



Department
for Education

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Secondary School Accountability Consultation

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This consultation proposes changes to the existing secondary school performance measures, which will reflect the significant reforms to GCSEs, and seeks views on the publication of other data which could strengthen the secondary accountability system.

To Teachers, Head teachers, Schools, Parents & Carers, Awarding Bodies, Subject Associations and Unions.

Issued 7 February 2013

Enquiries To If your enquiry is related to the policy content of the consultation you can contact the Department on 0370 000 2288

To

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Contact Details

If you have a query relating to the consultation process you can telephone: 0370 000 2288 or use the ['Contact Us'](#) page.

1 Introduction

- 1.1** This consultation seeks views on how to improve accountability for secondary schools in England. Accountability for primary schools and post-16 providers will be considered in separate consultation documents, which will be published shortly. The secondary school measures will reflect the significant reforms to GCSEs, with the improved qualifications taught from 2015 and first exams taken in 2017. Although the consultation focuses on the system once the exams have changed, many proposals could be put in place earlier. After the consultation we will determine which changes should be implemented in 2015 or 2016.

1.2 The consultation asks how we should publish and use data about schools' performance. It considers how Ofsted will use the headline measures in its work, but there are no plans to change the school inspection framework introduced in September 2012. If consequential changes are necessary to reflect accountability developments, it would be for Ofsted to make proposals and to consult on them.

2 Aims and vision

2.1 Schools will improve most when teaching professionals have the autonomy to decide how best to teach their pupils, alongside being properly held to account for their pupils' education and qualifications. The most effective education systems around the world are those that have high levels of autonomy along with clear and robust accountability. OECD evidence shows that a robust accountability framework is essential to improving pupils' achievement.

2.2 The Department has published the reformed National Curriculum and announced significant improvements to GCSEs, and it is right that we should improve the accountability system at the same time. The accountability system should be fair and transparent. It should reward schools that set high expectations for the attainment and progress of all their pupils, provide high value qualifications, and teach a broad and a balanced curriculum. The assessment and accountability systems should be the servant, not the master, of excellent teaching. At the moment, the accountability system has too many perverse incentives and can distort teaching and narrow the curriculum. The aim of the changes to assessment and accountability is to promote pupils' deep understanding across a broad curriculum and maximise progress and attainment for all pupils.

2.3 Central to this is the need to make it easier for parents and the public to hold schools to account. To achieve this, our aim is that almost all data about schools will be publicly available and accessible, to make direct accountability more meaningful. This will help to recognise the wide range of teaching and other activities carried out in schools. Publishing more data helps parents make choices about the school for their children. Governors, school inspectors, academy chains, dioceses and local authorities will be better placed to consider a school's success if they have easy access to information about all the work in a school.

- 2.4** We will achieve this through making information from the National Pupil Database available to all (with appropriate safeguards in place so individual pupils cannot be identified), and developing a new School Performance Data Portal. This Portal, to be introduced in 2015, will bring all the information about schools onto one accessible website. It will allow parents and others to look at many aspects of school performance in which they are interested. For example, a parent could look for a local school where previously low attaining pupils make good progress or one which has strengths in history. A governor might look at how a particularly effective school is using its budget in order to learn efficiency lessons. Researchers and commercial providers will be able to use the information to provide analysis to schools about different aspects of their performance, which should help schools to improve their teaching.
- 2.5** Within this context, the school performance tables will continue to make key measures about all schools easily available. These headline measures, like the English Baccalaureate (EBacc), will be the measures we think most parents should be aware of, along with any more detailed information they wish to access. We expect Ofsted to use these measures when they are assessing the performance of schools.
- 2.6** The accountability framework must set expectations to ensure that all pupils are being well-served by their school by defining the minimum floor standards that all schools must achieve. Floor standards have been very effective in raising the performance of the weakest schools, challenging them to make the necessary improvement to meet and exceed the floor. The number of secondary schools below the floor dropped from 216 in 2010 to 107 in 2011, allowing the floor standard to be raised for 2012. Schools which remain below the floor standard may be subject to intervention, and become a sponsored academy.

3 Case for change

- 3.1** The accountability system must work in tandem with, rather than against, teachers' aim to help all their pupils acquire the skills and qualifications they need to succeed in future. Reforms are needed to the measures we currently use for accountability to achieve this aim.

- 3.2** The Wolf Review identified that the current accountability system provided perverse incentives for schools to enter pupils for poor quality but 'easier to pass' qualifications because they 'counted' the same in the performance tables. This has meant that pupils have not always studied for the qualifications that will be most useful to them. The Department is already tackling this by publishing an annual list of high value vocational qualifications to be included in performance tables. The impact of this will be first shown in the 2014 performance tables. Further reforms to the accountability system should reinforce these changes and make sure all pupils study useful qualifications at Key Stage 4.
- 3.3** The current floor standard is based on the 5 A*-C including English and mathematics measure. This can encourage an excessive focus on pupils around the 'C/D' grade boundary at GCSE to the detriment of others. For example, Ofsted's recent report on mathematics teaching highlighted that some schools target interventions only at pupils near a C/D borderline, although 'the most equitable practice focuses on all pupils who are underachieving.' The current measure can also adversely affect high attaining pupils. Ofsted have noted that some schools enter pupils for qualifications early to 'bank' a C grade, even though pupils would be better served by entering the qualifications later in the year and aiming for an A or B grade.
- 3.4** The current accountability measures can also encourage schools to focus on a narrow curriculum. Having a headline measure that counts only five qualifications weakens the incentives for schools to improve their teaching across all academic and vocational subjects.
- 3.5** Ofqual's report into GCSE English in 2012 provides evidence of what can happen when qualifications are placed under particular pressure by the accountability system. In the case of GCSE English it found that a poorly designed qualification with too much emphasis on school-based controlled assessment, combined with the pressure the accountability system places on pupils achieving a C grade, led to significant over-marking of controlled assessments to meet grade boundary targets. We are setting out our policy on reforms to GCSEs alongside this consultation.

4 Summary of proposals

4.1 In this consultation we make a set of proposals about the headline measures we will use to hold schools to account, and the introduction of sample tests to track national standards. We ask for comments on these proposals. We also ask a series of questions about broader reforms to the accountability measures, requesting opinions about other data we should make available.

4.2 We propose:

- To publish extensive data about secondary schools through the Data Portal.
- To publish a measure showing the percentage of pupils achieving a 'pass' in English and mathematics.¹ This measure should be part of the floor standard.
- To publish an 'average point score 8' measure. It should have one slot reserved for each of English and mathematics; and three slots reserved for other EBacc subjects: sciences, computer science, geography, history and languages. The remaining three slots could be taken up by further qualifications from the range of EBacc subjects, or any other high value arts, academic, or vocational qualifications (as set out on the Department's list of vocational qualifications approved for inclusion in performance tables).
- That the key progress measure should be based on these eight qualifications, and calculated using a Value Added method, using end of Key Stage 2 results in English and mathematics as a baseline. This progress measure should be part of the floor standard.
- That schools should have to meet a set standard on both the threshold and progress measure to be above the floor.
- To introduce sample tests in Key Stage 4 to track national standards over time.

1 - [1] GCSE grades A*-G are all pass grades, however grade C and above are often referred to as being passes, both colloquially and in international comparisons. We use pass in inverted commas to mean an outcome consistent with performance standards in high performing educational jurisdictions.

4.3 In relation to further accountability measures, we ask:

- Whether the floor standard should be a relative measure in the first year of new exams.
- How to publish information about the achievement of pupils eligible for the Pupil Premium.
- What other information should be made available about schools in headline measures, along with the EBacc measure.
- How to recognise the progress and attainment of all pupils in the accountability system, particularly considering pupils who, as now, may not be able to access GCSEs.
- Whether we should collect and publish data from commercially-available tests, to provide useful comparative information for schools and parents.
- Whether the Department should no longer collect Key Stage 3 teacher assessment, whilst ensuring that the results of assessments continue to be reported to parents.
- How we can recognise the achievement of schools beyond formal qualifications.

4.4 We believe that the accountability system should encourage schools to make sure that as many of their pupils as possible achieve a good standard in key subjects. We believe that extra focus on pupils who struggle in English and mathematics is important. At the end of Key Stage 4, good qualifications in English and mathematics are crucial to pupils' prospects of moving on to further study or employment.

4.5 Under the point score progress measure, each pupil's achievements will count equally, which rewards schools for their work with all pupils. Pupils' scores across eight qualifications will be compared to the expectations that we have for pupils with their particular Key Stage 2 results. Progress measures give schools credit for helping all pupils, whatever their starting point. It will celebrate those schools that help children with low prior attainment achieve some good qualifications, and highlight schools in which pupils are not being stretched appropriately.

- 4.6** This approach provides a strong incentive for schools to offer a broad and balanced curriculum, including the academic core of the EBacc as appropriate, and to ensure high standards of teaching in a wide range of subjects. This balance of measures should improve the current system by rewarding schools more clearly for their work with all their pupils.
- 4.7** This consultation sets out the framework of accountability measures we intend to use in future. The level at which the floor standard measures should be pitched is not covered by this consultation. We will continue to consider this, and will provide more information once the reformed GCSEs have been developed further.
- 4.8** We recognise that there must also be reforms to the way in which the Government is held to account for improvements in education across the country. At present, the Department tracks national standards by the same headline measures used to judge the performance of schools. This can create a misleading picture: it is hard to be sure whether a rise in national results at GCSE shows that pupils' understanding of key subjects has improved, or that schools have adapted their teaching based on the particular qualifications in the headline measure. We will therefore introduce new tests, independent of qualifications and school accountability, to track national standards over time, building on the model used by respected international tests such as PISA, PIRLS and TIMMS. The tests will be taken by a sample of pupils sufficient to give nationally representative results.

5 Proposals for Reform to the Secondary School Accountability Framework

- 5.1** This section considers the key performance measures which will be published about secondary schools. Along with the information available through the Data Portal, performance tables would continue to show the most important information about secondary schools in headline measures.

5.2 Only high value qualifications, which meet the Department's pre-defined criteria, will be used in performance table measures. Reform has already been successfully implemented with regard to non-GCSE qualifications and has resulted in schools being incentivised to teach high value vocational qualifications since September 2012. Our reforms to GCSEs will ensure that all GCSE qualifications are robust and rigorous, and we have asked Ofqual to consider which of the current GCSE subjects should be available as reformed qualifications. Results in qualifications not meeting the Department's criteria will be published through the Data Portal.

5.3 Attainment measures

Threshold measure: We believe that secondary schools should place particular importance on making sure all their pupils leave with high value qualifications in English and mathematics. Pupils with qualifications in these subjects are significantly more likely to find employment in future. As Alison Wolf wrote in her review of vocational education: "good levels of English and Mathematics continue to be the most generally useful and valuable vocational skills on offer. They are a necessary precondition for access to selective, demanding and desirable courses, whether these are 'vocational' or 'academic'."

5.4 We propose that a threshold measure showing the percentage of pupils achieving a good standard in both English and mathematics GCSEs should be published and included in the floor standard. Schools which do not help their pupils to secure good English and mathematics qualifications are not achieving their core purpose. We recognise that the use of threshold measures has the potential to distort schools' teaching practice. Our proposals therefore balance the use of threshold and progress measures in the hard accountability framework. We believe it is right to retain threshold measures in English and mathematics, because of the critical importance of achieving a 'pass' in these subjects for pupils' progression to further education or employment. In that context it is it is right for schools to focus extra resources on helping more of their pupils achieve a good standard in these subjects.

5.5 We also recognise that threshold measures can place qualifications under pressure. We have set out our policy on reforms to GCSEs, which makes clear the new qualifications should be more stretching than they are currently, with less predictable assessments and less scaffolding of questions. We have indicated to Ofqual that the value of

the qualifications for individuals must take precedence ahead of ensuring the absolute reliability of the assessment. We will take account of this in considering the implementation of the new accountability framework.

- 5.6** Average point score measure: We intend to publish an attainment measure based on each pupil's score across eight qualifications. The eight qualifications will consist of English, mathematics, any combination of three other current EBacc subjects (combined science, physics, chemistry, biology, computer science, geography, history, and languages, save only that combined science cannot count in addition to any of physics, chemistry and biology); and three further high value qualifications in these subjects, other academic subjects, arts subjects or vocational qualifications that meet the Department's pre-defined criteria. If a pupil takes more than three further qualifications, then their highest three scores will count in the measure. The average of all pupils' scores in these eight qualifications will be published in the tables.
- 5.7** This approach incentivises schools to offer an academic core of subjects to their pupils, by reserving five slots for these qualifications. It allows schools flexibility to tailor the core as appropriate for their pupils. Including three further qualifications in the measure will reward schools that also offer a broad and balanced curriculum. Pupils can follow their interests to take further academic subjects, including but not limited to further EBacc subjects, arts subjects, and high value vocational qualifications.
- 5.8** The point score approach rewards schools for the achievements of all pupils. The measure will not create incentives to focus on pupils near a particular borderline, thus supporting teachers' aims to help all their pupils achieve their best. We will develop the detail of the point score system once decisions have been made on the grading of reformed GCSEs.
- 5.9** In most cases, we think an academic core of subjects should be studied up to age 16. However, this measure does not make academic subjects beyond English and mathematics compulsory for all. Some pupils may be better served by focusing on fewer than eight qualifications. A point score measure allows pupils and schools to achieve a better score by gaining high grades in fewer than eight qualifications, rather than a low grade in all eight. A school would gain recognition on this measure for a pupil with good results in English and

mathematics along with three good grades in vocational qualifications.

5.10 Pupils will know their own score, and will be able to evaluate how well they have performed at the end of Key Stage 4 by comparing their score with easily available local and national benchmarks.

5.11 Progress measures

We will also construct a progress measure based on the same points score system in eight subjects, defined as above. We propose the progress measure should be created using a Value Added (VA) methodology. It will take the progress each pupil makes between Key Stage 2 and Key Stage 4 and compare that with the progress that we expect to be made by pupils nationally who had the same level of attainment at Key Stage 2 (calculated by combining results at end of Key Stage 2 in English and mathematics).

5.12 This progress measure will become part of the floor standard used to identify underperforming schools. Using a progress measure helps to make judgments about schools fair. Schools which have an intake with low prior attainment will be rewarded if their pupils achieve higher average grades than would reasonably be expected. Coasting schools, where a high-performing intake of pupils does not go on to achieve high grades, will be exposed as underperforming by this type of measure.

5.13 Taken together these measures will give a good picture of a school's teaching. They focus on minimum standards in English and mathematics, and the progress of all pupils in both an academic core of subjects and a broad and balanced curriculum. These are both essential elements of a school's teaching, and so we propose that schools should be required to perform well on both measures to be above the overall floor.

5.14 The required levels for both the minimum standards in English and mathematics, and for progress in the eight subjects, will be set to ensure that these are sufficiently challenging without unfairly disadvantaging schools with a very low-performing or very high-performing intake.

Question 1: Do you agree with the proposals for the headline accountability measures?

6 Measuring performance of disadvantaged pupils

- 6.1 Poverty remains strongly associated with poorer performance, on average, at every key stage. This is not acceptable.
- 6.2 The Pupil Premium provides considerable funding to address this gap. Schools have complete control as to how they spend this money to support the needs of their particular pupils. It is, however, important that schools are held to account for how well their disadvantaged pupils do.
- 6.3 Since 2011 parents have been able to judge how well a school supports the achievement of disadvantaged pupils through information published in the performance tables. Comparative information about the performance of disadvantaged pupils and their peers is shown for each school in areas such as attainment and progress at Key Stage 4, subject to a school having sufficient numbers of each to ensure anonymity of individual children.
- 6.4 We will continue to publish the attainment of children eligible for the Pupil Premium, that of other children, and the gap between them, subject again to the anonymity constraint mentioned above. We will publish this for both the floor standard elements: the proportion of pupils receiving a 'pass' in English and mathematics, and the progress of these children in the eight subjects as defined above.

Question 2: Is there any further information we should provide about the performance of disadvantaged pupils?

7 Relative measures for floor standards

- 7.1 When reformed GCSEs are introduced we will have limited benchmark data available to determine an appropriate level at which to pitch the accountability measures. Therefore, for the first year of new exams we could use a relative measure for the floor standard. In this approach we would identify the worst performing number of schools, rather than those below a pre-determined floor standard. We do not propose to use relative measures as part of the longer term floor standard arrangements as this would mean each year there would be a set number of schools who fall below the floor standard, with no opportunity to recognise improvements across the system.

Question 3: Should we look to use a relative measure as the floor

standard in the first year of the new exams?

8 Other headline measures

- 8.1** In addition to the measures outlined above, we will continue to create other easily available headline measures to help parents consider the performance of schools, and to inform school inspection visits. These will operate in the same way as the EBacc measure in the current system.
- 8.2** The reforms to the accountability measures set out in this consultation will not lead to any changes to the current EBacc measure. The proposed floor standard measures will promote an academic core of subjects more strongly but the EBacc will continue to be valuable. The EBacc will encourage schools to offer the full range of academic subjects to more pupils. This combination of subjects gives pupils an excellent grounding to continue to higher education. Since introducing the EBacc, there has been an increase in the number of pupils who have been entered for this group of subjects, and we want to improve take-up even further.
- 8.3** We also propose to publish a headline measure showing the progress of pupils in each of English and mathematics, to show how pupils with low, medium and high prior attainment perform in the most important subjects. It would complement the threshold measure in English and mathematics.
- 8.4** In relation to headline measures we plan to show how schools perform compared to similar schools, as well as national benchmarks. Similar schools will be identified using a statistical neighbours approach, taking into account prior attainment. We intend to start publishing this information from Spring 2013.

Question 4: Are there any other measures we should consider publishing?

9 Data transparency

- 9.1** The Department is currently procuring a new Data Portal or “Data Warehouse” to store the school performance data that we hold and provide access to it in the most flexible way. We have recently published four times as much data about secondary schools in performance tables and we want to build on this greater transparency

using the new Warehouse. The Warehouse will include all data we hold about secondary schools, subject to the need to protect the anonymity of children.

- 9.2** Parents will be able to use this data to determine schools which teach particular subjects or groups of pupils well. They will be able to look at specific issues, such as searching for schools in their local area that teach previously high attaining pupils to excel in physics, or which have particularly good success rates in vocational subjects, or art or music. Researchers will be able to analyse and compare schools' performance in many areas identifying potential areas for improvement.
- 9.3** The Data Warehouse could also be used to gather more data about non-statutory tests administered by secondary schools. Schools should regularly carry out tests and assessments with all their year groups across a range of subjects to inform future lesson planning and provide parents with detailed information on their child's attainment and progress.
- 9.4** It may be possible to allow schools to enter their own internal test data into the Data Warehouse. Parents would then be able to understand the results they receive about their own child more easily, helping them to make an informed judgement about whether their child's test results represent good progress or a cause for concern. Ofsted may be able to recognise improvements in schools more quickly with access to this type of information. The data will need to be handled carefully to ensure parents and inspectors are comparing similar test results when looking across schools.
- 9.5** This may be particularly useful at Key Stage 3, where there is mandatory teacher assessment but parents do not receive statutory test results. Some pupils' rate of progress can slow during the transition period to secondary school, and so parents may value information about their child's achievement during this time.

Question 5: Do you think we should collect and publish test data from internal assessments through the Data Warehouse?

- 10** Recognising the attainment and progress of all pupils
- 10.1** The accountability system should recognise the achievements of all pupils. Inspectors and others consider the cohort of pupils when

making judgments about a school. In this context they will consider the progress of pupils with very low prior attainment and particular types of special educational need (SEN) to make sure the school is setting suitably high expectations for these pupils and providing high quality teaching, tailored where necessary.

10.2 Many pupils with SEN and those with behavioral issues in Pupil Referral Units (PRUs), given high quality teaching and support, will be able to achieve good results in high value qualifications. However, there will be a very small minority of pupils who, despite schools' best efforts, would not be able to succeed in GCSE exams. We should aim to publish data that will provide information about these pupils' progress wherever possible, subject again to protecting individual privacy. The data available through the new Warehouse will help parents and inspectors to identify schools in which previously low attaining pupils achieve some qualifications, or can demonstrate good results in other tests. The Department will continue to consider whether there is a robust way to include this type of data in progress measures for schools.

10.3 In recognition of the cohort of pupils, the floor standards do not apply to special schools or PRUs in the same way as they apply to mainstream schools. Ofsted consider a special school's context when making their judgements about their effectiveness. A significant minority of special schools do support their pupils to make expected progress between Key Stage 2 and Key Stage 4, and so are above floor standards, although no special schools are above the floor target for both progress and attainment.

Question 6: What other data could be published to create the right incentives for schools, including special schools, to ensure the best progress and attainment for all of their pupils?

11 Key Stage 3 assessments

11.1 Currently, schools are required to assess their pupils in National Curriculum subjects at the end of Key Stage 3. These teacher assessments are reported to parents and the Department.

11.2 It is important that parents continue to receive this information, and so we propose to retain the statutory requirement to conduct and report teacher assessments in all National Curriculum subjects. These assessments should take place when pupils have completed the

programme of study for each subject, and should be based on the extent to which pupils know, apply and understand the matters, skills and processes set out in the Key Stage 3 programmes of study.

- 11.3** At present, the Department collects schools' results but does not publish the data in tables. We propose to remove the requirement to report Key Stage 3 results to the Department, which would reduce the bureaucracy for schools. In addition, since we are removing levels for the National Curriculum, the Department could only collect very limited information at Key Stage 3 in future. If the Department does continue to collect this information, we could make it available through the Data Portal to promote transparency.

Question 7: Do you agree that the Department should stop the collection of Key Stage 3 teacher assessment results?

12 Achievement beyond formal qualifications

- 12.1** There should be scope within a school's curriculum to promote achievement that is not intended to lead to any formal qualification. This work should be recognised and celebrated as part of the accountability framework. Pupils do not necessarily need to achieve a very high number of qualifications; it is not necessary to take more than 8-10 GCSEs or other qualifications to demonstrate a breadth of academic achievement.
- 12.2** Schools already provide many ways for young people to broaden their education through cultural, creative, sporting and community opportunities. Wider achievements are frequently used by universities and employers to distinguish between pupils with similar academic attainment.
- 12.3** School inspections currently check that schools are providing a broad and balanced curriculum, as part of inspectors' scrutiny of the leadership of a school. We would like to explore further ways to recognise schools that offer a wide range of opportunities and promote excellence in these areas. However, performance tables reflect pupils' success in achieving the core of educational qualifications they need for future achievement. They cannot, and should not, encompass the much broader range of activities from which pupils should benefit.
- 12.4** Since September 2012, schools have been required to set out their year-by-year curriculum online. We could build on this by setting

clearer expectations on how information about the range of activities schools offer is made available on their websites. We could also explore providing a facility within the Data Portal for schools to enter information about the range of non-qualification activities they offer, if they wish to do so. Parents could then easily access this information, and compare between schools.

- 12.5** We may also be able to learn from international practice. For example, Singapore has introduced high profile awards for schools that excel in various aspects of curriculum provision, such as sports or promoting pupils' well-being. These awards are clearly visible on the same website as comparative data about schools' academic performance.

Question 8: How should we ensure that achievement beyond formal qualifications is recognised?

13 Sample tests

- 13.1** The primary purpose of GCSEs is to evidence pupils' achievement. Currently, GCSEs are also used to measure school achievement, and to track national standards. Each qualification must be reliable for each of these purposes, which places greater strain on the design of one assessment.
- 13.2** Standards in individual secondary schools are tracked using the headline measures in Key Stage 4 performance tables. National standards, the attainment of the whole cohort of pupils across the country, are also judged on the basis of year on year improvements in the same high stakes tests. If this way of calculating national standards is continued in future, there may be less incentive to maintain rigour and the highest standards in qualifications. A focus on one exam type may also mean that pupils achieve greater success in a particular qualification without standards necessarily rising in the subject more broadly.
- 13.3** National standards can be tracked using different tests that are independent of the qualifications, and independent of government. There would be no incentives to reduce the rigour of these tests. The tests could be taken by a sample of pupils sufficiently large to make robust judgements about changes in national standards. Such tests, in English, mathematics and science, would be similar to the well-known and well-respected PISA, PIRLS and TIMMS tests, but would take

place annually.

Question 9: How can national sample tests best be introduced?

14 Implications for school inspection

14.1 Ofsted's school inspection framework and handbook set out the arrangements for inspecting schools and the areas that will be covered during inspections. This includes 'pupil achievement' as one of four key areas. Attainment which is consistently below floor standards is one of the criteria for the inspection descriptor of a school which is likely to be "inadequate" for pupil achievement, cross-referred to the government's definition of floor standards. Ofsted will need to take account, in its school inspection guidance, of new measures of attainment and progress for floor standards and in performance tables, and consider whether and how the new floor standards relate to the grade descriptors of schools.

15 How to Respond

15.1 Consultation responses can be completed and emailed to: accountability.consultation@education.gsi.gov.uk

or by downloading a response form which should be completed and sent to:

Phil Elks
Department for Education
Level 2
Sanctuary Buildings
Great Smith Street
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16 Additional copies

16.1 Additional copies are available electronically and can be downloaded from the Department for Education e-consultation website at: <http://www.education.gov.uk/consultations>

17 Plans for making results public

17.1 The results of the consultation and the Department's response will be

published on the DfE e-consultation website in summer 2013.