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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – summary of responses

Proposed changes to school target setting requirements in Wales

Date of issue: May 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Proposed changes to school target setting requirements in Wales

Audience

Education bodies involved or interested in school target setting in Wales, including, schools, local authorities, regional education consortia, teaching unions, awarding bodies, practitioners and public bodies.

Overview

On 21 January 2019, the Welsh Government published a 6-week consultation on proposed changes to the target setting requirements on school governing bodies in relation to Year 11 pupils at Key Stage 4. This document summarises the responses received and provides the Welsh Government response and next steps.

Further information

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Additional copies

This document can be accessed from the Welsh Government's website at <https://gov.wales/changes-target-setting-requirements-schools>

Related documents

<https://beta.gov.wales/changes-target-setting-requirements-schools>

[*Education in Wales: Our national mission*](#)

*The School Performance and Absence Targets
(Wales) Regulations 2011*

*The Education (Amendments Relating to Teacher
Assessment Information) (Wales) Regulations 2018*

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Introduction

On 21 January 2019, the Welsh Government published a 6-week consultation on proposed changes to the target setting requirements on school governing bodies in relation to Year 11 pupils at Key Stage 4. This document summarises the responses received, the Welsh Government response and Next Steps.

Summary

The consultation asked a total of 7 questions regarding proposals to make changes to the target setting requirements on school governing bodies in relation to Year 11 pupils at Key Stage 4. The proposals were to:

- remove the requirement to set measure-specific targets – this would remove the statutory requirement for governing bodies to set targets in relation to the percentage of Year 11 pupils to achieve: - i) the Level 2 threshold including an approved relevant qualification in English or Welsh first language and Mathematics (i.e. the Level 2 inclusive) and ii) the Level 1 threshold (5 GCSEs at grades A*- G)
- increase the required number of non-specified targets to be set – this would increase the required number of non-specific targets that governing bodies are already required to set for Year 11 pupils at Key Stage 4 (from three to six) based on self-evaluation
- make transitional provision which allows the governing body to set provisional and final targets for 2019 to 2020 (the transitional year) which are not based on targets set in previous school years.

The consultation ran between 21 January 2019 and 8 March 2019. We would like to thank all stakeholders for taking the time to respond to the consultation and for providing their comments.

Enquiries about this document should be addressed to: ims@gov.wales.

Responses

There was a fairly low response to the consultation with only **33** responses received. Responses were received from a mixture of regional consortia, Local Authorities, unions, schools, regulatory bodies, individuals and representative organisations. A full list of respondents is provided below.

Organisation	
1	Education Achievement Service
2	UCAC
3	Anonymous
4	NASUWT (union)
5	Catholic Education Service (CES)
6	Fitzalan High School
7	Association of School and College Leaders (ASCL)
8	Cardiff Committee of Secondary Headteachers
9	Estyn
10	GwE
11	National Education Union Cymru
12	Mr John Killick
13	Flintshire County Council
14	NAHT Cymru
15	Qualifications Wales
16	Mr Alun Jones
17	Anonymous
18	Anonymous
19	Anonymous
20	Dr Alan Houston
21	Anonymous
22	Anonymous
23	Anonymous
24	Anonymous
25	Anonymous
26	Anonymous
27	Anonymous
28	Education Department, Swansea Council
29	Anonymous
30	Darland High School
31	Ysgol Maesydderwen
32	Anonymous
33	Anonymous

The table below provides a breakdown of response statistics split into the categories: 'agree', 'disagree', 'neither agree nor disagree' and 'comment only'. Responses are recorded as 'comment only' where the respondent provided comments but did not

explicitly indicate whether they agreed or disagreed with the proposal. Questions 5 – 7 have not been calculated as they asked more open questions with a range of answers.

Question	Agree		Disagree		Neither agree nor disagree		Comment only		TOTAL	
	No.	%	No.	%	No.	%	No.	%	No.	%
Question 1	26	81	4	13	1	3	1	3	32	100
Question 2	20	63	4	12	6	19	2	6	32	100
Question 3	12	38	11	34	7	22	2	6	32	100
Question 4	7	23	13	42	11	35	0	0	31	100

*Some totals may not equate to 100% due to rounding

Analysis of Responses

Q1.	Do you agree with our proposal to remove the statutory requirement for school governing bodies to set performance measure-specific targets for year 11 pupils at Key Stage 4?									
Agree		Disagree		Neither agree nor disagree		Comment only		Total		
No.	%	No.	%	No.	%	No.	%	No.	%	
26	81	4	13	1	3	1	3	32	100	

A total of **32** stakeholders answered this question with the majority – 26 respondents (81%) agreeing with the proposal. There were a number of comments supporting the removal of specific accountability targets as respondents felt that it allows smarter accountability for higher and lower attaining learners, as well as supporting the wellbeing of learners and staff.

There were 4 respondents (13%) that disagreed with the proposal. Of these, one felt that the requirement to set targets against the old measures should instead be replaced by a requirement to set targets against the new performance measures on the basis that Key Stage 4 is the only Key Stage with published data at school, local authority, regional and national level and is the only Key Stage based on external qualifications. They also pointed to a lack of consistency in the collection of information against what is then available in the public domain and published by Welsh Government. 1 respondent wanted to retain the Level 2 inclusive measure as a useful school improvement driver.

1 respondent neither agreed nor disagreed with the proposal...

1 respondent did not specifically state whether or not they agreed with the proposal, but nevertheless supported its intentions with some concern that the aims of the proposals may not be realised in practice.

Some general points made by individual respondents included a need to provide clarity to governing bodies and schools, a need for some consistency across schools and clear accountability for targets and a need to ensure Challenge Advisors do not continue to hold schools, school leaders and teachers to account for targets mirroring the existing Level 2 inclusive and Level 1 thresholds.

Q2.		Do you agree that statutory school target-setting requirements for Year 11 pupils at Key Stage 4 should be non-specific, providing greater autonomy for schools to set genuinely challenging targets focused on the real priorities for improvement in their own context based on self-evaluation?							
Agree		Disagree		Neither agree nor disagree		Comment only		Total	
No.	%	No.	%	No.	%	No.	%	No.	%
20	63	4	12	6	19	2	6	32	100

A total of **32** stakeholders answered this question with the majority – 20 respondents (63%) agreeing with the proposal. Supporting comments included that it would remove the often unintended negative consequences of benchmarking on narrow datasets. One reply commented that there are currently too many variables when used to compare schools, and that targets should always be about individual schools and learners. It was also noted that there is a need for consistent local advice and guidance on effective self-evaluation processes and signposting good practice, robust arrangements to ensure that schools are identifying the most appropriate targets for improvement and a need to ensure a focus on improving provision and standards for learners.

Only 4 respondents (12%) disagreed with the proposal with one citing a lack of consistency in the approach to target setting at Key Stage 2, Key Stage 3 and Key Stage 4. The other considered that schools should be able to set challenging targets based on their own priorities in addition to some specific ones which reflect what young people need in order to enter the world of work, training or further education such as maths, English and some science. Another response queried whether the removal of specific targets would result in unrealistic expectations being put on some schools, or other schools setting unambitious targets. 1 response referred to parents/carers; that they should be able to have information on pupil achievement which allows school to school comparison.

6 respondents (19%) neither agreed nor disagreed with the proposal, one of which was from a school that noted they have found setting targets against performance measures useful and would continue to do the same.

The other (Estyn) considered it would be appropriate to set broad criteria for the targets that follow national priorities such as the Welsh Language, decreasing the effect on poverty and raising the standards of more able pupils. They also suggested requiring a specific number of the targets to be set against the new points score measures to avoid the historic focus on Level 2 inclusive threshold measure.

2 respondents (6%) provided general comments but did not specifically state whether or not they agreed with the proposal. One of these (Qualifications Wales) highlighted a concern that targets based on qualification outcomes can lead to a narrowing in teaching practice, suggesting that measures should be broader and utilise qualitative information to help interpret changes in measures.

It was recommended that Welsh Government consider providing guidance on designing and setting appropriate targets to help schools and local authorities make the most of the flexibility introduced in the proposals. Some helpful examples were provided such as ideas on how to incorporate student voice on issues such as teaching and learning and feedback from a school’s community, or ways to measure student and staff wellbeing. Development of a national bank of resources over time was also suggested based on good practice of how schools can develop effective measures.

Similarly, the response noted the importance of ensuring schools are supported to make appropriate use of performance results data, for example to make allowance for normal year-on-year statistical variation associated with relatively small sample sizes at a school level.

The remaining respondent focused on the new accountability arrangements more generally and sought assurances that the new arrangements will not place unnecessary or excessive workload and bureaucratic burdens on teachers and school leaders.

Q3		Do you agree with our proposal to increase the required number of non-specific targets for Year 11 pupils at Key Stage 4 based on self-evaluation? Schools governing bodies are already required to set three targets in this way.							
Agree		Disagree		Neither agree nor disagree		Comment only		Total	
No.	%	No.	%	No.	%	No.	%	No.	%
12	38	11	34	7	22	2	6	32	100

A total of **32** stakeholders answered this question – 12 respondents (38%) agreed with the proposal. Supporting individual comments included the importance of ensuring meaningful targets over merely complying with a specified number, with one respondent welcoming the importance that schools are able to determine these targets, rather than the Local Authority or consortia. One responded noted that this fits in well with local self-evaluation whilst another expressed the need for moderation of self-evaluation in order to avoid overstating. A further response referred to

concerns about strength of self-evaluation in some schools leading to variability of targets set.

Issues with the terminology used were referred to by two respondents, both suggesting a need for clarification as to how the term "target" is used. One of these (from a regional consortium) referred to targets as 'areas of development' and suggested clearly defining that these can be both qualitative and quantitative.

11 respondents (34%) disagreed with the proposal, both considering that the number of non-specific targets should be kept at three (this is covered specifically by question 4). Reasons cited included consistency between all key stages and allowing schools the flexibility to decide if they need to increase the number of targets. One of the responses suggested requiring three specific targets based on the interim performance measures.

7 respondents (22%) neither agreed nor disagreed with the proposal, pointing to a need for further clarification on what 'non-specific targets' and ensuring appropriate support, advice and guidance is available in order to be able to set meaningful targets. 1 respondent felt that non-specific targets should focus on whole-school priorities as this approach could potentially lead to an over focus on Key Stage 4, whilst 6 respondents felt that the number of targets should meet school and learner needs and should have no fixed number.

The remaining 2 respondents (6%) provided comments only without explicitly indicating whether or not they agreed with the proposal. A suggestion was put forward that this is an opportunity to reduce the number of targets to alleviate the high-stakes pressure on schools, teachers and school leaders.

The importance of the focus and range of measures over the actual number of targets was once again highlighted, along with the need to put in place guidance for schools. There were also comments covered in question 2 including concern that targets based on qualification outcomes can lead to a narrowing in teaching practice.

Q4		Do you agree that six is an appropriate number of statutory targets for Year 11 pupils at Key Stage 4? If not, what do you consider is an appropriate number and why?					
Agree		Disagree		Neither agree nor disagree		Total	
No.	%	No.	%	No.	%	No.	%
7	23	13	42	11	35	31	100

A total of **31** stakeholders answered this question with a mixed response. Of those, 7 respondents (23%) agreed with the proposal; one response indicated that there should be no more than six.

11 respondents (35%) neither agreed nor disagreed with the proposal. Many of these commented that the quality of the targets is more important than the quantity (a recurring theme throughout other questions) with some indicating a need for some

flexibility in the number to be set. Alternative suggestions included a defined minimum and maximum to enable schools to determine how many targets to set based on their context or a specified amount of school-based, LA-based, regional-based and national targets, recognising the strong partnership working that has developed between schools, local authorities and regional consortia.

One respondent questioned if setting a specified number contradicts the intention to provide greater autonomy and self-direction for schools. The need for appropriate support and guidance was again raised. Two responses felt that 3 to 4 targets would be sufficient and allow greater focus, whilst another response suggested that all schools should be required to set between 3 and 5 targets based on self-evaluation and school priorities.

13 respondents (42%) (2 from Unions) disagreed with the proposal, some suggesting that a lower number would be more appropriate due to the impact on teachers and head teachers. A minimum of 3 was suggested as an alternative allowing target setting to be tailored to each individual school. The risk of schools simply replicating the existing targets for threshold measures was also raised along with a need to ensure that Challenge Advisors do not continue to hold schools, school leaders and teachers to account for targets mirroring the existing measures.

Q5	<p>We would like to know your views on the effects that the proposed changes to statutory school target-setting requirements would have on the Welsh language, specifically on:</p> <ul style="list-style-type: none"> i) opportunities for people to use Welsh ii) treating the Welsh language no less favourably than the English language. <p>What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?</p>
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A total of **22** stakeholders answered this question. The majority of respondents considered that the proposals would have no effect on the Welsh Language. Two respondents felt that the effect would be positive, whilst another response commented that forcing Welsh upon learners via Key Stage 4 targets would not increase the number of Welsh speakers and that foundations needs to be put in place in primary school. A further respondent felt that the onus should be on school Governing Bodies to identify whether targets for Welsh language need to be set in individual schools.

One respondent noted that the proposal for six non-specific targets could enable all six of these to potentially be un-related to Welsh for all schools, even for Welsh Medium schools.

To improve the effect on the Welsh language, individual suggestions included requiring schools to set one target that is related to Welsh or requiring an LA/regional derived target which included the development of both provision and outcomes in Welsh. A total of 3 respondents advised that they would support a key performance indicator for Welsh 2nd language.

Conversely, another respondent expressed concern about requiring a specific target relating to the Welsh Language, considering it would place learners and education professionals under unnecessary pressure. It was argued that schools should be free to set the targets which relate to their specific setting taking into account factors such as prevalence of Welsh within the community, Additional Learning Needs and English as a Second Language.

Two respondents made reference to WESPs, noting the importance that there is opportunity for linkage to local authority WESPs as well as Regional Welsh Language Development planning. One of these noted that if targets are not collected for Welsh Language then this will affect the ability of LAs to produce meaningful aggregate / individual school level targets for the WESPs.

Q6	<p>Please also explain how you believe the proposed policy could be formulated or changed so as to have:</p> <ul style="list-style-type: none">i) 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 languageii) 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.
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A total of **19** stakeholders answered this question with four of those referring to their earlier response to question 5.

Two respondents stated that they didn't consider any changes were required to the policy, while another noted the variability in targets would need policy development to specify the requirement for schools to pay regard to points i and ii above when evaluating priorities.

One response suggested the introduction of a fluency spectrum that could be used as an indicator, whilst another suggested that there should be a cluster based approach and strategies to support learners particularly where numbers of Welsh speaking learners are low and that this should start in early years through to GCSE.

One respondent suggested that whole-school non-specific targets would better enable schools to set more suitable targets to support the Welsh language, whilst

another respondent suggested that school, local authority or regional development of the Welsh Language could be a part of a quality assurance stage of target setting.

Two respondents did not feel that this necessarily supported the 2050 commitment for 1 million Welsh speakers.

Q7	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.
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17 stakeholders provided comments in response to this question. These covered a range of issues, many of which were covered to some extent in answers to earlier questions. A summary of the points made is set out below:

- The whole system should be reviewed formally after an agreed period of time to ensure the new system does just create new unintended consequences
- More flexibility to amend targets during the school year (e.g. after inspection)
- Need to find a universal way of measuring pupil progress and genuine value added
- Some concern that consortia will be able to decide what schools' six targets will be and data continue to be aggregated up as before
- Concern that LAs signing off targets is not consistent with the approach of greater autonomy for school self-evaluation
- Need stability - time to introduce and embed is needed to ensure that change is managed effectively and is sustainable in order to build capacity as a self-improving system
- Professional development for leaders needs to be designed alongside changes to the target setting process to ensure that the collective ethos and approach is embedded
- A need to monitor the impact of the proposals on teacher workload
- School improvement in Wales should be linked to rigorous accountability measures and it is important that the high level of accountability is not lost going forward. (school)
- Clarity needs to be provided around how the process will be verified, authenticated and validated.
- One of the responses (GwE) provided in-depth advice on verification, authentication and validation, highlighting the importance that target setting works with current work on the Estyn/OECD toolkit of collaboration and peer-engagement to support self-evaluation and improvement planning. Comments included:
 - In developing targets, awareness must be given to how the process will be verified, authenticated and validated.
 - The verification and authentication have to be manageable in a local context
 - The validation process must evaluate the rigour of the verification and authentication stages and not define global targets that will corrupt its perceived autonomy, rigour and local context. The validation process would be best served by a sampling system that evaluates the authentication stage.

- Developing a guidance framework for schools which models culture, ethos, practice etc. should be fundamental to the principles that underpin effective target setting.
 - Enhanced focus on building capacity and on developing coaching skills of leaders at all levels needs to be embedded into target creation. The process needs to develop leaders as more effective 'leaders of change'.
 - We now must build trust and time so that we ensure that we adopt the most effective model/processes. Rushing this will repeat the corrupted problems that have driven the old system into the disrepute of focusing on the institution and not the pupil.
- One of the responses queried the rationale for not including the KS2 and KS3 targets as part of this consultation, as Governing Bodies are still required to publish these targets. Another response indicated that KS2 and KS3 target setting requirements should be removed
 - Another response commented a need to ensure that irrespective of targets, Estyn inspect on an equal basis

Welsh Government Response

Overall, it is clear that stakeholders are generally in support of the proposals and of their intentions.

The most significant variation in responses received related to the proposal for six non-specified targets. We accept that the nature of targets is more important than the number set; however, it is important to ensure that there are sufficient targets to enable a range of targets to be set.

One respondent felt that if targets were not collected specifically for Welsh Language then this would affect the ability of LAs to produce meaningful aggregate / individual school level targets for the Welsh in Education Strategic Plans (WESPs). It should be noted that school targets should only be used to support self-evaluation and should not be aggregated up to a local authority measure of performance to hold schools to account. Regulations (The Welsh in Education Strategic Plans and Assessing Demand for Welsh Medium Education (Wales) Regulations 2013) underpinning statutory requirements for WESPs and local authority plans for Welsh-medium education provision, are not affected by this consultation. It should be noted that a review of the 2013 Regulations was undertaken during 2017/18 and new Regulations relating to local authority Welsh in Education Strategic Plans will be consulted on during May 2019.

A number of responses called for a need for guidance to support schools in their target setting process. The Welsh Government is currently reviewing guidance on the reporting of school and pupil information, and information on target setting will be included in the revised guidance. However, much of the current guidance on target setting will remain.

In terms of more significant changes suggested to the system, it is important to remember that the changes proposed at this stage are interim arrangements only, in advance of the implementation of the new Evaluation and Improvement arrangements. The primary aim of

these changes is to bring statutory target setting requirements at Key Stage 4 in line with the interim performance reporting arrangements, whilst removing specificity in the current regulations, and introducing an additional element of autonomy as an early step on our journey to a more autonomous school system.

Whilst schools may choose to set Key Stage 4 targets against the interim performance measures based on points' scores, we do not expect to see schools setting targets against the old measures as from 2019, data for the old measures will no longer be published at a sub-national level.

In response to comments received regarding inconsistency with target setting at Key Stages 2 and 3, it should be noted that at Key Stages 2 and 3, the requirements are still very much aligned with existing assessment arrangements. As such, and whilst the curriculum reform is ongoing, it would not be prudent to rush into making similar changes to requirements for Key Stages 2 and 3.

In response to a query seeking clarity regarding attendance targets, as outlined in paragraph 29 of the consultation document, the amendments only relate to pupil performance in Key Stage 4 examinations. All other existing target setting requirements will remain for the interim period.

It is important to retain some level of reassurance to ensure targets are appropriate, therefore local authorities will still be required to approve targets. However, it has been made clear to Directors of Education that school targets should only be used to support self-evaluation and should not be aggregated up to a local authority measure of performance to hold schools to account.

During this transitional phase, it would be premature to try to implement any more significant changes to target setting requirements.

Going forward, school target setting requirements and the extent to which they are managed and/or legislated by the Welsh Government within the future Evaluation and Improvement arrangements, is part of ongoing wider discussions and reform. *Draft Evaluation and Improvement (accountability) arrangements for Wales* was published in February 2019:

<https://gov.wales/sites/default/files/publications/2019-02/draft-evaluation-and-improvement-accountability-arrangements-for-wales.pdf>

In response to concerns regarding the variability in school self-evaluation and appropriate target setting, the document above sets out a summary of arrangements relating to evaluation and improvement and accountability; that school level target setting arrangements will remain, as will the need for local authorities to approve, but with more flexibility for schools to reflect individual school context. The document also refers to consideration of appropriate verification, authentication and validation processes, already being looked at as part of the work supported by Estyn and the OECD to develop a self-evaluation toolkit for schools.

In response to a query about variable targets and inspections, Estyn school inspections are governed by the Education Act 2005 and related regulations. Each inspection is undertaken on an individual school basis, and inspectors are required to evaluate the work objectively within the context of individual schools.

Next Steps

The Welsh Government intends to continue with the proposals as outlined in the consultation document through amendments to the Target Setting Regulations. The intention is for amended regulations to come into force on 1 September 2019.