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Consultation – summary of responses

Teacher assessment: strengthening arrangements to improve reliability, consistency and confidence

Date of issue: May 2015

Teacher assessment: strengthening arrangements to improve reliability, consistency and confidence

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| Audience | All bodies involved in the education field, including unions, further education (FE) colleges, employment agencies, local authorities, education training providers and awarding organisations. |
| Overview | This document provides a summary of responses and feedback about the consultation on the proposals to improve reliability, consistency and confidence in teacher assessment. |
| Action required | None – for information only. |
| Further information | Enquiries about this document should be directed to: Olga Lewis Assessment Branch Department for Education and Skills Welsh Government Cathays Park Cardiff CF10 3NQ Tel: 029 2082 3222 e-mail: assessment@wales.gsi.gov.uk |
| Additional copies | This document can be accessed from the Welsh Government's website at www.gov.wales/consultations |
| Related documents | <i>Teacher assessment: strengthening arrangements to improve reliability, consistency and confidence</i> (Welsh Government, 2014) |

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Introduction

Following the publication of the 2004 Daugherty Report, Wales moved away from a test-based methodology of assessing learners to one based on teacher assessments against the Foundation Phase outcomes and national curriculum level descriptions. However, confidence in the system depends on trust in the assessment system and that the process is applied consistently and with common understanding of the outcomes and level descriptions.

Detailed guidance is produced annually to local authorities and schools to ensure an agreed understanding of Foundation Phase outcomes and national curriculum levels. However, despite this, feedback from schools, regional consortia, teaching unions and Estyn indicates that more needs to be done to improve the reliability and consistency of teacher assessment.

In 2012 Welsh Government commissioned research from the Australian Council for Educational Research in the form of 'An investigation into Key Stage 2 and 3 teacher assessments'¹. They concluded that while the current teacher assessment system in Wales has in place all the main components that high-quality teacher assessment systems across the world use, the Welsh system has not yet achieved the level of proficiency required. In response to this evidence and in order to improve confidence in the current teacher assessment system, the Welsh Government developed a number of proposals which formed the basis of the changes suggested in the consultation document.

On 12 December 2014, the Welsh Government issued a consultation to seek views on these potential changes to improve reliability, consistency and confidence in teacher assessment. The proposals were whether, and how, to:

- require local authorities (through regional consortia) to improve the application of teacher assessment
- strengthen the existing system of cluster group moderation by introducing a statutory requirement for all schools at Key Stages 2 and 3 to participate
- extend the existing system of cluster group moderation at Key Stages 2 and 3 to include the Foundation Phase
- introduce a new system of external verification for Key Stages 2 and 3.

The consultation closed on 06 March 2015.

The Welsh Government received a total of 90 responses. Teachers, headteachers, regional consortia, professional unions, local government organisations and private companies working in education were among the respondents.

A full list of respondents can be found in the Annex (see page 12).

¹ '[An investigation into Key Stages 2 and 3 teacher assessment](#)', prepared for the Welsh Government by the Australian Council for Educational Research, and published in June 2013.

Summary of responses

Question 1 – Do you agree with the benefits of requiring regional consortia to place the improvement of teacher assessment within the annual regional consortia business plans (as per the National Model for Regional Working) from 2015–16?

| | |
|----------------------------|-----------|
| Agree | 62 |
| Disagree | 6 |
| Neither agree nor disagree | 11 |
| No proforma response | 11 |
| Total | 90 |

There was strong support for this proposal, both in the responses to the closed question and in the supporting comments. Key supporting comments included the following.

- It makes sense to use the national model for regional working where the regional consortia are responsible for overseeing and ensuring the reliability of teacher assessment moderation.
- It will be important to provide a framework for reporting in order to promote common approaches between the regional consortia.
- This would ensure integrity and comparability of results across all schools.
- It would bring consistency across the regional consortia and make the data resulting from the comparison the regional consortia's performance reliable.
- It would stipulate consistency of purpose and continuity, provided that the arrangements focus on strengthening professional discussion and common understanding of standards.
- It makes good use of the annual regional consortia business plans which are an appropriate vehicle to deliver and evaluate the policy aims and it avoids the need of additional legislation and associated reporting. Rigour and consistency of approach could be developed through the Welsh Government providing guidance and a framework for reporting within the business plans.
- The proposals are the right step forward, however the next step should be the development of experience within regional consortia to advise special schools, settings and specialist centres how to strengthen and lead moderation.

Of those responses which weren't supportive, the main comments included the following.

- This could place colleagues working for the regional consortia in a difficult position, moving them from working with schools in a supportive role (offering assistance in raising standards) to a monitoring and judgemental role.
- This effort spends more money on a process that cannot work.

In addition, the following more general comments were expressed.

- The business plan should include provisions for the year-on-year progression based on actions resulting from the areas of improvement identified from the outcomes of the previous year.
- The requirement for the regional consortia to improve teacher assessment should include improving support, enhancing moderation, clear examples, and providing training opportunities.
- The regional consortia's work on improvement of teacher assessment should build upon the same processes and systems that local authorities have been using successfully in previous years.

Welsh Government response

We are pleased that this proposal received broad support. The Welsh Government will take this action forward immediately.

Question 2 – Do you agree that we do not presently need to place a specific statutory duty on local authorities to provide a separate annual report?

| | |
|----------------------------|-----------|
| Agree | 39 |
| Disagree | 15 |
| Neither agree nor disagree | 23 |
| No proforma response | 13 |
| Total | 90 |

There was significant support for this proposal. Supporting comments noted the following.

- Before making any process statutory it is always a good idea to try it out first and then review the success.
- The arguments behind needing new legislation for this requirement are not compelling at present.
- There is no reason to add yet another statutory reporting burden and therefore cost on local authorities.

There were a small number of responses against this proposal. Specifically the following:

- Placing this duty would raise the status of teacher assessment right from the outset within the whole of Wales, ensure fuller participation and secure positive engagement.
- A statutory annual report would make the local authorities ensure that time and funding is given to schools to support assessment and moderation.

- There should also be a statutory duty on local authorities to provide a separate annual report on teacher assessment within their schools.
- A statutory annual report would not put any unnecessarily bureaucratic burden on local authorities, because in practice, the work will be performed by the challenge advisers working within regional consortia.

Welsh Government response

This proposal received reasonable support. Consequently, the Welsh Government will not legislate at present. However, we will continue to keep this under review.

Question 3 – Do you agree that statutory participation in cluster group moderation from 2015–16 will benefit teacher assessment reliability?

| | |
|----------------------------|-----------|
| Agree | 59 |
| Disagree | 11 |
| Neither agree nor disagree | 11 |
| No proforma response | 9 |
| Total | 90 |

There was strong support for this proposal. Supportive comments are noted below.

- Statutory participation would allow schools to compare their pupils' progress and exchange ideas on successful teaching and assessment methods, spreading best practice across a region.
- It would benefit teacher assessment reliability and ensure continuity of the staff's expectations.
- It would ensure that all schools are included and that being outside of the system is no longer an option.
- It would make staff feel much more secure in their judgements, while providing consistency and establishing robust procedures at the same time.
- It would provide professional training benefits, particularly for less experienced and new teachers.
- It would protect staff's professionalism and safeguard standards if ever the levels are contested.
- It would make the transition from Key Stage 2 to Key Stage 3 easier/more smooth.

Comments opposing the proposal noted the following.

- There are potential difficulties which arise when teacher assessments made by some schools are challenged by others.
- There is a potential impact of statutory duties on teacher and head teacher workloads.

- Cluster moderation meetings might be too focused on levelling individual pieces of work rather than concentrating on the level at which a learner is operating.
- Cluster moderation meetings might lead to sharing bad, rather than good practice.
- The proposal is unlikely to improve the system where at Key Stages 2 and 3 teacher assessed levels are awarded, which is followed by externally marked examinations in secondary school (i.e. it will not narrow the national gap in indicators between Key Stages 2 and 3 and GCSEs).

In addition, the following opinions were expressed.

- Pupils' work and documentation must come from the existing work/practice of the school as opposed to creating work/documentation just for cluster moderation.
- Welsh-medium schools are in the minority within the clusters in some geographical areas. Therefore it is necessary to ensure that Welsh-medium schools should have appropriate cluster moderation everywhere.
- Local authorities and consortia may not have the capacity to undertake the proposed activities: existing structures must be complimented by sufficient resources.
- Schools should be funded directly to deliver cluster-based activity, rather than funding the regional consortia which only have a facilitating role.
- A dispute resolution mechanism is needed.
- A duty should be imposed on the head teacher of each school within the cluster (or a senior member of staff) to be present at each cluster moderation meeting.
- The requirements regarding what materials should be produced, when and where the cluster moderation meetings will take place should be clearly communicated to all schools at the start of the academic year.
- Special schools and settings should be included in cluster moderation, although the definition of the term 'cluster' should not be geographically limited and it should be flexible.

Welsh Government response

This received very strong support. The Welsh Government will take forward the preparation of the relevant legislation.

Question 4 – Do you agree, in principle, that cluster group moderation should be extended to include Foundation Phase?

| | |
|----------------------------|-----------|
| Agree | 71 |
| Disagree | 4 |
| Neither agree nor disagree | 5 |
| No proforma response | 10 |
| Total | 90 |

There was very strong support for this proposal. Supportive comments included the following.

- The transition between the Foundation Phase outcomes and national curriculum level descriptions is an area of great discrepancy and cluster moderation is vital in ensuring that accurate assessments are made across the whole of school education.
- Authentication of the awarded outcomes is not the only aim – it is also necessary to ensure that schools are able to measure the development and achievement of their pupils correctly throughout the whole period of their school education, including the Foundation Phase.
- Cluster moderation would ensure that the pedagogical philosophy of the Foundation Phase is understood, recognised and filtered throughout the education system in Wales and that it is part of the joined up approach to the whole education cycle.
- Cluster moderation would develop a common understanding of outcomes and promote the sharing of good practice. It would strengthen the system and provide the framework for much closer and extended collaboration on assessment.
- Cluster moderation challenges the judgments around borderline pupils and thus impacts on the reliability of teacher assessment.

Responses against this proposal stated the following.

- Current assessment methods are expensive, time consuming and ineffective and this proposal will not change the situation.

The following general comments were also expressed.

- Releasing staff at the end of both phases to attend cluster moderation sessions will be expensive and it is vital that the release is funded.
- There needs to be assessment continuity between the Foundation Phase outcomes, then Key Stage 2 and Key Stage 3 teacher assessments and finally, GCSE outcomes.
- Cluster group moderation should be extended to include the Foundation Phase, but only literacy and numeracy should be moderated to avoid unnecessary layers of bureaucracy.
- This should be an inclusive model which special schools/units may be able to subscribe as well (especially bearing in mind that Foundation Phase is of particular relevance for SEN pupils).
- Extension of the cluster group moderation to include Foundation Phase is important in terms of consistency and continuity, but it does not necessarily need to be statutory.

Welsh Government response

This proposal received very strong support. The Welsh Government will explore further the practical implications of such a system before returning with future proposals.

Question 5 – Do you agree that the teacher assessment standards will be improved by introducing a new system of external verification from 2014–15?

| | |
|----------------------------|-----------|
| Agree | 52 |
| Disagree | 13 |
| Neither agree nor disagree | 12 |
| No proforma response | 13 |
| Total | 90 |

There was substantial support for this proposal. Supporting comments stated the following.

- External verification would ensure better accountability and improve accuracy and reliability of data.
- It would improve professional confidence in teacher assessment and focus all schools on ensuring that the evidence to support judgements is readily available and easily signposted.
- It would highlight the inconsistencies in teacher assessments and contribute to the teacher assessment harmonisation.
- The independence of the body and the randomness of sampling will ensure that the assessment results are not inflated to meet the authorities' expectations beyond the reality of pupil capabilities.
- The use of both random and targeted sampling of learner profiles will ensure a fair and diagnostic approach.

Comments from those opposed stated included the following.

- Pupils can be easily trained to present work in their books at a certain level, but this does not necessarily mean that they can understand, retain and apply what they have learned; the easiest way to demonstrate this is formal tests.
- There should be more time for the end-to-end process to embed before the external verification programme is introduced.
- To be effective, verification should be more closely linked to preparation for Key Stage 4 using the LNF as the vehicle and it should be performed by clusters, local authorities and regional consortia rather than being external.

The following general comments were also expressed.

- The body must have the trust and the respect of the profession and its membership must have a recognised grounding in classroom experience and teacher assessment themselves.
- External verification should be driven by the profession, and reflective of it, while also remaining impartial.
- The independent external verification body must work alongside stakeholders in a transparent way and be accountable.
- The external verification process must be informative and support schools rather than be seen as yet another level of accountability.
- It is positive that the work could also help identify professional development opportunities but this development for schools should not be prescriptive.
- The term 'targeted sampling' needs to be clarified.
- If the system goes ahead, ultimately it should include special needs schools and settings, provided that the verifiers consider samples below Foundation Phase Outcome 1.
- The time required to prepare a profile for targeted sampling should be taken into account.

Welsh Government response

This proposal received substantial support. The Welsh Government will be introducing the cluster group external verification for Key Stages 2 and 3 from the current academic year, led by the EAS Partnership. This year the programme will start as an introductory scheme, followed by the establishment of full external verification system for the two subsequent academic years (i.e. 2015/16 and 2016/17).

Question 6 – Are you content for this model to commence in 2014–15 on a consensual basis, with legislation to follow only if required?

| | |
|----------------------------|-----------|
| Agree | 39 |
| Disagree | 25 |
| Neither agree nor disagree | 15 |
| No proforma response | 11 |
| Total | 90 |

There was general support for this proposal. The following comments supported the proposal.

- There is enough professional agreement across the country that consistency in teacher assessment has got to be secured without legislation being necessary.
- Provided that the model and accompanying support is a positive development; there should be no need for legislation.
- The only way to ensure a consistent approach and fair, robust, reliable system is to commence with a set external verification model across local

authorities throughout Wales and get the process as right as possible before making it statutory.

- Starting in 2014/15 is appropriate because evidence indicates that there are significant weaknesses in teacher assessment, which are entrenched and long-standing. The sooner that the validity, reliability and accuracy improve, the better.

Of the six proposals consulted upon this proposal received the largest number of objections. Responses against this proposal included the following.

- There is not enough time to complete the process correctly and thoroughly this academic year.
- In order to give weight to external verification it is necessary to make it statutory straightaway.
- External verification should never be statutory because it will mean more processes and paperwork, but less time to improve standards in the classroom.
- Whether statutory or not, external verification would be conducted in parallel with the National Reading and Numeracy Tests, GCSE and A level examinations and therefore it will place huge burdens on secondary teachers.

In addition, the following comments were expressed.

- Teacher assessment cannot provide a clear picture of learners' attainment and therefore it should be substituted for formal tests at Key Stages 2, 3 and 4.
- 'Inclusive' schools are not really 'inclusive' unless pupils with special educational needs are included into the external verification activities.
- It is necessary to clarify the whole process, including all learner groups and types of schools involved, prior to the introduction of the new system to ensure clarity.
- An extensive training programme should be provided to raise awareness of the requirements (e.g. examples of learner profiles and portfolios) before the external verification programme is introduced.

Welsh Government response

This proposal received general support. However, the developments will be monitored and depending on the results at the end of the academic year 2016/17 the position might be reviewed.

Question 7 invited general comments on related issues not specifically addressed in the consultation.

There were 59 comments in total, which included the following.

Model of assessment

- Proposed changes should contribute to an all inclusive assessment model for learners of all abilities and types including learners for whom English is not the first language, learners who are gifted and talented, who have severe learning difficulties, profound and multiple learning difficulties as well as learners with autism.
- Assessment must be aligned between the Foundation Phase and Key Stage 2. It must ensure that there exists one set of levels and it must adjust the outcomes and levels where they do not match.
- The lack of consistency is due to the fact that the number of options available for the summative assessment of a child is very limited.
- Reliable national exemplification materials across all phases would be very helpful in securing national consistency.
- To be consistent, verification needs to be organised across the local authorities' borders.
- National curriculum requirements for Key Stage 2, Key Stage 3, GCSE and A level need to be better aligned to allow for a smooth and consistent progression.

Level descriptions

- Level descriptions in the national curriculum are vague and it is sometimes difficult to distinguish between the levels. If the use of levels and outcomes continues, consistency could be provided by the introduction of sub-levels within a level/outcome.
- There is a pressure on teachers and schools to make the process of determining the level more 'scientific/factual' which is impossible to do as the descriptions of outcomes and levels contain a number of different statements.
- At the moment there is no system to address the schools that appear to have assigned the levels inconsistently. The moderation process seems to finish at the end of the school year, and any discussions between secondary and primary schools move to the new cohort in September.
- A more streamlined, national standards checklist with specific criteria for achieving the different levels will help teachers.

Methods of assessment

- Cognitive abilities test (CAT) should be used for assessment because this test assists teachers in accurately measuring the potential of pupils and identifying the areas of strength and weakness.

Effect of proposed changes on the sector

- The proposed changes must be resourced in to support teachers for additional workload, supply cover and administrative cost.
- Although ensuring reliability and consistency of teacher assessment is important, it should be borne in mind that all changes cost money and require resources therefore realistic financing, human, material and time investment should be provided for the implementation.
- The regional consortia are now set to have a key role in improving teacher assessment, yet they are not fully functional or effective. Also, local government reorganisation may have an impact on consortia working.
- There can be wide discrepancies between the test outcomes and the teacher assessment outcomes in Year 2 and Year 6. Test outcomes should also have a greater role in judging the reliability and accuracy of teacher assessment.
- Any or all of the proposals taken forward as a result of this consultation should be implemented in the light of the recommendations made by Professor Donaldson's review of curriculum and assessment arrangements.

Practitioner professional development

- For teacher assessment to be effective it is necessary to ensure that teachers are well trained, their expertise is backed by the regional consortia's advice, and also that there exists a cross-consortia monitoring.

Special educational needs (SEN) schools and settings

- The proposed changes should be extended to include SEN schools and settings. However, it is necessary to take into account specific requirements of this educational sector.
- Clusters should not be based on geographic location; adequate funding for moderation activities and training should be provided.

Welsh Government response

The Welsh Government will be giving very careful consideration to the suggestions and observations provided.

Such issues as the model and methods of assessment, the level descriptions and the effect of the proposed changes on the sector will be approached in the light of the recommendations of Professor Donaldson's Review².

For instance, the problems and suggestions concerning the possibility of the inclusion of Special Educational Schools and settings into the proposed changes will be given particular examination. The Welsh Government is committed to the cause of professional development for those working in the education sector and will consider the best way to provide the relevant training alongside the introduction of the suggested improvements in teacher assessment.

² Professor Donaldson's report on curriculum and assessment arrangements – [*Successful Futures: Independent Review of Curriculum and Assessment Arrangements in Wales.*](#)

Annex: Full list of respondents

Ysgol y Bannau Aberhonddu
Newtown High School
Trelewis Primary School
Ysgol Y Gader
Cefn Saeson School
Afon Taf High School
Lliswerry High School
Ysgol Gynradd Talacharn a Thremoilet
Ysgol Glan Morfa
Casllwchwr Primary School
Brynmill Primary School
Morrison Comprehensive School
Ysgol Gymraeg Glan Cleddau
Park Community Primary School
South West and Mid Wales Consortium
Ysgol Gyfun Gwyr
NUT Cymru
Pentrehafod School
St Padarns RC Primary School
Moorland Primary
Ysgol Plasmawr
Catholic Education Service
NAHT Cymru
St Margarets RC Primary
St Joseph's Infants
Awel y Môr Primary school
Groes Primary School
Blaenhonddan Primary
Gnoll Primary School
YGG Rhosafa
YGG Cwmnedd
Ynysmaerdy Primary
Crellnant Primary
Pen Afon Primary
Groes Primary School
Ynysmaerdy NPT
Cwmnedd Primary School
Sandfields Cluster
Traethmelyn Primary
Ystalyfera Cluster
Sky Rocket Training
Tredegar School
GTCW/CyngAcc
Llanilltud Faerdref Primary School
Tonyrefail School
Vale of Glamorgan Local Authority
Ysgol CCC
Llysfaen Primary School

GwE
Flintshire County Council
Estyn
Ysgol Pencryae
Ranelagh International Ltd
Swansea LA
Ysgol Maesydderwen
Portfield School
Ysgol Heol Goffa
Ysgol Penybryn
Heronsbridge School
Ysgol Hen Felin
Crownbridge School
Maes Special Ebbw School
Crownbridge School
Pen-y-Cwm School
Greenhill School
Tŷ Gwyn School
YBC
Trinity Fields School
Ysgol Penmaes
ASCL Cymru
St Brigid's school
YGG Pontybrenin
Powys LA
CYDAG Uwchradd
ATL Cymru
NASUWT
ERW
Maesyrrhandir CP School
Welshpool High School
WLGA