



Department  
for Education

**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**

If you would prefer to respond online to this consultation please use the following link: [www.education.gov.uk/consultation/](http://www.education.gov.uk/consultation/)

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.

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

Name: Adrian Prandle and Louisa Thomson	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Association of Teachers and Lecturers	

Address:  
7 Northumberland Street  
London  
WC2N 5RD

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division 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 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 checked="" type="checkbox"/> Union / professional association
<input type="checkbox"/> Pupils	<input type="checkbox"/> Other	

Please Specify:

## Teacher assessment and reporting to parents

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

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

#### Comments:

ATL has in recent years produced much work on assessment and accountability (<http://www.atl.org.uk/Images/Make%20assessment%20measure%20up.pdf>). We believe that school accountability is essential but that its evolution into a highly pressurised regime controlled by government and operated in part by Ofsted has been damaging to children's learning and teachers' capacity to do their jobs well.

There are different forms and levels of accountability from local to national, parents and government, communities and Ofsted. Schools are accountable to many different interests. It is essential to recognise this and acknowledge that certain facets of the assessment and accountability system cannot support multiple interests and purposes simultaneously. Being accountable to parents is clearly important but perhaps to realise this in the best way for children, teachers and parents, government must accept that it doesn't need to know everything at a national level. Though it is increasingly difficult with the presence of academies and free schools, government should trust parents and communities to hold schools to account through local democratic structures.

ATL believes that the two purposes of pupil assessment should be to support learning (formative) and to report achievement resulting from learning (summative). Both forms of assessment need to be integral to the curriculum and to teaching and learning. The current system puts excessive weight on the outcomes of pupil assessments. As we have argued previously, this can result in risk averse behaviour such as teaching to the test and an aversion to innovation.

It is essential that any changes to primary assessment and accountability support the purpose of assessment and that government holding schools to account does not get in the way of pupils' development. Assessment should be about understanding what has been learnt and not learnt, identifying gaps in learning that need filling. Demonstrating knowledge and understanding are important, but no more so than their application. Social skills and attitudes are also important aspects of learning and development that teachers feel should be captured in an assessment and accountability system. ATL argues that assessments put too

many uses serve no purpose properly. We retain our concern about young people in this country being amongst the most tested in the world and welcome any opportunities for increasing the prevalence of teacher assessment, capitalising on teachers' professional abilities.

ATL has surveyed members from early years, primary and secondary settings asking for their views on the current primary assessment and accountability proposals, as well as organising a separate policy seminar with teachers to develop our response to this consultation. ATL supports the need to rationalise school assessment and accountability in primary schools, but we have many concerns about the proposals in this consultation, and overall feel that the principles set out will not underpin an effective assessment and accountability system.

### *Assessment without levels*

The DfE has previously announced that National Curriculum levels are to be abolished, and as a result the consultation has not asked explicitly for views on this approach. However, we feel it is important to explore the potential benefits and limitations of removing levels, as this is such a fundamental part of the government's proposals.

ATL feels that in principle the idea of removing National Curriculum levels is welcome. It could potentially rebalance the emphasis on absolute attainment at primary level, and give schools the freedom to develop a system for capturing the progress of their pupils that best meets their particular needs and circumstances. It could help to promote teacher assessment, and with the right support improve the capacity of teachers to assess confidently and accurately, integrating assessment with the curriculum and pedagogy. Removing levels could also present an opportunity for schools to have a system in place where there is less emphasis on pushing children to the next level as quickly as possible. As one teacher explained - *'we are pushing young children too quickly through the levels and this means we are failing them because they are missing basic building blocks in their learning'*.

However, schools are pulled in different directions by varying, often contradictory, needs – from parents, pupils, national government and Ofsted. The consultation does not distinguish between different forms of accountability and where the data that schools will collect in their new assessment systems will go. Developing a system to report progress robustly to parents is a different requirement for schools from having a system in place that allows a school to be nationally comparable with a quantifiable number on a league table. It is not clear what the government is prioritising.

Therefore, an element of national guidance is inevitably required so that schools know what they will be inspected on, and what pupil progress data they are expected to publish. The consultation does not address these issues and there are a number of details that require further work and clarification – in particular:

- Whether government intends to specify what information will be reported

to parents

- How Ofsted will use assessment data in their inspections
- How schools will compare themselves to other schools and settings
- How secondary schools will use the information from primary schools

Standardisation and consistency is also important for transferability between schools – both between primary and secondary, but also for pupils changing schools during their primary education. Teachers are unclear how they will be able to moderate with other schools in their local area if different systems are in place. This is a valuable aspect of assessment, and in developing reliability in the system. In addition, teachers appreciate the opportunity for peer discussion about their practice.

It was apparent from ATL's survey that many schools have not had time yet to consider what might replace levels, and as a result, expected that some form of levels or sub levels would continue to be used in the future. The level of detail in year by year specifications in core subjects in the new National Curriculum would also seem to encourage this approach. The benefits of levels were often cited, in particular that they are useful in measuring pupil progress, provide clear targets to aim for, and are a common currency that teachers, parents and pupils understand. Members also reported many problems with levels, including whether they are used consistently. This would suggest that even this lukewarm support for keeping levels is pragmatically driven – based on systems having been developed and embedded in schools over a number of years.

Progress must be assessed in a way that is meaningful to teachers and parents and supportive of pupil progression – removing levels in a rush, without giving schools time to develop possible alternatives is not a productive way to empower the education sector to develop its own systems. The likely outcome would be a 'business as usual' approach, or schools making snap decisions on commercially available products due to lack of time. At the very least, an interim approach should be adopted, where national expectations are developed in consultation with the sector, and schools are given more time to consider what system would suit them, their children and parents best and how to ensure consistency of expectations locally and nationally.

ATL members had a number of suggestions for what could replace levels - teachers believe that providing more qualitative information to parents, such as highlighting gaps in learning and how they can be addressed, would be a useful outcome of assessment without levels. Given that parents generally want to know whether their children are where they should be for their age, if they need support and if they are enjoying their education, simpler statements along the lines of the EYFS profile could be provided. However, there is concern that parents' expectations are also shaped by the current prevailing culture around data in which levels and sub-levels belong.

In summary, for the new national curriculum's assessment without levels to work, the whole culture around assessment and accountability must improve, including the role of parents. Teachers feel deprofessionalised and the impact of high stakes accountability is that many lack confidence in designing their own systems of assessment that will be used for accountability purposes.

**2 a) What other good examples of assessment practice we can share more widely?**

Comments:

ATL members indicated that case studies, sharing good practice, and being given access to assessment models that could be easily adapted would all be useful in developing an alternative to assessment without levels. The government needs to find ways of supporting schools to actively share and disseminate the good practice and case studies that exist to support consistency and build the confidence of schools to assess without levels. It is not enough to simply list the names of schools – there needs to be clear explanations of what distinguishes schools leading in this area, and why that particular assessment system works, and how it could be adapted for different contexts. There is an opportunity to create a learning network and encourage creativity but this needs to be initiated in an effective and timely manner at the point where schools are beginning to consider new systems.

**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
---	-----------------------------	-----------------------------------

Comments:

The government should not be naïve about the scale of the task ahead for schools to develop their own assessment systems, especially given teachers in primary schools are also in the process of bringing in a new National Curriculum for all year groups in all subjects over the next two years.

ATL members felt that creating a new assessment system would require a Head teacher and SMT to be outstanding in their field, and have the capacity to develop and implement this in their schools. It is also vital to recognise that support will be needed in the form of both time and money for training and development of assessment systems. Planning, creating and implementing a new system, liaising with other schools and facilitating moderation will be challenging to achieve within existing school budgets. In recognition of how much work is involved, specific inset days and in house training will also be required – both at the developmental stage,

but on an ongoing basis whilst any new system is given time to embed and be refined.

## 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
------------------------------	--	-----------------------------------

#### Comments:

Government should withdraw its proposals for ranking pupils by deciles. ATL feels strongly that this is unhelpful and unfair for 11 year-olds and offers pupils, parents and teachers very little useful information and nothing with regard to what should be done and what will happen next. Whilst 'top 10%' and 'bottom 10%' have a minimal degree of meaning, we question how anyone will know what to do upon being informed they are in the fourth decile or the seventh decile. Education must be about helping children learn and their social development, and not crude hierarchies. Ranking systems like that proposed fail to celebrate the success and progress of pupils working very hard within or beyond the level they are working at. ATL is concerned about bullying of those in the top and bottom groups.

ATL believes firmly that progress is of at least as much value as attainment scores. The focus of this should be to demonstrate how a pupil's learning and development has moved on, rather than ranking them alongside children who had a similar base. Life is not so simple as to make crude comparisons – it should be remembered that we are dealing with people not statistics. It is important for progress data to be published with context too, and we argue that, if introduced, the reporting of baselines should also include socio-economic information that provides substance to any judgements of schools.

We would like to see more evidence to support the proposed adoption of scaled scores in national curriculum tests and assessments as the consultation paper is vague on why this is the preferred approach. We understand that the Standards and Testing Agency is undertaking work on the scaled score and we appreciate that this needs time. However, it is very difficult to comment at a consultation stage lacking in such detail. ATL would welcome the opportunity for further consultation as this work develops.

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

### Comments:

ATL's members do not judge KS1 tests to be helpful to year 2 children or teachers. They do not stand alone as a useful measure without elaboration and other forms of evidence of learning from teachers and pupils. If the focus is to be on measuring progress, then at present, KS1 tests do not show how pupils have progressed since starting at school.

ATL believes a progress measure is an essential feature of primary school accountability but is not convinced that the current proposals for a baseline will be effective for government and support children's learning. To demonstrate progress, and the role a school has played, in a logical way any baseline should be as early in school as is feasible. We set out under question 6 below our full thoughts on the proposed introduction of a baseline check.

**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
------------------------------	--	-----------------------------------

Comments:

73% of the responses from ATL members were against this proposal. If KS1 tests do remain, ATL believes that publishing school level data would result in the same problems that exist at the end of KS2 – in particular that children are taught a limited and unbalanced curriculum because teachers have felt constrained to tailor their teaching to the National Curriculum tests. As one of our members explained: *'publishing results earlier would be confusing to parents, emphasise the failing 10%, add extra pressure on staff to make the children 'perform' rather than learn, and will kill creativity'*.

As ATL has argued before, testing can be stressful and demotivating on pupils, within a wider context where the results are not exact measures anyway. The results of KS1 tests (if they are not abolished) should be available internally to help staff, but not used to fuel further anxiety amongst children and parents.

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

Yes

No

Not Sure

Comments:

ATL notes the concern of the Assessment Reform Group and British Educational Research Association about the baseline check. This emphasises the problematic nature of the intensity of the current accountability culture and the problems of assessments being used for multiple purposes at once. The Cambridge Primary Review amongst other stakeholders are also opposed and there is due cause for government to embark on a wider, sophisticated and unrushed consultation on the value of baseline assessment.

Teachers already undertake diagnostic assessment of children in their class, and will be doing this from the start of school. This can provide accountability to parents. Using it for national accountability undoubtedly complicates matters and it can be argued that dual use possibly invalidates the assessment for either purpose.

There are a number of problems with a baseline check that need serious consideration and resolution. In presenting these proposals government should have already demonstrated its thinking, and any supporting evidence, on a number of aspects. We urgently need the Department for Education to clarify:

- How can a baseline check at the fixed points proposed be used for holding schools accountable to government for first and middle schools where

teaching and learning cuts across institutions? Or when children attend separate infant and junior schools?

- What is the fairest way of making a baseline judgement – at a set age? At a set time in the year? At a set duration of schooling? Government appears to have forgotten that children start school at different ages and at different points in the year as well as that there can be almost a year's difference in age between the youngest and eldest in a class.
- What measures in what areas of learning and development does government intend to use as the baseline, and what is the evidence that these particular measures are closely aligned to attainment at the end of key stage 2 and are therefore a good way of measuring progress?
- What consideration will be made for children with special educational needs or English as an additional language with the baseline assessment? (Particularly as these may not have been identified if baseline happens at the beginning of school.)
- How does government propose to deal with the perverse incentive in a punitive accountability system to keep the baseline 'score' low in order to make it easier to demonstrate progress by the end of primary school? Or the converse which is that schools or parents will feel judged on a baseline measure and will attempt to 'teach to the test'?
- What lessons have been learnt from the last baseline check to be introduced?
- How can guarantees be built into the design of a baseline check that formative assessment and accountability to parents are not undermined?
- Does government agree that an analysis is needed of what the likely impact of introduction of a national baseline assessment will be on the 'comparable outcomes' approach adopted by Ofqual for GCSE grading?

At this stage it is not clear at all whether these issues are surmountable.

The nature of the baseline assessment also requires further consideration and detail. It should not be seen as a 'test', but instead a 'check' or 'diagnostic assessment' based on teacher assessment, done on a one to one basis between teacher and pupil, and with teachers deciding when this is most appropriate.

ATL believes that should a baseline assessment be introduced it is better done near – but not at – the start of reception for effective measuring and before it risks being either unpleasant for or detrimental to children. A baseline assessment within the first few weeks of reception is unrealistic given this can be a chaotic point for teachers and children as they settle in. If a baseline assessment is done at a later stage in reception, age and school starting point must be taken into account.

However, ATL believes that a baseline check is most useful for teachers and pupils in planning next steps and monitoring progress. We suggest that rather than prioritising government's desire to use a baseline in league tables that primacy should be given to 'local accountability' – that is, accountability to parents.

Nevertheless, the accountability system, and particular performance tables, will be wholly inadequate without a progress measure. Attainment alone does not present

a picture on school effectiveness and the difference a school has made can be disguised by reliance wholly on test scores. This is why we believe government needs to take more time to ensure it adopts a way of showing progress that is actually effective, eradicates perverse incentives, and serves children's learning. Whether this is a baseline check or not requires deeper consideration. The case made thus far is not yet convincing. ATL will be very happy to accept any invitation from government to assist this work.

Baseline assessment can be useful to be able to show where a child has started from at the beginning of their learning journey and the impact that a school has had on their progress. A problem that teachers frequently report is the mismatch between the EYFS profile and KS1, so again a baseline assessment in reception might partially help to address this – provided the EYFS profile and KS1 tests were made non-statutory.

Our members stressed that most teachers do some form of baseline assessment anyway, and teachers are confident about recognising the educational impact of disadvantage very early on. However, there is need for clarity over how the data will be used. If the baseline is genuinely intended to show a starting point, then it should not be used to judge schools, as they have no control over their intake and the contextual factors that might mean low scores on a baseline assessment. If the baseline is used to help teachers see what individual pupils require in terms of support, and reduce the overall assessment burden in early years and KS1 then it could be a useful way forward. In addition, ATL argues that socio-economic data should be a constituent part of reporting baseline assessments and schools may also want to survey parents at the start of reception for contextualisation.

The DfE needs to provide more detail on its intentions, and also how the baseline will relate to KS2 testing - there is concern that what can be measured and usefully recorded at the start of reception is incomparable with what the government wants to report on at the end of year 6. Whilst government is rightly interested in reading skills and mathematical ability at the end of primary school, we don't believe that these proposals really take into consideration what reception teachers are assessing. For example, can a child share? We also support the views of the NAHT that it should be made clear that a baseline is not a predictor of future progress.<sup>1</sup>

At this stage we believe it is of paramount importance for government to initiate a longer, wide and detailed consultation of the value and uses of baseline assessment. It is absolutely essential that any baseline assessment is rigorously written and trialled and not simply imposed from the Department for Education.

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

---

<sup>1</sup> <http://www.theguardian.com/teacher-network/teacher-blog/2013/sep/16/why-we-should-test-pupils-age-four>

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

Comments:

No – if a baseline check is introduced it should be standard across all schools.

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

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

Comments:

The majority of our members (55%) felt that the baseline check should not be optional. If this introduced, then all educational settings should be expected to participate, and be accountable for the progress of their pupils.

**Accountability**

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

Comments:

ATL believes the high floor standard for attainment is too high and risks labelling children as failures at an early age. As well as being damaging for teacher morale and teacher retention, there are great risks with children being told they are not 'secondary ready' but being sent off to the next stage of their education nevertheless.

Of greatest concern though is the government's proposal to raise the floor at the same time as raising the expected standard from pupils. Changing them simultaneously appears unjust and liable to cause a lot of problems for schools acting in good faith for their pupils. ATL urges government to review this proposal and considering staging the process of change.

These proposals offer no consideration of how floor targets work equally for small schools or small cohorts. Take a group of six pupils. For that school to be above the attainment floor, every pupil would need to reach the new expected level – they can achieve only 100% with all six pupils meeting the standard or 83% with five. Yet we know that there can be all sorts of complex reasons (not simply the school being below par) for a child struggling to reach desired attainment levels – let alone considering circumstances which affect performance on the day, or mere unluckiness. We do not believe that three year rolling averages properly account for this widespread reality. Five year averages may begin to lessen the effect of such situations.

The danger of relentless – rather than balanced – focus on academic achievement in primary school is a limitation of the development of other crucial characteristics expected of primary schools: for example, a love of learning, excitement about continuing their education, self-confidence, and the skills enabling the formation of good relationships. Teaching to the test is a real problem which government is aware of, and Lord Bew sought to reduce. These proposals taken together are more likely to increase the dominance of testing in education.

We strongly support the use of a progress measure but government must be clear very soon about its detail. In order for this to work government must first ensure the baseline assessment is sound and has professional and public support. We believe this is easier said than done when government's track record for piloting is weak.

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

Comments:

ATL supports this proposal, as if a baseline check is introduced then it is important to reduce the assessment burden overall in the first few years of primary school. However, as we have highlighted throughout this consultation response, there are a number of issues around measuring progress that do need to be clarified and developed further before implementing any changes, to avoid creating an unhelpful gap between reception and year 6.

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

Yes

No

Not Sure

Comments:

Though we recognise government's intention to encourage schools to not solely focus on pupils near borderlines, ATL does not believe that an average point score measure will be useful for pupils, parents or as part of floor standards for accountability to government. Using one measure to counter the effects of another is a flawed approach. In essence, two wrongs don't make a right.

We think a focus on average point scores, which will quickly transmit to pupils, will fail to recognise children as different nor their exceptional individual talents, particularly outside of English and maths. We question whether the development of 'good all-rounders' should automatically be prioritised over identifying and extending the individual abilities and passions of each pupil.

The proposal to provide average point score information to Ofsted but not include in performance tables is unnecessary. The inspectorate is already data-driven enough and in recent years has spoken of stepping away from this approach. Schools regularly report that inspectors come into school with an unshiftable prejudice as to what the school is going to be like, placing increasing pressure on teachers and pupils and stifling confidence in innovation. Feeding inspectors with

more data will not help children learn.

**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
---	-----------------------------	-----------------------------------

**Comments:**

ATL does not support published league tables which place undue pressure on the teaching profession to the detriment of children's learning. We believe both government and parents have recourse to lots of information about schools without the need to produce hierarchies.

We can restate that progress measures are an essential component when attainment data is being published. In addition, as much context as possible should be provide so that fair judgements can be made about schools strengths and weaknesses – for example: socio-economic information, schools taking excluded pupils, SEN intake, EAL intake, pupil premium entitlement, school type (i.e. urban/rural, size).

**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?**

Comments:

ATL believes that it is important to measure progress for all children, but our members felt strongly that it would be unfair to publish data from special schools given the different challenges and contexts. However, schools can be held accountable in ways other than publishing data, for example through inspection carried out on a local basis and moderated nationally.

If P-scales are removed, there are some important principles that need to be taken into account. The benefits of P-scales are that they break learning down into small achievable steps and do capture the small steps of progress that children with SEN who are being assessed against P-scales make.

ATL members have stressed that children with SEN do not tend to make predictable progress that can be judged by numbers, and as a result there is often a wider picture that captures what children can do that needs to be communicated. It is important to demonstrate the capability of children with SEN in other subjects and disciplines beyond the core subjects, as well as life and social skills.

ATL feels that this consultation treats pupils with SEN as an afterthought. In addition, the new National Curriculum framework takes no real account of pupils with SEN. Before any decisions are made on assessment there needs to be a proper discussion with all relevant stakeholders on how to address this and ensure that both the curriculum and assessment makes sense for all pupils, regardless of their particular needs and ability.

In summary our recommendations are:

- The proposal to rank pupils by deciles should be withdrawn. This is unfair for 11 year olds and offers pupils, parents and teachers very little useful information.
- If there is sufficient evidence that floor targets should be raised, and that test standards should be raised, the government should carry out the changes in stages and not all at once.
- We support the use of a progress measure for accountability purposes. We are extremely concerned that the risks of using this measure in league tables outweigh any benefit. Government should work with schools to understand how they currently measure and report children's progress to parents, what baselines are currently used, and what measures other than crude league tables can be used to hold schools accountable. If, after considered and thorough evaluation, it is decided that a standard baseline assessment should be used, then it must be rigorously written and trialled and not simply imposed on schools by the DfE.

- The new National Curriculum framework takes no real account of SEN pupils. Before any decisions are made on the assessment of SEN pupils, there needs to be a proper discussion with all relevant stakeholders on how to address this and ensure that both the curriculum and assessment makes sense for all pupils, regardless of their particular needs and abilities. This is long overdue and should not just be an afterthought at the end of the consultation.
- The Government should not be naïve about the scale of the task ahead for schools to develop their own assessment systems. We urge the government to find ways of supporting schools to actively share and disseminate the good practice and case studies that exist across the country, in order to support consistency and build the confidence of schools to assess without levels.

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>	x
E-mail address for acknowledgement: lthomson@at.org.uk	

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, 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
-------------------------------------	-----	--------------------------	----

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.**

Completed responses should be sent to the address shown below by 11 October 2013

Send by post to  
Sue White / Jennifer Conlon  
Assessment Team  
Qualifications and Assessment Division  
Department for Education  
Level 2  
Sanctuary Buildings  
Great Smith Street  
London  
SW1P 3BT

Send by e-mail to: [PrimaryAssessment.CONULTATION@education.gsi.gov.uk](mailto:PrimaryAssessment.CONULTATION@education.gsi.gov.uk)