



Department
for Education

Consultation Response Form

Consultation closing date: 1 May 2013
Your comments must reach us by that date.

Secondary School Accountability Consultation

Consultation Response Form

THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://www.education.gov.uk/consultations>).

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.

Reason for confidentiality:

Name

Organisation (if applicable) Mathematics in Education and Industry

Address:

MEI,
Monckton House,
Epsom Centre,
White Horse Business Park, Trowbridge, Wiltshire,
BA14 0XG

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Public Communications Unit by e-mail:

consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please mark an 'x' in the box that best describes you as a respondent.

<input type="checkbox"/> Teacher	<input type="checkbox"/> Head teacher	<input type="checkbox"/> School
<input type="checkbox"/> Parent-Carer	<input type="checkbox"/> Local Authority	<input type="checkbox"/> Awarding Body
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Union	<input type="checkbox"/> Governor/Governing Body
<input checked="" type="checkbox"/> Other		

Please Specify:
Curriculum development organisation for mathematics.

1 Do you agree with the proposals for the headline accountability measures?

Yes

No

Not Sure

Comments:

We strongly agree with the aim of changing the assessment and accountability measures in order to promote students' deep understanding across the curriculum. The current system distorts teaching in schools.

The proposals may improve the situation. However, it is very difficult to predict the unintended consequences of changes to accountability measures. There will remain a perverse incentive for schools to "play" the system. Any complex system of holding things to account based on one or two measures is subject to unintended consequences.

In our view, parents currently have access to sufficient data about a school's performance to make informed decisions. We do not believe that making more data available would improve schools. It would be an unnecessary and costly process to develop the School Performance Data Portal.

It is difficult to see how valid measures of progress in foundation subjects, the arts and PE would be achieved.

Attainment Measures

Threshold measures

The proposed threshold measure for English and mathematics will continue to distort the teaching in these vital subjects. Schools will focus resources on borderline students and so learning is likely to be shallow and mechanistic. Consequently, we propose that this threshold measure be removed.

Average point score

The proposal to publish the average point score for 8 subjects will help to reward schools who focus on the attainment of students of all abilities. However, it may lead to a narrowing of the curriculum as schools restrict students to 8 subjects from a limited list. Schools could perversely promote subjects for which they have a strong track record of success and not run others, limiting choice and opportunity for students. Moreover, the proposals will result in more students being pushed into taking more EBacc subjects, irrespective of whether that is the best pathway for particular students. We are concerned that vocational routes are not fully endorsed by this proposal. We would suggest that the choice of 8 subjects be wider and more flexible so that schools could devise appropriate pathways for students of all abilities. Students who would benefit from pursuing a more practical curriculum should not be disadvantaged and neither should their schools.

It is inconsistent for science to be compulsory to Key Stage 4 in the National Curriculum but not be a compulsory part of the average point score accountability measure; surely it will not be acceptable for students to “drop” science at age 13?

We have reservations about the use that might be made of a student’s average point score. Whilst it may be interesting for students to compare their average point score with national averages, it may also become “currency” in applying to sixth-form or higher education and the implications of this should be thought through carefully.

Progress Measures

The progress students make in secondary school should be the key accountability measure. It is not clear how the floor standard for progress will be set, or how it will be measured between KS2 and GCSE.

Value added is difficult to measure accurately for non-academic subjects where there is no correlation with the performance in English and mathematics. How will value added be measured in these subjects?

2 Is there any further information we should provide about the performance of disadvantaged students?

Yes	<input type="checkbox"/> No	X <input type="checkbox"/> Not Sure
-----	-----------------------------	-------------------------------------

Comments:

.

3 Should we look to use a relative measure as the floor standard in the first year of the new exams?

Yes

X No

Not Sure

Comments:

In the first year of any new examination, results are not reliable. Natural variability in student performance in examinations can mean that there is no significant difference between two schools in spite of one school performing slightly better in examinations than the other.

4 Are there any other measures we should consider publishing?

Yes

No

Not Sure

Comments:

The proposals focus on high value subjects, which are mainly academic subjects. This will devalue the benefit of following a vocational pathway, which would be more appropriate for some students. In addition, the proposals place too much emphasis on progression to higher education.

In order to decide which measures are appropriate, it is necessary to first decide what outcomes are valued and then establish which measures model them with the greatest integrity.

The introduction of the EBacc has caused an increase in the entries to academic subjects and demonstrates the power of accountability measure to encourage schools to steer students down certain pathways. Constraining the curriculum through these accountability proposals is at odds with the aim of improving education by giving schools more freedom and autonomy.

In paragraph 8.4 reference is made to low, medium and high prior attainment,

presumably at KS2. How will these tiers be decided and will they be fixed or relative to the attainment at KS2 each year?

5 Do you think we should collect and publish test data from internal assessments through the Data Warehouse?

Yes

No

Not Sure

Comments:

Internal assessments should be formative as well as summative, to support students' progress. It is sufficient to report the results of internal assessments to students and their parents.

In addition, preparing results for entry onto the database would be time consuming and costly and it would be impossible to ensure comparability between schools so the data would not be useful.

6 What other data could be published to create the right incentives for schools, including special schools, to ensure the best progress and attainment for all of their students?

Comments:

The assumption underlying this question is that publishing data is the best means of ensuring progress and attainment for all students. It is not clear that this assumption is correct. In the past, HMI used to advise schools about how to ensure the best outcomes for students.

7 Do you agree that the Department should stop the collection of Key Stage 3 teacher assessment results?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
---	-----------------------------	-----------------------------------

Comments:

Yes, however it should still be a requirement of schools to report to parents the interim progress and attainment of students at the end of year 8 or 9.

The consultation document recognises that the removal of levels means that schools could only provide limited data about Key Stage 3 performance. It is not clear how Key Stage 2 performance will be reported. Will that be similarly limited? If so, how can it be a suitable basis for the future measurement of progress at Key Stage 4? If not, how will this be achieved?

8 How should we ensure that achievement beyond formal qualifications is recognised?

Comments:

It is important that achievement outside of the academic curriculum is recognised and celebrated. Schools should be encouraged to enable students to discover and develop their talents in all areas. This should be reported on by Ofsted.

We support the idea of developing awards at various levels for different aspects of the curriculum. However these awards should be based on the level of participation as well as excellence and should not result in additional work and expense for schools.

9 How can national sample tests best be introduced?

Comments:

Referring to the use of GCSE results to measure national standards, paragraph 13.2 indicates that the accountability framework could result in unreliable standards if the results of high stakes tests are used. This also applies at school level.

National sample tests should focus on particular skills, knowledge and understanding that are highly-valued; these elements should form part of the curriculum and also be incorporated into the design and assessment of the new GCSEs. In order to be truly national, the sample should include students at independent schools, as well as those in maintained schools.

The development of such tests needs serious work from expert bodies, including statisticians. The previous experience of the APU and NFER should be drawn on in this development.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply X

E-mail address for acknowledgement: Charlie.stripp@mei.org.uk

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

X
Yes

No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 1 May 2013

Send by post to:

Phil Elks
Department for Education
Level 2
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: accountability.consultation@education.gsi.gov.uk