

Consultation on the Schools Standards and Organisation (Wales) Bill – 22nd June 2012

About the GL Education Group (formerly the Granada Learning Group)

The GL Education Group is a leading independent provider of educational assessments, resources and training for schools. Its child mental health and wellbeing assessments are also widely used within the NHS. The company works through two divisions: GL Assessment and GL Performance.

GL Assessment specialises in literacy, numeracy, reasoning, special educational needs and attitudinal assessments, and has relationships with over 85% of UK primary and secondary schools. Tests are nationally standardised and include parental reporting where appropriate. In-depth interpretation services help to identify appropriate intervention strategies.

Assessments include the *Pupil Attitudes to Self and School (PASS)* survey and the *Cognitive Abilities Test (CAT)*, as well as the *Schedule of Growing Skills (SGS)*, which is widely used within the Flying Start programme. CAT has been cited by both Estyn and Leighton Andrews as an example of best practice assessment. In his March 2012 speech, 'Teaching makes a difference: One year on', the Minister drew attention to how CAT is used to set informed targets and smooth the transition to secondary school. Over two thirds of Welsh secondary schools have used CAT in the past two years.

GL Performance provides management tools, stakeholder surveys, professional development and interpretation services for schools. Its portfolio includes:

- National College training programmes such as Leading from the Middle, Local Leaders in Education and Developing Senior Leadership Teams;
- Schoolcentre, an online tool that brings together self-evaluation, school improvement and performance management;
- Kirkland Rowell Surveys, provider of contextualised and weighted parent, staff and pupil surveys;
- GO 4 Schools, an online tracking tool that supports whole-school improvement through the efficient capture and analysis of school data;
- Data Interpretation and Analysis Services, enabling schools to exploit fully the data they gather through assessment and self-evaluation.

3. What are your views on each of the main parts of the Bill – Part 2 – Standards (sections 2-37) (see pages 9-17, 92-99 of the Explanatory Memorandum)

1. This response focuses on school improvement guidance (sections 32 to 37). As the legislation is currently drafted, the GL Education Group understands that:
 - a. Ministers may issue guidance to a school authority (that is, the local authority, governing body and headteacher of a school) on how it "*should exercise its functions with a view to improving the standard of education*". That guidance may be issued to one or more school authorities, and may also be revised or revoked.
 - b. Section 34(1) of the Bill states that "*Before issuing or revising school improvement guidance, the Welsh Ministers must consult school authorities likely to be affected by the guidance and such other persons as the Welsh Ministers think fit on a draft of the guidance.*" Thereafter, Ministers must lay a



copy of the draft before the Assembly, which has 40 days in which it may resolve not to approve the draft. Without such a resolution, the draft must be issued.

- c. Unless it is unreasonable to do so in a particular case or category, the school authority must then follow that guidance. However, it may decide on an alternative policy relating to the subject matter of the guidance, in which case the policy must set out where and why it is different. That policy statement must then be followed, although the school improvement guidance must also be followed wherever it has not been displaced by the policy statement.
- d. The policy statement can be revised or revoked, and it must be published and sent to Ministers. If Ministers do not agree that the alternative policy statement will improve education standards, they can direct the school authority to take those steps set out in the school improvement guidance.

2. These sections are supplemented in the Bill's explanatory notes, and we note in particular the following:

"3.30 The Welsh Government School Standards Unit is working to develop a systematic methodology to identify best practice and support its effective implementation into other schools. We are also identifying a range of high quality materials and resources to support teachers and help them develop their practice focusing on national priorities of literacy, numeracy and reducing the impact of poverty on attainment. Such best practice material will be developed in consultation with local authorities and schools. This will be published on the Learning Wales website when it is launched in September 2012. We have worked with practitioners to ensure that these materials are relevant and engaging so practitioners will use them to improve their teaching. The purpose of the school improvement guidance clauses in this Bill would be to place such guidance on a statutory basis."

"3.37 In these cases we would wish to use the School Improvement Guidance to set out proven techniques and specify the schools in which it should be used. Examples of this might include specifying the mostly effective literacy "catch up" schemes, or the best behaviour management techniques."

3. We are very supportive of the Government's focus on spreading best practice. Where standards are variable, or where adoption of particular practices would be beneficial to schools, we expect Ministers' school improvement guidance to be a valuable tool. We see stakeholder engagement as critical to the success of the guidance, and believe the Learning Wales website should be a hub for much of the discussion around the most effective techniques and resources. We also hope the Government will actively invite broad participation and clarify how suppliers and research organisations, as well as schools and local authorities, can submit suggestions. Moreover, the GL Education Group would welcome greater clarity in a number of areas, whether expressed through amendments to the legislation or through recognition in its explanatory notes and ongoing policy decisions. Those areas are:

- a. How will Ministers recognise and support continuous professional development and the ongoing evolution of best practice
- b. Who will be consulted in drafting the school improvement guidance
- c. How will Ministers ensure that specified resources are appropriate, and how schools, suppliers and stakeholders can highlight quality resources
- d. What degree of latitude will schools have in developing their own alternative policy statements, and how will this be consistently applied
- e. What support structures will be in place for school authorities



CPD and the ongoing evolution of best practice:

4. Inherently, best practice is not static: it should be constantly evolving, with teachers learning new approaches, developing their technique, adapting to new resources and technologies, and building on current best practice in order to improve educational outcomes over time. The expectation of Continuous Professional Development (CPD) needs to be engrained throughout the teaching profession. CPD should have a much higher status, and alongside collaboration, it should be seen as an essential and empowering part of the teaching.
5. Moreover, the right interventions need to be decided within the specific context of its socio-economic environment, leadership, teachers and pupils. Determining the effective practice to prescribe requires in-depth knowledge of the particular circumstances of the school and its peers, and understanding of the causes of under-performance. For example, we have found that schools use the results of our assessments to inform interventions and develop practice in different ways dependent on context. The *Pupil Attitudes to Self and School (PASS)* survey is used by schools to assess the root causes of behavioural problems and to intervene before difficulties become entrenched. The focus of interventions is therefore usually on the pupils. However, recently a school in Wrexham found *PASS* useful in highlighting areas where teachers could improve, particularly with pupil engagement, and used this to inform interventions focused on staff rather than pupils.
6. The initial steps set out in the guidance may be the same across different schools, but as the school progresses in its implementation, specific areas may need to be adapted in order to address the root causes of a school's challenges. To ensure that the intentions of the school improvement guidance are not obscured, and to assist in the implementation of the Ministers' guidance or school's policy statement, a culture of best practice and continuous professional development needs to be constantly encouraged and pursued.
7. In order to achieve that culture, schools need to integrate into their everyday management ways of developing and identifying best practice. For example, schools need to be able to come together to compare their interventions and discuss the reasoning behind them. Key methods include (1) using school-based tools such as *Schoolcentre*, which enable schools to share their improvement plans with one another and receive comments on those plans; (2) accessing public collections of best practice, such as the upcoming Learning Wales website; (3) analyse benchmarked data to compare progress against that of others and identify areas for improvement at a whole school and pupil level; and (4) attending CPD events such as conferences, exhibitions and training days, as well as visiting similar or nearby schools. Through this, schools will be consistently and continually generating best practice, as they will be seeking outside expertise, being exposed to new ideas and resources, and analysing their own actions.

Consultation on school improvement guidance

8. The Bill gives Ministers a pivotal role in the complex process of identifying best practice. At present, the draft Bill states that Ministers must consult the affected school authorities and "*such other persons as [they] think fit*". The explanatory notes similarly mention local authorities and schools, but do not describe further who Ministers may choose to consult. However, we believe that the importance of actively inviting and seeking out a wide array of expertise should be explicitly recognised.
9. For example, in our experience, significant emphasis is placed on teacher assessment, yet teachers do not receive sufficient training in selecting the appropriate type of assessment, drawing on national research, analysing results and ensuring the reliability of their conclusions. We have found that the strongest assessment approach is a complementary combination of teacher and independent assessment. By creating a jigsaw of results from a pupil's performance, that is, perhaps by comparing a pupil's *Cognitive Abilities Test*



(CAT) scores to curriculum test scores and the teacher's own observations – and perhaps finding that quantitative reasoning is better than mathematics results – underachieving pupils may be identified and next steps developed which take into account the school's circumstances. By triangulating results in this way, and comparing the pupil against nationally standardised scores, schools can develop accurate pupil profiles and targeted interventions.

10. However, integrating such best practice techniques depends on creating links within the education community. Ministers need to seek out the research of external organisations and the experience of those in contact with a range of schools. In this way, they will be able to develop a sophisticated view of how examples of best practice can be applied in different schools. Stakeholders should include research institutions, educational publishers and training providers. These parties would provide an important link between a school's circumstances and the range of possible interventions given those circumstances and others' experiences.

Appropriate specified resources and sourcing stakeholder recommendations

11. Central specification of teaching tools, techniques, approaches or resources needs to be approached carefully, if it is not to have a commercially and educationally stifling effect. For example, by specifying particular resources, these may become the de facto choices, undermining the impetus to identify and improve best practice, as well as potentially divorcing interventions from the appropriate school context. Conversely, by encouraging particular teaching practices, organisations can more readily predict teachers' demand and so develop teaching resources in a timely manner as well as involve teachers and pupils in their design. This will also ensure that best practice is able to develop as necessary and with more flexibility to adapt to specific school circumstances.
12. Rather than specifying an individual resource to tackle a particular issue, we believe a more effective approach would be to give a range of possible resources. This would support the development of a best practice culture, as schools would be actively engaged. Schools would need to adopt practices which will help them in the long term, including tailoring their resource choices to teachers and the cohort, and to the school context and available budget. Giving a range of resources also gives schools the flexibility to adapt their approach according to the impact of the changes made.
13. To be most effective, the Learning Wales website will need to invite broad participation from stakeholders besides the schools and local authorities which have so far been highlighted. Resource suppliers and research institutions in particular should be actively involved, and we look forward to greater clarity on how suggestions can be submitted. Such wide-ranging involvement will be important for the credibility of the website. This is because many interventions depend upon being tailored to specific school and cohort circumstances, with experience of such interventions often coming from organisations that have built up and analysed significant amounts of school and pupil data.

Role of alternative policy statements

14. The Bill allows for schools determining their own policy statements rather than following the Ministers' school improvement guidance. This is a particularly valuable aspect of the Bill: the most effective interventions are likely to be those where the school analyses the educational improvement required, tailors its response to its specific circumstances, and commits to implementing and evaluating the impact. In this way, the Ministers' guidance may well be used directly, but it should also be seen as an impetus for schools to lead improvement measures. To be effective, school authorities will need the assurance that they can formulate their own policy statements, with such assurance being balanced by understanding that Ministers and Estyn will monitor for the required improvements.



15. School authorities will also need to ground their statements on a clear understanding of the school. A prerequisite for this is reliable and suitably granular data, upon which suitable interventions can be based. Schools should be expected to provide a rigorous dataset that includes a range of indicators, including summative assessment, measures of underlying ability and attitudinal feedback that can then be used as a basis for targeted interventions. By ensuring that they consistently have access to a rigorous dataset that includes information on underlying abilities and attitudinal feedback, schools will ensure that they always know how they are performing, at both a whole school and individual pupil level.
16. Schools developing their own policy statements should be encouraged, as it will again foster a culture of best practice, with schools actively leading their own improvement. In addition, having such an expectation of schools helps create educational continuity and avoid politically-led changes.

Support structures for implementing guidance

17. Some school improvement guidance may require schools to make significant changes. Appropriate support infrastructure needs to be in place to ensure that schools have the ability and time to make the adjustments.
18. The central point to recognise is that the key drivers of improvement are likely to be (1) school leadership determined to address the challenges the school faces and (2) good teachers who best apply the right resources and techniques to their cohort's needs. The Bill's provision for a local authority to require a school to work with another school (section 5) is likely to be important in this respect.
19. Through such direct links and comparisons, schools, whether weak or strong, will be better positioned to know themselves and their pupils better. Comparisons can also be made at a national level, through standardised assessment results. For example, through the *Cognitive Abilities Test*, schools can identify pupils' hidden strengths and weaknesses, and adapt their teaching to bringing out pupils' full capabilities. At a whole-school level, parent, teacher and pupil surveys (such as Kirkland Rowell Surveys, which are also nationally standardised) can indicate areas where the school should pay particular attention to improvement. Specific interventions can then be sought based on the results and the successes of other similar schools.
20. As part of the best practice culture, schools will need to be able to evaluate the impact of the school improvement guidance (or their alternative policy statement), with high performing schools also analysing their successes. For example, schools could conduct their own longitudinal studies in order to examine the impact of their teaching, year on year. CAT, which has been cited by Leighton Andrews as a best practice assessment, is often used by secondary schools to assess pupils when they join in Year 7 and provides a reliable indicator of likely outcomes at GCSE. Teachers can introduce interventions tailored towards pupils' strengths and weaknesses, and the value added impact of these interventions can be analysed once the same pupils reach Year 11 and take their GCSEs. Where pupils have achieved higher than predicted grades, the school can show it has helped them to perform beyond expectations and can analyse the impact of the guidance or policy statement.

Conclusion

21. The GL Education Group believes that Ministers need to drive a culture of best practice and CPD, actively seeking out a wide range of stakeholders to help contribute to educational standards in Wales. Those practices which will most help schools in the long term to support an ethos of continual improvement should be fostered. For example, schools should select those resources most appropriate to its circumstances, they should develop strong links with other schools, comparing themselves locally as well as nationally, and they should be encouraged to develop ambitious policy statements tailored to their circumstances.

