



Standards  
& Testing  
Agency

# **Standards and Testing Agency Review**

**STA response**

**November 2016**

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# Standards and Testing Agency Review

## Foreword from the Chief Executive

Standards and Testing Agency (STA) plays an important role in providing an effective and robust national testing, assessment and moderation system to measure and monitor pupils' progress from reception to the end of key stage 2 (KS2). Ensuring that the Agency is fit for purpose is vital, as it provides confidence and assurance in the primary testing and assessment system to schools, teachers, parents and our other key stakeholders.

I am grateful to Pedro Wrobel and his review team for their thorough and insightful approach and to the many individuals and organisations who have taken time to contribute their views on the Agency through interviews and workshops.

The 2016 test cycle was one of the most challenging delivery cycles the Agency has managed and one which came with a high degree of risk. Following the introduction of the new, more demanding national curriculum in 2014, this was the first year of implementing the associated assessment regime. This involved a number of changes which included a new suite of harder key stage 1 (KS1) and KS2 tests, a new interim teacher assessment framework, the removal of levels and a move to scaled score reporting of results, and a new reviews (appeals) service. These changes placed additional operational and communication requirements on the Agency.

Despite it being a challenging year, the new tests accurately measured pupil performance, the Office of Qualifications and Examination Regulation (Ofqual) were content with the Agency's technical approach to standard setting, and 100% of tests were marked and results returned to over 16,500 schools as planned on 5 July. This was the result of over 3 years of intense project and programme planning and the dedication and professional expertise of the Agency's staff.

However, there were 2 high-profile security breaches which generated significant publicity and reputational damage to the Agency. Firstly, in December, the modified version of the KS1 spelling guidance was published containing live test words instead of sample words. The immediate internal investigation conducted by the interim Chief Executive concluded that this was a genuine mistake – human error – and not an attempt to leak any live test material. However, as the test could no longer be deemed secure, the Minister of State for Schools announced that schools would not be required to administer the KS1 grammar, punctuation and spelling (GPS) tests this year. It was at this time that the Minister announced his intention to launch a root and branch review of the STA's operations after the current test cycle.

Secondly, Pearson, the Agency's external marking supplier, mistakenly uploaded the KS2 English GPS test onto its secure marker portal site, 24 hours ahead of schedule. The paper was spotted by an authorised marker who then chose to breach confidentiality and leaked it to the Guardian newspaper. Pearson apologised for this breach and

conducted an investigation. No evidence was found to suggest that any sensitive test information entered the public domain before children were due to take the test. As a result, the KS2 GPS test went ahead as planned.

These 2 breaches were deeply regrettable and highlighted weaknesses in the Agency's practices concerning quality assurance, clearance and managerial oversight. There were also underlying cultural factors which the Agency had been aware of and was already working to address.

I, and the Agency as a whole, welcomed the review and worked constructively with the review team. The report found that the Agency was broadly fit for purpose and has a number of strengths, but it also highlighted some important areas for improvement, which I fully accept. The interim Chief Executive had already started a period of internal transformation in response to the security breaches. I will continue to work with my senior management team to build on our strengths and make rapid improvements to the Agency in response to the review's recommendations. The remainder of this report sets out how the Agency is responding to each of the recommendations from the STA review.

**Claire Burton**

Chief Executive

# STA response

## Introduction

Our primary purpose is to provide an effective and robust testing, assessment and moderation system to measure and monitor pupils' progress from reception up to the end of KS2.

We are responsible for the development and delivery of assessments and testing in England, under statutory instruments, on behalf of the Secretary of State. In carrying out these functions, we:

- develop and implement assessment policy in schools in line with ministerial priorities
- develop high-quality and rigorous national curriculum tests and assessments in line with ministerial policy
- undertake operational delivery of national curriculum tests and assessments (including printing, distribution, provision of systems, marking and data capture)
- support the process of teacher assessment moderation in order that data is robust and can be used for national statistics
- support schools and other stakeholders

In addition to this we are also responsible for:

- setting and maintaining test standards, including standards related to marking, and producing guidance and exemplification materials for the end of KS1 and KS2 English writing teacher assessment
- management of the professional skills test for prospective teachers
- the general qualifications logistics service provided to centres and examiners

Following the security breach during the administration of the KS1 English grammar, punctuation and spelling test, the Schools Minister announced a 'root and branch' review of the operations of STA.

The primary objective of the review was to determine whether STA is fit for purpose. In other words, can STA be relied upon to deliver a robust system for primary assessment, development and delivery of skills test for prospective teachers and the collection of general qualifications (GQ) papers. The secondary objective of the review was to identify STA strengths and areas of concern, and to make recommendations to address the latter.

We welcomed the outcome of the review which found that STA is broadly fit for purpose in the short term and can continue developing and delivering primary assessment, skills tests and the collection of GQ papers to an appropriate standard.

It was right that our strengths were acknowledged:

- our test development process is widely recognised by professionals as high-quality and effective for assessment purposes
- we have consistently delivered test operations and logistics every year, despite resource constraints, difficult contractual relationships, and with staff operating under significant pressure and risk
- staff possess and use strong project and programme management expertise to support operational delivery across the test cycle
- our staff are skilled, energetic and motivated and committed to delivery

However, there are a number of issues that need to be addressed. The next section sets out our response to the recommendations and how we will implement them.

Recommendations and actions have been grouped where appropriate.

## Response to recommendations

### Strategic direction

**R1. STA establishes an infrastructure that enables stronger strategic oversight of the Agency. This should include a stronger corporate centre, supported by clearer end-to-end oversight (recommendations 12 and 13) and access to meaningful performance data and analysis (recommendation 20), as well as clarity over the focus of each of its leadership vehicles.**

**R16. The effectiveness of existing governance and accountability structures should be considered. There should be an effective forum for risk discussion to provide scrutiny and challenge of STA strategic risks. Senior managers should have clear oversight of the most significant risks facing the Agency, and receive sufficient assurance that the risk management process is adequate and working effectively. There should be clear structures to systematically and promptly escalate risk to the right level to enable action to be taken.**

We have already:

- strengthened the capacity of the Agency's senior leadership team by moving from a two to a three Deputy Director structure. There are now separate work areas responsible for assessment policy, test development and test operations, giving each Deputy Director more capacity to think beyond the immediate demands of the current test cycle, and look more strategically at the long-term approach to work in their area. This has been achieved within the Agency's current funding envelope
- strengthened the Agency's senior management team by building an additional cross-cutting function for strategy and communications into a newly configured senior role as Head of Strategy. We have also created additional capacity within the Agency to improve management information and challenge across the end-to-end process of test development to test operations. These changes have also been achieved within the Agency's current funding envelope
- started a review of the Agency's governance arrangements, redesigning the terms of reference of the Agency's Strategic Performance Review (SPR) Board. This Board is the logical place in the Agency's governance arrangements to provide stronger strategic challenge and direction to the Agency and agree and monitor delivery against a new 5-year plan
- reviewed and strengthened STA's approach to risk, which is set out in the STA Risk Management Framework. Clear issue and risk escalation routes are in place, up from operational level through to strategic management boards. All of the Agency's risks, across the whole of its business, are reviewed at least monthly by the relevant board and escalated as appropriate. Recognising that the current STA risk management approach requires further strengthening, all staff will be retrained

in the active identification, management and escalation of risks, also the use of horizon-scanning, scenario-modelling and other risk management tools and techniques. We will also look to adopt a stronger approach to ensure that we learn lessons from previous issues and events, and implement contingency planning for all risks. In addition, the Agency will review contingency plans for our key policy assessment, test development and test operations risks, ensuring that these are sufficiently robust

Going forward we will:

- make the newly configured STA Head of Strategy responsible for developing meaningful performance data and providing challenge and scrutiny across all areas of business. This will allow us to make evidence-based judgements about the performance of the operation as a whole, to spot pressure points, and to provide an effective challenge to the business
- restructure STA SPR Board meetings to ensure that focus is on strategic questions, risks and issues, and we will strengthen the external challenge by appointing further members to the Board from outside DfE
- review the arrangements for making decisions on the Agency's business where there are cross-cutting implications

**R2. STA establishes an infrastructure that enables stronger strategic oversight of the Agency. This should include a stronger corporate centre, supported by clearer end-to-end oversight (recommendations 12 and 13) and access to meaningful performance data and analysis (recommendation 20), as well as clarity over the focus of each of its leadership vehicles.**

We have already:

- established a reconfigured Chief Executive's Office under the direction of the Head of Strategy and begun work to improve the Agency's governance arrangements

Going forward we will:

- work across the Agency's senior team to develop and publish a new five-year strategic plan which will set out our priorities for the Agency, alongside a refreshed suite of key performance indicators. The strategic plan will provide a clear articulation of the mutual roles and responsibilities of all those involved in policy and operational decision making. The five-year plan will be a clear statement of the Agency's appetite for risk and will be the key document against which the Agency's performance will be judged. Ofqual will be consulted on the plan and it will be signed off by the STA SPR Board and Ministers

**R3. Mechanisms are established to ensure that all STA staff understand and are engaged in the strategic direction of the Agency and can see how their roles contribute to the Agency's strategy and objectives.**

We have already:

- made a series of improvements to internal communications with STA staff, including regular publication of the internal staff newsletter, messages from the Chief Executive and re-instating face-to-face oral updates from the Chief Executive to staff at the Coventry site. We have also held the first in a series of all-staff events to share the findings of the STA review and engage staff in developing the response to its findings

Going forward we will:

- establish cross-grade and cross-site STA review implementation groups to support the Agency's leadership in tackling the findings of the review. This group will play a vital role in supporting the Agency's Senior Management Team (SMT) to make a reality of the changes recommended by the review. In particular, the implementation group will lead on developing and implementing a series of actions to address the underlying cultural factors that impede the Agency's performance
- make improvements to staff line management arrangements, introducing monthly performance conversations between line managers and their staff to ensure that everyone in the Agency understands how their role supports STA's wider objectives as well as their part in changing the performance and culture of the organisation

## **Culture**

**R4. STA focuses on building a constructive, collaborative and corporate culture across the Agency. The senior management team should reflect and role model these behaviours, supporting all staff to take corporate initiative and ownership for issues that fall outside of their responsibility.**

We have already:

- recognised and accepted the criticism of the Agency's SMT in modelling some of the negative aspects of the Agency's culture. The proposed changes to the membership of STA's senior team will make a difference to this, but we intend to continue to challenge ourselves to work more constructively and collaboratively across the Agency's senior leadership team.
- retained a specific corporate objective within all STA staff's annual performance agreements. This was a break with the wider approach taken by DfE, ahead of the findings of the review, in recognition of the emphasis that the Agency needs to place in this area

Going forward we will:

- establish, communicate and model a clear set of values for the Agency and set expectations for how staff approach their work and collaborate across teams, which will be monitored through improved performance management and the DfE people survey

**R5. Staff are engaged in articulating a cultural vision for the Agency, to make sure that staff understand what is expected of them. This should include a statement of the Agency's risk appetite, and aim to build the confidence and morale of its staff, empowering them to make appropriate decisions.**

We have already:

- begun this process through an all-staff event and the creation of cross-grade, cross-site implementation groups

Going forward we will:

- use the STA review implementation groups to work across the Agency to develop the new cultural model for STA. We will use the findings of the forthcoming DfE people survey to benchmark staff engagement and morale and will seek measurable improvement over the coming year

## **Assurance processes and end-to-end oversight**

**R6. STA establishes clear senior level oversight of assurance processes, with named senior managers accountable for specific processes. Senior managers should satisfy themselves that internal controls are adequate and working effectively.**

**R7. Consistent, comprehensive and proportionate assurance processes are used across the Agency. All processes should be documented, owned and shared across teams in the Agency, in order to improve visibility and oversight, and ensure that assurance processes, particularly those involving handoffs, are complete and without gaps.**

**R8. Escalation routes are clear and defined, to allow prompt remedial action to be taken to resolve issues where they arise.**

**R9. Feedback loops are in place to identify recurring issues and themes for resolution and future prevention. Processes should be continually updated to reflect feedback received. Training is provided to staff so that everyone is aware of the processes in place and how to follow them.**

**R12. One senior leader is appointed to take responsibility for end-to-end oversight across STA operations, from policy to test delivery. This individual should be supported in facilitating strategic thinking and discussion about STA processes, and empowered to provide a challenge function to the rest of the business: championing value for money and highlighting enterprise-level issues and opportunities.**

**R13. A single end-to-end policy through to test delivery process map is developed and maintained. This discipline may help to highlight enterprise-level issues, risks and opportunities. It should also help to ensure that risks that fall between or across a number of teams are identified and ownership allocated.**

We have already:

- appointed a new Head of Strategy to the senior management team, with a remit to create stronger end-to-end oversight of STA business
- developed process maps for individual areas of the business, such as test operations and test development
- redesigned our document clearance processes and held training events with all staff to ensure that they are familiar with the new requirements
- implemented a cross-Agency security continuous improvement (CI) project to review the Agency's test development and delivery security management, e-monitoring and information assurance arrangements

Going forward we will:

- identify a single named individual as end-to-end STA Security Manager, empowered to look into all and any security aspects of the Agency's business and report on such, direct to the Chief Executive
- require the STA Security Manager to report to SMT on a regular basis, on security risks and issues from across the business
- further strengthen our document security by identifying a single senior document owner responsible for the quality of all document content – including that drawn from other teams within the Agency and wider DfE
- restructure the CEO's office to provide support for the new Head of Strategy and through reconfiguring existing roles, strengthen capacity in the STA's data team to support the development of the data hub, such that new management information is made available to STA's senior team to challenge performance in an evidence-based way
- use capacity within the Agency's new strategy team to review the individual process maps to create a single STA end-to-end policy test delivery process map, highlighting risks and opportunities for improvement/streamlining. The new process map will be discussed and reviewed by the refocused SPR Board

## Policy and Delivery

**R10. STA should improve the communication and information flow between its policy and delivery functions. It should ensure there are clear structures in place for decision-making, allowing delivery and policy impacts to be considered together, and considered in the context of STA strategy (recommendations 2 and 3).**

We have already:

- taken steps to improve cross-Agency working, restructured the senior team and created a greater focus on strategic thinking and cross cutting policy development and delivery

Going forward we will:

- strengthen this through refreshed governance and decision-making arrangements and changes to the broader culture of STA
- ensure operational delivery is more fully considered in developing policy

**R11. STA improve its information flow with the wider DfE policy, strategy and delivery community ensuring that STA delivery constraints are reflected in wider thinking, and that wider strategic and policy trends are recognised and acted upon by the STA where appropriate.**

We have already:

- established joint governance arrangements with key policy teams in the wider Department – in particular, those working on school accountability, curriculum and qualifications policy within the Department’s Education Standards Directorate
- established a high-level delivery group, the membership of which includes specialist data analyst and stakeholder communications colleagues to support the delivery of the 2017 test cycle

Going forward we will:

- build on this by establishing an assessment policy task and finish group. The membership of this group will comprise key STA delivery personnel, and departmental school accountability, curriculum, qualifications, special educational needs, Early Years and specialist analytical colleagues. This group will be the main vehicle for the strategic management of assessment policy development, ensuring that the right joins are made with the wider DfE policy community and linked policy initiatives

## Risk

**R14. STA identifies its biggest delivery risks, and makes an assessment about the risks it can and cannot mitigate under current structures. Contingency plans should be owned, prepared and documented for each scenario.**

We have already:

- reviewed and strengthened STA's Risk Management Framework. The Framework clearly details processes for how to raise, manage and escalate risk across the Agency
- identified a comprehensive set of risks across STA business and have put in place a robust mitigation plan for the majority of them
- reviewed, agreed and rolled out a comprehensive STA business continuity plan which will be shared at the Strategic Performance Review and with the Department's Performance Committee

Going forward we will:

- review the governance arrangements of STA's Risk Committee to ensure it is able to challenge, scrutinise and interrogate key STA risks and issues as effectively as possible
- carry out a contingency planning exercise to ensure plans are in place for each scenario
- review our building block risk on primary assessment systemic failure and develop an appropriately robust contingency plan for sign off by Ministers. Currently a wholesale failure of the test system is subject to a thorough up-front process of risk mitigation to ensure this risk does not manifest. After each test cycle the Agency also reviews lessons learned and applies a continuous improvement approach to make each test cycle more efficient and effective than the previous one. However, whilst our contractual arrangements with suppliers set out contractor responsibilities to the Agency in the event of significant failure, there is no detailed STA test delivery contingency plan

**R15. STA considers options for building more resilience into their operating model, balancing their risk appetite against value for money.**

We have already:

- developed the capacity within the Agency, through the new strategy team, to undertake more of this work

Going forward we will:

- keep under review the number of test items we need in reserve at any one time alongside developing new metrics on the 'attrition rate' between different items

being commissioned and their eventual use as part of a test. We will consider these issues as part of senior management oversight with the Agency, not just as part of the test development process. Overtime we will seek to optimise value for money

- increase the prominence of risk versus value for money considerations when considering improvements to test development and standard-setting processes
- strengthen our assessment of the balance between quality and cost in making operational and commercial decisions, informed by better financial and performance data

## **Procurement and contract management**

**R17. STA establishes clear oversight of all procurement, contracts, grants, the commercial pipeline and financial information. STA should ensure it has a central, up-to-date and complete source of all contract and grant information, including tracking of procurement and contract variations and contract information at budget level, which is consistent with DfE operational tools. Budget monitoring should be performed at contract level, with clear oversight of how contracts fit with the financial year budgets.**

**R18. Contract management, budget management and procurement are recognised as specialist areas that require skilled staff. STA should have appropriate access to skilled commercial and financial experts to support contract procurement, negotiation and management – whether this is provided centrally or locally. STA should establish proactive training to upskill staff where required.**

**R19. STA defines a clear value for money framework, and uses this to assess and monitor existing and future contracts, ensuring that these represent best value.**

We have already:

- taken up staff development opportunities provided by DfE and sourced additional training for staff with Delegated Commercial Authority
- started to migrate our contracts onto the Redimo contract and grant management system and we will ensure that this is maintained. This will provide performance, savings and pipeline data across all STA contracts

Going forward we will:

- work with DfE's Commercial Division to ensure that the recommendations from the STA review and the Cabinet Office Commercial Capability Review are implemented to improve the skills and commercial leadership in STA
- work with Commercial Division who will continue to provide resource to develop the markets that STA operate in and undertake sourcing activity. Additional

resource on contract and performance management will be embedded within STA, with support from Commercial Division on the most complex negotiations

- work with Commercial Division to undertake a medium term review of existing contractual arrangements to identify opportunities to rationalize. We will develop a plan to provide upskilling and training to create greater expertise in leading successful contract and performance delivery
- make use of the new logical framework that DfE is implementing to ensure that we continually measure the impact and outcomes against our delivery objectives

## Central performance analysis

**R20. STA establishes a central performance analysis team. This team should be responsible for putting together a central performance “hub” that brings together all relevant performance data and metrics into one accessible place. The team should be responsible for and empowered to look at performance data across the Agency. They should spot strategic and specific local level issues, and facilitate conversations so that senior managers and leaders understand the issues and are able to develop solutions.**

**R21. STA identifies a set of key performance indicators to help monitor and assess its own performance. These are communicated to all staff, to build corporate ownership.**

We have already:

- started a recruitment process for an additional specialist data analyst to support the development of the data hub, working to the new Head of Strategy

Going forward we will:

- agree a new suite of Key Performance Indicators (KPIs) and appropriate lead indicators with the STA SPR Board and use performance against these to report to the Agency's SMT
- empower the new performance analysis function with a specific remit to look creatively at every aspect of STA business performance reporting. Through this mechanism we hope to support the Agency's SMT to think more fundamentally and strategically about the operation and performance of the Agency, rather than focusing on incremental improvement to existing tactical business delivery approaches

**R22. STA considers the balance it wants to strike between quality and value for money in its operations. In particular, it should consider the extent to which it wants to “gold plate” some of its development methodology, and ensure that value for money analyses form a standard part of its decision-making.**

The response to this recommendation is covered under recommendations 17-19.

## Resourcing

**R23. STA establishes a forward-looking resource plan that aligns with the strategic plan (recommendation 2) and addresses issues of retention, succession planning, recruitment and predicted skills requirements.**

We have already:

- increased the focus on prioritisation and flexible resourcing across STA, through discussion at the Agency's SMT. We also have resource plans in place within the individual teams within STA and keep a central plan of resourcing for the next two years
- developed a more sophisticated approach to recruiting high-quality general and specialist staff, using the Department's policy and project delivery, also other specialist, professions' networks and seek a senior level experienced secondees from within the wider UK test development community

Going forward we will:

- develop a staff succession plan, identify the Agency's key 'mission-critical' posts, and agree a plan for filling those roles in the event of staff departures

**R24. STA considers alternative recruitment models for some of its specialists, and builds closer links to the wider DfE analytical community.**

We have already:

- used international psychometric conferences to market technical posts within the Agency

Going forward we will:

- address the short supply of specialist skills, particularly in areas such as psychometrics. We will look at new approaches to attract these staff. Options include recruiting statistics graduates and developing their skills in-house or seeking support from external organisations on a contract basis. We will also look at developing a longer term partnership with a university to develop a psychometrics course

**R25. STA ensures that effective knowledge management mechanisms are in place across the Agency, to ensure knowledge and skills transfers where necessary.**

We have already:

- planned the departure of key staff leaving the Agency in a way that has enabled a thorough handover of responsibilities and work
- introduced a 'Test Delivery Speed Cycle' training programme to induct new staff, and re-acquaint existing staff, into the operational processes relating to live test delivery in schools
- reviewed and improved our staff induction materials and will be running an improved programme of induction events for the staff joining the Agency's newly formed Assessment Strategy, Policy and Communications Division. This includes dedicated training to the Agency's file management system (Workplaces), providing secure and effective access to current and historical documents

Going forward we will:

- promote the Agency at STA Roadshows, the annual DfE Fair and on social media
- roll-out a 'Policy to Test Delivery' staff training programme to support the work to tighten the links between the Agency's assessment policy, test development and test delivery teams and functions, and launch a mentoring approach for new staff by experienced staff

## Stakeholder management

**R26. STA ensures that its processes are customer-centric, and its delivery is designed with the customer in mind.**

**R27. STA establishes a strategic and constructive approach to stakeholder engagement and communication. This should involve bringing in the appropriate skills, thinking strategically about stakeholder consultation and communications, and putting in place appropriate structures to deliver this.**

**R28. Feedback loops are established, so that STA can listen to its customers and stakeholders and adapt to feedback accordingly.**

We have already:

- begun work on a single communications plan for the Agency, which knits together operational test delivery communications (for example, about the operation of the annual test cycle) and strategic communications (for example, on changes to assessment policy). This will look at the nature and timing of communications with schools, teachers, parents, local authorities and Regional Schools Commissioners
- established a regular forum to discuss primary assessment policy with representatives of the teaching unions, and are using these meetings to inform future assessment policy thinking. We have also discussed primary assessment concerns with the DfE Education Forum, and Headteacher and Teacher reference groups

- conducted a communications survey with schools to establish what works and what could be improved in our communications with them

Going forward we will:

- make changes within the Agency to better facilitate alignment of strategic and operational communications functions
- use the feedback from our recent stakeholder survey to improve the delivery of our messages. In particular:
  - incorporating feedback about our communication products and channels for the 2016 test cycle into our strategy for the 2017 test cycle. This includes: a new email design and format with more succinct copy; publication every Tuesday during term time unless there are important announcements; publication of the assessment updates on GOV.UK, to attract a wider audience; and the option to subscribe to assessment update emails
  - in response to schools being unable to release teachers / headteachers from their teaching responsibilities during the school day, webinars scheduled for November 2016 will be broadcast over lunch time and after school to help a larger audience to engage
  - continue to use social media to get messages out to teachers, schools and local authorities as feedback shows this is a very popular platform.
- consider running the communications survey more regularly to increase the feedback loop for our customers and also to track our progress.

## Conclusion

STA is committed to developing and delivering robust and high quality assessments and tests. We welcomed the review when it was announced and engaged openly and constructively with the review team.

We have already begun addressing some of the issues identified in the review and this work will continue over the coming year. Progress by the review implementation group will be monitored internally by the Senior Management Team on an ongoing basis.

The Government Internal Audit Agency will conduct a formal review of our progress in early 2017.



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