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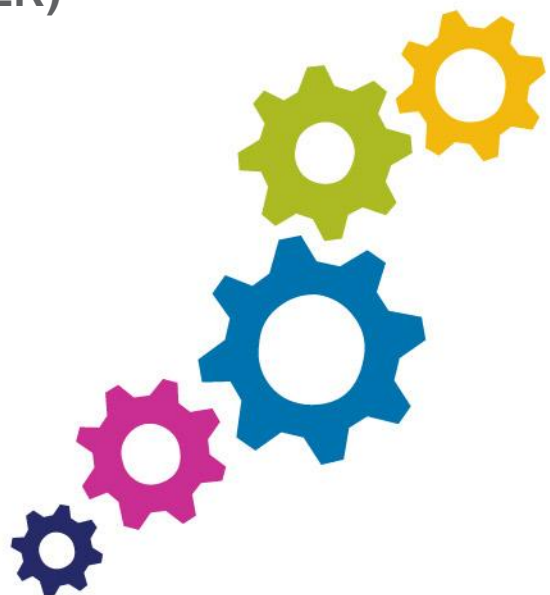
## Consultation Response

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# NFER Submission to Government Consultation: Intervening in Failing, Underperforming and Coasting Schools

**January 2016**

National Foundation for Educational  
Research (NFER)



## 1.1 About NFER

NFER is a charity and the leading provider of independent educational evidence and assessments in the UK. We provide evidence that improves education, learning and the lives of learners. Our insights are relevant and accessible and inform policy and practice across the world. Successive UK governments, in particular, have used them to inform policy thinking.

Through expert research and extensive knowledge of education and assessment, we offer a unique perspective on today's and tomorrow's educational challenges. We draw on trusted relationships, working with a range of influential organisations from government departments to employers; from school leaders and teachers to parents. The breadth of our work enables us to have a systemic view of the education system, linking together evidence from different areas to give a wide perspective.

## 1.2 About this document

Between October and December 2015 the Department for Education held a [consultation](#) on intervening in failing, underperforming and coasting schools. This document is NFER's response.

The consultation followed the publication of a draft proposal to address underperformance in local-authority-maintained schools. The consultation sought views on revised guidance on schools causing concern, including how maintained schools which are eligible for intervention are defined and how the powers of intervention available to Regional Schools Commissioners (RSCs) and local authorities should be used.

The paragraph numbering in the document follows the consultation questions. We only answered those questions where we could draw on relevant evidence or expertise.

## 1.3 Related documents

Other NFER consultation responses and policy papers relevant to underperforming schools are also published on the NFER website. Specifically, this consultation response refers to the following:

- Walker, M., Sims, D., Lynch, S. Durbin, B., Henderson, L. and Morris, M. (2012). Evaluation of the Gaining Ground Strategy (DfE Research Report 216). London: DfE. [[Available online](#)]
- Durbin, B., Wespieser, K., Bernardinelli, D. and Gee, G. (2015). A Guide to Regional Schools Commissioners. Slough: NFER. [[Available online](#)]
- White, R., Martin, K. and Jeffes, J. (2012). The back on track alternative provision pilots: Final report. Slough: NFER. [[Available online](#)]

- The Institute of Education and the National Foundation for Educational Research (2014). *School Exclusion Trial Evaluation* (DfE Research Report 364). London: DfE. [[Available online](#)]

## 1.4 Response

**2) Chapter 3 of the Schools Causing Concern guidance proposes how RSCs should make decisions about what action should be taken in schools that meet the coasting definition. Do you think that the described approach and process is appropriate?**

We support the government in its decision to give school leaders the responsibility to improve their schools, and the opportunity to demonstrate their plans to improve. NFER's evaluation of the [Gaining Ground Strategy](#)<sup>1</sup> found that expert support and advice (similar to that proposed to come from RSCs, local authorities and Headteacher Boards) helped to provide participating coasting schools with a set of flexible and responsive resources which could be used by school leaders. Governors and headteachers told us that they particularly valued a non-prescriptive, devolved approach, which enabled them to target resources based on their in-depth knowledge of their school, and their experience, expertise and needs.

There are a number of differences, however, between the approaches taken by the Gaining Ground Strategy and those now proposed for schools falling within the new 'coasting' definition. Chief amongst these is the absence of any additional financial support<sup>2</sup> and the provision of dedicated school-to-school support<sup>3</sup>. Our evaluation of the Gaining Ground Strategy concluded that additional funding for study support helped schools to develop capacity and provision, helped support creativity and experimentation, and allowed for intensive intervention. At the same time, school-to-school support benefited eligible schools by exposing them to new ideas and approaches, gave staff the opportunity to learn from a high-performing school's experiences, and helped foster mentoring-type relationships. In doing so, Gaining Ground encouraged and enabled schools to take stock of their strengths and limitations and further develop their infrastructure to lead, manage, and coordinate improvements related to the performance of staff and pupils. These are outcomes that the government should seek to replicate.

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<sup>1</sup> The Gaining Ground Strategy was a school improvement programme for secondary schools that had reasonable-to-good GCSE examination results, but poor progression rates in English and mathematics. It ran for two years between 2009 and 2011. NFER and SQW evaluated the impact and value-for-money of the strategy. We concluded that the strategy made a valuable contribution to enhancing participating schools' strategies, plans and interventions for improving pupil attainment and progression. The final report is available online: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/184088/DFE-RR216.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/184088/DFE-RR216.pdf) [17/12/15]

<sup>2</sup> Gaining Ground schools were awarded funding of £30k per annum to access additional specialist support and to help them to deliver extended services, in particular study support, to engage and motivate pupils.

<sup>3</sup> Eligible schools were partnered with high-performing schools to support, challenge and inspire them.

**3) Chapter 3 explains that RSCs could use their discretion to decide not to intervene where a coasting school is supporting its pupils well, but has fallen within the coasting definition because of its circumstances or pupil characteristics. Do you agree that this is appropriate? The guidance is not intended to be exhaustive, but please specify if there are other such circumstances or factors you think should be included in the guidance that currently are not.**

We support the government's proposal to give RSCs discretion to decide which schools within the definition of coasting have a sufficient plan and sufficient capacity to improve, which schools will need additional support and challenge in order to improve, and in which schools it will be necessary for the RSC to intervene. This is especially the case given our concerns with the use of threshold measures, discussed further under Q7 and Q8.

Gaining Ground demonstrated that by supporting schools with relatively modest levels of funding, and by allowing them to set their own school improvement priorities, schools can put together a package of support best suited to their needs. Gaining Ground also sheds light on additional factors that support school improvement that RSCs may wish to consider in determining the course of action for schools within the coasting definition. These include:

- schools' spending priorities and how existing resources might be better deployed to help drive improvement
- the quality of existing systems for tracking and monitoring pupils' progress and the ways these are used – data is the tool for focusing improvement
- the extent to which schools are already drawing on the experience and expertise of higher-performing schools (e.g. to provide innovative and effective practice examples for strengthening the management of change, the organisation and content of teaching and learning, and the provision of pupil support)
- the extent to which there exists a positive culture of expectations within the school, which continually raises the aspirations of governors, staff and pupils and challenges them to achieve more.

**7) Do you agree that the three principles (explored in paragraphs 16-20) underlying our coasting definition are the right ones?**

Yes, we agree with the suggested principles. It is important also in designing any performance regime to meet a wider set of criteria, which underpin the remainder of this submission:

- **Effectiveness** – the regime should incentivise and reward the behaviour that is actually required of schools, and not create perverse incentives. This is encapsulated in the principles set out in the consultation document. However,

there is a risk that by applying them through threshold measures (i.e. a single fixed level of performance, below which a school is defined as underperforming, as opposed to considering their score on a continuum), perverse incentives will be introduced among schools close to these thresholds; or that a disproportionate level of attention or resource is focussed on schools just below the threshold compared to those just above. This is an issue that has been sought to be addressed through the new Progress 8 measure at Key Stage 4, so it would be unfortunate for similar mistakes to be repeated in how Progress 8 is used to hold schools to account.

- **Simplicity** – there is a danger in constructing a set of performance metrics well-aligned with the desired outcomes, and avoiding perverse incentives, that the metrics become complex and difficult to understand. This brings dangers of its own, in that if schools do not understand the measures (or, worse, misunderstand them), then they are unlikely to respond in the desired manner, or be open to external intervention and support.
- **Fairness** – the metrics should not unfairly disadvantage schools with particular characteristics or in particular circumstances beyond its control, such as unusually large numbers of pupils with Special Educational Needs.

### **8) Should the definition of a coasting school be where data shows that, over a three year period, the school is failing to ensure that pupils reach their full potential?**

There are threshold measures embedded at several points of the proposed regime, and each carries a risk of producing an unintended response, or failing to fully address underperformance.

Firstly, the ‘three years in a row’ condition risks a scenario whereby schools with two years in a row below the coasting threshold invest excessive effort in ensuring the upcoming year 6 or year 11 cohort perform above the threshold, at the expense of other pupils in the school. This increases the chances the following year it drops back below the threshold, and a situation where the school gets trapped in a cycle of focussing on the threshold at the expense of a longer-term, whole-school approach to school improvement.

Secondly, to qualify as coasting, a primary school for example has to fall below twelve distinct thresholds relating to reading, writing, maths and overall progress, over three years. If a school clears any one of these twelve thresholds it will not qualify as coasting, despite still appearing substantively like any other coasting school. Furthermore, a school just below the coasting threshold in maths for example, but well below the threshold for writing, would be incentivised by the regime to focus on their moderate maths performance rather than their poor writing results.

As part of our analysis undertaken for the report ‘[A guide to Regional Schools Commissioners](#)’<sup>4</sup>, we estimated how many schools will have been coasting if the

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<sup>4</sup> This report included a comparative analysis of the eight RSC regions, examining the numbers of primary and secondary academies in each; underperforming academies and local authority

rules were applied to results over the period 2012-2014. This identified 496 mainstream primary schools that would have been deemed coasting, but a further 754 schools who only cleared one of these thresholds. These schools are unlikely to be substantially better performing, and therefore in need of substantially less attention or support.

This second issue will not apply to secondary schools after the new Progress 8 measure is introduced, which already combines performance across multiple subjects.

We recognise the value of a simple category that signals a need for improvement, and that the definitions are already reasonably complex. We also recognise and welcome the discretion given to RSCs, which to some extent mitigates some of the risks related to the proposed threshold approach. However, there are still risks of undesired consequences. With this in mind, we have suggested some alternative approaches below, each intended to address the problems we have identified, and which are more in keeping with the discretion afforded to RSCs.

1. Rather than a binary 'coasting or not' classification based on schools failing to clear the threshold for three years in a row, schools could be assigned a score out of five (say), recording how many of the past five years they have cleared the threshold. Schools scoring four (i.e. dropping the below the threshold in just one of the four years) might just be placed on 'watch' by the RSC, and schools scoring two or three are likely to be roughly those identified as coasting under the current proposals. This approach will better align the definition itself with the nuance of the RSCs' potential response, and – crucially – avoid the perverse incentives described above.
2. In the case of primary schools, a similar approach could be applied to each individual criterion. Either schools could be rated out of twenty over the five year period, or separate scores out of five could be reported for maths, reading, writing and overall progress.

**9) Should the proposed interim definition for coasting in 2014 and 2015 be based on the accountability measures for those years, against which schools were held to account? If so, are the thresholds right? Alternatively should the new 2016 accountability measures be applied retrospectively for 2014 and 2015?**

We agree with the proposed approach, and that it would be unfair to apply new performance measures retrospectively.

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maintained schools (both those below the floor and those or deemed coasting based on applying the proposed criteria to 2012-2014 performance); the availability of sponsors well-placed to take on underperforming schools; and the scale of the challenge presented by rising pupil numbers. The report is available online: <http://www.nfer.ac.uk/publications/RSCR01/RSCR01.pdf> [17/12/15]

If a threshold approach is adopted, then we suggest some consideration is given to the level of available capacity/resource to support coasting schools. In other words, the threshold would be set at a level that results in roughly the number of schools eligible for support that RSCs and the wider system are capable of prioritising. As our RSC [report](#) highlighted, the capacity of RSCs (and suitable sponsors) is an important consideration, particularly in some regions.

### **11) Should coasting standards be applied to Pupil Referral Units? Can this be data driven – if so, what metric could be used? What other indicators might be used?**

PRUs (and all forms of alternative provision) should be subject to relevant scrutiny and challenge to ensure pupils achieve to their highest potential. PRUs and registered alternative provision providers, like mainstream schools, are subject to Ofsted inspections (with many receiving good and outstanding ratings). However, we believe that mainstream coasting standards should not be applied to PRUs as they do not function and operate in the same contexts as mainstream schools. For example, our evaluations of the [Back on Track alternative provision pilots](#)<sup>5</sup> and the [School Exclusion Trial \(SET\)](#)<sup>6</sup> found that their pupils generally present with a diverse and often changing set of needs and priorities that the PRU has to accommodate. As a result, many social, emotional, behavioural and health-related issues that act as barriers to academic achievement have to be met first. In short, it is difficult to envisage how a coasting definition applied to PRUs could meet the ‘fairness’ criterion suggested in our response to Q7.

PRU provision encompasses a broad spectrum, with considerable variation in the nature, purpose and structure of individual establishments, ranging from time-limited, preventative early intervention programmes for those pupils identified as being at risk of disengagement and exclusion, to full time alternative provision for those excluded from, or unable to attend mainstream schools.

Many PRUs also offer specialist outreach support to mainstream schools. Because of their relationships with the mainstream sector, the composition and needs of PRU cohorts can also change year on year, reflecting, for example, changes local socio-economic, demographic and cultural factors and the exclusion practices of schools.

There are, therefore, inherent difficulties in identifying a single metric that could be used to apply coasting standards to PRUs, or even to find an agreed universal set of metrics that could meaningfully capture the diversity of provision offered by and through PRUs. What is clear, is that assessments of the effectiveness of PRUs

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<sup>5</sup> The Back on Track pilots were designed to transform the quality of alternative education for those who were excluded from, or who for some other reason were unable to attend school. NFER was commissioned to undertake a longitudinal study to document the progress and experiences of 12 projects designed to develop best practice and encourage greater diversity in alternative provision. The report is available online: <https://www.nfer.ac.uk/publications/APIZ01/APIZ01.pdf> [17/12/15]

<sup>6</sup> SET tested the benefits of schools having greater responsibility for meeting the needs of permanently excluded pupils and those at risk of permanent exclusion. The trial started in 2011 and ran until 2014. It involved volunteer schools drawn from 11 local authorities. The report is available online: <http://www.nfer.ac.uk/publications/APSR01/APSR01.pdf> [17/12/15]

should be based on the journeys of individual learners/pupils from the beginning of their relationship with the PRU, the quality for needs assessments carried out, the plans put in place to help pupils realise their potential in terms of social, emotional and personal development as well as academic and vocational achievement and future progression.



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**National Foundation for  
Educational Research**  
The Mere, Upton Park,  
Slough, Berks SL1 2DQ

T: 01753 574123  
F: 01753 691632  
E: [enquiries@nfer.ac.uk](mailto:enquiries@nfer.ac.uk)  
[www.nfer.ac.uk](http://www.nfer.ac.uk)