
Ymateb i Ymgynghoriad / Consultation Response

Enw / Name:	Owen Evans
Rôl / Role:	Her Majesty's Chief Inspector of Education and Training in Wales
E-bost / Email:	ChiefInspector@estyn.gov.uk
Rhif Ffôn / Tel No:	029 2044 6446
Dyddiad / Date:	01.04.22
Pwnc / Subject:	Changes to current school assessment arrangements and local authority prospectus

Background information about Estyn

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

Introduction

Overall, we strongly agree with the proposals on revoking the end of Foundation Phase and end of Key Stage 2 assessments. We think this will help support the education system move towards the intended aims and objectives of the Curriculum for Wales by:

- Removing the link between assessment and accountability
- Allowing leaders and teachers the space to re-imagine assessment as integral to good teaching
- Moving the thinking for effective assessment away from summative tracking towards ongoing formative approaches that allow teaching to become responsive to the needs of pupils
- Focusing schools' thinking on the purpose of assessment and how to incorporate a range of approaches into their curriculum planning across phases
- Removing the focus on collecting data that does not provide sufficient insights into what pupils actually know and can do and which does not always impact positively on the quality of teaching and support pupils' learning
- Encouraging schools to think more holistically about the quality of teaching required to provide richer and more useful information on pupils' learning.

On revoking the requirements to moderate end of Key Stage 2 and end of Key Stage 3 assessments we agree with the proposal for the following reasons:

- If Key Stage 2 assessments are removed, then there is no need to carry out the moderation process.
- It will remove the burden on schools to prepare material for moderation meetings, which do not always provide useful experiences for teachers to understand pupils' learning or the impact of teaching.
- It will allow schools and clusters the time to begin to think about (or further develop) their current networks in readiness for the 'shared understanding of progression' model as set out in the new assessment proposals.

We agree with the proposal to remove the requirement on local authorities to distribute paper copies of their protocol to all parents/carers and learners. However, we note the need for hard copies to be easily accessible if required.

Although we support the proposals to amend assessment arrangement, we would strongly emphasise that in order to realise the benefits of these changes, it is essential that schools and clusters are supported by high quality professional learning to develop their understanding of effective approaches to assessment and to secure a 'shared understanding of progression' as set out in the new assessment proposals.^[1]

^[1] [Supporting learner progression: assessment guidance](#)

Consultation questions

Question 1 – In responding to the consultation, what is your primary role?

Learner	<input type="checkbox"/>	Parent or carer	<input type="checkbox"/>
Teacher	<input type="checkbox"/>	Governor	<input type="checkbox"/>
Practitionerw	<input type="checkbox"/>	Challenge advisor	<input type="checkbox"/>
Senior leader	<input type="checkbox"/>	School improvement officer	<input type="checkbox"/>
Headteacher	<input type="checkbox"/>	Inspector	<input checked="" type="checkbox"/>
Principal/vice-principal	<input type="checkbox"/>	Local authority representative	<input type="checkbox"/>
Other (please specify):	<input type="checkbox"/>		<input type="checkbox"/>

Question 2 – Which setting or organisation are you responding from?

Maintained nursery setting	<input type="checkbox"/>	Governing body	<input type="checkbox"/>
Funded non-maintained nursery setting	<input type="checkbox"/>	Regional consortium	<input type="checkbox"/>
Primary school	<input type="checkbox"/>	Local authority	<input type="checkbox"/>
Secondary school	<input type="checkbox"/>	Private training provider	<input type="checkbox"/>
Middle school	<input type="checkbox"/>	Third sector	<input type="checkbox"/>
Pupil referral unit (PRU)	<input type="checkbox"/>	Government	<input type="checkbox"/>
Special school	<input type="checkbox"/>	Awarding organisation	<input type="checkbox"/>
Further education college	<input type="checkbox"/>	Teaching union	<input type="checkbox"/>
Private training provider	<input type="checkbox"/>	Regulatory body (includes inspectorate)	<input checked="" type="checkbox"/>
Adult community learning	<input type="checkbox"/>	Other (please specify):	<input type="checkbox"/>

Question 3 – Are you providing feedback on behalf of an organisation or group?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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If 'yes', please specify:

Estyn

Revoking the end of Foundation Phase and end of Key Stage 2 assessments

We would like to explore your views on the proposal to remove the end of Foundation Phase and end of Key Stage 2 assessments from the 2021 to 2022 academic year onwards, with the other current statutory assessment requirements remaining in place until Curriculum for Wales roll-out. The details of these proposals can be found in the consultation document.

Question 4 – To what extent do you agree or disagree with the proposal to remove the end of Foundation Phase assessments from the 2021 to 2022 academic year onwards?

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Please explain your answer:

We feel that this approach will support leaders in schools to think more carefully about the purposes of assessment within the Curriculum for Wales.

Removing the links between assessment and accountability will support schools in re-imagining the role of assessment as integral to good teaching and learning. It will also help schools and school improvement services to consider their role in securing and supporting improvement and not place undue emphasis on aspects of assessment that have limited impact on improving teaching and learning.

Furthermore, the removal of these assessments will help support schools in reducing the use of unhelpful data for self-evaluation purposes that does not provide sufficient insight into what pupils know, understand and can do. For example, schools sometimes track teacher assessed outcomes and levels (and sub-levels) to try and demonstrate progress, but do not consider sufficiently useful and specific information on the skills and knowledge of pupils, or the impact of teaching on progress.¹

Removing the need to report outcomes and levels externally will also reduce the pressure on leaders and teachers to ensure as many pupils as possible reach an expected 'outcome or level'. Instead, leaders and teachers can reflect more carefully upon the purposes of assessment. They can think more clearly about how they can incorporate a range of approaches when planning their curriculum and when considering the quality of teaching required to provide richer and more useful information about pupil's learning. For example, this may include many schools building on the good formative practice they have developed throughout the pandemic. This is particularly important within the current education climate where schools are still experiencing significant internal and external pressures.

¹ [Estyn annual Report 2020-2021 p 20](#)

Question 5 – To what extent do you agree or disagree with the proposal to remove the end of Key Stage 2 assessments from the 2021 to 2022 academic year onwards?

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Please explain your answer:

Please note our response above, which also applies to this question. However, when considering this question specifically, there may also be a need to consider the transition arrangements from Key Stage 2 into Key Stage 3. There is still a need for continuity in learning, and for staff at Key Stage 3 to understand the skills and knowledge of pupils at the end of Key Stage 2 in order to build upon them effectively. While not providing a sufficiently clear picture on its own, the end of key stage teacher assessment data has been used to support this transition process. Without this information primary and secondary schools will need to think carefully about how they ensure a shared understanding of the needs of pupils at these transition points.

Additionally, teacher assessment data is shared with parents at the end of Key Stages. While this has not given parents a comprehensive insight into their child’s strengths and areas for development, it has given them some understanding of their progress in relation to expected attainment. Moving forward, we feel it is important that schools are supported to develop effective lines of communication with parents that improve upon these previous reporting arrangements. New approaches will need to help parents understand more clearly what their children can do, what they need to improve and how they can be supported at home.

Revoking the requirements to moderate end of Key Stage 2 and end of Key Stage 3 assessments

Should the end of Key Stage 2 assessments be removed from this academic year onwards, the moderation of these assessments would be revoked as a consequential amendment.

In addition to this, we would like to explore your views on the proposal to remove the requirements to moderate the end of Key Stage 3 assessments from the 2021 to 2022 academic years onwards. The details of these proposals can be found in the consultation document.

Question 6 – To what extent do you agree or disagree with the proposal to remove the requirements to moderate the end of Key Stage 3 assessments from the 2021 to 2022 academic year onwards?

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Please explain your answer:

If the requirement for schools to come together to moderate end of Key Stage 2 assessments is disapplied, we agree that it would be unhelpful to require secondary schools to make new arrangements with other secondary schools to moderate end of Key Stage 3 assessments during the interim period until the Curriculum for Wales rolls out to Year 9. However, secondary schools will still need to ensure consistency for their learners in how they are assessed at the end of the Key Stage 3. We agree that this can and should be done within schools and does not require a separate process.

Removing this requirement will allow schools and clusters the time and space to begin to think about (or further develop) their current networks in readiness for the 'shared understanding of progression' model as set out in the new assessment proposals.²

Question 7 – Further to the proposals outlined in the consultation document, are there any wider implications relating to the transition from the current assessment arrangements to the new assessment arrangements that should be considered? Please provide details below:

It will be important to ensure that the new procedures for developing a 'shared understanding of progression' allow a constructive and professional learning experience for staff and do not simply replace the current 'checking' arrangements for moderation.

Further clarification over the role of 'baseline' assessments or 'on entry assessment' will also be useful for schools to enable them to identify pupils' starting points accurately. This should be closely aligned to the arrangements being developed for children who access their education in non-maintained settings.

Proposed changes to the School Information (Wales) Regulations 2011 – local authority prospectus

We would like to explore your views on the proposal to remove the requirement on local authorities to distribute paper copies of their prospectus to parents/carers and learners in their transfer year at schools maintained by the local authority who might transfer to schools similarly maintained. Local authorities are already required to publish a copy of their protocol on their website and make copies available on request at their offices, all schools and for reference at public libraries. The details of this proposal can be found in the consultation document.

Question 8 – To what extent do you agree or disagree with the proposal to remove the requirement on local authorities to distribute paper copies of their protocol to all

² [Supporting learner progression: assessment guidance](#)

parents/carers and learners in their transfer year regardless of whether they want a copy or not?

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>

Please explain your answer:

As set out in the proposal, most parents/carers can access this information online which will reduce the costs and environmental impact of local authorities. However, it is important that paper copies are **easily** available for families to acquire, and local authorities must ensure that parents can request them without needing to follow burdensome procedures.

Language

Question 9– We would like to know your views on the effects that this legislation would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Supporting comments

We do not feel that this legislation would have any specific impact on the opportunities for people to use Welsh. There is a continued need for Local Authority protocols to ensure that documents are available in both Welsh and English online and in paper.

Question 10 – Please also explain how you believe this legislation could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Supporting comments

N/A

Question 11 – We have asked a number of specific questions. If you have any related issues which we have not been specifically addressed, please use this space to report them.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: