Welsh Government

Consultation – summary of responses

National Literacy and Numeracy Framework and Tests

Date of issue: January 2013
National Literacy and Numeracy Framework and Tests

**Audience**
Primary, secondary and special schools in Wales; Welsh local authorities and regional education consortia; unions; various organisations that have an interest in literacy and numeracy; and members of the public.

**Overview**
An online consultation on the draft National Literacy and Numeracy Framework (LNF) and Tests began on 11 June 2012 and ended on 12 October 2012. This document provides a summary of the responses received and sets out the Welsh Government’s response.

**Action required**
None – for information only.

**Further information**
Enquiries about this document should be directed to:
Foundation Phase and School Curriculum Branch
Department for Education and Skills
Welsh Government
Cathays Park
Cardiff
CF10 3NQ
Tel: 029 2082 5447
e-mail: curriculumdivision@wales.gsi.gov.uk

**Additional copies**
This document can be accessed from the Welsh Government’s website at www.wales.gov.uk/educationandskills

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Introduction

The Minister for Education and Skills, Leighton Andrews AM, has made raising standards of literacy and numeracy in schools a priority.

In his keynote address 'Raising Schools Standards' on 29 June 2011 to the Institute of Welsh Affairs, he announced the intention to introduce a new National Literacy and Numeracy Framework (LNF) for all learners aged 5 to 14.

The LNF was developed drawing on the features of high-performing international models and what we know about what good schools in Wales are already doing.

The LNF has been developed in partnership with the Association of Directors of Education in Wales (ADEW) advisory panel consisting of local authority (LA) literacy and numeracy advisers. The Welsh Local Government Association (WLGA) was represented and received regular electronic versions of the draft LNF as it developed.

Primary, secondary and special schools will use the LNF to make sure that the teaching of literacy and numeracy skills is embedded in all subjects across the curriculum rather than focused on English, Welsh and mathematics lessons alone.

This report provides a summary of the responses to each of the consultation questions relating to the LNF. A further summary report will be provided on the responses relating to the reading and numeracy tests.
Overview

An online consultation on the draft LNF and tests began on 11 June 2012 and ended on 12 October 2012. The online consultation raised 160 responses.

There were also five LNF consultation events held in various locations across Wales that covered all four Welsh consortia regions. The format for the sessions included an introduction to the LNF and a brief presentation from Estyn to establish the background to and need for the LNF, followed by table work on the LNF.

Over 300 delegates attended the consultation events which included teachers, local authority (LA) officers, union representatives and staff from various organisations with an interest in literacy and numeracy. Four events were originally planned – one per consortia region. Owing to popular demand another event was held in Treforest. The events were held in the following locations:

- **11 July 2012**: South East Wales Consortia at Newport YMCA Conference Centre
- **14 September 2012**: Central South Consortia at ESIS Conference Centre, Treforest
- **18 September 2012**: South West and Mid Wales Consortia at Halliwell Conference Centre, Trinity College Carmarthen
- **19 September 2012**: North Wales Consortia at Conwy Business Centre, Llandudno Junction
- **21 September 2012**: Central South Consortia at ESIS Conference Centre, Treforest.

From Welsh Government statistics last updated 5 November 2012 there are currently 1388 schools in the primary sector. Ninety-seven of those took part in the consultation by submitting a consultation response form or by attending a consultation event.

There are currently 216 secondary schools in Wales. Sixty-four took part in the consultation.

There are currently 43 special schools in Wales. Eleven took part in the consultation.

Responses were also received by LAs, unions, various organisations that have an interest in literacy and numeracy and members of the public.
Summary of consultation responses

The following section provides the main points from the online consultation process and from the LNF consultation events. The questions raised invited open-ended responses so the information summarised below is qualitative and based on the main themes that emerged from the large variety of responses that were received.

**Question 1 – Do you think the expectations for year-on-year assessment are pitched correctly? If not, please explain why and suggest alternatives.**

The majority of responses thought that the year-on-year expectations were pitched correctly. However, a significant amount of these responses also indicated that the expectations were very challenging. There was a general acknowledgement that challenging expectations were needed to raise standards but this would take time to achieve. The following were the main points.

- The LNF is easy to follow with each key stage per page. The tables make it easy to follow and assess.
- There is a clear focus and an appreciation that the data will not be collected nationally but used by schools for learning purposes, e.g. to help identify learners who are underachieving.
- It is important that the Foundation Phase and primary stages of education successfully build on the expectations of the LNF before learners move to secondary school.
- There needs to be flexibility for learners working at higher or lower than their expectations for their year level. There is a risk that the LNF could be taken too literally with age rather than stage approach and be used to teach what is listed in each year group and not take into account high achievers and low achievers. So year-on-year expectations should be seen as a guide as learners develop at different rates.
- The higher expectations will be an issue for schools in more deprived areas of Wales where learner attainment can be below that expected of learners.
- The higher expectations will be an issue for learners whose first language is not English or Welsh.
- Learners will be expected to be able to use some skills across the curriculum before they have mastered the skill in English, Welsh or mathematics lessons.
- Learners with additional learning needs (ALN) may not make the same annual progress as other learners so their progress may be a consolidation of achievements and will be horizontal in some cases rather than linear.
Question 2 – Are the right skills emphasised? Do you think any have been missed that should be included?

Most of the responses indicated that the right skills are being emphasised in the LNF. There was a clear call for guidance, training and support on how the skills in the LNF can be applied across the curriculum. There were some recurring themes concerning what should be included or removed from the LNF – these included the following.

- The LNF needs to contain the importance of reading for pleasure in order to stimulate learning.
- Creative writing should be included in the LNF for literacy development and therefore fiction texts need to be included as well as non-fiction texts.
- Uncertainty over whether the LNF values the importance of handwriting more than ICT skills.
- Application of ICT skills should be included in the numeracy component.
- Temperature conversion is unnecessary and should be removed as the Fahrenheit measurement of temperature is no longer used.
- There needs to be more on measurement of area and volume in the numeracy component.
- There needs to be guidance on how to apply the requirements of the LNF. There needs to be exemplification materials for teachers. English, Welsh and mathematics teachers may be able to understand how to use the LNF but other subject teachers need to understand how to apply the skills in the LNF in purposeful and relevant contexts.
- Concern about the relationship between the LNF and the requirements of the national curriculum subject Orders.

Question 3 – Is the language used in the framework precise enough? If not can you give specific examples of changes needed?

Most of the responses to this question indicated that the language of the LNF was precise enough. Some commented that the language is more helpful than in previous skills or guidance documents. However, many felt that the language would only be fully understood by English, Welsh and mathematics teachers, and that other subject teachers may find difficulty. There were some concerns raised about examples where the language in the LNF was ambiguous. There will also be the need for support material for many teachers to use the LNF. The following were the main points.

- In order to share outcomes with learners and parents/carers the language needs to be clearer and more simplified in order for them to understand.
• Either the language should be simplified or a detailed glossary for non-specialist teachers should be provided.

• The language used in the Welsh version is occasionally vague and could be interpreted differently by different establishments. There is no clear definition of ‘standard Welsh’.

• Some of the terminology should be changed, i.e. ‘components’, ‘elements’ and ‘aspects’ may cause confusion especially for non-specialists.

• The numeracy component of the LNF was on the whole considered to be more precise than the literacy component. For example, ‘writing for information’ was seen as confusing when teaching different types of texts. ‘Reading for information’ contained reading for ‘sustained periods’ which doesn’t define for how long this is precisely.

• The words ‘to begin to understand’ were considered too ambiguous, as a learner either understands or does not.

• In the main, the language used in the ‘Routes’ is clear, unambiguous and helpful but there is some confusion over the titles, i.e. Routes for Literacy and Routes for Numeracy could be confused with the ‘Routes for Learning’ programmes.

• While being precise, the language can be inflexible and over-prescriptive; learners need time and space to grow and learn.

• Guidance and support is needed to help teachers. Support is needed to understand progression, terminology and key terms.

Question 4 – Is it appropriate that Welsh-medium schools be required to also assess against the English framework from Year 4 onwards?

The majority felt that it was appropriate for Welsh-medium schools to assess against the English-medium literacy component of the LNF from Year 4 onwards because Welsh-medium school learners need the same level of English literacy skills as those in English-medium schools. However, some argued that it should not be a statutory requirement but the school itself should be able to decide whether to assess against the English-medium literacy component of the LNF or not. The main themes emerging were as follows.

• It is appropriate that Welsh-medium schools be required to assess against the English-medium literacy component of the LNF from Year 4 onwards because all learners in Wales need to be functionally literate in English.

• Some form of assessment would be appropriate so Welsh-medium learners can be equipped with skills in English, which will be necessary if they move out of Wales.
• It should not be compulsory; schools or learners should have the choice whether to assess against the English-medium literacy component of the LNF or not.

• It is appropriate, but there will be the issue of more workloads for Welsh-medium schools as they’ll be required to assess against both versions of the literacy component and consideration needs to be given to whether a Welsh-medium school has the capacity to meet the requirements of both.

• It would undermine the aim to deliver education through the medium of Welsh and could put Welsh-medium schools’ language policies in danger.

• In Welsh-medium schools literacy in English can only be assessed in English-language lessons, so there are no other opportunities to assess against the English-medium literacy component.

• It would be appropriate to introduce this at a key stage boundary at Year 3 rather than Year 4.

**Question 5 – Teachers will be required to complete an assessment for every learner against the appropriate age-related statements in the framework. Would a template for optional use for recording and reporting those assessments be useful for teachers?**

A large majority of respondents indicated that a template would be very useful for recording and reporting assessments and a standardised template would be needed for consistency. There were concerns raised over the additional workloads that would be generated through additional assessment, as well as concerns as to who would be responsible for administering the tracking tool. The following were the main points.

• The idea of year-on-year assessments is good because the LNF gives teachers clear guidance on what to teach and assess but these tests need to cover the whole range of skills in the LNF.

• It is important that a template brings about consistency in the recording of assessments and consistency in marking across the school, LA, the region and Wales as a whole. A standardised tracking system introduced by the Welsh Government would reduce duplication of work.

• Many stated that something linked to the INCERTS tracking tool would be useful as many schools already use this system or other tools to track learner progress.

• There would need to be clear guidance and advice on how to report the results to parents/carers given that the LNF tests are additional to the national curriculum tests.
• The system for tracking would need to be electronic so it is possible to collate evidence and should be readily available for teachers using a variety of different devices to access the information.

• It is important that the tracking tool does not lead to a ‘tick list’ exercise and use of such a tool should be optional and not statutory given that some schools already have their own effective tracking systems in place.

• Exemplar materials would be needed on how to use the tool as there will be a great deal of training required for staff.

• Concern that there will not be enough time to assess every learner against the LNF as well as assessing against the national curriculum subject Orders; concerns also about who will be responsible for recording information on assessments and how to report back qualitative information to learners and parents/carers.

Question 6 – Should Routes for Learning become the statutory basis for assessment of learners with profound and multiple learning difficulties/complex needs?

From the responses there was a great deal of uncertainty over whether Routes for Learning should be the statutory basis for assessment for learners with more complex needs. The following were key points.

• The ‘Routes’ components of the LNF ensures that there were equal opportunities for the whole ability spectrum and that the LNF should be for all learners – severe ALN learners should not be separate.

• Some reference needs to be made to the P levels in the literacy section. There needs to be clarity on how to link P levels currently used in specialist settings in mainstream schools. Guidance is needed on which learners can go on the ‘Routes for Learning’ programme in a mainstream classroom.

• Concerns with using age-related statements for ALN learners because they are not working at their chronological age. Reporting on assessment results for ALN learners could be demoralising. For this it was believed that the Routes components would be fine as a planning tool but not as an assessment tool.

• Schools should be allowed to make individual decisions on matters relating to ALN rather than have statutory assessments put in place.

• The references to ALN learners should also refer to learners where English and Welsh are additional languages.

• For ALN learners who do not have profound learning difficulties, there is a gap between the main LNF and Routes components – clarity is needed on whether these learners can work effectively as they are a couple of years behind their chronological age.
Question 7 – Alongside the statutory reading tests additional formative material will be developed for use in the classroom. These ‘tests’ will be optional, but how likely are classroom teachers to make use of this resource and what would make it most useful?

The majority of the respondents felt that supplementary material would be useful, with some replying that it would be essential to introduce formative material if the national tests were to provide data to inform the teaching of reading rather than being a mere tracking device. However, many respondents felt it was difficult to assess the extent of take-up without prior knowledge of the form the test would take, and others responded that there was already enough supplementary material in schools. A substantial number of respondents understood the ‘additional material’ to mean exemplary or ‘practice tests’. While some welcomed this, many felt that it would encourage a culture of teaching to the test. The following were the main points.

- For supplementary materials to be useful, it would need to be easy enough to administer and mark. It should clearly show learners’ strengths and areas for improvement. Formative material that would help teachers’ planning by establishing the way forward with learners would be especially welcomed.

- For the supplementary materials to be used across the curriculum it would need to be themed or subject-specific as while all teachers have responsibilities to raise literacy and numeracy standards, they have to maintain standards in their own subject areas.

- Any supplementary materials produced needs to be engaging, attractive and fit for purpose. It should also be available in computerised form for those unable to access paper-based tests.

- Teachers should be able to use any additional material flexibly to meet their teaching needs and not in a prescriptive way. Several respondents commented on the usefulness of the supplementary materials devised for Routes for Learning and felt that the additional tests should be fit to be used in the same way.

- Many respondents felt that sample materials that reflected the format of the test and which could be used as a practice resource would be more useful than additional formative material. Formative assessments were already consistently made by teachers at all stages of learners’ progress.

- Testing more frequently than needed would be counter-productive to learning.

- Training should be provided for teachers in how to use the optional materials. Training for literacy and numeracy coordinators would be essential.

- Workload issues associated with the introduction of optional tests would need to be considered carefully.
Question 8 – The reading and numeracy tests will generate standardised scores and progress scores. Should an age equivalence also be provided?

The majority of respondents were of the opinion that age-equivalent scores should be generated alongside the standardised and progress scores. The general opinion was that age-equivalent scores would be more meaningful for parents/carers although many respondents, including some who were in favour of age-equivalent scores, said that they would not share them externally. A major factor for those who disagreed with the introduction of age-equivalent scores was of the demoralising effect they would have on low ability, special educational needs (SEN) and English/Welsh as an Additional Language (EAL/WAL) learners and the fact age-equivalent scores did not give a reliable measure of progress for these learners. The main points were as follows.

- Respondents in favour of age-equivalent scores felt that it made sense to have these scores from the tests and be in line with age-related statements of the LNF.

- Age-equivalent scores were also seen by many as a more straight-forward basis for deciding appropriate provision of intervention.

- Respondents against the use of age-equivalent scores emphasised their unreliability and their potential to mislead and be misunderstood by learners and their parents/carers.

- Teachers of ALN and EAL/WAL were concerned about the irrelevance of an age-equivalent score to their learners and their learners’ parents/carers.

- It was generally agreed that standardised scores were more suitable for analysis.

- A number of respondents were concerned about there being too many sources of data giving conflicting views of learners’ progress. Some felt that national curriculum and Foundation Phase outcomes were more reliable indications of progress than an age-equivalent score from a test.

- There was also concern over the validity and security of the date upon which any of the scores would be calculated.

Question 9 – What do you consider to be the practical implications of administering and marking reading and numeracy tests in your school?

Responses ranged from those who foresaw no new practical implications as the national test would replace those currently in use and would be administered and marked in the same way, to those who felt the impact of the tests would be massive. Many of the latter responses came from schools that used computerised tests and obtained electronic feedback. The following were the main points.

- The biggest concern was time; time taken to administer the test, alongside disruption to the timetable, and the time commitment needed for the marking
of the tests. Many felt that the time taken up by the tests would be to the detriment of classroom learning.

- Teachers from authorities that used computerised tests and received scores and their breakdown electronically saw the return to paper-based tests as a step backward.

- While some respondents welcomed the ‘two-week window’ others felt that it would reduce the security of the tests and the validity of the data collected from them.

- Consideration of time and staffing to support ALN learners and learning in special schools was vital. Some schools were concerned that they would need to bring in extra staff to support learners in taking the tests.

- The issue of workload was prominent in the responses to this question and many felt that the test posed an additional burden to schools. Views put forward on how this could be mitigated ranged from external administrators/invigilators to dropping the need for teacher assessment at key stages for teachers of English, Welsh and mathematics.

- Some respondents felt that the marking of the test would impact disproportionately on members of English, Welsh and mathematics departments.

- The common theme emerging from the responses to this question was the need for external marking. Many respondents were concerned not only with the time implications, but for the security and integrity of the tests. It was felt by many that there was scope for the system to be abused. There was also a fear that the inconsistencies apparent in the assessment of national curriculum levels and Foundation Phase outcomes would be the same in terms of the test results and that the marking of the tests might be ‘over-generous’ in order to produce the best data. At the very least there would need to be some element of external moderation.

- Guidance on the administration of the tests and their marking is needed. This should also take in issues for teachers of and learners with ALN as well as those in special schools, Pupil Referral Units (PRUs) and mixed-age classes.

- There needs to be consideration of when the tests take place and schools need to be notified of this in advance for planning purposes.

- Whether schools should receive financial support, in order to bring in extra staff and training for practitioners, was also raised.
Question 10 – What analyses of the test data (for example included in your Core Data Set or provided via DEWi when data is uploaded) would be useful to support planning at individual learner, class, school or local authority (LA) level, and to support self-evaluation?

Although there were a number of respondents who were concerned about the validity of the data due to security and validity of the test results, there was a wide variety of suggestions as to how the data could be interrogated most usefully. The main themes emerged were as follows.

- Any analysis undertaken must be with schools before the end of the summer term for it to feed back into the school evaluation and school improvement plans.
- There needs to be specific guidance on how the data should be used.
- Data published nationally is unhelpful and is likely to lead to league tables.

Data might be fed back to schools on the following.

Performance with reference to:

- gender
- Free School Meals (FSM) v non-FSM
- ethnicity
- EAL/WAL
- Irish travellers
- able and gifted
- learners on the cusp (SS 85–95)
- year-by-year progress scores
- performance at individual item level.

Useful comparisons could be made between:

- classes
- year groups
- other members of the family of schools
- other schools in the LA
- nationality
- test scores and national curriculum teacher assessment levels.

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

The key issues raised in answer to this question were as follows.

- There were concerns about the timescale for introducing the LNF. Some felt that this was being rushed and should be piloted first, and some stated that
implementation would be very difficult considering a lack of training days available.

- A number of responses indicated that more INSET days are required for training in the LNF.

- Many teachers are not confident about their own literacy and numeracy abilities so there are significant issues around training teachers to be competent in these areas before they are able to teach learners.

- There is a need for specific curriculum-related materials to exemplify to teachers how they can develop literacy and numeracy skills in their individual subjects.

- There was concern raised on the non-inclusion of reading for pleasure and the lack of mention of library services.

- There needs to be guidance on how to help EAL and WAL learners to fit into the LNF.

- There were questions raised in terms of training and workload issues.

- Coherence is needed between the LNF and national curriculum, especially in terms of feeding back results to parents/carers.

- Consistency is needed in the way all teachers interpret the LNF.

- Examples are needed to demonstrate how the LNF would work in practice.

- In secondary schools issues were raised in terms of who would coordinate the LNF.
Responding to the consultation and next steps

The consultation responses have been taken into account in preparing the final version of the LNF that will be introduced into schools on a voluntary basis in January 2013. The following are the steps we are taking to respond to the consultation.

Revisions to the LNF

Some aspects of the LNF have been revised in light of the very helpful consultation responses that we received, e.g. the reading strand of the literacy component has been changed in response to concerns that the title ‘reading for information’ might understate the importance of readers reading for pleasure. It now refers to ‘reading across the curriculum’. Also as a result of consultation feedback we have removed the term ‘Fahrenheit’ as it was felt that this was an outdated form of measurement and in both literacy and numeracy components there have been ‘Extension’ columns added to the LNF to stretch higher achievers.

The final version of the LNF will be available on Learning Wales from January 2013, in advance of statutory implementation in September 2013.

Welsh-medium schools

In the consultation we asked for views on the use of the English-medium literacy component of the LNF in Welsh-medium primary schools. Most respondents agreed with the principle that the English-medium literacy component of the LNF should only be a statutory requirement and be assessed from Year 4 onwards. We have therefore decided that in Reception to Year 3 inclusive, Welsh-medium schools should only be required to use the Welsh-medium literacy component of the LNF (alongside the numeracy component). From Year 4 onwards we expect Welsh-medium schools to use both the English-medium and Welsh-medium literacy components. Schools can of course also use the English-medium literacy component in Reception and Years 1–3 if they wish to.

Training and support – new national support programme

A suite of online bilingual guidance and training materials are currently being developed to help schools implement the LNF before the LNF becomes statutory in September 2013. The first of these materials, the curriculum planning guidance and training workshops, will be published in January 2013, followed by classroom practice materials in September 2013 to coincide with statutory implementation.

In addition, we are investing more than £7 million in a new national support programme that will be put in place to offer direct support to schools and teachers to help them effectively implement the LNF, as well as to bring about improvements in the way that literacy and numeracy are taught in schools. The programme will begin in January 2013.
Assessment against the LNF

The LNF is first and foremost a curriculum planning tool. However, it also provides a means for schools to assess learner progress and report to parents/carers. In the consultation we proposed that the LNF should be used to support formative assessment and assessment for learning.

A key theme emerging from the consultation responses has been the importance of schools embedding the LNF in their curriculum planning and for this in turn to lead to changes in learning and teaching. It is changes in learning and teaching that will ultimately raise standards. While respondents generally agreed that assessments should be made in relation to learners’ progress against the expectations in the LNF, concern was expressed about how this requirement would sit alongside existing assessment requirements. There were also concerns raised about the potential workload implications. The decision has therefore been taken to adopt a phased approach to the requirement to undertake assessments against the LNF. The LNF will be a statutory curriculum requirement from September 2013 and formal assessment against the LNF will become a statutory requirement from September 2014. This means that schools will have a full academic year to focus on embedding the LNF into their curriculum planning and their learning and teaching before being required to assess learners’ progress against it.

On 1 October a review of the curriculum and assessment arrangements in Wales was announced, in particular to ensure that the LNF, tests and wider assessment arrangements which operate in schools all form part of a coherent whole. The phased approach to the implementation of the assessment requirements of the LNF will also allow time to consider the conclusions of this review.

Schools should still use the LNF to support assessment for learning. Reports to parents/carers on their child’s progress in literacy and numeracy will still be required on an annual basis from September 2013. These requirements will entail schools including in the reports that they give to the parents/carers of each learner information based on the numeracy and reading tests as well as a narrative report on literacy and numeracy based on the LNF. Governing bodies will also be expected to include, in their annual report to parents/carers, information on the school’s performance in literacy and numeracy based on the reading and numeracy tests as well as in relation to the LNF.

The National Reading and Numeracy tests

Provision of supplementary material

As noted in the consultation document, additional formative assessment material is being developed to support the teaching of literacy. This material is designed to assist teachers in making formative assessments of their learners’ reading, to add to the data from the summative assessment provided by the tests. In addition, sample materials relevant to the main numeracy tests and the main and additional formative reading tests will be made available in advance of May 2013 to assist schools in implementing them.
Age-equivalent scores

In line with the consensus from the consultation, age-equivalent scores will be made available for parents’/carers’ information, supported by appropriate advice about how to interpret them. However, in light of concerns about overall validity, these scores will not be used for data analysis or reported to schools as part of the school-level analysis provided.

Transitional support for implementation

We have designed the tests to be as simple to administer as possible. It is also important to note that many schools will have been administering a range of tests in any case for a number of years, so the additional burdens will be limited. There will, however, be some additional support made available for schools in the first year of the tests.

Data use and interrogation

We will continue to explore with systems suppliers what analyses can be developed in order to assist schools and others to use the data from the tests most effectively.
Publicity

The LNF was publicised on the first day of the online consultation via the *Dysg post 11* and *Dysg pre-11* newsletters and was also advertised online on the Welsh Government and Learning and Skills Observatory Wales websites.

The consultation events were publicised in the *Dysg post-11* and *Dysg pre-11* newsletters on the 25 June and also on the Welsh Government and Learning and Skills Observatory websites.