



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**

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:

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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](mailto: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	X Awarding Body
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Union	<input type="checkbox"/> Governor/Governing Body
<input type="checkbox"/> Other		

Pearson is the world's leading learning company. In the UK, Pearson is the largest awarding organisation offering Edexcel and BTEC Qualifications as well as delivering the current KS2 NCT tests. It is also the largest provider of Educational learning materials in Primary, Secondary, FE and HE. Pearson's education work combines 150 years of experience with assessment services and online support for learners in more than 70 countries.

The views in this response are all those of Pearson, but are also the result of wide consultation with many of the schools, academies and colleges with which we work. We have also been the sponsor of detailed work on the implications of these accountability proposals with the policy think tank CentreForum, which will be independently published in due course.

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

Yes

No

Not Sure

**The principles inherent in these proposals are a positive step towards a more intelligent accountability system and Pearson warmly welcomes this.**

The centrality of the progress measure in these proposals, and the inclusion of a direct link between this value-added measure and the proposed floor standard, is particularly welcome. A headline measure based solely on absolute attainment is inevitably at risk of capturing more about the nature of a school's intake than about the qualities it exhibits and the impact that it has. We fully support a measure that captures the vital role that a school plays in helping all young people – whatever their prior attainment or circumstances – make progress in their lives.

The impact that the current 5A\*-C headline measure has had on school behaviour is well documented. As a proxy for success, it is not only too narrow, but risks encouraging decision-making that prioritises benefit to the institution above benefit to the individual learner. These proposals reflect the criticality of a focus on all learners, not just those on pivotal borderlines. And they reflect the importance of a broad and balanced curriculum, specific to learner needs (both current and future). They will ensure all students have access to an academic core whilst providing space for high quality creative, practical and vocational learning.

In order for these proposals to be genuinely effective – that is, to create new incentives within the system that support schools to do the best for all their learners – we believe that the Department must give further consideration to the interplay between the new measures, and how they are likely to be used. Whilst the inclusion of the average point score and value added measures is designed to offset some of the effects of retaining a threshold in maths and English, those effects are unlikely to disappear entirely. Pass rates are a simpler concept for parents and governors to contend with, and they are certainly more suited to the inevitable process of league table creation by media outlets (in September, when much of the more nuanced data is not yet available). For these new headline measures to have a genuinely 'headline' impact, they must take equal prominence in public consciousness. There is a very real danger that they will not.

**As such, Pearson recommends that the Department gives strong consideration to the creation and release of one overall composite score, based on the headline measures set out in these proposals.**

CentreForum are currently exploring this issue and will set out further details in their

forthcoming report.

Those broad principles aside, there are elements of each of the three proposed headline measures that require further consideration:

**a) Threshold attainment measure in English and maths**

Pearson fully supports a specific focus on English and maths in the accountability framework. These subjects are the gatekeepers to further education, employment and a successful life, and it is right that performance in these subjects should be closely monitored.

We do however recognise the concerns expressed in paragraph 3.3, regarding the continued focus on the percentage of learners obtaining a pass (particularly if this is defined as a particular grade). If a 'line in the sand' is drawn, incentives are created that minimise the impact lower- and higher-ability learners can have on a school's overall achievement. There is then a danger that schools will feel compelled to continue to focus their efforts on the learners whose performance hovers around that threshold, potentially at the expense of those above and below it.

**Pearson endorses the inclusion of an English and maths threshold measure, but recommends that in both the average point score and value added measures, these two subjects are given double points at all grades.**

If a threshold in English and maths continues to exist, it is critical that the interplay between the three proposed headline measures serves to incentivise a broad focus on all learners. Giving heavier weight to these subjects in the two measures that recognise the attainment and progress contribution of every young person could encourage schools to focus on attainment across the ability spectrum in these most crucial subjects.

**b) Average point score measure**

**Pearson supports the inclusion of an inclusive average point score 8 (APS8) measure that facilitates a broad and balanced curriculum.**

**We do not believe that such a measure should be used to determine the take up of particular qualification types, nor should further specific prohibitions be introduced that in effect narrow a school's autonomy over their curriculum choices.**

We welcome an APS8 headline measure because it is ultimately inclusive: all learners contribute to it, across the full attainment spectrum, with no group of students more or less valuable than any other. It provides a broader, more reliable picture of a school as all performance is summarised, rather than just those students performing above a cut

score. In our research with stakeholders and senior leaders, there was broad consensus that best eight was a fairer, more accurate reflection of attainment within a school.

Pearson also welcomes the proposal to use this measure to facilitate the provision of a broad and balanced curriculum. The current proposal affords room for an academic core (a characteristic of many high-performing jurisdictions) as well as further selection from a rich range of academic, creative, practical and vocational options.

If the accountability system is to be used to incentivise the take up of particular curriculum subjects, the potential for some degree of choice within this and the ability to personalise for different learner progression needs and preferences is critical. We support the concept of 'slots' as outlined in the consultation document, but feel strongly that any further prescription around choices within these slots (for example, the suggestion that double science might be downgraded to count as only one) would be highly inappropriate.

Furthermore, the slots should be conceived in terms of different curriculum subjects rather than qualifications. In the context of recent work to secure the high standard of ALL qualifications that attract points in league tables, this measure should not be used to determine the take up of particular qualification types. If a qualification is a recognised GCSE or on the DfE list of approved non-GCSE provision, and has thus been verified as a high quality alternative, then it should be acceptable for inclusion in any 'slot'.

We are concerned by the *2016 Performance Tables: Technical Guidance for Awarding Organisations* document which states that 'future publications of KS4 Technical Guidance will seek evidence that any qualification being proposed for inclusion in performance tables does not have significant overlap with reformed GCSEs'. We feel strongly that to recognise only reformed GCSEs in subjects where there is currently a degree of choice (for example IGCSEs, Certificates, BTECs) would be extremely limiting. It would compromise the principle of allowing schools to offer a curriculum that meets the needs and aspirations of all their students. We fully support the view that there is a need to avoid significant overlap of **content** within an individual learner's eight subjects, but this is easily handled through exclusion rules as in the current system, and with restrictions on repeats of curriculum subjects.

**The interactions between these various slots, and any additional rules as to the subjects or qualification types that are eligible for inclusion, are likely to have a profound impact on the curriculum that a school is incentivised to offer its learners. Recent data modelling carried out by CentreForum indicates the potential for dramatic changes to rank order of schools in a particular region depending on the decisions that are made for entry in specific subjects and qualifications. If too restrictive a policy is adopted around eligibility for these slots, it will significantly compromise one of the key stated intentions of the**

**proposals, namely 'to provide a strong incentive for schools to offer a broad and balanced curriculum'.**

### **c) Progress measure**

**Pearson strongly endorses the inclusion of an APS8 value added progress measure as both a headline measure and floor standard.**

In many respects, an accountability framework based *purely* on progress would be a fairer reflection of a school's performance. A value added measure recognises that the intakes of schools vary enormously: intelligent accountability does not punish schools that serve disadvantaged students or reward elite schools that draw from educationally advantaged families. There is a useful symmetry with the APS8 attainment measure, and it is very similar to the 'best 8' metric that schools currently use and understand.

This measure would, however, be much improved if a more robust and stable baseline could be found to replace the KS2 English and maths data. There is considerable anxiety among stakeholders about the use of data that is in itself a product of a high-stakes accountability framework and thus subject to distortion; similarly, it is subject to gaps. We understand that the Department is looking at ways to improve on this data, and we would be happy to consult on further proposals. Pearson has a great deal of experience in both the development and delivery of national assessments at all key stages.

We recommend that more fine-grained information is used to calculate value added. It is common practice to assign numerical values to grades and levels, such that they are treated as interval data, despite spanning a large number of marks. This approach gives no more credit to someone at the top of a grade or level band than someone at the bottom of the same band. Using standardised scores would allow for better reflection of the progress that learners make.

### **Beyond quantitative accountability**

Intelligent school accountability must, by necessity, stretch beyond the quantitative framework that governments use to identify poor performance, and that parents use to make choices for their children. International research indicates that many high-performing jurisdictions (e.g. Finland, Ontario, New Zealand) emphasise a strong focus on formative accountability within and between schools as the key lever for change; building the capacity of teachers and school leaders to drive effective self-improvement. It is worth noting that many of these jurisdictions do not have league tables, or even publish school-level performance data. Pearson supports a definition of intelligent accountability that combines external 'summative' monitoring with real support for internal self-improvement processes. As such, we are supportive of the collaboration engendered by Teaching Schools and the increase in the number of National Leaders of Education. Broadening out headline measures and increasing

access to data is an important part of the drive to improve the quality of educational provision, but it is only one part of the picture.

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

X Yes

No

Not Sure

**Pearson strongly supports the principle that much more should be done to lessen the impact of relative deprivation on educational outcomes in the UK.**

The 26.3 percentage point gap between the attainment of KS4 learners receiving free school meals and the rest of the national cohort is a critical issue, and it is right to consider how the accountability framework could provide further incentives for schools to address this. Relative deprivation has a much bigger impact on educational outcomes in the UK than in many other countries. It is unacceptable that FSM learners generally make less progress at secondary school than non-FSM students with the same prior attainment. Schools can make a huge difference to the outcomes of these learners: there is currently significant variation in their attainment across centres, far more than for children from wealthy backgrounds, who tend to perform reasonably well in all schools (Allen/Burgess, 2010).

Pearson recommends that the Department continues to publish data on the performance of FSM learners in its performance tables. This could be incorporated into a headline measure, if performance was reported on the basis of a comparison with matched schools.

A specific focus on FSM learners within a headline measure would need to be done with considerable care: any sort of metric will be prone to manipulation, and will be based on a proxy for deprivation that is in itself not watertight. 'Success' with FSM learners can depend too often on their number within a school. However, the use of matched schools with similar cohorts would mitigate against some of these effects and is worth investigation.

We also feel it is appropriate to task Ofsted to focus more specifically on this. This could be by linking the acquisition of the highest inspection ratings to the progress made by FSM learners. Certainly we believe that Ofsted should not simply intervene where their progress is poor, but also look to build an evidence base of good practice: the Joseph Rowntree Foundation reported last year that there are 'substantial issues with the evidence base for the effectiveness of interventions aiming to improve the educational



outcomes of poorer children’.

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

X Yes

No

Not Sure

Although broadly speaking we are not in favour of relative measures, as they effectively recast the accountability system as a zero sum game, in which one school can only move above a threshold at the expense of another. This endangers collaboration between schools and fails to recognise the real progress that schools are making.

However, we concur with the point about the impact of significant system change at KS4. Early data modelling has indicated that these new measures have the potential to impact significantly on a school’s position in the national distribution, and as such, a transition period is required to allow schools to make changes to their curriculum planning, intervention strategies and so on. It would be fairest to allow for a two to three year lead-in period, during which the floor standard is relative.

4 Are there any other measures we should consider publishing?

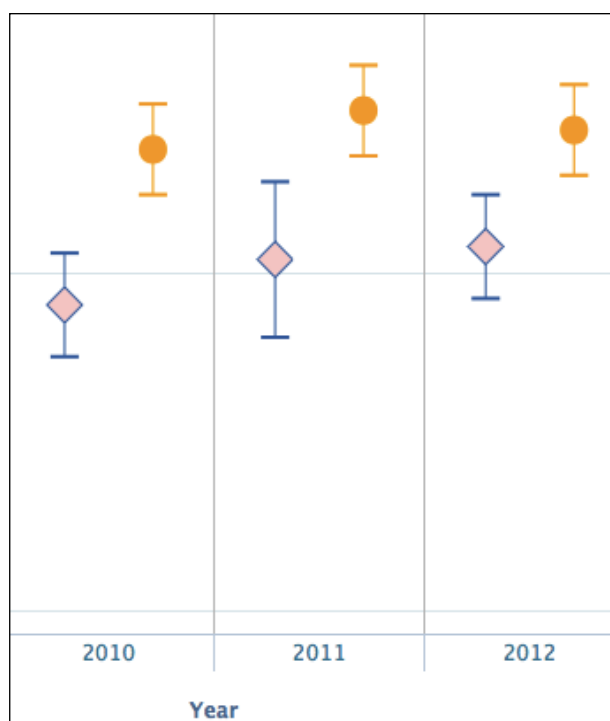
X Yes

No

Not Sure

**Pearson recommends that performance tables provide information regarding school performance over time, for each of the three main headline measures.**

We recommend that this information be displayed in graphical form for the benefit of the end user, and in relation to the performance of statistical neighbours as well as national averages. We recommend that the Department looks at the My School website utilised in the Australian system. The simple example below shows the performance of a real school in relation to similar Australian schools (with confidence intervals provided). The school is underperforming in relation to like schools (hence its rose colour – higher than average performance is green), but is slowly catching up:



[www.myschool.edu.au](http://www.myschool.edu.au)

*Yellow markers = schools with similar cohorts*

*Rose markers = school in question*

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

Yes

X No

Not Sure

No. We believe there is enormous value in the use of formative assessment within schools to improve the quality of teaching and learning and raise attainment but it should be reserved for internal or research use. It is inappropriate to publish this data on a publically accessible database if there is a danger that it might be used to make comparisons between schools, because it is neither standardised or calibrated and not intended for this purpose.

The wider collection of the data that schools produce - ideally linked to teaching and learning strategies and interventions - would however open up the possibility of highly valuable, evidence-based efficacy studies, where researchers and practitioners could learn much about the ways of improving teaching and learning. Pearson is already working in this area with our ResultsPlus services, which allow schools to look at a detailed profile of student achievement and devise appropriate learning programmes and interventions. In the future, we will be providing more tools for schools and others to analyse the data they gather on their students, to help improve the quality and effectiveness of learning.

**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?

On paragraphs 10.1 - 10.3: it is appropriate that floor standards are not applied to PRUs and special schools and that the consideration of their effectiveness is left to Ofsted.

In terms of incentivising a focus on all learners in mainstream schools: there is an argument that if any group of children should be singled out for intervention within a school it is those who start secondary school with the lowest literacy and numeracy levels. We assume with measures such as best eight that all schools will be incentivised to focus equally on all learners, but we have no reason to believe that it is equally difficult to move from a D to a C as it is from an F to an E: we do however know that those with low prior attainment go on to make lower levels of progress between KS2 and KS4. It is unavoidable that schools and teachers will consider where their efforts may be the most effective and we cannot tell a priori what their decisions will be. If the Department wishes to incentivise a focus on a specific group of learners, a specific

measure targeting the progress of the lowest attainers might be most appropriate.

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

X Yes

No

Not Sure

Yes. Whilst KS3 teacher assessment results have valuable currency within a school, it is not clear that they have the same meaning across all schools, not least because the levels given are generated through an array of different assessment types. As such, any reported data and subsequent conclusions could be misleading if used for accountability purposes.

See, however, our comments under question 5. We do believe that the wider use and analysis of student attainment data for efficacy studies has great potential for the improvement of teaching and learning.

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

### **Qualitative information**

There is a broad range of information – qualitative and quantitative – that serves to create a richer picture of the achievements of schools and students. It is right to continue to broaden this out, to allow parents to make better informed choices and for governments to take into account the full value a school offers. The 2011 Family Lives report *A new conversation with parents* (commissioned and published by Pearson) indicates that qualities such as behaviour, information on bullying, the quality of teaching and a school's reputation within a community all play a stronger role in parental choice than quantitative data.

There is a danger, however, in trying to quantify things that are essentially qualitative, and there are more effective ways of conveying some of this information. Much is readily available as part of a school's latest Ofsted report or on their own website. We believe that schools should be encouraged to provide a wide range of qualitative information to the communities they serve, and that Ofsted should continue to seek to strike an appropriate balance between data analysis and qualitative assessment. We do not recommend that these elements are incorporated into headline measures.

### **Destination data**

We support the Department's commitment to providing and improving destination data. Information as to the number of students progressing on to further education (and, if possible, employment) serves to enrich that broad picture of a school and its intake. The more detail that can be harvested around school leavers' choices and next steps, the broader that picture becomes.

We do not however recommend that this data is then incorporated into the set of headline measures. Ultimately, there are many contributing factors with the potential to affect a learner's progression to further education or employment that lie beyond the control of a school.

### **9 How can national sample tests best be introduced?**

#### **Pearson supports the creation of national sample tests to ensure that standards are tracked over time.**

If improvements in teaching and learning are leading to real improvements in attainment, the evidence from national sample tests will allow these gains to be recognised with confidence by awarding organisations and policy makers.

We do recognise the concern that further tests could be seen as an additional burden on students and schools. A way forward might be to introduce a single annual test that provides a measure of cohort performance, ideally on a census basis or on a sampling matrix. If the content of the test were independent of the GCSE qualifications, the test could be administered in Year 10 and so avoid a burden of testing in Year 11. Depending on the preferred length of assessment, the content of the test could be a single combined test or three separate tests based on the underlying subject traits in the core KS4 subjects of mathematics, science and English. This would provide a mechanism for measuring not only cohort performance over time and internationally but also a source of data for maintenance of standards in GCSEs. A de-coupling of the content and form of assessment from the GCSE would also avoid accusations of duplication of assessment and enable the test to be delivered on-screen.

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:** [bob.osborne@pearson.com](mailto:bob.osborne@pearson.com);  
[emma.whale@pearson.com](mailto:emma.whale@pearson.com);

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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](mailto:carole.edge@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**