

## **EIS Comment on the Scottish Government's Response to the Report of the Education and Skills Committee Inquiry into SNSAs**

The EIS, as representative of more than 80% of Scotland's teachers, welcomes the opportunity to comment on the Scottish Government's response to the Education and Skills Committee Inquiry into SNSAs, to which we previously provided both written and oral evidence.

We welcome the Scottish Government's emphasis within its response to the Committee's report, on the importance of teacher professional judgement in assessing the progress of children's learning. We remain clear that such judgement can reliably occur without any necessity for national standardised assessment. We would reiterate our view that moderation of learning, teaching and assessment- professional collaboration, essentially- is the most effective means by which teachers can hone their skill in judging the progress of children's learning, in the best interests of learning and teaching and thereby of children themselves.

Whilst we acknowledge the government's sensitivity to issues of teacher workload in relation to the SSLN, we wish to make clear that the EIS was not in favour of the discontinuation of SSLN nor of the introduction of mass standardised assessments, unilaterally announced by the First Minister in September 2015.

Clearly, the workload implications of SNSAs which involve more than ten times the number of young people than SSLN did are significantly greater, more so in schools and local authorities where other forms of standardised assessment continue to be used in addition to SNSAs, despite clear guidelines to the contrary.

Whilst teachers are not required to mark SNSAs, the logistics of administering them, supporting P1s and children with additional support needs to undertake them, analysing the data and engaging in professional discussion about the data, all incur workload costs far beyond that of SSLN.

The Scottish Government emphasises the school and local authority level data supplied by SNSAs as a benefit that SSLN did not have. The EIS would repeat that schools, prior to the introduction of SNSAs, and still aside from them, were and are, rich with data about pupil progress. We would echo previous comments we made that the assessment information which is gathered by teachers and learners themselves, from a wide range of sources, and which is critical to informing next steps in children's learning, is what should matter most.

The EIS recognises that assessment information in the format that teachers, children and parents use it, may not be quickly or easily digestible by government. However, teacher judgement data as a short-hand summation of the plethora of assessment information that teachers gather about learning, given at the end of P1, P4, P7 and S3, as it is now, for the purposes of informing national and local government on system performance, could reliably occur, as it did in the first year of CfE levels collection, without SNSA data. Indeed, it is

precisely such a summation, in terms of students achieving CfE levels, which is reported publicly through the NIF.

There is no evidence of system level data from SNSAs informing any meaningful input into education policy or practice.

On the matter of the continuation of other forms of standardised assessment by some local authorities, or some schools within some local authorities where decision making in this regard has been devolved to headteachers, the EIS remains concerned at the flouting of the Scottish Government guidance that SNSAs were to be used in place of all other standardised assessment. A recent query to local authorities by the EIS on their approach to Year 2 revealed some concerning practice.

Of those who replied, six local authorities, whilst stating that they did not direct schools to present young people for other standardised tests or assessments, indicated that any decision to do so was at the discretion of individual schools. Some local authorities went on to state that individual schools do use other standardised assessments, for example, MALT, GL and Incas.

Four local authorities indicated that other forms of standardised assessment continue as directed by them, one stating that it assesses children in P3, P5, P7 and S2 in both reading and maths. This local authority response outlined its work with Scottish Government to develop 'bridging arrangements' to enable the replacement of existing assessments with SNSAs at some point post-2020. The three remaining of these local authorities indicated that they continue to use additional assessments with all P1, and one of these also with P5 and S1.

One local authority's response was ambiguous, both in terms of the direction it provided to schools and of the extent to which other standardised assessment may be in use.

That local authorities either instruct or fail to discourage the use of other standardised assessment is a matter of continuing concern to the EIS. The recently refreshed Scottish Government guidance on the purpose and use of SNSAs, whilst useful in many aspects, omits explicit reference to the intention that SNSAs were to replace the other forms of standardised assessment that were being used widely, though not universally across, or for the most part within local authorities, prior to the introduction of SNSAs. The EIS would wish to see stronger intervention by the Scottish Government to prevent such over-assessment of learners, especially P1s, as continues in too many schools and local authorities in Scotland.

Regarding the extent to which teacher judgement determines the timing of SNSAs, five local authorities responded to the recent EIS query suggesting that they continue to direct schools to administer SNSAs within designated timeframes, though some indicated that there was scope for individual schools to break free of these. Ten responses stated that the local authority did not determine timeframes for the administration of SNSAs, indicating that it was for schools and in some cases, schools and teachers, to determine this.

Whilst this is a healthier picture than in Year 1 of SNSAs, it would seem that local authorities in the majority of cases fall short of explicitly endorsing and enabling teacher professional judgement as the best determinant of the timing of SNSAs.

Again, the EIS would strongly welcome Scottish Government action to discourage local authorities/ schools from setting assessment windows which have the unintended consequence of veering SNSAs into higher stakes territory. We were pleased to see the inclusion of advice related to the timing of SNSAs within the recently refreshed statement of purpose and use, and would now like to see this message consistently reinforced by Scottish Government and Education Scotland, and acted upon by local authorities and school management teams.

Similarly, we would question the practice of whole classes of children undertaking SNSAs within the same time period. The EIS believes that both assessment methodology and the timing of assessment should be tailored to the learning needs of individual pupils. Our recent query to local authorities indicated that whole cohort completion of the national standardised assessments at the same time, is commonplace for P4, P7 and S3. P1 pupils in many local authorities undertake the assessments with 1:1 support, so do not undertake them simultaneously to their classmates but within the same broad timeframe.

The responses from local authorities highlight that the design of the P1 SNSAs requires intensive adult support for their completion, as evidenced by the Year 1 of SNSAs EIS member survey. No local authority has indicated that SNSAs are administered to children at a time determined by their individual need. The combination of evasive and other responses suggest that whole cohort presentation is common; at best children sit SNSAs in groups. The EIS believes that if assessment is genuinely to support learning, the timing of assessment should be determined by the needs of the young person as the learner, as judged by class teacher who is best placed to understand individual learner needs.

Finally, the EIS would wish to signal some mild caution about how SNSA data is used at school and local authority level as indicated in local authority responses to our query on the approaches to SNSAs in Year 2. For the most part, responses relating to the use of data at school level were in line with Scottish government guidance, though with some reporting that SNSA results feature strongly in discussions relating to stage attainment. The EIS is clear that SNSAs should not be used as an accountability tool and will continue its monitoring both nationally and locally in this regard.

In local authorities in which SNSA data is collected (it was reported that at least two local authorities do not collect the data), responses indicated that authorities have used the information to support individual staff in planning learning; and individual teachers, schools and clusters around professional judgement; to aid the identification by individual teachers, collegiate teams and senior leadership teams of areas of strength and development need; and to support schools in data analysis for the purposes of self-evaluation and improvement.

The use of SNSA results to inform self-evaluation and improvement activities is another aspect which the EIS will continue to monitor to ensure that SNSA results, being very limited in their focus, do not have a disproportionately weighty role in driving such activities. Again, we welcome the inclusion of advice to this effect in the Scottish Government's refreshed statement of purpose and use of SNSAs.

It was explicitly reported by one local authority that SNSA data is being used to quality assure the teacher judgement collection and mid-year targets. The EIS is clear that testing the professional judgement of teachers is not an appropriate use of SNSA results. This is another area which we continue to monitor and in which we would wish to see unequivocal and repeated messaging by Scottish Government and Education Scotland.

## **Conclusion**

The report from the Independent Review was quite explicit in setting out several safeguards around the use of standardised assessments. It is incumbent on Scottish Government and its agencies, specifically Education Scotland and the Learning Directorate, to ensure that these safeguards are adhered to, otherwise our system will drift towards the type of target driven assessment regime which Curriculum for Excellence was designed to move us away from.