



House of Commons
Education Committee

**Primary assessment:
Government Response
to the Committee's
Eleventh Report of
Session 2016–17**

**Fifth Special Report of Session
2017–19**

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The Education Committee

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The current staff of the Committee are Richard Ward (Clerk), Katya Cassidy (Second Clerk), Anna Connell-Smith (Committee Specialist), Chloë Cockett (Committee Specialist), Madeline Williams (Inquiry Manager), Jonathan Arkless (Senior Committee Assistant), Hajera Begum (Committee Apprentice), Gary Calder (Senior Media Officer), and Alex Gore (Media Officer).

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Fifth Special Report

The Education Committee reported to the House on [Primary assessment](#) (HC 682) in its Eleventh Report of Session 2016–17 on 26 April 2017. The Government's response was received on 13 October 2017 and is appended to this report.

In the Government response, the Committee's recommendations appear in **bold** text and the Government's responses are in plain text.

Recommendations 12 (paragraph 85) and 19 (paragraph 59) are addressed to Ofsted, who will be responding separately. For this reason, these recommendations are not addressed in this response.

Appendix: Government Response

Introduction

The government welcomes the Committee's recognition of the importance of assessment and testing in the education system. Both in-school formative assessment and testing and nationally-consistent statutory assessments have a crucial role to play in supporting every pupil to achieve their full potential. Assessment informs teaching, supports teachers to identify where additional support is needed, and enables the government to hold schools to account for the progress that they make with all of their pupils. Assessment and testing at primary school is common practice across European and Organisation for Economic Co-operation and Development (OECD) countries, with 30 out of 35 countries assessing pupils through national, standardised assessments in the primary phase.¹ Evidence shows that a primary assessment system which balances school autonomy with strong external accountability makes the most significant difference to pupil achievement.²

As the Committee has recognised, substantial changes were made to the primary assessment system in the 2015 to 2016 academic year, as the culmination of our work which began in 2010 to raise academic standards. New national curriculum tests, aligned with the more challenging national curriculum, which was introduced in 2013 and first taught in 2014, were taken for the first time and new frameworks were also introduced for statutory teacher assessment in key stages 1 and 2. We believe that we were right to take urgent steps to raise standards in our primary schools. Previous expectations were simply too low and left too many children unable to achieve well in their GCSEs. In 2015, only 52% of pupils achieving a level 4 at the end of primary school (the previous expected standard), went on to achieve 5 A*-C, including English and mathematics, at GCSE. Ensuring that every pupil leaves primary school equipped with the basic academic knowledge and skills they need to succeed at secondary school is an important part of making sure that this is a country that works for everyone.

The Committee has expressed reservations about the use of assessment data in school accountability. We believe that it is important that we have an accountability system that is fair, inclusive and properly reflects the work of teachers to ensure that all children fulfil their potential. Whilst nationally-consistent data, based on robust assessment, has an

1 OECD (2015) [Education at a Glance 2015](#)

2 OECD, [PISA 2009 Results IV: What Makes a School Successful?](#) 2010

ongoing place in our accountability system, we are clear that no single piece of data should determine any intervention. Data should always be considered alongside the school's broader context and historical performance, and should be just the starting point for a dialogue about how best to support a school to improve.

Whilst the Committee has recognised the importance of raising standards, they have recommended that there should be longer lead-in times for the implementation of changes to the statutory assessment system in the future. Although the reform process began in 2011, with the new curriculum published in 2013, we recognise that the pace and scale of recent changes has been stretching, and we are committed to working with the sector to establish a stable, long-term primary assessment system.

We have already taken a number of steps to create that stability. Last October, the Secretary of State made commitments that there would be no new national tests introduced before the 2018 to 2019 academic year; that the key stage 1 grammar, punctuation and spelling test would remain non-statutory in the 2016 to 2017 academic year; and that statutory reading and mathematics resits would not be introduced in year 7.

In March this year, we launched consultations on the future of primary assessment in England and the recommendations made by the Rochford Review of assessment arrangements for pupils working below the standard of national curriculum tests. We are encouraged that the Committee has expressed support for a number of proposals set out in these consultation documents and confirmed in the government's responses to these consultations, including the introduction of a more flexible approach of assessing English writing and improving the baseline used to measure the progress schools help pupils to make, following a full trial, pilot and close working with the sector to consider the implications of the new baseline as it is developed. The responses to these consultations set out a clear and considered plan to work closely with the schools sector to move towards a stable, long-term primary assessment system that supports every child to achieve their best.

Responses to individual recommendations

Oversight and implementation

1. The Government must introduce longer lead in times for future changes to assessment or standards to mitigate the negative impacts of constant change, and the process of communication must be improved. The time allocated for design and delivery should enable schools to be given thorough information about changes at least a year before they will be implemented, without incremental changes throughout the year. (Paragraph 14)

Reforms to the primary assessment and accountability system began in 2011, with the commencement of the national curriculum review. The new national curriculum was published in September 2013, and first teaching began in September 2014. The government consulted on primary assessment and accountability under the new curriculum between July and October 2013. This was followed by a further consultation on performance descriptors for use in key stage 1 and key stage 2 statutory teacher assessment, which ran between October and December 2014. This consultation received a large volume of diverse feedback, and it was important that we took the time to give this feedback proper

consideration. As a result, new interim teacher assessment frameworks were published at the start of the 2015 to 2016 academic year, for first use in the summer of 2016. New national curriculum tests were first announced in March 2014. In addition to sample questions published in summer 2014, complete sample tests were made available in the summer of 2015.

We nevertheless recognise that the pace and scale of recent changes has been stretching for schools, teachers and pupils. Whilst we believe that the 2015 to 2016 academic year would have always been challenging, given this was the first year of that assessments were based on the new, more ambitious, national curriculum, we accept that the changes were not always communicated as well or as quickly as they could have been. We are committed to giving schools as much notice of any future changes to statutory assessment arrangements as possible. The Department for Education Protocol states that there should be a lead-in time of at least a year for any accountability, curriculum or qualifications initiative coming from the department that requires schools to make significant changes or which will have an impact on staff workload. We will continue to work to this Protocol, which was reviewed and then reissued in February 2017, when making any future changes to the primary assessment system. We have made a clear commitment to stability, including setting out that there will be no new additional national tests or assessments introduced before the 2018 to 2019 academic year.

However, we also accept that there may be cases where there is a clear and demonstrable call from teachers and headteachers to act quickly to address issues within the statutory assessment system. In these instances, we will remain open to responding positively and quickly. In the consultation document 'Primary assessment in England', we proposed moving to a more flexible approach to assessing English writing. In doing so, we recognised that there may be desire within the sector to see changes introduced as quickly as possible, and that we would be willing to make this change for the 2017 to 2018 academic year, should we receive a clear message that this timing would be preferable. Responses to the consultation have demonstrated a demand from head teachers and teachers to see this change made as soon as possible, and the government response to the consultation therefore confirmed that we will move to a more flexible approach in the statutory teacher assessment of writing from the 2017 to 2018 academic year onwards.

In addition, we continue to strive to communicate about, and support schools, in administering the statutory assessment system in as effective a way as possible. We will continue to seek and respond to feedback from teachers and headteachers on how best to do this.

2. We remain to be convinced that the STA will be able to meet all the recommendations set out in the 'root and branch' review. We recommend that the Government should commission a further short review following the 2017 SATs to assess progress made against the recommendations of the internal report, particularly in light of further changes proposed by the Department in its ongoing consultation. (Paragraph 15)

The externally-led Standards and Testing Agency (STA) review took place between 11 July and 2 September 2016. It found that the STA was broadly fit for purpose, but needed to address a number of areas if it was to remain so for the future.

The STA fully accepted the findings of the review and a number of actions were taken immediately to address issues raised. This included strengthening the capacity of the senior leadership team. There are now clearly-defined work areas responsible for assessment policy and communications, test development and test operations, giving Deputy Directors more capacity to think beyond the immediate demands of the current test cycle, and to look more strategically at the long-term approach to work in their areas of responsibility. The STA's senior management team has also been strengthened. Regular cross-team policy and delivery boards, led by each of the divisions and attended by officials drawn from across the STA and the wider department, provide further opportunities to break down the silo culture highlighted by the review.

The STA has continued its programme to strengthen its approach to risk management. All risk owners have been reminded of their responsibilities in their roles, and risk management training is mandatory. The STA's Risk and Security Committee meets monthly to challenge and interrogate key risks and issues through open discussion, improving agency-wide risk and issue management, and strengthening the reliability, suitability and integrity of risk controls and contingency plans. Government auditors and policy officials form part of the Committee's standing membership, alongside the STA's senior management team. Escalation processes have been improved and owners of escalated risks are required to attend the Risk and Security Committee to account for proposed and live risk and issue management controls, mitigations and contingency plans.

Following the 2016 security breaches, the STA has also implemented a continuous improvement project to review its test development and delivery security management, as well as e-monitoring and information assurance arrangements and practices, including those of its delivery partners. The document clearance process has been redesigned and rolled out, with all staff receiving training on the new arrangements. The STA is also currently recruiting for embedded support from commercial specialists to build capacity and capability in this area.

To improve in the remaining areas highlighted in the review, the Chief Executive has initiated an internal Agency-wide change programme. This is being taken forward by staff drawn from across the STA, supported by a central programme management team, and it is subject to direct scrutiny from the STA's senior management team, Chief Executive, government auditors, and the Permanent Secretary.

Among the first external outputs of this programme is a refresh of the STA's Key Performance Indicators (KPIs) to better help monitor and assess its own performance. The Agency's refreshed KPIs have been published in the STA's Annual Business Plan and reviewed in the STA's Annual Report and Accounts. Linked to this is a strand of work to improve the management information made available to the senior management team to enable them to challenge performance in an evidence-based way. Other work includes development of an Agency-wide commercial delivery value for money framework, and the launch of an end-to-end policy and delivery process map, to facilitate better cross-team understanding and closer join-up between different parts of the STA.

3. There is a lack of clarity over the responsibilities of the Minister, STA and Ofqual through the development process of national curriculum assessments. Additionally, there is a lack of confidence in the STA's independence from Ministers. (Paragraph 18)

The STA is an executive agency of the Department for Education. The STA's function is to provide an effective and robust testing, assessment and moderation system to measure and monitor pupils' progress through primary school from reception to the end of key stage 2. The STA is responsible for the development and delivery of statutory national curriculum assessments and testing in England.

Ministers in the Department for Education are responsible for determining the national curriculum and have powers to make regulations about assessments which are implemented via the STA. However, Ministers have no role in the development of live test materials or in the process of setting or maintaining standards, beyond determining the national curriculum, from which the expected standard is derived. The STA is wholly independent from Ministers in this regard. STA's status as an executive agency supports this independence.

Ofqual is the independent regulator of qualifications, examinations and assessments in England. It does not report to ministers but reports directly to Parliament. Ofqual has statutory objectives to promote standards and confidence in regulated primary assessments. It focuses on validity of the assessments and does so in a number of ways, including through research; ongoing monitoring; and the provision of technical advice to government to inform future approaches to assessment. It does not approve STA's decisions, but its activity can provide post-hoc assurance: for example, Ofqual scrutinised the standards-setting process for new tests at key stage 1 and key stage 2 last year.

Within the Department for Education, the respective roles and responsibilities of Ministers, STA and Ofqual have always been strictly maintained, but we agree that they may not have been as clear to the public and stakeholders as they could have been. We will address this by publishing further information on gov.uk.

4. An independent panel of experts and teachers should review the development process to improve confidence amongst school leaders and teachers. We recommend an independent review of Ofqual's role in national curriculum assessments to ascertain whether the regulator should have greater oversight. (Paragraph 19)

Whilst we agree with the Committee that more could be done to improve the transparency of the test development process, we are disappointed that it has not recognised the high-quality nature of the test development process, despite hearing evidence from Ofqual describing it as "far more robust than what is used for general qualifications." National curriculum assessments follow a rigorous test development process, which takes place over three years, with substantial involvement from teachers and experts. This includes large-scale trialling with nationally-representative samples of pupils and reviews involving teachers and curriculum experts. All teachers can apply to participate in a review panel. Teachers are also involved in the standard-setting process of any new test. We have provided further detail about the test development process at Annex A.

This test development process follows a widely validated, internationally recognised, model and is generally regarded as being high quality, as Ofqual highlighted in their evidence to the Committee. The model is based on recognised good practice and robust psychometric methodology. Given that teachers and other experts already play a substantial role in the test development process each year, we do not believe that there is additional value in a further panel reviewing the test development process. We do, however, think that school

leaders and teachers would benefit from a better understanding of the test development process. We will, therefore, provide further information on the development process on gov.uk, and further consider how we can better communicate the process through which tests are developed.

As set out in response to recommendation 3, Ofqual is the independent regulator of qualifications, examinations and assessments in England and scrutinises key processes relating to the validity of assessments, such as standards maintenance and test development.

We believe that Ofqual's current role as independent regulator is effective and proportionate; and that further review is not necessary as it would be unlikely to add value. Ofqual has specific statutory objectives, duties and powers in relation to national assessments. These have been designed around the particular approach to delivering national curriculum and early years assessments, which are developed and managed by a single government agency.

Ofqual have been consulting on their regulatory framework in order to further clarify their role and responsibilities in relation to national curriculum assessments, and to seek feedback from stakeholders.

Design and development

5. The STA should do more to explain the development process of national curriculum assessments to schools and ensure that teachers have confidence that they are involved from an appropriate stage. The Department and STA should publish plans to improve the test experience for pupils, particularly for reading. (Paragraph 26)

We recognise that the test development process may not be widely understood by the education sector. We will work to better communicate this, including by publishing information on gov.uk and by publishing test handbooks later in the year. An overview of the test development process is provided at Annex A.

Having considered additional feedback on the 2015 to 2016 test cycle, beyond that provided by the pupils and teachers who trialled the materials, we took a number of steps to improve the key stage 2 reading test experience for pupils this summer. This included additional consideration of the texts selected, the structure of the test paper and the sequencing of the questions. We are pleased that informal feedback from the administration of the 2017 reading test suggests that the experience was significantly more positive for pupils. We will continue to evaluate how pupils experience national curriculum tests, both in the trialling phases of the test development process, and in live administration, and will continue to take this feedback on board for future assessments. For example, based on previous feedback from the sector, we plan to change the day that the reading test is taken next summer, so that it is not the first paper that pupils sit in test week.

6. The balance of evidence we received did not support the proposition that focusing on specific grammatical techniques improved the overall quality of writing. We support the Department's proposal to use a 'best fit' model for teacher assessment of writing. We recommend the Department should make the Key Stage 2 spelling, punctuation and grammar test non-statutory, but still available for schools for internal monitoring. As well as short term changes to writing assessment, the Government should carry

out a thorough evaluation of the reliability of teacher assessment judgements and reconsider whether it is appropriate to use these judgements for accountability purposes. (Paragraph 36)

The introduction of the grammar, punctuation and spelling test and the use of teacher assessment for the statutory assessment of writing was recommended by the 2011 Bew Review of the key stage 2 testing, assessment and accountability system. The review found that, beyond the technical elements of grammar, punctuation and spelling, the creative nature of writing meant that it is not well suited to an externally-marked test.

We recently consulted on the future of primary assessment in England, including the proposal to move to a more flexible approach in the teacher assessment of English writing. Following overwhelmingly positive feedback to this proposal, we have confirmed that we will move to a new approach, which places more weight on teachers' professional judgments in the statutory teacher assessment of writing, from the 2017 to 2018 academic year onwards; we have published revised statutory teacher assessment frameworks in writing which incorporate this change.

The consultation document also set out our plans to review the interim teacher assessment frameworks, including in writing. This review has now concluded and we are confident that this review has effectively addressed the balance between technical and creative elements of writing in the frameworks. As such, we believe it is important that the key stage 2 grammar, punctuation and spelling test remains statutory. Accurate spelling, punctuation and grammar are the cornerstones of effective written communication and it is essential that they are mastered by every pupil. The current grammar, punctuation and spelling test reflects the content of the new national curriculum, which has been benchmarked against the highest-performing educational jurisdictions internationally. Academic research³ also shows that teaching grammar in context has a positive effect on the quality of pupils' writing, and Ofsted's 2012 report, *Moving English Forward*, states that there should be more emphasis on the teaching of grammar.⁴ We want all pupils to have the opportunity to acquire these skills to a good standard and that is why, from primary school onwards, there is a greater focus on the teaching of spelling, punctuation and grammar.

We recognise that there have been concerns about the use of teacher assessment judgements in the accountability system. Much is done to ensure consistency and provide confidence in teacher assessment outcomes. Local authorities have a statutory duty to moderate at least 25 per cent of schools in their area, supported by STA moderation guidance. In addition, the STA moderate a sample of all local authorities. In response to concerns, we have taken a number of steps to improve moderation and are confident that it is sufficiently reliable for use in the accountability system. In the last academic year, we have worked closely with the sector to improve moderation guidance and have delivered standardisation training for local authority moderators, to ensure a high level of consistency and fairness on a national scale. Further training will be provided in the current academic year to support the 2018 moderation process.

Teacher assessment will remain a part of the statutory assessment system for the foreseeable future to assess pupils' attainment in writing (and to act as the baseline for measuring

3 Myhill, D., Lines, H. and Watson, A. (2011) Making meaning with grammar: a repertoire of possibilities. University of Exeter. *Metaphor*, Issue 2, 2011

4 [Moving English Forward: Action to raise standards in English](#), Ofsted, March 2012

progress at key stage 1 until such time that assessments at the end of key stage 1 are removed). We will, of course, continue to monitor the effectiveness of teacher assessment judgements. It is also worth noting that the primary assessment consultation sought views on long-term alternative approaches to assessing English writing and we have confirmed that we will pilot peer-to-peer moderation next summer.

7. We welcome the Rochford review and look forward to seeing the implementation of its conclusions. (Paragraph 38)

We have recently consulted on the recommendations made by the Rochford Review, and the government's response to this consultation has now been published. We have accepted the Review's recommendations on the statutory assessment of pupils working below the standard of national curriculum tests who are engaged in subject-specific learning. The Review's recommendations, that the interim pre-key stage standards are extended down to cover these pupils, will take effect from the 2018 to 2019 academic year onwards. We have also committed to pilot the Review's recommended approach to assessing those pupils not engaged in subject specific learning in the 2017 to 2018 academic year, and we will take final decisions on whether to accept these recommendations following the pilot.

Support and training

8. National curriculum levels were removed without enough support in place for schools to implement their own assessment systems successfully. Many schools have now adopted ineffective assessment systems. (Paragraph 47)

9. Professional development training on effective assessment procedures should be carried out by senior leaders and classroom teachers after ITE. This should include assessment for pupils working below the standard of national curriculum assessments. The Government should provide adequate resource for this training as part of its commitment to continuing professional development. (Paragraph 48)

10. The availability of more high quality advice and guidance would mitigate the risk of schools purchasing low-quality assessment systems from commercial providers. The Government must make that advice and guidance available. This could include a more developed 'item bank' of case studies, professional development training, guidance on good assessment and links to research into effective assessment. (Paragraph 49)

We recognise that the removal of levels was a significant change for schools. Levels were only ever intended to be used for end-of-key stage statutory assessment, but over time they came to dominate all assessment and teaching practice. This had a damaging impact on teaching and failed to give parents an accurate understanding of how their children achieved in school. In the subsequent support that the department has provided, we have been mindful of the need to avoid inadvertently imposing a new national system of formative assessment on schools, to allow schools to design assessment systems that work for their pupils and curricula. We have, however, sought to provide more general guidance through the Commission on Assessment Without Levels, which reported in September 2015. The Commission's final report provides guidance intended to support schools as they develop their own assessment systems. We remain committed to supporting the school system to make the transition from levels and our work in this area is ongoing.

The STA has commissioned further research into current assessment practice in primary schools. This will aid us in supporting schools to manage the key challenges in implementing effective in-school assessment systems. In addition, we are considering developing an online training module on in-school assessment. The module would be aimed at classroom teachers, school leaders, governing bodies and teaching schools. We will also consider the case for the creation of a national assessment bank as we learn more about how schools are responding to the challenges of life after levels. However, we remain mindful that we do not want to replace one top-down prescriptive system of formative assessment with another.

We welcome the Committee's endorsement of the importance of ongoing professional development throughout a teacher's career. We have already strengthened the way teachers are trained through the new Initial Teacher Training framework, but we know that training is just the first step. We are promoting a culture of high-quality professional development in schools and helping teachers and school leaders to identify and participate in the most effective activities. We are giving schools the freedom to work together to identify and participate in high-quality development opportunities that respond to teachers' needs.

We know that for professional development to be effective, it has to be of high quality. As part of our commitment to help the profession access high-quality development resources, we brought together an expert group of academics, head teachers and teachers to produce a new Standard for Teachers' Professional Development. Published in July 2016, the Standard is based on the best international evidence. It supports teachers and school leaders to make the best choices to prioritise and enable high-quality activities. It also encourages providers to raise the quality of their programmes to ensure they meet the needs and aspirations of schools.

The government's role is to empower schools by supporting a culture within the profession that constantly seeks to improve and uses evidence by supporting developments such as the Chartered College of Teaching. Rather than relying on central government, organisations such as the College will enable the profession to drive its own improvement. The College will focus on helping teachers to access high-quality professional development and to use the available evidence base on effective teaching to inform their own practice.

As the Committee suggests, we are making more resources available through programmes such as the Teaching and Leadership Innovation Fund. The Fund will provide around £75 million to enable schools and providers in the most challenging areas of the country to access funding for bespoke professional development opportunities. We will also fund places on already successful programmes, such as NPQs, for teachers and school leaders in these areas. The Fund will help us to build on our existing knowledge of what works and share this evidence across the sector.

Impact of high-stakes assessment

11. Many teachers reported 'teaching to the test', narrowing of the curriculum and increased pressure and workload as a result of statutory assessment and accountability. Although Ofsted is required to monitor whether schools are teaching a broad and balanced curriculum, reports suggest there is often too strong a focus on English and maths teaching. (Paragraph 58)

Statutory assessment at the end of key stage 2 focuses primarily on English and mathematics to support children to master the basics of literacy and numeracy. Crucially, restricting statutory assessment at primary to English, mathematics and science avoids overburdening pupils and teachers with assessments.

Nonetheless, all schools are required to teach a broad and balanced curriculum. Maintained schools are legally required to teach the national curriculum, which at key stages 1 and 2 includes science, art and design, computing, design and technology, languages, geography, history, physical education and music, in addition to English and mathematics. Whilst academies and free schools have the freedom to choose their own curriculum, like all schools they are required to teach a broad and balanced curriculum. We do not prescribe how much time schools spend on specific subjects, but Ofsted will consider during inspections whether schools are teaching a broad and balanced curriculum. In recognition of the crucial role a rich curriculum plays in a good education, Ofsted are currently carrying out a thematic review focusing on the school curriculum.

As part of our work to consider how we can improve pupils' experience of the tests, we will consider how the texts included in the reading test can better incorporate content from the broader primary curriculum so that they draw from a rich knowledge base.

13. School leaders and governors should support a culture of wellbeing amongst staff and pupils and ensure that external assessment does not result in unnecessary stress for pupils. The Government should assess the impact of changes to curriculum and standards on teacher and pupil wellbeing before they are introduced and publish plans to avoid such negative consequences. (Paragraph 60)

We welcome the Committee's recommendation that school leaders and governors should support a culture of wellbeing amongst staff and pupils. Whilst assessment is a fundamental part of a child's education, we are very clear that it should not cause them stress or anxiety. Schools should encourage all pupils to work hard and achieve well, but we do not recommend that they devote excessive preparation time to assessment, and certainly not at the expense of pupils' wellbeing. Teachers, school leaders and parents all have a role to play in ensuring that children are prepared for assessments in a way that is proportionate.

This government is doing much to promote mental health and wellbeing in schools, including publishing a blueprint for school counselling services, which provides schools with practical evidence-based advice on how to deliver high-quality school-based counselling to pupils. The Department of Health have committed an additional £1.4 billion for mental health services for children, young people and new mothers up to 2020. The government has also funded the development of MindEd, a free online resource that allows all those working with children and young people to access information on a range of mental health issues.

In introducing changes to curriculum and standards, the government has previously consulted widely and carried out equalities impact assessments, including when reforming the national curriculum between 2011 and 2013. These processes are designed to help assess attitudes to and effect of change on both teachers and pupils. Both consultation responses

and the equalities impact assessment set out concerns raised and any government plans to mitigate them. We have also published impact assessments relating to the recent responses to the primary assessment and Rochford consultations.

Accountability

14. Many of the negative effects of assessment are in fact caused by the use of results in the accountability system rather than the assessment system itself. Key Stage 2 results are used to hold schools to account at a system level, to parents, by Ofsted, and results are linked to teachers' pay and performance. We recognise the importance of holding schools to account but this high-stakes system does not improve teaching and learning at primary school. (Paragraph 66)

It is important that we have an accountability system that is fair, inclusive and properly reflects the work of teachers to ensure that all children fulfil their potential, regardless of their background or any additional needs that they may have. Whilst we are clear that nationally-consistent data, based on robust assessment, has an ongoing place in our accountability system, we recognise that concerns have been raised by the Committee about the perception of the data as high-stakes for schools. We have been clear that we want an accountability system where no single piece of data should determine action taken. Ofsted are clear that they consider a range of data and information on a school before coming to a judgement about its performance. Regional schools commissioners, local authorities, governors and parents should also look at a range of data, alongside the school's broader context and performance history, rather than focusing on one piece of information alone, when interpreting a school's performance data or Ofsted report. Key stage 2 results should be just the starting point for a conversation about a school's performance and about how best to support a school to improve.

Similarly, in terms of teachers' pay and performance, headteachers set out what it is they will take into account in making judgements about whether teachers have met their objectives and the relevant standards—using The Teacher Standards. This might include a range of factors beyond key stage 2 results alone, including wider outcomes for pupils, improvements in specific elements of practice (such as behaviour management or lesson planning), impact on effectiveness of other staff, and a wider contribution to the work of the school. As set out since September 2004, the [School Teachers Pay and Conditions](#) guidance requires schools to have a pay policy in place, which sets out the basis on which they determine teachers' pay, and schools are free to adopt their own approaches on pay and appraisal, provided these are consistent with the relevant statutory frameworks and regulatory requirements. Neither the department nor Ofsted require schools to follow a particular approach, and would not encourage a blunt regime based solely on the key stage 2 results.

15. The Government should change what is reported in performance tables to help lower the stakes associated with them and reduce issues of using data from a small number of pupils. We recommend publishing a rolling three year average of Key Stage 2 results instead of results from a single cohort. Yearly cohort level data should still be available for schools for use in their own internal monitoring. (Paragraph 67)

We are aware of the limitations of reporting data based on small cohort sizes and already have a number of mechanisms in place to recognise this. We do not publish data for a

school unless they have data for at least six pupils in their year 6 cohort. Schools are excluded from the floor standards and coasting definition where there are fewer than 11 eligible pupils in their year 6 cohort. In addition, for all schools, the number of pupils are published as contextual information alongside the results.

In previous years, we have published three-year averages of key stage 2 results as additional measures, with the results of the latest single year as the headline measure. 2016 saw the introduction of new key stage 2 assessments based on the new, more challenging national curriculum, and new accountability measures. The 2016 data are therefore not comparable to 2015 data or data from earlier years. However, once we have three years of comparable data, our intention is to return to publishing three-year rolling averages. In addition, it should be noted that in January 2017 the department published regulations setting out its policy on coasting schools. The coasting definition is based on three years of data to identify schools where, over time, pupils do not fulfil their potential.

16. We welcome the increased focus on progress in performance measures and the Government's commitment to introduce an improved baseline measure. However, in its consultation document, the Government fails to appreciate potential harmful consequences of introducing a baseline measure used for school accountability in reception. (Paragraph 76)

17. The Government must conduct a thorough evaluation of potentially harmful consequences of introducing any baseline measure, involving early years experts and practitioners, including impacts on pupil wellbeing and teaching and learning. The primary purpose of a measure of children at age 4 should be a diagnostic tool to help early years practitioners identify individual needs of pupils and should only be carried out through teacher assessment. We welcome the Government's commitment that no data from a baseline will be used to judge individual pupils or schools. (Paragraph 77)

The primary assessment consultation, which closed on 22 June, sought views on whether introducing a new reception assessment is the best way to improve the baseline for measuring the progress pupils make at primary school. The consultation document was very clear about the importance of a proper, considered debate around the proposals put forward. The consultation sought views on what the key characteristics of such an assessment should be, and the point within the reception year it would most suitably be administered, considering the impact on schools, pupils and teachers.

The government response to this consultation has now been published, and confirms that we intend to introduce a new assessment in the reception year to act as the baseline for measuring progress. This new reception assessment will be statutory from September 2020 onwards, ensuring that there are appropriate lead-in times, to give schools sufficient notice of changes. We have, however, listened to the Committee's important points about ensuring that we fully consider the design and potential implications of a new baseline assessment in reception. As set out in our response to the consultation, we will work closely with the early years and schools sector as well as assessment and analytical experts as we carefully design and deliver the new assessment. We will have key sign-off points throughout the development of the assessment that these stakeholders will be engaged in. It is for this reason that we will run a trial in the 2018 to 2019 academic year and a large-scale voluntary pilot in the 2019 to 2020 academic year, before the assessment is introduced on a statutory basis in the 2020 to 2021 academic year.

Through the consultation, we have engaged, and we will continue to engage, with a range of stakeholders, including teachers, assessment experts, early years experts and practitioners, and data experts, in order to ensure the content and mode of delivery of the new assessment is appropriate for the age of the children taking it. We have been clear that the new assessment will cover material that pupils should already be familiar with to avoid the assessment altering teaching practice. In addition, we will continue to evaluate the impact of the assessment on pupil wellbeing and teaching on an ongoing basis.

The primary purpose of a new reception assessment, as outlined in the consultation document, will be as a baseline for measuring progress across the primary phase. However, we have noted the Committee's suggestion that a baseline should be a diagnostic tool to inform teaching. As set out in the government's response to the consultation, we plan to ask a single supplier to design and deliver the new assessment on behalf of the STA. We will ask the chosen supplier to design and deliver the baseline assessment to ensure that it can provide a narrative summary of pupil's strengths and weaknesses. We are, however, clear that data from the new reception baseline assessment will not be used to judge individual pupils or schools on attainment in reception.

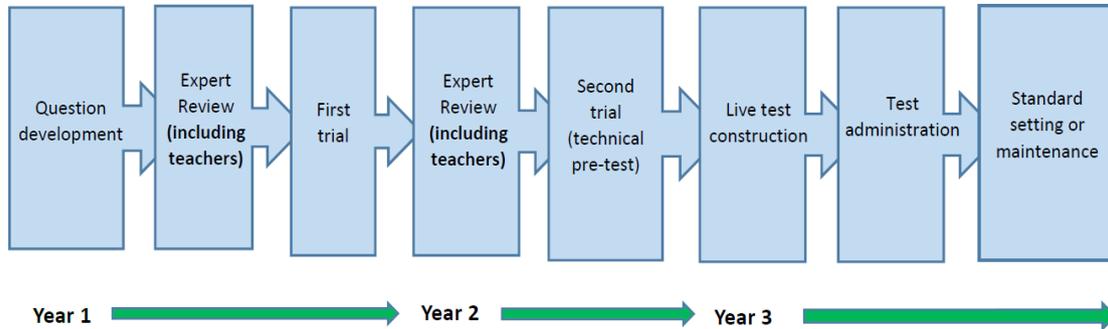
18. For future reforms, the Government should carefully consider the impact of setting thresholds for schools with short lead in times. We agree with the Government's aim of raising standards at primary school but think that setting extremely challenging targets only leaves many students feeling they have failed, when in a previous year they would have succeeded. Expected standards should be raised over a much longer time period to give schools a chance to adjust to new expectations. (Paragraph 84)

We welcome the Committee's support for our aim to raise standards in our primary schools. Given the scale of changes taking place to the assessment system, we always recognised that 2016 would be a challenging year and sought to mitigate the effect of this change on schools as much as possible. However, we do believe that it was right to act to raise standards sooner rather than later, to avoid further cohorts of pupils leaving primary school without the basics needed to succeed at secondary.

We have been clear that no decision on intervention would be made on the basis of a single piece of data, in 2016, 2017 or beyond. We are also very clear that no pupil should be labelled as a failure, and that results from national curriculum assessments should always be reported to pupils within the context of their broader progress and successes.

As the Secretary of State made clear in her statement to Parliament on assessment last October, we recognise that the pace and scale of recent changes has been stretching. We are committed to achieving a stable, sustainable primary assessment system and have made clear that there will be no new national tests or assessments introduced before the 2018 to 2019 academic year. As mentioned earlier, the department's Protocol for changes to accountability, curriculum and qualifications sets out that there should be a lead-in time of at least a year for any accountability, curriculum or qualification initiative that requires schools to make significant changes, which will have an impact on staff workload. The government's response to the 'Primary assessment in England' consultation exemplifies this commitment to appropriate lead-in times, setting out that we will introduce a statutory multiplication tables check in key stage 2 from the 2019 to 2020 academic year onwards, and that we will introduce a statutory reception baseline assessment from the 2020 to 2021 academic year onwards. We will continue to consider the impact of any future changes to curriculum and standards on schools and pupils, and will provide as much notice as possible to allow schools to adjust to any change.

Annex A: An overview of the test development process



National curriculum assessments undergo a high-quality and robust test development process that takes place over three years. This ensures that tests are valid and reliable measures of the national curriculum. The development process consists of five phases:

(1) Question development

Test frameworks are developed for all national curriculum assessments. They explain the purpose and the structure of the tests and outline exactly what could be assessed from the curriculum. Test frameworks include a content domain, cognitive domain and test specification, outlining minimum and maximum marks for different areas of the curriculum to ensure that appropriate breadth and depth of the subject is included in each test. The test frameworks are shared with curriculum and education experts throughout development, including with teachers.

In the first stage of the test development process, questions (known as items) and mark schemes are written by test development experts on the basis of these test frameworks. These questions are subject to a small-scale trial, after which they are refined.

(2) Expert review and item validation trial with a nationally representative sample of schools

During the next stage of the process, all items undergo expert review by three panels. A range of stakeholders, including teachers, headteachers, curriculum experts and inclusion experts, review each question and provide feedback. Experts provide feedback on the suitability of items for the age group, whether items test the desired construct and whether there are any issues with the accessibility of the question. Comments from all three panels are amalgamated and each question is amended accordingly. Any item that is not deemed suitable does not proceed in the process.

All items are then trialled with a nationally representative sample of schools to determine how they function technically, and whether they perform as they were intended to. Each item is trialled with approximately 300 pupils.

Following the item validation trial, the data is internally reviewed with curriculum advisers, further amendments are made if required, and any unsuitable items are removed.

- (3) Expert review and technical pre-test with a nationally representative sample of schools

Items which have been successful at the previous stage are then collated into booklets for further extensive trialling and review.

These booklets undergo expert review by teachers, headteachers, curriculum experts and inclusion experts. As with the item level expert review, experts provide feedback on how suitable the items and overall tests are for the particular age group, whether it tests the desired construct, and whether there are any issues with accessibility.

These booklets then undergo a wider trial with a nationally representative sample of schools in what is known as a technical pre-test. This is designed to gather reliable statistical data, and each item is trialled with approximately 1,000 pupils. Following the technical pre-test, data is internally reviewed with further amendments made if required and any unsuitable items removed. Only items that are performing well are taken forward for potential live test selection. During both the item validation trial and technical pre-test trial, administrators and teachers complete questionnaires about the materials, including reporting on pupil experience. This information is considered alongside the item performance data.

- (4) Live test construction

Following these two rounds of trialling and expert reviews, the live tests are constructed. The proposed live test is subject to further review by teachers, expert reviewers, inclusion specialists and curriculum advisers before being confirmed. Test mark schemes are finalised from earlier versions. Modified versions of the tests are also developed for pupils with access requirements, including large print and braille versions. The live tests are then administered by schools.

- (5) Standard setting or maintenance

Standard setting is an internationally recognised process and involves teachers using their professional judgement to determine the mark threshold of the expected standard using the performance descriptors and information from the live administration of the tests. The 2016 tests were the first to assess a new national curriculum in which expectations of pupil achievement had been raised, therefore a new expected standard needed to be set. A national expression of interest was sent to all schools that had a statutory obligation to take the tests. Each subject had two standard setting panels, with between 20 and 30 teachers participating in each panel, and across all subjects and key stages 343 teacher panellists were involved.

Once the standard was set, a raw score to scaled score conversion table was created. Once standards have been set, in all subsequent years it will be necessary to maintain the standard that was initially set. This involves an internationally recognised psychometric process.