to making these assessments, according to the curriculum that they use and the needs of their pupils.</p>	<p>areas of need remained equally important.</p> <p>Our response recognised the divergence of opinion about the suitability of the use of the seven areas of cognition and learning as a tool for assessment, but, overall, we supported its further development and set out the need for further guidance in addition to that provided by the Rochford Review to enable schools to assess against the seven areas.</p> <p>We identified a number of technical concerns, and provided exemplars, about whether a gap exists between the seven areas of engagement and the entry to the expected standard</p>	<p>However, the focus of statutory assessment on cognition and learning should not undermine provision in any other areas of need set out by the SEND code of practice.</p> <p>It is important that schools continue to monitor and support pupils' development in all 4 areas to foster engagement with the world and to encourage autonomy.</p> <p>The response accepts that pupils with the most severe or profound and multiple difficulties frequently do not make progress in a linear way, and recognises that there be value in teachers having greater flexibility in terms of how they carry out assessments, in order to develop approaches that work for their pupils and the curriculum that they follow.</p> <p>The pilot will also consider whether schools are able to adapt the 7 areas of</p>	<p>relevant legislation. In the meantime, schools should continue to assess pupils not engaged in subject-specific learning using the P scales.</p>	<p>learning.</p> <p>It is also right that the suitability of the use of the seven areas for assessment should be tested through pilots.</p> <p><u>But more to do:</u></p> <p>It is important that the pilots address the technical concerns about gaps between the seven areas and the entry to the expected standard.</p>
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3. Reporting assessment data

Recommendation	NAHT said	Government response	Additional information	NAHT's view
<p><u>Recommendation 9:</u> There should be no requirement to submit</p>	<p>On balance, NAHT supported the Review recommendation that</p>	<p>Government will pilot the assessment of pupils not engaged in subject specific</p>	<p>DfE notes that, if accepted, the Review recommendation would mean that it would not be able</p>	<p><u>Right decisions:</u> We think that the pilot is a</p>

<p>assessment data on the 7 areas of cognition and learning to the Department for Education, but schools must be able to provide evidence to support a dialogue with parents and carers, inspectors, regional schools commissioners, local authorities, school governors and those engaged in peer review to ensure robust and effective accountability.</p>	<p>schools should not be required to submit assessment information to DfE for pupils not engaged in subject specific learning, because this allows schools to better meet the specific needs of their pupils and teachers to exercise professional judgement.</p>	<p>learning against the 7 areas of engagement for cognition and learning during the 2017 to 2018 academic year. A final decision will be taken following the pilot.</p> <p>The pilot will also consider the extent to which the Review's recommended approach provides robustly evidence pupil progress, and the extent to which assessment data can be collected. Following this pilot, DfE will determine what, if any, assessment data will be collected by the department.</p>	<p>to collect nationally consistent data, which would require a specific format for reporting, undermining the freedom to assess.</p> <p>The response notes that not having nationally consistent data would mean that schools would be held to account in a way that was slightly different. Schools would have to be able to evidence pupil attainment and progress through discussion, including with parents, governors, local authorities, Ofsted and regional schools commissioners.</p> <p>If the review recommendations are accepted following the pilot the assessment of pupils not engaged in subject-specific learning would only take effect from the 2019 to 2020 academic year onwards.</p> <p>In the 2017/2018 and 2018/2019 academic years, schools should continue to report assessment outcomes using P scales for this group of pupils.</p>	<p>sensible way to determine whether it is feasible to move to a system where assessment information is no longer collected, how this should be approached, and to evaluate its success.</p> <p><u>But, more to do:</u></p> <p>It is critical that the pilot explores the way in which accountability should be exercised if nationally consistent data is not collected – this should include scoping how Ofsted will gather evidence and make judgements.</p>
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4. Implementation

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<p><u>Recommendation 6:</u> Initial Teacher Training (ITT) and Continuing Professional Development (CPD) for staff in educational settings should reflect the need for teachers to have a greater understanding of assessing pupils working below the standard of national curriculum tests, including those pupils with SEND who are not engaged in subject-specific learning.</p> <p><u>Recommendation 7:</u> Where there is demonstrable good practice in schools, those schools should actively share their</p>	<p>In our consultation response we set out the need for:</p> <ul style="list-style-type: none"> - all ITT programmes to contain specific training to ensure that trainees are familiar with the new arrangements - the strengthening QTS project to include formal, high-quality SEND training for all new teachers, in order to ensure their familiarity with the new requirements and equip them to support pupils with SEND in their future careers - funded CPD for all existing teachers (mainstream and SEND) is required to underpin 	<p>Government agrees that ITT and CPD must support teachers and school leaders to develop their understanding of assessment for pupils working below the standard of national curriculum tests.</p> <p>It indicates that 'a sound understanding of special educational needs' is part of its aim in 'strengthening the quality and content of ITT programmes, and references the framework of core content to ITT (July 2016). It references new toolkits for ITT providers that are under development, including the development of specific SEND resources.</p> <p>The response also references the Standard for Teachers' Professional Development and the Teaching and Leadership Innovation Fund,</p>		<p><u>Right decisions:</u></p> <p>Government's recognition of the importance of ITT and CPD in supporting teachers to develop their understanding of assessment of pupils working below the standard of the national curriculum test is welcome.</p> <p><u>But, more to do:</u></p> <p>The government needs to go further by ensuring high quality, universal training within ITT; building funded SEND training into the work of the strengthened QTS project for all teachers in the early stages of their careers; and rolling out funded CPD for all existing teachers to support their work.</p>

<p>expertise and practice with others. Schools in need of support should actively seek out and create links with those that can help to support them.</p> <p><u>Recommendation 8:</u> Schools should work collaboratively to develop an understanding of good practice in assessing pupils working below the standard of national curriculum tests, particularly across different educational settings. Schools should support this by actively engaging in quality assurance, such as through school governance and peer review.</p>	<p>the new arrangements.</p> <p>In addition we said sufficient funded planning, preparation and implementation time is required to support the delivery of the new arrangements.</p>	<p>stating that DfE will explore training materials and additional support that could be offered to schools to help teachers to have a greater understanding of assessing pupils working below the standard of national curriculum tests.</p> <p>Government refers to empowering schools to share knowledge and experience by promoting and supporting a culture within the profession that constantly seeks to improve, uses evidence, and stays ahead of the curve by supporting developments such as the Chartered College of Teaching.</p>		
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5. Pupils with English as an additional language (EAL)

Recommendation	NAHT said	Government response	Additional information	NAHT's view
<p><u>Recommendation 10:</u> Further work should be done to consider the best way to support schools with assessing pupils with English as an additional language.</p>	<p>This is a complex area, as pupils' needs can be masked, or complicated by the need for language acquisition, particularly where schools find it difficult to access support services, either due to funding constraints or the availability of appropriately trained staff. Additional funded resources and training are required.</p>	<p>Government agrees with this recommendation – it plans to update statutory assessment guidance on assessing pupils with EAL to support teachers in making judgements about determining whether a pupil's limited communication abilities means that he or she is unable to access the test.</p>		<p><u>Right decisions:</u></p> <p>The response shows that government has grasped the complexity of the issues.</p> <p><u>But more is needed:</u></p> <p>Government needs to provide funding to ensure that schools have appropriate resources and training to draw upon.</p>

Government also set out its views on:

6. Reducing the burdens within the assessment system for pupils working below the standard of national curriculum tests

Government indicates that if the recommendations about assessing pupils against the 7 areas of engagement were to be accepted following trialling, this could reduce burdens by allowing schools to develop a system that suits the individual needs of their pupils.

It states that the simplified pre-key stage standards will reduce burdens in terms of the evidence that teachers have to collect about each pupil, and that exemplification material will be provided.

7. Equalities

Government indicates that it views extending the interim pre-key stage standards to cover all pupils engaged in subject-specific learning will ensure that the statutory assessment system is as inclusive as possible, and support progress on to national curriculum. It states that piloting the engagement model proposed by the review for those pupils not yet engaged in subject-specific learning will ensure that statutory assessment of these pupils is suitable to capture the progress of all pupils. The Rochford Review Equalities Impact Assessment can be found [here](#).