



**November 2017**

**National Improvement Framework: Response to the consultation on measuring the attainment gap and milestones towards closing it**

**Introduction**

Children in Scotland is the national network improving children's lives. Giving all children in Scotland an equal chance to flourish is at the heart of everything we do. By bringing together a network of people working with and for children, alongside children and young people themselves, we offer a broad, balanced and independent voice. We create solutions, provide support and develop positive change across all areas affecting children in Scotland. We do this by listening, gathering evidence, and applying and sharing our learning, while always working to uphold children's rights. Our range of knowledge and expertise means we can provide trusted support on issues as diverse as the people we work with and the varied lives of children and families in Scotland.

Children in Scotland supports national efforts to reduce the poverty related attainment gap and has contributed to previous consultations and engagement opportunities on this subject on behalf of our members. We are pleased to be able to respond to this consultation on measuring the attainment gap and milestones towards closing it.

**Our views on measuring the attainment gap**

Throughout the development of the National Improvement Framework we consistently highlighted that assessment is a necessary part of the education process and we recognise the pivotal role assessment can play in aiding and developing student progress when properly applied.

Children in Scotland also strongly supports evidence-led policy making based on the proportionate collection and analysis of reliable data. However, we have a number of concerns about the introduction of

standardised assessment for the purpose of measuring the attainment gap, which are summarised below:

- Whether tests give an accurate representation of learning (potential for error and bias), particularly with younger children
- Potential for assessments to become 'high stake' even if this is not the original intention, leading to pressure on pupils and on staff to 'teach to test'<sup>1</sup>
- The potential narrowing of the curriculum, with an over emphasis on literacy and numeracy
- Whether the measurements will actually drive positive change.

We recognise that the consultation paper has made effort to address some of these concerns, with an emphasis on multiple measures, including health and wellbeing. However, we would like to see more explicit assurance that agreed measurement approaches will be articulated and implemented for the purpose of school improvement, rather than measuring individual performance.

### **Q1: Have we based these proposals on the right principles?**

Children in Scotland support the inclusion of clearly laid out principles for measuring the attainment gap. We feel that the Scottish Government is on the right track with the proposed principles. However, we believe that there should be an additional principle added which recognises children's right to an education (in line with the United Nation Convention on the Rights of the Child Article 29), and to have any barriers to education, including poverty, removed in order for them to achieve their full potential.

#### *Principle 1*

We feel that the use of stretch aims is important as the Scottish Government rightly points out that attainment must be improved across the social gradient. However it may be useful to link the stretch aims to a clear plan of how the improvements in the various measures will be achieved. These proposals will need to include a wide range of policy areas that focus on the whole child and not just how we will improve the delivery of the school curriculum.

As we have raised in previous consultations we have concerns with the use of SIMD as the measure of deprivation. Not all those who experience poverty live in disadvantaged communities and as such the use of this as the measure may distort the picture in relation to the attainment gap. For example, improvements in SIMD 3 may hide a lack of improvement for some who experience poverty in areas in the

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<sup>1</sup> Natalie Mons (2009) Theoretical and real effects of standardised assessment: background

grouping. Similarly improvements in SIMD 5 may not point to improvements among the worst off in that group.

#### *Principle 2*

We agree that using a wider basket of measures will give a far clearer picture of whether the gap is closing as opposed to using one single measure. We will discuss these more fully in Q2.

#### *Principle 3*

We agree that measures should be simple and easy to report against. However we would also suggest that if the government is serious in its desire to measure and close the attainment gap, it must ensure it uses the correct measures - not necessarily the most simple ones. As identified above, attainment has a number of drivers and therefore a wide range of measures needs to be used and these cannot sit simply within the realm of education.

#### *Principle 4*

Yes there should be a clear line of sight from the agreed measures and milestones to the priorities set out in the National Improvement Framework. However, as we have raised already in this response, we believe these measures need to be broader than those priority areas outlined in the National Improvement Framework, if the nature of the attainment gap is to be fully understood and addressed.

For example, both health and wellbeing and attainment are hugely influenced by socio-economic status, and so we are of the view that there ought to be a clear link between measures that look at poverty and inequality and the priorities outlined in the National Improvement Framework.

#### *Principle 5*

We are pleased to see that the Scottish Government has included health and wellbeing in its framing of the attainment gap. However we have a number of concerns about the health and wellbeing measures proposed, as we will discuss below.

We also have significant concerns about how health and wellbeing assessments will be implemented, from a child rights perspective. Health and wellbeing assessments need to be undertaken on a voluntary basis with informed consent, consider data protection issues and, importantly, are linked to appropriate support if needs are identified. Implemented badly, health and wellbeing measures could be stigmatising and if not accompanied with support, potentially more damaging for children and young people than helpful.

Fundamentally, if widespread health and wellbeing assessment is implemented, the Scottish Government have a duty to invest in the services and supports which have been proven to have a positive impact on poor health and wellbeing in response.

#### *Principle 6*

We are pleased to see the proposal include 3 and 4 year olds, as early years provision will be vital in preventing the attainment gap from forming in the first place. Research has shown that differences in children's cognitive development linked to parental background can be seen as early as 22 months and studies indicate that children from higher-income households significantly outperform those from low-income households at age 3 and 5. By age 5, there is a gap of 10 months in problem-solving development and 13 months in vocabulary<sup>2</sup>. An emphasis on early years is therefore vital.

As indicated, standardised assessment is not feasible or desirable at such an early age, and we recommend an emphasis on developmental progress (as opposed to 'developmental concerns' as described) focusing on communication and relationships.

#### *Principle 7*

We agree that the measures must be credible and understood to fairly reflect the progress in closing the poverty related attainment gap. The measures included will give evidence on some important aspects of attainment, but not all. Further measuring attainment by SIMD data will not offer the level of sophistication to show when or where real progress is being made, or where real blocks and barriers persist.

#### *Principle 8*

We agree that milestones must avoid perverse incentives. We are particularly concerned as with all measurement of attainment that there will become an element of teaching to test.<sup>3</sup> As such we reiterate our support for sampling based measurements rather than standardised assessments.

We would suggest the use of attainment of SCQF level may ultimately create perverse incentives for teachers and schools. By measuring the number of passes we are concerned that schools may feel pressure to encourage pupils from lower SIMD quintiles through courses that do not support them to reach their full potential to give the appearance of increased attainment. This could be particularly prevalent as SCQF

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<sup>2</sup> Sosu E & Ellis S (2014) Closing the Attainment Gap in Scottish Education, York: Joseph Rowntree Foundation.

<sup>3</sup> See Sahlberg, P. (2009) A short history of educational reform in Finland. White paper, April.

levels do not give an understanding of grade or make any differentiation between courses.

The use of SIMD as a measure of deprivation could also ultimately create perverse incentives for schools to support better off families in disadvantaged areas. This could lead to a widening of the attainment gap in practice, despite it looking more favourable through this measure.

**Q2: Do you agree with having a basket of key measures to assess the progress made?**

We have previously raised concerns with the model of testing that the Scottish Government has committed to, however if new measures are to be implemented, we agree that having a basket of key measures is essential. Using a single measure would not give a wide enough view of attainment and could create perverse incentives.

The aim to minimise complexity of the Framework is welcomed, and remains an important point. However we feel that a wider basket of measures that are not focused solely on attainment but are linked to progress in other legislation such as the Child Poverty (Scotland) Bill are required. This legislation introduce targets to reduce child poverty, and it would be reasonable to hypothesise that reductions in child poverty would support a reduction to the poverty related attainment gap. Measures of child poverty are therefore vital to the success of this approach.

We also feel that measurements need to be clearly linked to investment going forward and not simply as a way to show progress.

**Q3: Are the proposed key measures the right ones?**

Children in Scotland is pleased to see an acceptance of the importance of early years on the attainment of Scotland's children and young people. We know that early child development is key to attainment later in life.<sup>4</sup> However we would have serious concerns with putting in place rigorous high stakes at this stage. While we accept that this appears to be focused on child development we know that children develop at different rates and there can be a high level of fluctuation in indicators at this stage. As such we would encourage the use of sampling of development scores and not standardised assessments.

We are also encouraged to see that there is measurement at various stages of education, which should give a more rounded view.

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<sup>4</sup> Sosu E & Ellis S (2014) Closing the Attainment Gap in Scottish Education, York: Joseph Rowntree Foundation.

However we have concern over aspects of the measurement proposed in the consultation.

In previous responses on the Framework, we highlighted the opportunity to utilise SSLN data for primary school pupils as opposed to standardised assessments. We are unsure why the SSLN has been discontinued when there are plans to measure attainment in numeracy and literacy.

While we recognise the vital importance of literacy, numeracy and health and wellbeing to attainment, we feel it is important to reiterate that focusing on these three areas alone gives a narrow understanding of attainment, and does not recognise skills, aptitudes and abilities pupils can hold and develop within school contexts such as through the arts, technologies, sport and citizenship. The Scottish Government must ensure that the full intended depth and breadth of Curriculum for Excellence is protected and enhanced by the introduction of this Framework, and we would like to see this recognised going forward.

We also have concerns that the measurement is still entirely focused on the school environment. Learning and attainment takes place outside of Scotland's schools and continues well beyond when young people leave. The current proposed measures only look at how SCQF level 5 or 6 qualifications young people have when leaving school, however this does not take account of the fact that the school learning environment may not suit some young people and many may leave early and go on to attain elsewhere. Furthermore, consideration should be made for those currently not attending school, particularly for health and wellbeing issues, where we know attainment is likely to suffer. School based assessment may miss some of the most vulnerable young people.

As iterated above, educational attainment is affected by experience of poverty and as such either the basket of measures or sub measures should be clearly linked to targets contained within the Child Poverty (Scotland) Bill. While we accept that progress in this area cannot be seen as confirmation of a narrowing of the attainment gap, progress, or a lack thereof, in reducing child poverty will be a key indicator in whether we can expect to see a narrowing of the attainment gap going forward. Indeed the inclusion of such measures or sub measures would be more in keeping with the holistic nature of the GIRFEC model.

We accept there has been an attempt to understand how children and young people are doing once they leave school by including the participation measure. However we have concerns that this does not do enough to measure what types of work, training or learning children and young people have gone on to. For example is being on a zero hour contract or enrolled in a short term training course considered the

same as being in higher education? More focussed measures will therefore be required to develop a more accurate understanding.

**Q4: Will this approach avoid the introduction of perverse incentives?**

As we have raised previously in this response we have concerns that use of SIMD can create perverse incentives.

We also have concerns that in the context of school governance reforms, where it is proposed that head teachers will be responsible for closing the attainment gap further perverse incentives could be created for schools.

The focus on measuring how many children and young people leave school with at least one SCQF 5 or 6 as a measure could encourage schools to push children and young people from lower SIMD to focus on subjects that they may be more likely to pass but may not be productive for them when they leave the learning environment. Outcomes for children and young people must be the priority. As such, a potential solution could be using a wider basket of measures for attainment that focus on the whole curriculum or to measure higher levels of attainment.

We would also be concerned that this approach could lead to the introduction of school league tables, a step which we have been at considerable pains to avoid in Scotland. How the data will be reported on will be crucial therefore, and we should take steps to avoid publication of school level evidence wherever possible.

**Q6: Does the use of SCQF levels reflect a sound approach to measuring senior phase attainment? Are there other options such as Insight tariff points?**

We can see the value in using SCQF levels as this is the most readily available set of data and their use allows for comparison across a cohort of pupils taking widely different curriculums. Indeed, we have previously called for the continued use of available data sets.

However as we have previously raised in this response, the use of SCQF levels in combination with SIMD may mean pupils from lower SIMD groups are encouraged into courses that are perceived as less challenging in the SCQF level to give the appearance of a narrowed gap. The use of SCQF also does not allow for measurement of different grades in a cohort and so cannot show whether pupils from lower SIMD brackets are achieving A's at the same rate.

We would suggest exploring other options, including the Insight tariff points system as it would allow for more of a weighting by grade.

**Q7: How best we can give more meaning/clarity to the terms “SCQF 5” and “SCQF 6” so they are accessible to all?**

We are not currently clear how well understood the SCQF levels are by children and young people or their families. However from our research for this consultation we would suggest that these could be given a clear definition that is understandable to children and young people, their families, practitioners and policy makers. We would suggest that a much clearer definition of what is expected overall at each level would be helpful.

This should be accompanied by making the SCQF level descriptors document<sup>5</sup> far more accessible, at present we do not feel the document is at all user friendly. This could be made shorter and have more understandable language with clear links to the curriculum so that it is relatable for children and young people. This could involve including the interactive framework in an accessible version.

**Q8: Are these the right sub-measures? Are there others that should be included?**

*At risk populations*

Fundamentally, we are concerned that the Framework does not recognise specific barriers for groups who are disproportionately affected by poverty and the attainment gap, for example, children and young people with additional support needs or care experienced young people. Recent figures<sup>6</sup>, have shown that 35% of care experienced young people leave school with one or more qualification at SCQF Level 5 or above, compared to 84% of the general population, and that 45% of looked after young people have been assessed as having mental health issues.<sup>7</sup>

In a recent report from Enable Scotland<sup>8</sup>, one young person shared: *“if it’s a lesson I understand, then I feel comfortable. But for some others I do need additional support or tuition. Without this additional support, I worry that I’ll fall behind.”*

Similarly, young carers, of whom there are an estimated 44,000 in Scotland<sup>9</sup>, highlighted concerns around education and the additional

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<sup>5</sup> <http://scaf.org.uk/wp-content/uploads/2014/03/SCQF-Level-Descriptors-WEB-Aug-2015.pdf>

<sup>6</sup> Scottish Government, 2016

<sup>7</sup> Office for National Statistics, 2004

<sup>8</sup> “IncludED in the Main?!” , ENABLE Scotland. Available at <https://www.enable.org.uk/wp-content/uploads/2017/08/IncludED-in-the-Main-22-Steps-on-the-Journey-to-Inclusion.pdf>

<sup>9</sup> Scottish Government, 2017



barriers they face: *"I failed most of my exams because my attendance at school was so bad due to caring."*<sup>10</sup>

We would therefore recommend that more emphasis is placed on measuring attainment within these specific populations.

### *Health and wellbeing measures*

In terms of the health and wellbeing measures proposed, we recognise that no one ideal tool is currently available and that the SDQ and WEMWBS are validated and well used measures. However, neither are perfect or give a whole picture of health and wellbeing – a particular gap would be around physical health needs for example. Further, there are serious questions about how they would be administered, particularly with younger children. WEMWBS is only validated for those aged 13 and over, and therefore would not be appropriate for younger children. It is similarly recommended that SDQ should only be self completed by children aged 11 and over, with parents or teachers completing versions for younger children. This obviously raises a number of questions and concerns, including:

- Are parents expected to complete the SDQ? If so, how would this be administered?
- If teachers are expected to complete it, would there be potential for bias?

As highlighted above, we also have significant concerns about how health and wellbeing assessments will be implemented, from a child rights perspective. Health and wellbeing assessments need to be undertaken on a voluntary basis with informed consent, consider data protection issues and importantly are linked to appropriate support if needs are identified. Implemented badly health and wellbeing measures could be stigmatising and if not accompanied with support, potentially more damaging for children and young people than helpful.

It may therefore be more appropriate, rather than introduce new measures, to make better use of existing data in this area. The Growing Up in Scotland (GUS) longitudinal study for example provides robust evidence on a range of physical and mental health issues, including SDQ scores. Investment in further data collection through GUS may therefore provide more accurate, reliable data.

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<sup>10</sup> "A Costly Youth: The Impact of Caring on Young People in Scotland", Scottish Youth Parliament, 2014.

**Q9: Is the use of stretch aims, by SIMD quintile, the right way to set milestones?**

As we identified in Q1 in relation to Principle 1 we feel that stretch aims are a good method of measuring progress across the social gradient. We would however reiterate our concern with the use of SIMD quintile for the reasons that have been repeated throughout this response.

**Q10: Are the stretch aims set at the right level?**

We believe the stretch aims should be ambitious and have an ultimate goal of eradicating the attainment gap. However, we recognise that this will take considerable time and investment to achieve, and is not within the gift of schools alone.

We do have questions over whether the stretch aims outlined are indeed achievable in the time frame outlined. This is of particular concern due to the governance reforms taking place, which will take significant time and resource to implement. We would therefore call for resources to be made available to ensure practitioners are supported to implement the Framework if it is to be successful in achieving its aims, as well as aligning this more closely with wider ambitions around child poverty and producing equitable outcomes for children and young people.

We also have questions over accountability in the new structures, which at this stage remains unclear. In order for the Framework to have merit and carry weight, there must be a clear system of accountability which details what will happen if these targets are not met, including what additional support will be allocated.

**Q11: Do you have any other comments on this consultation on measuring the attainment gap and milestones towards closing it?**

The Framework must link with key policies and developments such as GIRFEC, the review of the care system, the Child Poverty (Scotland) Bill and Additional Support for Learning policies, among others, in order to ensure a more cohesive national approach is taken. This ought to be informed by the views and experiences of children and young people, and we are concerned at the lack of engagement that has taken place so far in relation to the National Improvement Framework. Measures on the provision and take up of high quality early years would also support a shared understanding of the importance of early years education.

Children and young people have the right to have their views heard under the UNCRC<sup>11</sup>, including having meaningful opportunities to do

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<sup>11</sup> Article 12, United Nations Convention on the Rights of the Child

so. The Framework will have a significant impact on children and young people and would be richer for the inclusion and incorporation of their views.

Furthermore, parental and pupil engagement are crucial to the success of the programme. As previously highlighted, learning does not solely take place in the classroom, and so the role of parents and carers ought to be a consideration here. Similarly, children and young people should have opportunities to share what achievement means to them, and feel a sense of ownership over their education.

Testing without ensuring supports are in place for children and young people will not improve outcomes. Clear links to what support will be put in place is essential if the Scottish Government is to meet its ambitious and laudable aims. A Child Rights and Wellbeing Impact Assessment should also be carried out and actions identified to ensure equity for all.