

**Consultation Response Form**

**Consultation closing date: 11 October 2013**  
**Your comments must reach us by that date**

# **Primary assessment and accountability under the new national curriculum**

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<b>Please tick if you want us to keep your response confidential.</b>	<input type="checkbox"/>
Reason for confidentiality:	

Name: Julie McCulloch	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Pearson	
Address: Halley Court, Jordan Hill, Oxford, OX2 8EJ	

Please mark the box below that best describes you as a respondent.

<input type="checkbox"/> Primary school head teacher	<input type="checkbox"/> Primary school teacher	<input type="checkbox"/> Secondary school head teacher
<input type="checkbox"/> Secondary school teacher	<input type="checkbox"/> Other education professional	<input type="checkbox"/> Local authority
<input type="checkbox"/> Governor	<input type="checkbox"/> Parent / carer	<input type="checkbox"/> Union / professional association
<input type="checkbox"/> Pupils	<input type="checkbox"/> Other	

Please Specify: Educational service provider

## **Primary assessment and accountability under the new curriculum: Pearson's view**

*Please consider the text below as our main response to the consultation. Below this we have briefly answered the questions in the consultation form, referring back to the relevant section in this text in order to expand on our arguments where appropriate.*

### **Introduction: measuring what matters**

Pearson strongly supports the direction of the proposals made in this consultation, and in particular the aims behind the proposals. We take these to be a determination to significantly raise standards in the core subjects of English and maths, and to ensure that *all* pupils are at the stage at the end of primary where they are ready to make significant further progress at secondary level: that all pupils are 'secondary ready'.

Accountability systems are very powerful mechanisms for driving behaviour in institutions, but also come with the danger of perverse incentives. Accordingly it is important to focus on ensuring that schools deliver what will enable the greatest possible *progress* for each and every child throughout their school career and in life, overcoming as much as possible any disadvantages that individual pupils may have. This is what all good schools will aim to do, and accountability measures should principally focus on and measure what it is a 'good' school does.

We make three key recommendations in our response which we think, if accepted, will ensure the Government achieves its objectives. They reflect and align with the work we have done with CentreForum for the secondary accountability proposals which we hope will also have been found of value.

- a. **Use an average points-based progress measure (APPM) based on an entry baseline assessment as a principal floor standard for every primary school.** We make proposals as to how such a measure might be constructed, how the baseline assessments at entry might be taken, how an interim measure at the end of KS1 might be used to ensure early intervention as well as provide a mechanism for including infant schools in a coherent accountability framework. Prioritising pupil progress will ensure that it is in the interests of the institution as well as the pupil that all pupils achieve as well as they possibly can.
- b. **Retain a threshold measure alongside this points-based progress measure as part of a dual floor target mechanism. However, the priority suggested in the consultation paper should be reversed, with precedence given to the progress measure.** We suggest that by explicitly focusing on the level of progress achieved by pupils in every primary school, as well as the proportion of pupils in a school meeting a particular raw target, we could minimise the perverse incentives associated with thresholds. The aim is to reward those schools that add the most value while still challenging them to help their pupils reach the standard required to do well at secondary school and beyond.

- c. **Ensure that both the progress and threshold measures are based on a broad and balanced definition of secondary readiness, where English and maths knowledge and skills are paramount, but where the broader educational value of the primary phase is also reflected.**

We make proposals as to how such a measure might be constructed, suggesting that core English and maths skills taken from rigorous external tests should form 80% of the measure, but that it should also incorporate the broader learning skills that research shows are key to success at the secondary phase.

## **1. The power and problems that accountability systems offer**

All good primary schools will welcome the opportunity to demonstrate what value they add to the life opportunities of their pupils. A good school will be absolutely committed to helping their pupils make the best possible progress, to ensuring that they develop their skills and attitudes so that they have a lively interest in the world around them and that they have the learning skills to help turn interest into knowledge and understanding. They will understand and be completely committed to developing the core English and maths skills that are the foundation of effective learning and the absolute requirement for their future – in engaging with the world around them, in their further education and eventually in employment. They will want to ensure that they do their best to overcome the disadvantages some pupils bring to school, to do their best to close any gaps that there are at the start of their school life and ensure that new gaps do not open up as they progress through the school. Above all they will want to make sure that their students leave equipped to make the most of the next phase of their education – that they are truly secondary ready.

It is right to hold schools to account for this process, to measure what value they offer, to give information to parents to help them make well informed choices for their children and to continually try to ensure that all children achieve the best that they are capable of.

What may seem a simple process, though, of defining what a good school does and then simply measuring and reporting it – is more complicated. It is vital to measure what actually matters most, to do it in a way that ensures the minimum amount of distortion creeps into the system, that does not 'label' children, and that presents as broad a view as possible of children's strengths and areas for improvement.

Above all, the targets set for the institution must reflect what is best for the pupils and not lead to distortions in the interests of the institution. If high stakes tests are the sole measure used, they can become the definition of what the institution is required to deliver, resulting in narrow teaching to the test. If thresholds are the only way in which an institution is judged, the institution may focus attention on those pupils who are just below the threshold to maximise the apparent performance of the institution, resulting in a narrow focus on borderline pupils rather than a continued focus on each and every child to help them achieve the best that they are capable of. These dangers, and the perverse behaviours they can lead to, are clear at KS4 and it is equally clear that many primary schools feel a pressure to focus on test results and the pupils just below the current Level 4 threshold. This not only distorts children's primary education, but provides an unreliable basis for their secondary education, leading most secondary schools to waste valuable time in Year 7 re-testing children and, sometimes, to issues being masked by falsely inflated scores.

The conclusion is that there must be a relentless focus on ensuring that any measures used must reflect what really matters most in primary education for the individual child,

and deliver the highest standards and best possible progress for each and every one of them.

This view is backed up in recent research by the OECD, in their report *Synergies for Better Learning: an international perspective on evaluation and assessment* (2013). Derived from reviews of assessment and evaluation practice in OECD countries, including the most highly performing jurisdictions from which we are keen to learn, the key points of most relevance are that successful assessment systems

- integrate student assessment and school evaluation in a single framework which 'articulates ways to achieve the coherence between its different components';
- align assessment and evaluation with educational goals and learning objectives set out in the curriculum;
- focus on improvement of classroom practices and building of teacher professionalism;
- design the accountability use of evaluation and assessment in ways which minimise undesirable effects;
- place the student at the centre, fostering engagement in learning through using formative assessment strategies;
- use measures of performance that are broad enough to capture the whole range of student learning objectives.

## **2. Measuring individual pupil progress effectively**

### **2.1 Set the baseline at entry to the institution**

The question is asked in the consultation where to set the baseline measure – currently at the end of KS1. Our recommendation is that this should be moved to the point of entry to the institution (i.e. early in the Reception year, in most cases) so that the full value an institution offers is reflected in the measure. Leaving the baseline to the end of Year 2 means that the valuable work an institution does in KS1 is not recognised, there is no incentive or recognition of valuable early intervention work that the school may do and, indeed, there is even a perverse incentive on the school to set the KS1 baseline as low as possible so as to maximise the value the institution appears to offer. Whilst no good school would do this, it is nevertheless wrong to set the measure so that these pressures exist – there should be complete alignment so that perverse incentives do not exist.

There is value in retaining a check at KS1, for a number of reasons. It provides a clear check on children's progress at the midpoint of their primary education, and it is an essential output measure for infant schools and input measure for junior schools. There may, in fact, be an argument for weighting the progress made between entry and KS1 so as to encourage early intervention, to ensure that any gaps that might exist on entry

are addressed as soon as possible. There is a substantial volume of research in the area of primary attainment pointing to the value of early intervention – this should be reflected and valued in attainment measures. We recommend further thought be given to the pros (encouraging early intervention) and cons (including the possibility of making the stakes too high on the teacher-assessed KS1 assessments) of weighting.

We recognise that there are difficulties around baseline assessment at entry, but believe that these can be overcome. The tests will clearly need to be appropriate for very young children, and capable of giving an accurate picture of their attainment – but examples of such tests already exist (e.g. the PIPS Baseline standardised assessment system offered by the Centre for Evaluation and Monitoring at Durham University), and can no doubt be further improved. Allowance may need to be made for the significant effect being summer-born has at this age – this can be controlled for. If a range of providers are able to develop these tests (which we would recommend), we will need to ensure the tests are comparable and rigorous – but quality assurance procedures can be put in place to ensure this is the case.

In order to help schools to see the value of testing children on entry and, more importantly, to use the results to improve teaching and learning, we would urge the Government to provide as much useful data as possible from the baseline tests to institutions. The rapid provision of this data would enable schools to tailor their teaching as effectively as possible to individual children, and to provide necessary interventions in an appropriate and timely manner.

## **2.2 Develop a broader measure of secondary readiness**

There will be broad agreement on the primacy of key skills of English and maths as the cornerstone of success for the secondary phase, and we fully support this. The proposals in the consultation paper as to how a scaled score might be derived from SATs seem a valuable and workable proposal to us, although obviously subject to further work.

We think, however, that whilst English and maths are the key skills, it would be valuable to find a way of reflecting to some extent the broader curriculum that the primary phase offers, as well as the attitudinal skills that research has shown are so important to making progress. We recently undertook some research with 286 secondary heads and teachers, which gave some interesting insights into the knowledge, skills and attributes displayed by those pupils who are most ready and able to succeed at secondary school. We found the following:

- When surveyed, secondary teachers thought developing the right skills was most important (48%), closely followed by behaviour (46%), with knowledge being perceived as much less important (13%).

- The skills most valued by secondary teachers were organisation (53%), independent learning (48%), communication skills (48%) and listening (47%).
- The most valued behaviours were the ability to manage their own behaviour (82%), the ability to follow instructions (61%) and respect for others (61%).
- The most valued knowledge was a good Level 4 in English (84%), a breadth of knowledge (81%) and a good Level 4 in maths (79%).

We would, of course, be happy to share the full findings of this research with the Department.

In reality, however, it is impossible to separate these achievements. Conversations undertaken during the qualitative part of this research made some interesting links, for example, between literacy skills and these desirable behaviours and attitudes. One teacher, responsible for transition, underlined the importance of literacy to children's sense of self-worth as well as their academic achievement, commenting that 'Literacy is key. If children can't read then it affects absolutely everything from their self-confidence to their achievement academically. So if they can't read, they can't read maps, find their way around their new school, access signs, learn about their new environment. If their level of literacy is not up to scratch, then they can't access other subjects and it affects their level of achievement across the board. It also affects their level of concentration and focus in lessons. Children who can't engage with the lesson are more distractible and distracting to their peers. Low attainment generally leads to bad behaviour.'

We think it is important that any measure of secondary readiness should reflect this rounded view of the basis for likely success at secondary school – ensuring the primacy of literacy while recognising and validating the valuable work primary schools do in developing children's broader learning skills.

There will need to be further work around what measures might be used to do this, and what weightings should be given to different elements. One way to do this would be to develop a scale and instrument to measure learning readiness, possibly building on research done by the Sutton Trust and other research bodies into supporting transition, and to include the results of this alongside SATs results. This would give a more rounded view of children's progress at primary school, and encourage primary teachers to focus on these broader skills alongside those tested in SATs, providing children with a 'passport' to give their secondary teachers a clearer indication of their strengths and areas for improvement.

### **2.3 Use progress on an average points score as the key measure, backed up by a threshold measure**

Whilst there are strong arguments for using threshold measures as the way of ensuring that standards are raised, there are also concerns and, perhaps, better ways of achieving the same end. The consultation paper proposes that the bar be raised so that 85% of pupils are at a position where they are secondary ready – with the definition of being secondary ready likely to be at the equivalent of level 4b or higher. This is a stretching target, but one we should be determined to achieve. If used as the sole, or even the principal, measure of the effectiveness of a primary school, however, it would come with all the disadvantages that threshold measures bring with them. In our view, prioritising only threshold measures is likely to lead to:

- significant teaching to the test in an attempt to get pupils to the level;
- an unhealthy focus on a narrow band of pupils who the school identifies as being able to cross the barrier;
- the disenfranchisement and demotivation of very large numbers of pupils who will need additional support to get even close to a bar set so high;
- significant kick-back from teachers, who will initially see this as being an unreachable and unrealistic target.

We believe that it is possible to achieve the desired result without incurring these problems, by retaining a threshold attainment measure, but making it part of a dual floor target mechanism alongside a progress-based measure, with the latter taking precedence. Our understanding of the proposal in the consultation document is that schools will first be judged on a threshold measure (85% of pupils meeting the secondary ready standard). Only if they fail to meet that target, probably as a result of a challenging intake, will a progress measures then be taken into account in order to determine whether or not the school meets the floor standard.

We would argue that this is problematic. The key measure of school performance should be equally adept at exposing schools coasting with high ability intakes as at recognising high performing schools with challenging intakes. Only looking at progress in those schools that don't meet the threshold target risks insufficient focus on the value added by all schools. Progress should not be viewed simply as a safety-net or an 'excuse' for schools with a difficult intake, but as the basic marker of how well all schools are doing their job. This will be the basis of a culture of high aspirations which reaches all children.

A school may achieve a good threshold percentage but still not be helping its pupils to make the most progress they can, particularly if those pupils start school with relatively high attainment levels. Indeed, this is a particular problem in the context of a very high

threshold benchmark such as that proposed – the imperative of shifting large numbers of pupils towards the target may provide a weakened incentive to stretch pupils who should be achieving more.

We would therefore recommend that all schools should be evaluated firstly on the progress their children make, and secondly on whether or not they meet the threshold target. This would retain the necessary focus on enabling as many children as possible to be ready for the challenges of secondary education, while providing a clear imperative for all schools to help all children to make the maximum amount of progress possible. Importantly, while this would continue to provide a challenging threshold target for all schools, placing this alongside a robust progress measure would ensure that they are encouraged to strive to meet this target in a constructive and equitable way (i.e. without an excessive focus on borderline pupils to the detriment of others). This focus on progress would also align accountability measures more closely with the pupil premium, clearly signalling the expectation that schools should use the pupil premium to fund interventions that demonstrably increase the rate of progress for vulnerable children.

#### **2.4 Exemplar of how an Average Points Progress Measure might work**

This is presented very much as a 'straw man', to give an indication of how a progress measure might focus on key skills in English and maths, recognise the wider curriculum by including science, and reflect the broader learning skills valued by secondary schools.

### Draft proposals for Average Points Progress Measure (APPM)

	R	Y1	Y2	Y3	Y4	Y5	Y6
	Baseline		Check				Passport
Maths readiness	12		24				100-130
	8		16				90-100
	4		8				85-90
	0		4				80-85

	R	Y1	Y2	Y3	Y4	Y5	Y6
	Baseline		Check				Passport
English readiness	12		24				100-130
	8		16				90-100
	4		8				85-90
	0		4				80-85

	R	Y1	Y2	Y3	Y4	Y5	Y6
	Baseline		Check				Passport
Science readiness	12		24				100-130
	8		16				90-100
	4		8				85-90
	0		4				80-85

	R	Y1	Y2	Y3	Y4	Y5	Y6
	Baseline		Check				Passport
Learning skills readiness	12		24				100-130
	8		16				90-100
	4		8				85-90
	0		4				80-85

#### Total secondary readiness progress score

	scaled scores			Weighted scores			Final APPS
	Entry	KS1	KS2	KS1 progress	Final progress		
Maths	8	24	110	32	118	35	41.3
English	4	16	90	24	98	45%	44.1
Science	4	8	90	8	90	10%	9
Learning	4	8	100	8	100	10%	10
						<b>Total</b>	<b>104.4</b>

#### Notes

1. Scaled scores derived from proposals in consultation and extended to entry and KS1
2. KS1 progress double weighted to reflect importance of early intervention – proposal only
3. Final progress score uses KS1 weighted progress
4. Weightings of 35%, 45%, 10%, 10% - proposal only
5. Science and Learning readiness measures proposals - need clarification on scales to be used
6. Institution measure would be average of all individual progress points

## **2.5 Clarity over measuring the institution – proposed decile measure**

Whilst it is clearly essential that schools are held to account for their pupils' progress, and that parents are made aware of how their children are performing, we think the proposed decile measure is problematic and potentially counterproductive.

Firstly, the use of deciles will create a norm-referenced, rather than a criterion-referenced, method of reporting on children's achievements. Levels, while far from perfect, do at least provide a method of reporting that enables schools and parents to understand the performance of a child in terms of what they have been able to demonstrate they can do against a curriculum. In the proposed decile system, it will be difficult to interpret what a child is actually able to do, as the link to the knowledge and skills specified in the curriculum will be missing. Furthermore, the ability of a particular decile this year may bear little relation to the level of performance of the same decile last year.

Secondly, the proposed system would not be robust. The threshold marks for the awarding of deciles would be very close together, and so most pupils' raw scores would fall within a few marks of a threshold. For example, in maths we would expect the majority of decile bands to be only 5-10 marks wide, whereas the existing level thresholds are more than 20 marks apart. A significant number of pupils are therefore likely to be misclassified. Research for Ofqual's Reliability Programme in 2010 showed that misclassification estimates for KS2 national curriculum tests had fallen to 10-15%, depending on the subject. However, a similar analysis of decile misclassification (based on the existing key stage tests) suggests that this percentage might rise sharply.

Finally, and perhaps most importantly, we are concerned that, rather than providing a positive report on what children can do, a decile-based system may prove detrimental to pupils' sense of self-worth. By definition, half of every cohort will be assigned to a decile that is below average. No matter how good these pupils' progress or grasp of the curriculum, no matter how great their individual achievement, their decile will remain low if those around them also achieve well. And, as deciles are not planned to be awarded at any other age, they would provide a single snapshot, an inescapable label for every 11-year-old, carried forward into secondary education regardless of future progress.

As an alternative, we would point to international examples such as the Australian NAPLAN report that is given to every parent when their child takes the national literacy and numeracy tests. These reports use clear graphics to give all parents a good sense of how a child is performing against national averages and expected standards:

[http://www.nap.edu.au/verve/resources/2013\\_NAPLAN\\_Results\\_Parents\\_guide.pdf](http://www.nap.edu.au/verve/resources/2013_NAPLAN_Results_Parents_guide.pdf)

## Teacher assessment and reporting to parents

### 1 Will these principles underpin an effective curriculum and assessment system?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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### 2 a) What other good examples of assessment practice we can share more widely?

There are many good examples of formative assessment promoted through teaching and learning programmes provided by commercial and other suppliers. We would be happy to share examples of some of the approaches taken by Pearson's products and services for primary schools.

### 2 b) Is there additional support we can provide for schools?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Many schools will need support in moving away from levels, in developing their own robust formative assessment systems and in tracking pupil progress. We believe that this support can be provided by a range of suppliers, however, rather than being centrally prescribed.

## National curriculum tests in English, mathematics and science

### 3 Does a scaled score, decile ranking and value-added measure provide useful information from national curriculum tests?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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The proposals in the consultation paper as to how a scaled score might be derived from SATs seem a valuable and workable proposal, although obviously subject to further work. We think, however, that whilst English and maths are the key skills, it would be valuable to find a way of reflecting to some extent the broader curriculum that the primary phase offers. See section 2.2 of the Pearson view above for more detail on this.

We would argue strongly for a value-added measure which prioritises pupil progress, and recognises and validates the impact a school has on that progress. See sections 2.3 and 2.4.

However, whilst it is clearly essential that schools are held to account for their pupils' progress, and that parents are made aware of how their children are performing, we think the proposed decile measure is problematic and potentially counterproductive. See section 2.5.

## Baselines to measure progress

**4 Should we continue to measure progress from the end of key stage 1, using internally-marked national curriculum tests?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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We should continue to assess progress at the end of Key Stage 1, as this provides a clear check on children's progress at the midpoint of their primary education, and is an essential output measure for infant schools and input measure for junior schools.

We believe, however, that the initial baseline assessment should be moved to the point of entry to the institution (i.e. early in the Reception year, in most cases) so that the full value an institution offers is reflected in the measure. See section 2.1.

**5 If end of key stage 1 national curriculum test results are used as the baseline to measure progress, should school-level results be published?**

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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These results should be shared with Government and, where relevant, the local authority as a basis for comparison with other similar schools and to help manage intervention and support. They should not, however, be published as this stage is not a typical transition stage for children and we could destabilise the system by making it so.

**6 Should we introduce a baseline check at the start of reception?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Leaving the baseline to the end of Year 2, as is currently the case, means that the valuable work an institution does in KS1 is not recognised, there is no incentive or

recognition of valuable early intervention work that the school may do and, indeed, there is even a perverse incentive on the school to set the KS1 baseline as low as possible so as to maximise the value the institution appears to offer. Whilst no good school would do this, it is nevertheless wrong to set the measure so that these pressures exist – there should be complete alignment so that perverse incentives do not exist.

We recognise that there are difficulties around baseline assessment at entry, but believe that these can be overcome. See section 2.1.

### 7 Should we allow schools to choose from a range of commercially-available assessments?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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We are confident that quality assurance procedures can be put in place to ensure assessments from a range of providers are comparable and rigorous. It is essential that there is a clear correlation between the input and output measures, but we are confident that sufficient expertise exists, both in the Department and in industry, to ensure standards and comparability are maintained across a range of providers. See section 2.1.

### 8 Should we make the baseline check optional?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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If the baseline check is to be the key input measure to assess a school's impact, as we believe it should be, then it would need to be carried out by all schools.

## Accountability

### 9 Do you have any comments about these proposals for the Department's floor standards?

There must be a relentless focus on ensuring that measures reflect what really matters most in primary education for the individual child, and deliver the highest standards and best possible progress for each and every one of them. We believe the best way to do this is through a dual accountability mechanism that measures both threshold attainment and progress.

We would propose two changes to the accountability measures as proposed in the consultation document:

1. The measure of secondary readiness should reflect a rounded view of the basis for likely success at secondary school – ensuring the primacy of English and maths while recognising and validating the valuable work primary schools do in developing children's broader learning skills.
2. The principal measure on which schools are judged should be progress against similar schools, with threshold measures taking an important, but secondary, role. This would retain the necessary focus on enabling as many children as possible to be ready for the challenges of secondary education, while providing a clear imperative for all schools to help all children to make the maximum amount of progress possible.

See sections 2.2, 2.3 and 2.4.

### 10 If we take a baseline from the start of reception, should end of key stage 1 national curriculum tests become non-statutory for all-through primary schools?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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These would still form a valuable benchmark of children's progress at the midpoint of their primary education. There may, in fact, be an argument for weighting the progress made between entry and KS1 so as to encourage early intervention, to ensure that any gaps that might exist on entry are addressed as soon as possible. See section 2.1.

**11 Should we include an average point score measure in floor standards?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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We believe an average point score measure should be the principal measure on which a school is judged. See sections 2.3 and 2.4.

**12 Are there any other measures we should prioritise in performance tables?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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As mentioned above, we should recognise both progress and threshold attainment in performance tables, with both measures taking into account both the primary of English and maths and the importance of children's broader learning skills.

**Recognising the attainment and progress of all pupils**

**13 What data could be published to hold schools (including special schools) accountable for the attainment and progress of the lowest-attaining pupils?**

We believe that prioritising the progress measure is the best way of ensuring schools are held to account for all their pupils, whatever their level of attainment.

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.

<b>Please acknowledge this reply.</b>	
E-mail address for acknowledgement:	

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

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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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.**