Making Good Progress

Consultation Response Form

The closing date for this consultation is: 2 April 2007
Your comments must reach us by that date.
Department for Education and Skills

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

Name: Professor Paul Black, Dr Gordon Stobart, Professor Mary James, Professor Kathryn Ecclestone, Professor John Gardner, Professor Wynne Harlen

Organisation (if applicable)

c/o Professor Paul Black,
Department of Education and Professional Studies
King's College London
Franklin-Wilkins Building
150 Stamford Street
London SE1 9NH

If your enquiry is related to the policy content of the consultation you can contact Parag Vaghjiani on:

Telephone: 020 7925 5380
e-mail: Parag.VAGHJIANI@dfes.gsi.gov.uk

If you have a query relating to the consultation process you can contact the Consultation Unit on:

Telephone: 01928 794888 Fax: 01928 794 311
e-mail: consultation.unit@dfes.gsi.gov.uk
Please put an 'x' in the box that best describes you as a respondent.

- Teacher
- Teaching Support Staff
- School Governor
- Parent
- Education Official
- Other

Add Comments here.

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Section 1 -

Summary

1 "The question raised in this document is what more we can be doing through the system of educational assessment, challenge and support to focus more on progress" Do you think we could and should be doing more?

- Yes
- No
- Not Sure

We welcome many of the points expressed in the document, for example:

- Emphasis on the potential of all individuals to make better progress than many do currently (p1).
- The encouragement of debate on these matters (p3).
- The implied synergy of formative and summative assessment, although the interpretation of both of these and of how they can interact is questionable. The attention to progress requires both uses of assessment information.
- The recognition of the need to keep track of individual pupils’ progress and that of groups within a school – but we question the extent to which this can be used to ‘project performance into the future’, p5).
- The targeting of resources for pupils who most need to make progress.

However, we have serious concerns that the proposals in their current form will not contribute to the realisation of the goals they seek to achieve. These concerns centre on several issues that we judge to require more careful consideration before any decisions are taken to proceed with the proposals.

One of these issues is the interaction between assessment instruments and practices and the curriculum formulation. Another is the current state of knowledge and analysis of the dependability of key stage test results, i.e. their validity and reliability. A third is the effect of the changes on the outlook and commitment of pupils. Yet none of these issues receives direct attention in the proposal document. We find this surprising and we have included arguments about these issues in the responses below, albeit that the questions only relate obliquely to them.
2 "The document asks whether - without compromising the framework of tests, targets and performance tables which have helped drive up standards so sharply over the past decade - we can adapt the system to support a focus on progress as well as absolute standards." Do you agree?

[ ] Agree  [ ] Disagree  [ ] Not sure

This report highlights the increases in England’s test scores over 10 years, and in the light of these, the new measures are predicted to help learning on the basis of ‘more of the same’. So the overall justification for these changes is that extra and more frequent summative testing will raise standards. Two questions follow: (a) Did these increases reflect genuine improvements in pupils’ learning? (b) Will more of the same produce even more improvement?

In relation to question (a) The 2005 Statistics Commission Report Number 23 on Measuring Standards in English Primary Schools concluded that “the improvement in key stage 2 test scores between 1995 and 2000 substantially overstates the improvement in standards in English Primary Schools over that period, but there was nevertheless some rise in standards” (para 9).

At the same time there is well-researched evidence from the USA that, after the introduction of any new high-stakes test, test scores will rise for the first few years and will then level out, whilst at the same time scores for an alternative form of test will fall. We can predict with confidence that extra pressure to teach to the test, more effectively deployed in that each single-level test will cover a more narrow range of content, with the allowance to take a test at any one level on several occasions, will lead to an increase in the numbers achieving any given level. In this respect the initiative is bound to show an apparent success. But we can also be sure that much of this will be artificial, a product of practices that encourage superficial learning. Other features of the proposed changes are also sure to lead to apparent, but illusory, increases of this type.

In giving no hint of reservation about the meaning of increases in test scores, which might follow any changes in the testing system, the proposal paper is unhelpful as guidance to readers of the report. This bears on question (b) – will more of the same produce genuine improvements in learning? There is enough evidence to at least question this assumption, as will appear from the further points made in answers to later questions.

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Section 2 - What the Data Tells Us

3 "Despite everyone’s best efforts, there are still many children who fall behind their potential." Do you agree?

[ ] Agree  [ ] Disagree  [ ] Not sure

We note that too many pupils show poor levels of achievement and agree that special help may well be needed for them. However, there may not be dependable evidence that the pupil has not achieved as well as might be expected. A comparability problem will arise if the progress tests are treated as equivalent to the end of key stage tests, and there is no indication of how these problems are to be resolved. The problems occur because of the different structure of the single-level tests, which will not only be shorter, but will also be targeted at only one level. This makes them different from the present key stage tests with a level 6 test only having questions targeted at this level, while an end of key stage 3 test will have questions involving levels 5-7. We know from GCSE research, which has studied the effects of tiered papers, that it is difficult to ensure comparability between a grade C awarded on a lower tier and one on a higher tier (which involves harder questions targeted at higher grades).

Another dimension of the lack of dependability that may be experienced in assessing levels of achievement arises from the inevitable error in any measurement. Like every other type of measure, test results are subject to error, so it is disappointing to find in these proposals that no attention is given to measurement errors, a neglect which will inevitably lead to ill-considered judgements. Any short test cannot be a very accurate measure, however well constructed and carefully marked, because it is only a small sample of the possible achievements of the candidate. If the test is made shorter, the sample is made even smaller and this inescapable error in the measurement is bound to be larger (the consultation document does not say how the single-level tests will compare in length with the present multi-level key stage tests).

In the absence of any mention of measurement error, or resolution of the comparability issue, there is therefore the potential to conclude and report to any particular pupil and the parents that no progress has been made when in fact it has.

Section 3 - Assessment for learning, and testing for progress

4 "What is needed is a systematic approach which builds on effective assessment for learning practice and helps pupils and teachers to identify next steps in learning." Do you agree that this would be desirable?

[ ] Agree  [ ] Disagree  [ ] Not sure
We agree that ‘we want to improve the rate of progress’ (p4); however, whilst there is ample proof that one way to do this is to enable teachers to use assessment formatively\(^3\), there is little evidence to suggest that adding further summative assessment will do this. The reasons for this are set out in the following paragraphs.

Assessment for learning (formative assessment) does improve progress, whilst summative assessment can only indicate whether or not progress has taken place. In addition to empirical evidence there is a sound rationale to explain why formative assessment improves learning. It does this: by engaging pupils actively in their learning, so that they know what they are aiming for; by involving them in self- and peer-assessment of their progress; and by teachers using evidence from regular work about where pupils are in their learning to provide feedback about how to make progress. The essential role of the pupils in learning – essential because only pupils can do the learning - is denied in the discussion of assessment for learning (p 11) and the ‘personalised classroom’ (p16). The misunderstanding of the key features of formative assessment is demonstrated on page 11 where the use of ‘traffic lights’ is described as an approach used for teachers to record progress. In fact in formative assessment, this device is used by pupils as a means of self-assessment of their understanding in relation to particular learning goals.

Although the formative use of assessment is mentioned often in \textit{Making Good Progress}, the assessment practice proposed is not formative assessment but frequent summative assessment. The arguments that the changes proposed can improve pupils’ progress in learning are fundamentally undermined by confusing these two purposes of assessment and assuming that better use of summative data is the same as using assessment for learning.

Formative assessment is essentially on-going and impacts on teaching during a unit of work. To wait until ‘the end of a unit of work’ (p11) denies the possibility of the immediate action by teachers and pupils that improves learning. What is conducted at the end of a unit of work is summative assessment, which indeed could be a review of work on the topic. Such reviews are important; we are not saying that they should not take place, but they are not formative assessment and they do not by themselves enhance learning.

In the context of high stakes assessments in England, it has come to be regarded as inevitable that tests are preferred to teachers’ judgements. This is unfortunate because teachers’ assessments have potential to give accounts of progress across a wider range of learning outcomes than short external tests and can thereby more than match such tests in validity and reliability\(^4\).

We agree that, in making their summative assessment of progress, teachers ‘can draw on a wide range of evidence, both oral and written, from pupils’ performance’ (p


11). We would add that the information based on this evidence could be of greater reliability and validity than can be derived from a short written test. There is also the potential for teachers to use this information in charting pupils’ progress ‘from one National Curriculum (level) to the next’ (p12). However, it is only with some professional development in how to relate a range of evidence to assessment criteria (in this case level descriptions) that this can be done ‘pretty accurately’ (p12). There is evidence from recent work with teachers that, with appropriate professional development, they can judge levels with considerable accuracy. However it is essential that this professional development is provided; without it there is a serious risk of teachers themselves as well as others mistrusting teachers’ assessments. Any assessment that is genuinely based on teachers’ judgments must make provision for teachers to develop the necessary skills of relating a diverse set of evidence to assessment criteria. The close observation of pupils and scrutiny of their work required for formative assessment is one of the best ways of preparing for effective summative assessment by teachers.

Confidence in teachers’ assessment must also depend on the alignment, between different teachers and across schools, of their standards and judgements; this can be assured by moderation of judgments, which can take a variety of forms. One of these is group moderation, often supported by reference to examples of assessed portfolios of pupils’ work, which is an important means of providing high quality professional development in making summative judgements and benchmarking. Another is the use of special tasks or tests which can add information to help teachers make their judgments. A bank of well-designed tasks can not only help teachers to make judgments but can exemplify activities through which pupils can work towards important goals such as critical reasoning and the application of knowledge in new situations. It is in this context that levelled tasks or single-level tests could be useful, but only if they are low-stakes and marked by teachers. Our concern is that the development of these approaches to the improvement of teachers’ assessment will be hindered by the high stakes pressure of the initiative now proposed.

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5 "We are interested to explore the impact of enabling teachers to enter a pupil for an externally-marked test as soon as they are confident (through their own systematic assessments) that the pupil has progressed to the next [National Curriculum] level." Do you agree?

☐ Agree ☐ Disagree ☐ Not sure

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5 Evidence for this in Chapters 6 and 7 of Assessment and Learning (Gardner, J. (Ed) 2006, London: Sage
7 e.g. Evidence produced by QCA in the Monitoring Pupil Progress at Key Stage 3 project.
One outstanding feature is that the proposed single-level tests will be important to pupils, an extra source of concern to some parents, and a source of pressure on teachers and schools. The status of schools will be measured by new ‘progress’ results as well as by their results on the existing tests. The proposal to supplement schools’ income in the light of these single-level test results will further increase the pressure to give these tests priority. Thus it is clear that what is proposed would be a significant addition to existing high-stakes testing pressures. We agree that schools should be expected to aspire to improve upon the attainments of their pupils. We do not agree that this is best achieved by placing yet greater emphasis on test results.

High-stakes uses of individual pupils’ results are likely to distort teaching and learning. What is proposed in Making Good Progress is not a low-stakes ‘assess when ready’ model based essentially on teachers’ judgments, but a high-stakes external assessment, conducted every six months in every year, in which tests are seen as being ‘underpinned’ by teachers’ assessment, but are nevertheless a mechanism for awarding levels without any use of such assessments. We consider that there is a grave risk that this will exacerbate the current narrowing influence that national tests have on teaching and learning. Instead of this influence being concentrated in years 2, 6 and 9, the frequency of testing will mean that the experience of pupils in every year will be dominated by these single-level tests which will be even narrower than those currently used at the end of key stages. The already considerable time spent on test-related activities (estimated at around 10% of teaching and learning time in year 6 for example) would no doubt increase.

The impact of high stakes tests on teaching in this country has been well documented, with similar findings throughout the world. The high stakes put pressure on teachers to give practice tests, to teach what is tested and to adopt transmission teaching methods that favour recall of facts rather than understanding of concepts. What is tested is implicitly valued above other achievements; and teachers’ own on-going assessment becomes largely summative rather than formative. 8

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6 “We are considering the potential benefits of a series of "single-level" tests which, although taken more frequently, are in total no more burdensome than the current end-of-key stage "multi-level tests". The model could be a powerful driver for progression, raising expectations for all pupils, motivating them, bringing a sharp focus on 'next steps' and perhaps especially benefiting those who start the key stage with lower attainment than their peers, or are currently making too little progress. Ultimately, these tests might replace the end of key stage arrangements."  Do you broadly agree or disagree with this proposal?

8 See The role of teachers in the assessment of learning,(2006) ARG www.assessment-reform-group.org
The undesirable effects on teachers of the pressures to respond to the frequently changing requirements of the national curriculum and assessments have been widely documented and acknowledged. Yet these assessment changes are being pursued at a time when radical changes to the curriculum are also under consideration. It is evident that the task of deciding which pupils to enter, and at what times, for the single-level tests, requiring extra summative assessments and consultations about every pupil, will add a new pressure on teachers’ time. School managements may judge that they must press teachers to make as many entries as possible in the light of the rewards, in public status and in cash that will be at stake.

The formulation of national curriculum statements in terms of a sequence of levels, which have been composed to correspond to the ways in which pupils’ make progress in learning, is a fundamental feature of the national curriculum. These levels are not specified by age because they allow for the fact that pupils make progress at very different rates. It is a difficult task to optimise this correspondence, and this problem has been one of the reasons why the curriculum has been amended several times since its inception. However, the curriculum has consistently required not only progression through levels, which represent the development of skills, but also an increasing breadth of knowledge, and this breadth has been specified as increasing with age. For this reason, programmes of study become progressively more demanding with age, so that a given level at (say) key stage 3 represents an increase in demand compared with the same level at key stage 2.

The single-level tests are intended to measure achievement of a single level and cover key stages 2 and 3 (levels 3-7). What is not acknowledged is that a level 5 at key stage 2 is based on a different programme of study to that at key stage 3. For example a Year 9 pupil at level 5 will be expected to have read, and to write on, Shakespeare; a pupil at key stage 2 will not. There are similar knowledge issues in mathematics as key stage 2 focuses on numeracy while key stage 3 introduces new mathematical topics. Such differences raise many problems for the new system as proposed in the consultation document. The proposed system cannot be implemented without providing some resolution of these difficulties. Thus those consulted are being asked for opinions about a system of which some important decisions, which might affect their opinions, have yet to be taken.

Beyond key stage 3, further problems will arise from the lack of alignment between key stage 3 and GCSE requirements in some subjects, notably English. Where this arises, teachers in key stage 3 must choose between ignoring key stage 3.

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10 e.g. in English Speaking and Listening is assessed at GCSE, given 20% of the total marks, but not at key stage 3, Shakespeare is assessed by coursework at GCSE but by a written test at key stage 3. There are three strands in GCSE, four at key stage 3. The written tasks in GCSE are less extended and discursive than in the key stage 3 tests, and the marks schemes at GCSE are more holistic, and less atomistic, in approach than those for key stage 3.
constraints and concentrating on the GCSE priorities throughout, or working to key stage 3 targets and then changing orientation for Year 10. In respect of the present proposals, the additional emphasis on accountability for progress, and the related funding rewards, are bound to tilt the balance towards the latter choice. This a fault in the design of the assessment system, for what ultimately matters to the pupils is not their key stage 3 level, but their GCSE grade, whereas the key stage 3 levels will matter to their teachers and schools – a conflict of interest which cannot be to the advantage of pupils.11

Section 4 - Personalised teaching and learning to support progression

7 If you wish please comment on the subsections entitled "The 2020 Vision Report" and "Teacher strategies: the "personalised classroom".

We judge that the proposals draw very selectively on the 2020 Vision report, do not do justice to the main thrust of its argument and ignore the most fundamental recommendations. We note that one of the authors of that report has expressed this same view in public (Hargreaves, as reported in the TES 30/03/07 page 4).

8 If you wish please comment on the subsections entitled "Beyond the classroom - personalised support for all-round development" and "Next steps".

The enhanced frequency of testing, with each occasion creating a pressure to succeed, is bound to exacerbate the existing pressures that current test requirements exert on pupils. Pupils in England are already amongst the most heavily tested in the world, and there is strong evidence that test pressures have many undesirable effects.12 The impact on pupils is to place value on test performance rather than what is being learned. Many more pupils will have to take repeated practice tests, which overwhelm, de-motivate and lower the self-esteem of some, and particularly of the lower achieving pupils. The effect is to widen the gap between the lower and higher achieving pupils, and to focus attention on rank-order competition rather than on help to improve13. This is just the opposite of what

11 This is a problem of long-standing, stemming for neglect of one of the TGAT reports recommendations viz. Eventually changes will be necessary to the GCSE and other criteria. Changes derived from the development of the national curriculum should have priority in an orderly process of amendment (TGAT main report recommendation 37).
Making Good Progress asks for and which can indeed be achieved by developing the use of formative assessment\textsuperscript{14}. Given the general evidence of the relatively low sense of well-being amongst pupils in the United Kingdom\textsuperscript{15}, it would seem unwise to ignore the well documented evidence on the adverse effects of the pressures of testing.

\textbf{Section 5 - Targets at school and national level}

9 Do you agree with the statement that: "There is a strong case for establishing a measure of improvement in progression rates for pupils during the National Curriculum years"?

\begin{tabular}{|c|c|c|}
\hline
Agree & Disagree & Not sure \\
\hline
\end{tabular}

The fact that the single-level tests will be high-stakes tests has implications for the reliability and validity of these tests. If the tests’ results are to contribute to monitoring national standards, then there are some critical technical issues that have to be resolved. Without modification to the consultation document proposals it may well not be possible to resolve these technical issues, and there will remain some significant threats to the reliability of the progress tests, and to their use as a valid measure of progress within each key stage.

There will be difficulties in appraising the comparability of single-level tests with end of key stage tests. It is possible, particularly in the light of the issues discussed in paragraph 21, that the single-level tests will sample less of the curriculum than the multi-level end of key stage test, which samples the whole programme. This would be acceptable if it was simply being used to monitor progress (like the current optional tests). But these tests will be used to measure national standards – so it would be misleading, and unreliable, if progress level 5 data were combined with end of key stage level 5, because they are not equivalent in what they have assessed.

\textsuperscript{14} See Inside the Black Box, Black and Wiliam, 1998 London: nferNelson
\textsuperscript{15} The recently published OECD survey shows that for children over the ages 11 to 15, those in the UK came 20\textsuperscript{th} out of 20 OECD countries on an overall measure of subjective well being, and the percentage reporting ‘liking school a lot’ was 18\%, the 16\textsuperscript{th} in a set results for 21 countries: the report is available on the Unicef website: http://www.unicef-iedc.org/publications/pdf/rc7_eng.pdf
10 Do you agree with the proposal to formulate a new measure and target for pupil progress in the following terms: "The percentage of children achieving a basic level of progress expressed in terms of two National Curriculum levels (or equivalent)"?

- [ ] Agree
- [ ] Disagree
- [ ] Not sure

The system would be a one-way ratchet: once a pupil has passed a level they will never go back, only forward’ (p.13). This compounds the equivalence problems. Currently a pupil who gains a level 5 at key stage 2 has to ‘earn’ a level at key stage 3 – and might well regress because the broader curriculum is more demanding. Does the ratchet mean the pupil who gained level 5 at key stage 2 carries it forward to key stage 3 even if they only achieved a level 4 on the key stage 3 programme of study? This would be a recipe for level inflation: since 3% of pupils regressed a level during key stage 3 and 4% were absent from the end of key stage 3 tests (p.9: pie-chart), but both groups would have their best level carried forward.

A further comparability problem will arise because of the different structure of the single-level tests, for they will not only be shorter, but will also be targeted at only one level. This makes them different from the present key stage tests; for example a level 6 test will only have questions targeted at this level, while the end of key stage 3 test will have questions which involve levels 5-7. We know from GCSE research, which has studied the effects of tiered papers, that it is difficult to ensure comparability between a grade C awarded on a lower tier and one on a higher tier (which involves harder questions targeted at higher grades). The research has shown repeatedly that it is relatively easier to get a grade C on the easier paper.16. This will pose comparability problems if the progress tests are treated as equivalent to the end of key stage tests: there is no indication of how these problems are to be resolved.

One weakness of the consultation document is that it nowhere considers the limited reliability of test measures.17. Like every other type of measure, test results are subject to error, so it is disappointing to find in these proposals that no attention is given to measurement errors, a neglect which will inevitably lead to ill-considered judgements. Any short test cannot be a very accurate measure, however well constructed and carefully marked, because it is only a small sample of the possible achievements of the candidate. If the test is made shorter, the sample is made even smaller and this inescapable error in the measurement is bound to be larger (the consultation document does not say how the single-level tests will compare in length with the present multi-level key stage tests).

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17 Understanding of the effects of the inevitable error in measures based on short tests should be of importance in guiding the judgments that teachers base on these measures, but such guidance cannot be given because no measure of these reliabilities has been made (and there appears to be no intention to establish such measures in the future).
The consultation document treats test results as ‘absolute attainment’ (p.2), whereas the current best estimate is that at least 30 per cent of levels awarded are likely to be inaccurate\textsuperscript{18}. In terms of the distributions across levels of the entry cohort as a whole, this effect will even itself out (those given a level too high balancing out those given too low a level). However at the individual level, the level at which progress is calculated, this is a more acute reliability problem since an individual has both a 30 per cent chance of being given the wrong level at key stage 2 and again at key stage 3, an issue which is ignored e.g. in the discussion on pages 8-9. It follows that it will literally pay schools to enter pupils inappropriately – on the ‘off-chance’ they ‘get more lucky’ or ‘less un-lucky’. The addition of repeated single-level tests with similar levels of unreliability will compound this – repeated attempts will raise the probability of getting a higher level as a result of test unreliability rather than as a reflection of attainment. It follows that evidence about level progress rates will not be dependable.

A further source of technical problems arises in the inter-related issues of level setting, test frequency and administration. The current level setting procedures involve year on year comparisons between cohorts with well-defined memberships. The early single-level tests will be setting levels on unrepresentative and un-defined cohorts (i.e. those chosen because their teachers think they should pass), possibly drawn from different years. Such pupils will have experiences of the programme of study different from those at the end of the key stage, and will face a challenge of test preparation less demanding than that presented by the end of key stage test. Thus interpretation of the new results is a formidable technical task, particularly as the December 2007 test will inevitably be rushed and relevant data, e.g. about the entry, will be incomplete.

A further source of difficulties is that the rushed introduction of the single-level tests, coupled with lack of clarity about who should enter and what will be covered, increases the risk of unreliability caused by inconsistent administrative and entry procedures.

See our arguments about the inconsistencies introduced by the differences between the programmes of study at key stages 2 and 3 for the same level, and further inconsistency with GCSE. The system will produce many meaningless results unless such inconsistencies are first cleared up. In our view it would have been appropriate to have these cleared up, through consultation, before these new proposals were put out for consultation and set up for piloting.

Section 6 - Piloting the new approaches

12 Do you agree in principle with the proposal to pilot these ideas with a limited number of Key Stages 2 and 3 schools in selected Local Authorities?

☐ Agree ☐ Disagree ☐ Not sure

It is hard to predict how the proposed initiatives will work out in practice. There is, therefore, a case for a carefully mounted experiment, with thorough evaluation, so that the value and the requirements for large-scale implementation can be appraised. Here we draw attention to several worrying features.

a. The documentation accompanying the letter inviting local authorities to participate in a pilot study states that one task of a participating LA is: **To recruit an agreed number of schools, preferably clusters of local primary and partner secondary schools, giving priority to those keenest to raise their rates of progression by two full levels during the key stage and with the capacity to manage the demands of such a pilot.** Moreover, each LA has to appoint a project manager, and one of the qualities of the appointee, classified as essential, is: **Commitment to the principles embedded in the Making Good Progress consultation document.** Thus schools and individuals who are sceptical about the scheme may play no part in the pilot.

b. The same documents show that ten LAs (or clusters thereof) are to be selected to take part, with eight secondary schools and 50 to 60 primaries, making 80 secondary schools and 400 to 480 primary schools in all. Yet there are no details of the plans to evaluate such a large pilot, apart from collection of reports from the LA managers.

c. Planning for the pilot is to start this summer, so that a lot of work will have been devoted to the large-scale planning needed for this pilot before the consultation responses have been considered.

d. The pilot is to run for two years (so no pupil will be followed through all of either key stage 2 or key stage 3).
There is a technical distinction between a pilot and a trial, and there are good reasons for this distinction. A pilot is a small scale exercise, e.g. in a few schools only, to tease out any severe difficulties and/or unintended consequences, particularly on the well-being of pupils. These lessons are then incorporated into a revised plan to be used in large-scale trials. This sequence is advisable when the innovations being developed are likely to raise new and difficult problems, some anticipated but some not, which may well interact in the complexities of classrooms and schools in ways that cannot be predicted.

The process envisaged here is for a trial without pilots (technically it is misleading to call the exercise a pilot). Given the substantial impact the changes would have on schools, teachers and, most of all, on pupils, it seems unwise to embark on this trial exercise without a genuine pilot of at least one-year’s duration.

There is no indication in the document of any intended timetable for the ‘roll-out’ to all schools after the completion of the ‘pilot’. If the proposed pilot does go ahead, it is to be hoped that at least one year will be allowed after the end of the ‘pilot’ to allow for:
(a) Analysis and reporting of the evaluation of the pilot;
(b) Revision of the scheme in the light of the evaluation;
(c) Further consultation on the new proposals;
(d) Preparation for the new arrangements and training which will be necessary to secure successful change.

13 If you wish, please comment on anything arising from the first two subsections namely 'How would the pilot work?' and 'Support costs and the progression premium'.

Please note that both primary and secondary schools will be invited to participate in the pilot. The paragraph on page 21 headed 'Role of the local authority' should read "Each selected LA will invite a number of its primary and secondary schools to participate in the pilot."

See our response to question 12.

14 If you wish, please comment on anything arising from the subsection 'Individual tutoring'.

The demands for the proposed individual tutoring, 20 hours per needy pupil, will call for 2000 extra hours in an average secondary school with (say) 100 needy pupils, half the cost of which has to be borne by the school. Presumably, at least some of this work will have to be borne by specialist teachers rather than by a single ad hoc appointment. Apart from the overall cost, the logistics of arranging for these hours
seem formidably difficult (when are the pupils to be free without having to miss lessons, who can stay after school, whose lunch hour can be used, and so on?)

15 If you wish, please comment on anything arising from the last two subsections entitled ‘Tests for progress’ and ‘Progress Targets and the Progression Premium’.

See our responses to Questions 5, 6 and 10.

16 Please let us have your views on responding to this consultation (E.g. the number and type of questions, was it easy to find, understand and complete? etc.)

We have found it hard to present arguments within the constraints of these questions: for this reason some of our responses above have had to go beyond the boundaries of the question concerned in order to avoid fragmentation of the arguments.

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 ☒

Here at the Department for Education and Skills 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?

Yes

All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for
written consultation at least once during the development of the policy.

2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.

3. Ensure that your consultation is clear, concise and widely accessible.

4. Give feedback regarding the responses received and how the consultation process influenced the policy.

5. Monitor your department’s effectiveness at consultation, including through the use of a designated consultation co-ordinator.

6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website: http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 2 April 2007

Send by post to:
Consultation Unit
Area 1A
Castle View House
Runcorn
Cheshire
WA7 6GJ

Send by e-mail to: MakingGoodProgress.CONSULTATION@dfes.gsi.gov.uk