

DfES

Common Assessment Framework

12 November 2004

1. NASUWT welcomes the opportunity to comment on *Common Assessment Framework: A Consultation*.
2. NASUWT is the largest union representing teachers and headteachers in all sectors of education throughout the UK

GENERAL COMMENTS

3. NASUWT welcomes the proposal to create a Common Assessment Framework (CAF) and supports the aim to improve the consistency and quality of assessments. NASUWT also supports the aim to create a common assessment approach that can be used across the whole of the children's workforce. However, it is vital that a common approach to assessment does not lead to increased bureaucracy, and that there is absolute clarity regarding the roles and expectations of different groups of workers. NASUWT would strongly oppose the development of a framework which requires teachers to undertake administrative tasks, or which increases the workload burdens on teachers, since this would conflict with the requirements of the National Agreement '*Raising Standards and Tackling Workload*'. It is vital, therefore, that NASUWT, along with the Workforce Agreement Monitoring Group (WAMG) and the Implementation Review Unit (IRU), are consulted as the Framework and related tools and guidance materials are developed.

NASUWT recommends that:

- *the Common Assessment Framework must take full account of the requirements of the National Agreement ‘Raising Standards and Tackling Workload’. Teachers must not be required to take on administrative tasks relating to assessment and the Framework must not increase the workload burdens on teachers;*
- *WAMG and the IRU should be consulted at all stages of the development of the Common Assessment Framework, related tools and supporting materials.*

SPECIFIC COMMENTS

Purpose of the Common Assessment Framework

4. NASUWT agrees with the aim to implement a common approach to needs assessment and to create a framework where information can be easily shared with other agencies. NASUWT also supports the aim that assessment should provide a non-bureaucratic ‘whole-child’ assessment.
5. NASUWT supports the proposal that common assessment should be undertaken at the first sign of difficulty. However, whilst schools may often be the first organisation to identify a difficulty, this should not lead to the expectation that schools should be responsible for conducting the common assessment. It is vital that the full implications of the requirements are clarified and WAMG and the IRU should be consulted as part of this process.
6. NASUWT stresses that teachers must not be required to undertake assessments. It may be appropriate for a SENCO to contribute to the

assessment process, although the SENCO, if he/she is a teacher, should not be required to undertake administrative functions. However, NASUWT recommends that the assessment must be led by a lead professional from outside the school who should work with the school in undertaking the assessment.

7. NASUWT supports the aim to encourage and help practitioners working with children to identify the broader needs of the child. Common assessment should help to facilitate referral between agencies. However, it is important to recognise that successful interagency work requires much more than a common process. It should not be assumed that all schools will know about all of these other agencies. The proposals to develop guidance to help practitioners record their findings and identify the most appropriate response to meet identified needs is welcomed, provided this is done in consultation with the school workforce unions. In addition, NASUWT recommends that work is undertaken to develop a protocol for sharing information at a local level, and that this includes information about the range of services provided by the various partner agencies, and when and how such services can be accessed.

8. NASUWT agrees with the four basic principles for underpinning the development of the CAF: focusing on the child and his/her needs, providing practical and appropriate solutions to a child/young person's unmet needs; reducing bureaucracy from different assessments and data; and involving young people and families at all stages. NASUWT suggests that a further basic principle is added: ensuring consistency and coherence across services whilst respecting the distinct roles and responsibilities of the various services.

NASUWT recommends that:

- ***a lead professional outside the school should do the assessments; and***

- ***a further basic principle is added which focuses on ensuring consistency and coherence across services whilst respecting the distinct roles and responsibilities of the various services.***

How the Common Assessment Framework will Work in Practice

9. NASUWT agrees with the proposal that all practitioners who provide services for children and young people should know about the Common Assessment Framework and how to have a common assessment completed.
10. NASUWT does not agree that all practitioners should know how to complete a common assessment. Some practitioners should not be involved in undertaking a common assessment and do not, therefore, need to know how to complete the process.
11. The consultation document provides a list of the education practitioners who should be trained in each local area to use the CAF. NASUWT recommends that WAMG and the IRU are consulted before a final list is developed and that, in consultation with WAMG and the IRU, guidance is issued to LEAs and others who may be responsible for organising or delivering training. The guidance must make it clear who should and shouldn't be involved in training, the appropriate roles and responsibilities of different post holders, and what training they should receive.
12. Particular attention needs to be paid to the quality of assessments undertaken by staff in private sector early years settings. Teachers in nursery or reception classes often receive inadequate information from private early years settings, which results in schools having to undertake a fresh assessment. This means that there is an unnecessary delay before such pupils receive appropriate support. It also adds to the workload of

teachers and other staff within the school. NASUWT strongly recommends that private sector providers are properly regulated so that appropriate assessments are made and adequate information recorded, and that clear protocols for information transfer are observed.

NASUWT recommends that:

- *specific training is provided for appropriate staff in schools regarding the CAF;*
- *training on how to complete an assessment is only given to those practitioners who need to complete the process and that this should not include teachers;*
- *WAMG and the IRU are consulted before the final list of education practitioners is developed;*
- *WAMG and the IRU are consulted regarding guidance to LEAs and others responsible for organising or delivering training; and*
- *private sector providers must be properly regulated to ensure that appropriate assessments are made and adequate and appropriate information is recorded.*

How the Common Assessment Framework will be Developed

13. The consultation document makes reference to the need to take further account of education legislation, including part IV of the Education Act 1996, before the Common Assessment Framework is developed, and to draw from frameworks which already exist when developing the CAF. NASUWT stresses the need to ensure that there is consistency and coherence between the frameworks used by schools and those developed for the CAF.

14. NASUWT recommends that common assessment forms are kept brief and simple. It is particularly important that the common assessment form does not duplicate specialist assessment forms. NASUWT suggests that consideration is given to developing a standard form with a number of specialist sections. Specialist sections would only be completed if they are relevant.

15. NASUWT also recommends that the possibility of developing and implementing computerised assessment forms is thoroughly examined. This should include undertaking a detailed examination of the feasibility of introducing computerised assessment into different settings.

NASUWT recommends that:

- *steps are taken to ensure consistency and coherence between the CAF and frameworks used by schools;*
- *consideration is given to creating one assessment form with specialist sections; and*
- *the feasibility of implementing computerised assessment be investigated.*

How the Common Assessment Framework will be Implemented

16. The National Agreement '*Raising Standards and Tackling Workload*' places a statutory requirement on schools to implement changes that will reduce teacher workload and remodel the school workforce. The National Agreement provides an additional lever which may be useful in helping to ensure that the Common Assessment Framework is implemented effectively and appropriately.

17. NASUWT strongly recommends that WAMG and the IRU are consulted at all stages of the process of developing and implementing the Framework. This will help to ensure that there is consistency between the strategies for workforce reform and those relating to the Every Child Matters agenda. It will also help to ensure any problems are identified at an early stage and that schools support and ultimately implement the framework appropriately.

18. NASUWT stresses the importance of ensuring that the guidance makes it clear to all key partners that the common assessment process must take full account of the requirements of the National Agreement. Guidance should, for example, make reference to the roles and responsibilities of staff within and outside the school and to what school-based staff should and should not be expected to do.

19. It is vital that all those involved in the common assessment process understand and implement equal opportunities good practice. Various pieces of equalities legislation require this to happen. National bodies such as the DfES should take action to ensure that all policies and strategies address issues of racial discrimination and promote equality of opportunity and good race relations. Any guidance that is issued by the DfES should also address the statutory race equality duty. NASUWT strongly recommends that an equality impact assessment of the CAF proposals is undertaken, that steps are taken to ensure that any strategies and guidance that are developed address equality matters, and that the development and implementation process is monitored for its impact on and effectiveness in addressing equal opportunities.

NASUWT recommends that:

- ***WAMG and the IRU should be consulted at all stages of the process to develop and implement the CAF;***

- *guidance is produced that makes it clear to all partners what staff in schools should and should not be expected to do;*
- *the CAF, and related policy proposals, strategies and guidance should be subject to an equality impact assessment, and the development and implementation process should be monitored for its impact on and effectiveness in addressing equal opportunities.*

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