

INTO recognise that the Minister has acknowledged the significant issues that surround statutory assessment in schools. There have been efforts made by the Minister, his Department and CCEA to try and alleviate some of the impact of these assessments upon pupils and teachers. There remains a failure by the Minister, his Department and CCEA to grasp that the process is fundamentally flawed.

Teachers have likened the new arrangements to our popular tourist attraction Titanic. The arrangements have been years in the making. They were launched with great promise of work proofed processes that will allow teachers to assess further and faster than ever before. They even had limited sea trials. The people at the controls insisted on full steam ahead even when the crew urged caution. Some limited additional inadequate safety measures were put in place. Tinkering with timings and potential quantities allows us to move the deckchairs. However when we look at the system, we find we are still definitely on the deck of the Titanic.

Yet again teachers begin the school year without a clear picture of what is expected of them. The process has been built from a position of not trusting the judgements of teachers. It has had the impact of damaging the trust that teachers should have in the leadership of the education system.

The Ministers letter entitled; **END OF KEY STAGE ASSESSMENT: MODERATION ARRANGEMENTS FOR 2013/14 AND DEFERRAL OF LEVELS OF PROGRESSION IN USING ICT**, stated:

“The Levels of Progression, developed by the Council for the Curriculum, Examinations and Assessment (CCEA) with the involvement of the teaching profession, focus on skills as well as knowledge and are a key step in my drive to raise educational standards. They set out the skills that we should expect pupils to be able to demonstrate if they are to succeed in life and the world of work.”

INTO is concerned that the workload associated with the assessment arrangements combined with the high stakes collection and use of data undermine the efforts of teachers to redress the impact on social deprivation. There is a real danger that teaching to the test will impact disproportionately on pupils from deprived backgrounds. The levels of Progression were developed in conjunction with the teaching profession for the purpose of informing teachers' judgement of pupils learning. The levels of progression were not developed by teachers as a system check. All research indicates that using data for two purposes will distort the data. The focus upon the core skills undermines the other soft skills that are so important to our pupils as future citizens and employees in the 21<sup>st</sup> Century. This focus on core skills is therefore narrowing the curriculum.

The Minister continued;

“However important as the Levels are, in principle, to teachers, pupils and their parents, I am aware that many teachers not only see the associated assessment moderation arrangements as burdensome, they are also not confident that the Levels themselves are useful.”

*Teachers have made it clear that the levels themselves are not useful to pupils parents, boards of governors, ETI or politicians. This view of levels is endorsed by the Expert Panel (DfE 2011)”*

INTO asserts that the assessment process does not have the confidence of teachers or their professional body GTC NI. Teachers are concerned that the arrangements are burdensome. They are even more concerned about the impact of the arrangements on the breadth of curriculum offered in schools. Teachers are able to use the levels to inform professional dialogue. The levels are not however an appropriate tool for use as a system check.

The Minister said:

“I am determined that the focus of the current and coming academic years will be on working with you to build that confidence.”

Some work needs to be undertaken to rebuild the image of DE and CCEA as organisations that are focused upon the needs of pupils rather than being driven by the system and institutions.

With regard to the assessment process you cannot build confidence in something which is universally regarded

- by research as too narrow
- by teachers as of little or no use in summative or accountability terms
- as distorting the curriculum by measuring only those aspects that are easy to measure

The Minister continued;

“I previously made clear that the first years of implementation of the new arrangements would be a period in which CCEA, the Department of Education (DE), teachers and their representatives would work together to develop a robust and manageable set of arrangements. In this context, I accepted advice from CCEA on the operation of the arrangements on the basis that they would be reviewed by the Council after their first year of operation.”

INTO and our colleagues in the other Teaching Unions have been in constant negotiation with CCEA throughout the whole development period. We foretold many of the problems that have arisen. Our experience is that CCEA has not listened and has provided the Minister and the Department of Education with advice which ran entirely contrary to the discussions and ignored key feedback from the pilots. The arrangements are neither robust nor manageable.

The Minister stated;

"I firmly believe that teachers who are delivering the curriculum should have an opportunity to provide feedback on their operation and on ways to improve them. I am encouraged by all of the feedback I have received that the top priority for everyone concerned is the educational interests of pupils. It is also clear that teachers are looking for an assessment regime that supports teaching and learning in a manageable way."

Teachers are not looking for an assessment 'regime'. The term has a negative connotation, implying an authoritarian approach which imposes strict and often arbitrary and non-negotiable rules. There is no evidence that an assessment 'regime' improves teaching and learning. Indeed there is a lot of evidence that the absence of an assessment 'regime' improves teaching and learning.

Teachers continually evaluate their delivery of the curriculum and pupil progress as indicated in the GTC NI's Teacher Competencies. We believe the OECD report will confirm that we have extremely high levels of assessment throughout the pupils' journey through school. Teachers want an assessment model that supports them in their endeavours to raise educational standards and allows all pupils to realise their full potential.

The Minister went on to say;

"It is important to bear in mind that the primary purpose of the revised assessment arrangements is to provide this support, and not, as some have suggested, simply to provide data to the system for accountability purposes."

The fact that the system data is not the primary purpose of the assessment arrangement reflects the failure by DE and the Minister to understand that how data is used will impact upon how it is collated. Data provided by the system for accountability purposes (the levels or numbers generated) are almost universally regarded

- 1) as meaningless to pupils, parents and schools,
- 2) of little or no value to teachers, Boards of Governors, ETI or politicians and
- 3) of less than 1% reliability, regardless of the processes of moderation imposed. Teachers do not find that the assessment arrangements support them in their work. Results from the GTC NI survey would indicate that they are having the reverse effect.

**The act of collecting the data distorts the data.**

The Minister confirmed that;

“The CCEA programme of research and evaluation for the new arrangements took place across the last academic year for the primary and post-primary sectors. Importantly, the programme of research included school-principal events at the end of the school year, jointly hosted by CCEA and DE. In reporting back to me on the review, CCEA reported a number of common messages, including:

- o the pace of implementation;
- o the submission date for Levels was too early;
- o timescales were too tight / unrealistic; and
- o the arrangements created a heavier/unmanageable workload.”

The feedback reported here is selective and is all about adjusting the current statutory process to try to make it workable. It ignores the fundamental message which is that the process of teacher assessment and any associated moderation needs to be separated entirely from accountability. Instead, it needs to be seen and treated as a professional process for the improvement of assessment for learning and capacity building. To repeat **the act of collecting the data distorts the data and renders it useless for accountability purposes, regardless of the rigour of the moderation process.** Any moderation process which collects data for accountability purposes will distort and render the data unreliable because it simply should not be used in this way. Any review of arrangements should have included a number of roadshows for class teachers and assessment coordinators that actually undertook the assessment arrangements. Teachers at different levels will have had different experiences and should to be reflected in any evaluation.

The Minister further stated;

“While there are some positive aspects to take from the feedback from schools (the value to teachers of internal standardisation for example), it is clear that the feedback overall has been very negative. Over the past number of months I have listened to this feedback. I have also taken note of the findings of a review conducted by the General Teaching Council into the assessment arrangements. As a result, I have decided to move to revised arrangements that I believe will reduce the pressure on teachers and schools whilst maintaining the primary purpose of the Levels of Progression – to assist teaching and learning.”

DE and CCEA seem determined to tell the Minister that revising the arrangements will make them acceptable. The bottom line is as we have said – the imposition of ‘arrangements’ that collect teacher data – no matter what they are – distorts the data and does not assist teaching and learning. Another mechanism needs to be found. INTO would urge the Minister to seek out research and evidence of best practice in the area of assessment. It would also be important to look at appropriate mechanisms for performing system checks. A fundamental review informed by the OECD research report will represent a useful starting point.

The Minister indicated that;

“DE officials have met representatives of the teaching unions to discuss how the arrangements will change for 2013/14 and beyond.”

In actuality ‘DE officials have met representatives of the teaching **unions to tell them how** the arrangements will change without giving time to actually analyse and understand the core message. DE seems determined to try to continue to gather data that is of no value. CCEA seems determined to try to make acceptable processes that are fundamentally unacceptable. The bottom line again is that **the act of collecting the data distorts the data**. DE and CCEA continue to insist that the post primary model that they have imposed upon primary schools should arise naturally in the day to day work in the classroom. This demonstrates a lack of understanding of day to day work in the classroom. Primary schools teach a curriculum and not a syllabus. The requirement to generate ‘evidence’ is not part of day to day practise. Even under the new amended arrangements the teacher will need to generate a portfolio for EVERY pupil containing a minimum of 4 pieces per child in communication (120 pieces per class of 30). The fact that it is less likely to be looked at just makes it an even bigger waste of the teachers’ time.

The Minister asserted that;

“The views of the unions have been extremely valuable ... ”

The view of the unions is that a supportive light touch moderation process which is aimed ONLY at building assessment literacy and an understanding of effective assessment for learning is acceptable. Any other purpose distorts the professional process.

The Minister continued;

“...and CCEA will disseminate a more detailed picture of the arrangements in the coming days/weeks. Details of the revised model are outlined in the Appendix to this letter.”

There has been no real consultation before trying to roll out the next 'fix' Details of our full response to the revised model is outlined in the Appendix to this letter will issue in the coming days.

The Minister stated;

"Given the degree of uncertainty within the profession and the potential for confused messages to circulate, I thought it would be helpful for you to see the areas which have been addressed as the policy has been developed further."

Our members are confused about the current arrangements. The areas which have been addressed as the policy has been developed are still about 'tinkering' and are insufficient to render the policy acceptable. The policy remains fundamentally flawed.

The Minister stated further;

"Following feedback from teachers in June, I acknowledge that there is a need to emphasise the supportive nature of feedback and the overall moderation process. I am also determined to reinforce a point made previously, a point which is central to my policy of placing teachers' professional assessment at the heart of end-of-key-stage assessment; the production of evidence for moderation should not be additional to a teacher's work. Rather it should flow from the process of day-to-day assessment within the classroom."

INTO agree with all of these points. We wish to reinforce the points that teachers' professional assessment, supportive feedback to pupils and support moderation to build assessment capacity and understanding of professional standards are at the heart of the end-of-key-stage assessment process. This process is a professional one and should not be distorted by providing levels which are unscientific and always open to question and are considered of little use at any level of the system. This reality has been accepted elsewhere and needs to be accepted here. Teacher assessment is for diagnostic and formative purposes. Summative feedback from it to pupils, parents, receiving teachers and receiving schools should be sufficiently detailed to inform next steps in learning.

The Minister went on to state;

"As more detail becomes available, I am confident that any remaining concerns around workload will be addressed."

INTO are not confident that remaining concerns about workload will be addressed. The areas which have been addressed so far - adding a school portfolio layer; reducing the number of schools to be moderated and delaying the timescales – have **increased** rather than reduced workload or made the process more meaningless. Workload ‘proofing’ promised at all stages by DE and CCEA, simply has not occurred. The workload is generated in both the internally and externally moderated phases of the assessment process.

The workload arises from;

Preparation - selection of CCEA task, design and submission of task to CCEA for approval, preparation of materials photocopying etc.

Administration - teacher works with a group of pupils at a time to observe the skills, participation and performance of each pupil. (this on average would be repeated 6 times per class). Each group may require two sessions to complete the task.

Internal moderation - marking and evaluation.

This is repeated 3 to 4 times in each core skills area;

Annotation and drafting of coversheets for external moderation.

External moderation storage and collation of portfolios.

The Minister’s letter went on;

“I also know that many of you are concerned about the use to which 2012/13 Key Stage (KS) data will be put, for example by the Education and Training Inspectorate and/or parents. As I acknowledged in my letter to schools in January this year, with the move to a new assessment system, any use of data from these academic years may be problematic. For this reason, DE itself has not set system targets for KS1-3 for the 2012-13 and 2013-14 years. I will continue to ensure that this message is disseminated within DE and to its partner organisations.”

INTO is concerned that schools are still being asked to submit school targets. Last year these targets were published contrary to the assurances given to schools.

DE needs to be transparent about the research basis on which system targets are set and needs to conduct research into whether or not apparent improvements in meeting targets means actual improvement in educational standards. Again, the OECD report will inform a fundamental review. It is the view of INTO that this data should not be used to set targets ANY year.

The Minister has asked DE officials to;

“ work with CCEA to provide a communication for parents for inclusion in prospectuses and reports etc. This will set, in clear and simple terms, the nature and context of KS data over this and the next few years.”

It has been recommended in the past that parents simply want to know

- Is my child doing better than the standard expected for his/her cohort and what can I do to help him/her further
- Is my child at the standard expected and what can I do to help him/her further
- Is my child working below the standard expected and what can I do to help him/her further
- What are the school going to do about any issues that have been highlighted?

Reporting in this way will assist learning. To report in this way teachers need assistance, through supportive internal moderation – and cross-phase moderation - to understand standards. This is not achieved by remote external moderation of portfolios but rather by hands-on in-service training and in-school processes.

The Minister stated that;

“Clearly using end of KS data for accountability purposes inevitably leads to pressure on schools and teachers, indeed, addressing this was part of the rationale for moderation. I have heard from schools the degree to which they feel this is a pressure. If such pressure is having a negative effect on the use of the Levels for teaching and learning then we need to address this. I have always seen the assessment arrangements as continuously evolving, with the involvement of teachers and their unions, to ensure that they fulfil their primary purpose.”

While we agree with this statement, the Minister DE and CCEA need to accept that this system was imposed despite years of advice from Unions which questioned the purpose and processes but which was ignored. In essence the arrangements amount to a re-imposition of a system abolished in 2006 because it did not meet needs. We are supportive of a system which is based on research and best practice. We are not supportive of evolving a system which is fundamentally flawed. The rationale for moderation is professional hands-on support to increase assessment literacy, to improve ‘Assessment for Learning’ practice and to improve teacher understanding of broad standards, which are not scientific and are always open to challenge. Moderation must be based upon professional dialogue and therefore **cannot** be external. The finance expended on external moderation, which will always be open to question, should be re-directed towards teacher continuous professional development.

The Minister continued;

“With regard to the Levels of Progression themselves, DE officials and CCEA will be engaging with schools over the coming months with a focus on taking views on how the Levels’ role in supporting the work of teachers can be improved, by increased granularity, for instance, or clearer demonstration of progression within Levels. ”

This statement focuses on the disputed concept of ‘levels’ as opposed to the criteria underpinning the levels. The level-related criteria (statements of progression) as currently constituted, relate to the end product of communication and using maths. They omit appropriate consideration of 1) the degree of challenge of the task 2) the extent of subject knowledge deployed in response to the task and 3) the way in which the knowledge is thought about and managed in response to the task.

It is confusing for teachers to have statement of progression for thinking which are separated from the means by which that thinking is communicated. There is no research basis behind the levels as currently constituted. There is a research basis behind the thinking skills levels of progression. These two stands of work need to be brought together. This will require a lot of detailed engagement with teachers who are developing pupils’ thinking skills and personal capabilities in the way the curriculum intended.

Looking forward the Minister said;

“In addition, the forthcoming OECD report on our Evaluation and Assessment Framework, due shortly, will deal explicitly with the assessment regime here. I am confident that this will provide valuable input to consideration of how our assessment system evolves and remains fit for purpose.”

INTO look forward to the report and consider that the time should be taken to study its insights and to evolve an effective assessment system (not a regime) based on best international advice.

The Minister concluded;

“I believe we are moving towards agreement on a set of arrangements that will help us reach that goal. The revised 2013/14 arrangements are intended to go a long way towards this, allowing schools to embed the Levels while offering constructive and supportive feedback from CCEA.”

We believe we will be moving towards agreement on a set of arrangement that will help us reach our goal when it is accepted that:

- Teacher assessment is for learning and not for accountability
- Assessment support is provided to improve assessment for learning practice
- Moderation is used to build internal (and cross-phase) assessment literacy and understanding of standards only and not as a system check
- Other forms of assessment must be utilised for that

The current attempts to tinker with a fundamentally flawed system should be suspended and time taken to work on and evolve a research-informed system that we can all sign up to.

This is the experience of a key stage 3 teacher who is a CCEA task supervisor.

*"With regard to writing a task, it takes a good while, about three hours at least. The problem is that each task needs to be written for at least three different levels. So given that they expect at least three tasks, this means that the minimum number of tasks to be written is nine.*

*Each task is revised by two revisers. This is then checked by an Assistant Principal Reviser. If the task is not approved recommendations are made and sent to the teacher. The task then has to be resubmitted and goes through the same process again.*

*In IT task writing the teacher spends even more as there is limited help. The easy part is completing the online form for CCEA. The hard part is the planning and the writing of the task for the pupils. It means that overall the teachers who wrote the IT tasks in our school took at least 8 to 10 hours to have a task ready. They spent time initially to think of an area they think they could cover. They then talked to the IT Coordinator to discuss if the task was feasible, what hardware was needed, could they get access and if the software was there. They then presented the initial idea to their department and carried out a department audit. Next they sit and write a pupil task guide and put that into their planning. Eventually they get to the computer and write the actual task inline with the expectations of CCEA. Once this is done they wait for the adviser to read the tasks, send back the revisions that are needed and then rewrite. In the background a coordinator is needed to ensure that the departments combined are covering all the areas, "Es". When the department eventually get the task completed they have to mark and moderate their task and make sure that the electronic copy is stored. The coordinator then has to arrange to gather the departments together and moderate the work to standardise the work. In total from start to having a task approved it was an easy eight to ten hours.*

*We sent one task in from a department who managed to get a task from another school. The task had been approved for the other school but when it came back to us there were changes asked for. As both schools were*

*following the exact same syllabus it made sense and we promised to send a task back to them when approved. This other school spent an entire training day on the planning for the writing of tasks; the writing of the task was done in their time. Why reinvent the wheel*

The CCEA task advisors and supervisors all get paid for the additional workload. The teachers have to take on this additional work for no extra fee.