

Curriculum and Assessment Review: Call for evidence

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) is a trade union and professional association representing over 25,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business leaders and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million children and young people across primary, secondary, post-16 and specialist education.
2. ASCL welcomes the opportunity to contribute evidence to the Curriculum and Assessment Review. Our response is based on the views of our members, obtained through discussions at ASCL Council's Curriculum and Assessment Committee; with our primary, SEND, sixth form and FE advisory groups; and prompted and unprompted emails and messages.
3. When considering the impact of any proposals on different groups, it is ASCL's policy to consider not only the nine protected characteristics included in the Equality Act 2010, but also other groups which might be disproportionately affected, particularly those who are socio-economically disadvantaged.

B. General points

4. ASCL strongly welcomes the Curriculum and Assessment Review, and the open and transparent way in which it is being conducted. Our response to the call for evidence is rooted in five previously published policy documents:
 - [The Forgotten Third Commission's Report](#) (2019)
 - [ASCL's Blueprint for a Fairer Education System](#) (2021)
 - [Discussion paper on Labour's proposed curriculum and assessment review](#) (2023)
 - [ASCL's response to the Advanced British Standard consultation](#) (2024)
 - [ASCL's Manifesto for the 2024 General Election](#) (2024)

We refer the panel to these documents in considering evidence.

5. Our *Blueprint for a Fairer Education System* begins with the premise that the English school system – and by extension the national curriculum and national assessments – work well for most children and young people, but not for all, particularly the most vulnerable. We therefore broadly support the Review's focus on evolution, not revolution. However, there are some aspects of the current approach to curriculum and assessment which require immediate consideration (see below).
6. Given our overarching view of the strengths and weaknesses of the current system, our starting point for this response is therefore the learning and pastoral needs of our most

vulnerable learners. These include those with SEND, those from disadvantaged backgrounds, and the 'forgotten third' who don't achieve the expected standard in reading, writing and maths at KS2, and don't achieve the so-called 'standard pass' of a Grade 4 in English and maths at GCSE. We were pleased to see themes of social justice and inclusion running throughout the call for evidence, not just in Section 3.

7. The Review has been hailed by some as a generational opportunity to reform curriculum and assessment. While we agree that some changes are urgent and timely, we think this language is unhelpful and overreaches the scope of the Review. Our view is that, under any government, curriculum and assessment reform should be iterative. We have proposed below an approach to how this could work in practical terms.
8. ASCL supports the government's intention to make a revised national curriculum mandatory for all state-funded schools, including academies. However, it is important that this does not result in any loss of the expertise and thinking that many schools and colleges have put into the curriculum in recent years. The national curriculum should represent a common entitlement for all young people, but schools and colleges should retain autonomy in how it is implemented, and for the wider curriculum they provide around it.
9. There is a balance to be struck between school and college autonomy in designing and delivering a curriculum that is fit for purpose, taking on contextual needs and interests, and a common national entitlement. To this end, we would like to see a 'slimmed down' national curriculum. We think the Review should recommend that the government consults on the percentage of the average school timetable at different key stages that the national curriculum should take up. This should be a guide, rather than a specified statutory number of hours per topic or per subject. Not providing this guidance might mean some schools use their entire timetable to teach the national curriculum, while others allow more time for additional content. This may have the unintended consequence of widening the disadvantage gap even further.
10. The Review should, in our view, recommend that the government take the opportunity to articulate in the resulting revised national curriculum an ambition vision for education for all, rather than it merely being a list of subject-related content.
11. Throughout the call for evidence, the word 'outcomes' is used extensively. However, this term is not always clearly defined. Does it mean attainment and progress outcomes in national assessments, destinations for young people, wellbeing and happiness, longer-term employment and economic outputs, something else, or all of the above? Until the government sets out a clear ambition and vision for its educational reforms, and what it hopes to achieve from these, it is hard to design an appropriate national curriculum and assessment system.
12. As above, we think that this process should be iterative, and that the government should put in place a mechanism for ongoing curriculum and assessment review, being mindful of workload implications, costs to the system, and the need to avoid change for change's sake. We strongly recommend against a permanent curriculum and assessment arms-length body, which can all too easily become a closed shop and lead to unhelpful behaviours.
13. Instead, we propose the development of an ongoing independent curriculum and assessment review mechanism to advise government on possible changes to the national curriculum or national assessments. This should ensure independence and impartiality by having a series of checks and balances as to its membership and operating structure. Decisions on whether or not to implement the independent review

body's recommendations would remain with the government. The body would have no statutory powers to mandate curriculum changes.

14. We suggest a three-tiered approach to future curriculum and assessment review:
 - A statutory appointing committee, who appoint...
 - a standing committee, whose make-up is defined by the appointing committee, who in turn appoint...
 - expert groups, who work on a task-and-finish basis, based on the brief given to them, and who make recommendations to government.
15. In practice, if the government wanted to review an area of curriculum or assessment (e.g. the computing curriculum, GCSE English language, or the whole national curriculum), it would ask the standing group to convene a group of experts to make recommendations. The expert group would publicly report back to the government, and the government could choose whether or not to accept and implement the recommendations.
16. We also believe that there should be a two-way dialogue between the standing committee and the government. Our proposal is that government writes to the standing committee when it has a particular area of curriculum or assessment it wants to review, leading to the process outlined above. However, we propose that the standing committee meets annually to make recommendations to government about any areas of the curriculum or national assessments which may need review (they may recommend that no review is necessary). The government could then decide whether or not to ask the standing committee to convene an expert group.
17. We are glad that particular attention is paid in the call for evidence to English and maths, and particularly to the current resit policy and qualification choices for students who don't achieve a Grade 4 in Year 11. ASCL has long advocated for a new, universal assessment to demonstrate their literacy and numeracy competencies. We set out more detailed thoughts on this later.
18. The current structure of the national curriculum focuses on disciplinary subject knowledge. ASCL supports this approach: disciplines are not arbitrary, but important ways of thinking about the world. However, this focus has been to the detriment of wider, cross-disciplinary skills. Striking a balance is key.
19. We would not recommend a return to any notion that cross-disciplinary skills can be taught in a non-disciplinary vacuum, or should be the sole outcomes of a curriculum.
20. However, there is an opportunity for the Review to recommend different ways in which the national curriculum could be presented. Alongside disciplinary subject knowledge, there could be an opportunity to be clearer about how transferable skills could be woven through a knowledge-based curriculum. This could be exemplified through separate, non-statutory guidance.
21. Currently, the 16-19 curriculum is not included within the scope of the national curriculum. We welcome the Review's focus on post-16 education, but we think the approach of focusing on qualification pathways is fundamentally flawed. This risks making the same mistake as the previous government make in their thinking on the Advanced British Standard, i.e. attempting to define a curriculum through qualifications. We would strongly advise the current government to work with the sector to consider the purpose of 16-19 education, then to design a curriculum and national assessment system that meets these aims.

22. ASCL is acutely aware that any suggestions for what should be included in the curriculum must be tempered by what we think should be taken out. We have therefore been very cautious in proposing any significant changes to curriculum content.
23. Under Section 5, we have made some suggestions at a macro level. However, as a leadership union we do not think it is appropriate for us to comment on subject-specific content. Indeed, given the breadth of this review, we think it would be unhelpful for the Review to make any subject-specific recommendations. Instead, our view is that the Review should make recommendations to the government on subjects that need to be reviewed through consultation, and the urgency of these reviews, using the process outlined in paragraphs 13 to 16 above.
24. As the panel will be aware, teacher recruitment and retention remains one of the most significant barriers to curriculum implementation. We would strongly urge a joined-up approach between the government's commitment to deliver 6,500 new teachers, future iterations of the workload reduction taskforce, and its response to this Review. Curriculum changes, however well-intentioned, will have little impact on young people in the classroom if there aren't the specialist staff to deliver them.
25. The workload implications of curriculum and assessment reform are a critical concern for our members, who have undergone a decade of upheaval following major reforms under the coalition government, and then the ongoing impact of Covid, which remains significant. Any response from the government to the Review's recommendations must include a full impact analysis, including on workload.
26. Any curriculum and assessment change also has financial implications for schools and colleges, as well as for the government, regulators and awarding organisations. We urge the panel to recommend that the government's response to its recommendations is costed, with a commitment to fully fund associated costs incurred by schools and colleges.
27. It is important that an appropriate, ambitious and inclusive curriculum drives funding decisions, rather than the other way round. Currently the cost of delivering the national curriculum in different settings is not transparent. We suggest that the Review panel recommend that the cost of delivering the new mandatory curriculum is properly costed and funded appropriately for different settings.
28. Some of these costs will include teacher training and development. Any changes to curriculum content will require additional CPD. Again, we urge the panel to recommend that the government's response to its recommendations includes a commitment to invest in high-quality professional development to help implement any reforms.
29. Section 7 of the call for evidence recognises the interplay between curriculum, assessment and accountability. It is important that any changes to curriculum, assessment and qualifications are considered in the context of the accountability landscape. We therefore urge the Review, in its interim report in the spring, to suggest that the government holds off finalising major changes to accountability in the form of the introduction of report cards until the Review's final report in the autumn, to ensure any changes to curriculum, assessment and accountability are aligned.
30. The call for evidence implicitly and explicitly highlights a number of tensions in curriculum and assessment reform, which became evident during discussion with ASCL Council and ASCL member working groups. In our response to your specific questions below, we have attempted to offer a balanced but pragmatic approach.

C. Responses to specific questions

Section 2: General views on curriculum, assessment, and qualification pathways

Question 10: What aspects of the current a) curriculum, b) assessment system and c) qualification pathways are working well to support and recognise educational progress for children and young people?

31. There is much to be proud of in England's curriculum and assessment system. The national curriculum and qualification pathways work well for many young people at each key stage, including 16-16 qualification routes. However, they work much less well for around a third of young people, mainly those from disadvantaged backgrounds and/or with other vulnerabilities. Our view is that the Review should focus strongly on this 'forgotten third'.
32. Curriculum thinking is very strong across many schools, colleges and groups of schools, partly due the focus of the last government, partly due to grassroots movements and school-to-school collaboration, and partly due to the current inspection framework's emphasis on the quality of education.
33. Last year, under a regime which still used single-phrase judgements, 90% of all schools inspected by Ofsted were 'good' or 'outstanding' for overall effectiveness, up from 89% the previous year. While we have significant concerns about the use of single-phrase judgements, the fact that quality of education was formerly a limiting judgement suggests that the quality of the curriculum and assessment in most schools in England is very strong. We must not lose sight of that in any future reforms.
34. England's assessment system and qualification landscape is well-regarded, and offers a very high degree of reliability compared to some other jurisdictions. Our approach to grading and awarding is highly developed, ensuring consistency between different exam boards, between different exam series, and when reforms to qualifications are made.
35. The success of a blend of academic qualifications, applied general qualifications, and technical qualifications is well documented, and allows students from differing backgrounds and starting points to progress onto meaningful further education or employment.
36. The emphasis on a knowledge-rich curriculum has had a positive impact on many young people, who have learned content and skills they might not have encountered otherwise. This has sometimes been misrepresented as rote learning or memorisation tests. When implemented with fidelity, a knowledge-rich curriculum can provide an engaging and motivating experience.
37. The move away from attainment to progress at key stage 4 has been welcomed, as it recognises the progress that all students make, relative to their starting point. The same is not true, however, at key stage 2 or 16-18.
38. Qualification choice at level 2 and level 3 is very broad for most young people, although has become more restrictive in recent years as a result of Ebacc pressure and the threatened defunding of many applied general qualifications. Both GCSE and A level carry strong brand recognition with students, parents and employers, both in England and internationally.

39. The existence of a national curriculum, despite it not being mandatory for all schools, provides a useful benchmark for the knowledge and skills we expect young people to know and develop by the end of certain key stages. This helps ensure that teachers and parents understand whether or not pupils are on track to succeed.
40. The shift away from the fallacy that we can assess by levelled criteria, to a more sophisticated approach of assessing specific knowledge and skills over time, has had a positive impact on progress for children and young people. It means that the best in-school assessment is focused on what pupils need to learn, and where gaps in their learning may be.
41. The Question Level Analysis tool produced by the DfE is a powerful mechanism to support progression between KS2 and KS3. It allows primary schools to see where they may need to make improvements in their curriculum in future years, and allows secondary schools to see the very specific gaps in knowledge of their current Year 7s. Similar knowledge-sharing after other national assessments could be powerful, although costly.

Question 11: What aspects of the current a) curriculum, b) assessment system and c) qualification pathways should be targeted for improvements to better support and recognise educational progress for children and young people?

42. As mentioned above, the current curriculum and assessment arrangements do not work equally well for all young people, especially those with SEND and for disadvantaged learners. Roughly a third of children leaving primary school do not meet the combined expected standards in reading, writing and maths, and a similar third of young people do not achieve a Grade 4 in English and maths by the end of secondary school. We call these young people the 'forgotten third', because successive reforms have failed to meet their needs.
43. The SEND system is under-funded and the funding itself poorly distributed. Too often the needs of SEND learners in curriculum and assessment reform have been an afterthought, when the effective provision for pupils with SEND is central to successful school and college development.
44. The national curriculum and national assessments are currently too full of content. Many schools report that they struggle to get through the specified content by the end of each key stage. This does not allow time for schools to introduce contextualised topics, or to deviate from the prescribed curriculum or specification to explore the varied needs and interests of their pupils and students.
45. The burden of assessment at GCSE, in particular, is far too high. The OCR awarding body reports that the average GCSE student sits 31.5 hours of exams, usually over a three- or four-week period. This is in addition to any mock exam series the school or college may run, which is now an Ofqual requirement as part of the ongoing resilience arrangements. This puts England significantly higher than most other jurisdictions for the equivalent age range. This almost certainly stems from a political concern that content which isn't formally assessed, won't be taught – which in turn comes back to the interplay between pupil assessment and school and college accountability. The Review must address this in its recommendations.
46. Further, the extent of the current reliance on terminal exams is unnecessary and damaging to many young people. We would not recommend a return to a fully modular system, where students can resit every module every term. However, a balanced approach is possible; for example, allowing students to take papers within a general

qualification at the end of Year 10 or Year 12 (rather than having to take the whole qualification in a single year, usually Year 11 or Year 13, as is currently the case), and applying a first-entry rule for school accountability purposes to ensure that students are entered at the right time.

47. The current national curriculum is not reflective of the lives of many young people. It represents knowledge and skills from a particular, and contested, epistemological perspective. As a new national curriculum becomes mandatory, it must be representative and inclusive.
48. At the time of the call for evidence, a decision has not yet been made on whether to reverse the previous government's proposed defunding of many applied general qualifications. ASCL supports the [Protect Student Choice campaign](#), which has made strong, evidence-based arguments for the continuation of these qualifications.
49. The Curriculum and Assessment Review is an opportunity to rethink how the national curriculum is presented. It makes sense to keep the core structure based around key stages and subjects; however, there is also room to explore cross-curricular links throughout the curriculum in a more meaningful way. There is also the opportunity, through separate non-statutory guidance, to exemplify how content might be taught, in order to promote these skills.
50. Too often, schools feel the need to race through the national curriculum for their key stage, driven by the accountability system. Future iterations of the national curriculum could include 'warning boxes' suggesting that teachers don't attempt to teach particular content until knowledge and skills earlier in the curriculum is secured.
51. ASCL would support the development of optional national assessment materials, closely linked to the national curriculum, at each key stage, provided these were not used for accountability purposes. The removal of KS3 national assessments over a decade ago means that there is no government-backed benchmark of students' progress between the end of primary school and the start of GCSEs. A free assessment tool for schools to benchmark their students would be very welcome, and would support progression onto level 2 qualifications. This would mirror the approach now taken at KS1, with the government provision of optional tests.
52. In direct response to your question, the most immediate areas that needs targeting are English and maths, especially the GCSE resit policy, and the breadth of the curriculum. We were pleased to see both of these as distinct sections within the call for evidence, and have responded in full below.

Section 3: Social justice and inclusion

Question 12: In the current curriculum, assessment system and qualification pathways, are there any barriers to improving attainment, progress, access or participation (class ceilings) for learners experiencing socioeconomic disadvantage?

53. There is very clear evidence that learners from socio-economically disadvantaged backgrounds face multiple barriers in their education. The disadvantage gap at both KS2 and KS4 has grown since the pandemic, as the panel will be aware. The gains made over the last fifteen years since the introduction of the pupil premium have, devastatingly, been lost.

54. Nationally, the disadvantage gap begins when children enter school and widens, rather than narrows, as pupils progress through the curriculum and assessment system. Addressing this must be at the heart of the Review's recommendations.
55. Disadvantaged students are disproportionately represented in the 'forgotten third' of students who don't achieve a Grade 4 in English and maths at GCSE. This is in part because our assessment system requires a high degree of cultural capital and favours a particular approach to assessment and testing.
56. That being said, there is some evidence to suggest that exams are the fairest way to assess pupils. In 2020 and 2021, when centre/teacher-assessed grades were used, the disadvantage gap widened further. However, this must be seen within the context of the pandemic, when we know that the loss of learning was not equal across the country. There has been no large-scale research in England to assess the reliability and fairness of teacher assessment compared with exams. We welcome the government exploring options to diversify the range of assessments, but also suggest that caution is needed here.
57. There is no systematic tracking of student participation in extra-curricular activities, although many schools, colleges and trusts record this themselves. We therefore have no national data on disadvantaged learners' participation in the broader curriculum. The Review may want to consider a suggestion for tracking engagement over time, while being mindful of the implications for workload.
58. The current qualification pathways advantage students who achieve highly at each key stage, which – as above – has a significant impact on disadvantaged students. There is less choice and fewer progression routes for students who don't achieve a Grade 4+ in English and maths at GCSE.
59. Disadvantaged pupils are less able to access extra-curricular activities, clubs and trips. Because of the shortfall in core schools funding, the pupil premium has had to be used in some schools to support core teaching. We would like to see the Review recommend dedicated funding from HM Treasury, in addition to the pupil premium, to support access to extra-curricular opportunities for disadvantaged learners. This would help to narrow the disadvantage gap, as it would enable schools and colleges to provide more opportunities for disadvantaged young people.
60. Any recommendations or responses from the Review should include a full impact analysis. ASCL is frustrated that socio-economic disadvantage is not a protected characteristic. We recognise that it is not in the scope of this Review to address this issue, but we would like to see it recommend that socio-economic disadvantage be enshrined as a protected characteristic through legislation.

Question 13: In the current curriculum, assessment system and qualification pathways are there any barriers to improving attainment, progress, access or participation which may disproportionately impact pupils based on other protected characteristics (e.g. gender, ethnicity)?

61. The current national curriculum is not inclusive or representative of many young people. While a lack of representation in itself does not necessarily present a barrier, it can lead to disengagement and therefore impact on attainment.
62. In particular, ethnicity and sexual orientation are under-represented in the national curriculum. This could be addressed through non-statutory exemplification of how to implement the curriculum, rather than in the statutory national curriculum itself.

63. Qualification entry data shows that girls are less likely to enter certain subjects than boys, particularly in science, technology and maths. The Review should recommend a funded programme to encourage more girls into STEM subjects and to promote their access to STEM clubs and other initiatives.
64. Conversely, subject entry data suggests that boys are less likely to enter arts and creative subjects than girls. In the same way, the Review should recommend a funded programme to encourage more boys into creative subjects, and support schools and colleges to deliver this.
65. While schools and colleges have important flexibility in terms of the content they choose to teach, the current national curriculum prioritises a somewhat monocultural worldview, especially with regards to literature and history. The Review will need to balance the need to give all young people equal access to cultural capital with the importance of a representative and inclusive curriculum.

Question 14: In the current curriculum, assessment system and qualification pathways, are there any barriers in continuing to improve attainment, progress, access or participation for learners with SEND?

66. The current curriculum, national assessments and qualification routes are very far from being fit for purpose for all learners with SEND. It is impossible to make general observations about learners' needs, as these are highly individualised and complex. However, learners with SEND are over-represented in the groups of pupils who don't meet the expected standard at the end of primary school, and who don't achieve a Grade 4 in English and maths at GCSE.
67. The focus must be on accessibility to a common core curriculum offer. Accountability measures have created perverse incentives for schools and colleges not to prioritise learners with additional needs, or to consider how they access the curriculum. This should be the starting point for any reform, rather than an afterthought, which has too often been the case.
68. The forms of assessment currently favoured do not support all learners with SEND to demonstrate what they know and can do. The focus on exam-based terminal exams is a barrier to some learners' ability to progress. As set out above, ASCL is cautious in recommending major changes to the qualification landscape, but the current system is too damaging for too many young people to remain completely unreformed. Introducing greater flexibility in how pupils are assessed, for example by allowing a number of papers to be taken after the first year of study during a qualification rather than at the end of a multi-year course, would go some way to addressing this.
69. ASCL members report that alternative and applied qualifications are often used successfully with learners with SEND (as well as for many other students). We are deeply concerned about the plans put forward by the previous government, and now under consideration by the current government, to defund many of these courses. We urge the government in the strongest possible terms to keep applied general qualifications as part of the qualification landscape. Getting rid of applied qualifications would have a disproportionate negative impact on learners with SEND.
70. Too few learners with SEND achieve a Grade 4 in English and maths. Currently, sixth forms and colleges are able to offer these learners alternative level 1 or level 2 qualifications as part of their post-16 study programme. However, the current policy to reduce the condition of funding tolerance for resitting students from 5% to 0% by

September 2026 will severely impact the ability of sixth forms and colleges to do this. This will result in more learners being entered for qualifications which aren't right for them, leading to a demoralising and humiliating cycle of resits and failure.

71. The current accountability measures create perverse incentives to enter students for qualifications which aren't always appropriate for their needs. In particular, the Ebacc measure prioritises a narrow, albeit important, set of subjects. No national performance measures take into account the context of the school, other than prior attainment. This means that schools and colleges which serve a high number of learners with SEND are disadvantaged.

Question 15: In the current curriculum, assessment system and qualification pathways, are there any enablers that support attainment, progress, access or participation for the groups listed above?

72. As above, funding schools and colleges to provide a range of qualifications, both at secondary and post-16, is positive and means that learners in the groups listed above can follow pathways which best meet their needs. This flexibility is an important part of the qualification landscape, which we worry is becoming narrower over time.
73. High-quality online provision is also crucial for many pupils in challenging circumstances, such as learners with long-term health conditions, those recovering from medical procedures, or school refusers. Together with Academy 21, the first online school to be accredited by the DfE, we have made the case that attendance at online schools should not be coded as absence, which is currently the case. We are clear that the ultimate aim is for all learners to be learning in school or college, but online provision is an important stepping stone for many pupils to achieving this. This should be acknowledged in how it is reported.
74. The previous government was clear that we should not have lower expectations for some groups of pupils, especially those from more disadvantaged backgrounds – a view which we and our members strongly endorse. In this sense, the national curriculum represents an ambition for all young people. This should not change. Instead, the focus needs to be on how we support and enable all schools and colleges to meet that ambition for all learners, through access and engagement in the curriculum.

Section 4 – Ensuring an excellent foundation in maths and English

Question 16: To what extent does the content of the national curriculum at primary level (key stages 1 and 2) enable pupils to gain an excellent foundation in a) English and b) maths? Are there ways in which the content could change to better support this aim?

75. ASCL's view is that the content of the current national curriculum in English and maths in primary is largely fit for purpose, and that the expected standards in these subjects are appropriately ambitious. We do, however, have concerns about some elements of the curriculum (particularly in spelling, punctuation and grammar), and the way in which the curriculum is assessed, and primary schools are held to account – see below.
76. The introduction of phonics in the key stage 1 curriculum has, we believe, had a positive impact on children's early reading. This focus should be retained.
77. National hubs have played an important role in disseminating good practice. This model should be built on when the RISE teams are set up in early 2025. It is appropriate for all primary schools to have the continual improvement of early English and maths as a

priority, and to have access to high-quality support and the ability to work collaboratively with other schools and trusts.

Question 17: To what extent do the English and maths primary assessments support pupils to gain an excellent foundation in these key subjects? Are there any changes you would suggest that would support this aim?

78. Despite new evidence from the Education Policy Institute (2024) questioning the effect that the phonics screening check has had on reading at a national level, it is the view of ASCL's primary members that this check has been an important mechanism to improve reading in their schools. We therefore recommend the continuation of the check, but think the Review offers an opportunity to consider how it could be made more effective.
79. The DfE's ambition to have 90% of pupils leave primary school meeting the expected standard in reading, writing and maths is rightly ambitious, and should not be lowered following this Review. However, it is important that this remains a government ambition, for which the government holds itself to account, rather than an individual school or trust performance metric.
80. We are, however, a long way from achieving that ambition. Over a third of children did not meet the combined expected standards in reading, writing and maths in 2024. The reasons for this are complex, but more needs to be done to support schools in achieving this national ambition.
81. The burden of assessment on children at the end of primary school is too great. We recommend a further consultation on the content and size of KS2 assessments. The current system creates too much anxiety and stress for children, when it is largely used for accountability purposes. The reduction of assessment at KS2 is a key ASCL recommendation.

Question 18: To what extent does the content of the a) English and b) maths national curriculum at secondary level (key stages 3 and 4) equip pupils with the knowledge and skills they need for life and further study? Are there ways in which the content could change to better support this aim?

and

Question 19: To what extent do the current maths and English qualifications at a) pre-16 and b) 16-19 support pupils and learners to gain, and adequately demonstrate that they have achieved, the skills and knowledge they need? Are there any changes you would suggest that would support these outcomes?

82. The KS3 curriculum in English and maths is largely fit for purpose. Any changes to the subject content should be recommended through specific consultations, which this Review might propose are initiated.
83. Speaking and listening (oracy) is not prioritised in the curriculum or in GCSE assessment. The fact that speaking and listening is teacher-assessed, but does not count towards students' grades at GCSE, means that many students don't value these skills. In modern foreign languages, speaking and listening counts for 25% of a student's grade, which is regulated by Ofqual. We therefore can't see a logical reason for the same approach not being taken to oracy in English.
84. The English language GCSE is not fit for purpose. It is a poor proxy for being literate at the end of secondary school. It is not a qualification that is true to the discipline of

linguistics, nor the study of the English language, nor an accurate assessment of learners' literacy. Our view is that the English language GCSE needs urgent reform.

85. Recent qualification reforms have seen a move away from a focus on functional literacy and numeracy. ASCL members report that this has resulted in some learners becoming disenfranchised and disengaged in secondary English and maths. This in turn has an impact on the choices they make about 16-18 qualifications.
86. ASCL has, for some time, recommended the development of a new assessment in literacy and numeracy, distinct from the disciplinary GCSEs of English language, English literature and maths. This should represent a new gold-standard of literacy and numeracy, which a majority of learners should be able to achieve by the end of the secondary phase.
87. We are not blind to the challenges in developing such a qualification, especially as GCSE English and maths have such strong brand recognition with educators, employers and parents. However, we think that the development of such an assessment, which may or may not be accessed digitally, must be a core recommendation of the Review.
88. We are clear that any such assessment should be universal, and not something that is only taken by learners who don't achieve, or are unlikely to achieve, a Grade 4 at GCSE. If we continue with the ambition for 90% of learners leaving primary school to meet the expected national standard, there is no reason not to expect the same of secondary school leavers. ASCL is agnostic as to whether this new assessment should be delivered through a choice of awarding organisations or through a single STA assessment; this should be open to consultation.

Question 20: How can we better support learners who do not achieve level 2 in English and maths by 16 to learn what they need to thrive as citizens in work and life? In particular, do we have the right qualifications at level 2 for these 16-19 learners (including the maths and English study requirement)?

89. The current policy of resits is demotivating, humiliating and needs urgent reform.
90. The condition of funding requirement means that students who haven't achieved a Grade 4 or higher in English and maths are obliged to resit the same qualification until they do.
91. In technical terms, Grades 1 – 3 at GCSE are a pass, but in political terms only Grade 4 is deemed a 'standard pass'. ASCL deeply objects to this language, and the impact on the condition of funding as a result.
92. As above, we would like to see a new universal assessment of literacy and numeracy, which is distinct from GCSE English and maths. This would typically be taken during, or at the end of, KS4, but for learners who haven't achieved it by this point, could be taken later.
93. We do not think that a new assessment or qualification should be developed specifically for learners who don't achieve a Grade 4 in year 11. We think this would create a two-tier system, which would render the new assessment of less value than a GCSE. This is why we think it is important that the new assessment is universal for all learners.
94. However, we are warm to the idea of a credit-accumulation style qualification, which would allow learners to gain a level 2 qualification in English and maths. We think this

would work particularly well for resitting students, if a new assessment is not developed. This would mean that learners could accumulate marks over time, rather than needing to sit the entire GCSE at once, which would allow more students who have struggled previously to achieve a recognised and respected qualification.

95. We strongly urge the Review panel to recommend a discrete consultation on a new English and maths (or, preferably, literacy and numeracy) assessment.

Question 21: Are there any particular challenges with regard to the English and maths a) curricula and b) assessment for learners in need of additional support (e.g. learners with SEND, socioeconomic disadvantage, English as an additional language (EAL))? Are there any changes you would suggest to overcome these challenges?

96. Both disadvantaged learners and those with SEND are over-represented in the percentage of pupils who don't achieve the expected standards by the end of primary school, and the 'forgotten third' who don't achieve a Grade 4 in English and maths at GCSE. We have set out our views on this earlier in our response.
97. There was a more than 12% increase in approved access arrangements for GCSEs and A levels between 2023 and 2024. Around a fifth of students nationally received 25% extra time in their exams. We think this demonstrates that the assessment system is not working adequately for many learners, especially those in the groups identified above.
98. As above, any reform to the English and maths curricula or assessments should have accessibility, inclusion and the needs of SEND and disadvantaged learners at its core, and as a guiding principle.

Section 5: Curriculum and qualification content

Question 22: Are there particular curriculum or qualifications subjects where: a. there is too much content; not enough content, or content is missing; b. the content is out-of-date; c. the content is unhelpfully sequenced (for example to support good curriculum design or pedagogy); 10 d. there is a need for greater flexibility (for example to provide the space for teachers to develop and adapt content)? Please provide detail on specific key stages where appropriate.

99. As a leadership union and professional association, ASCL does not comment specifically on subject content.
100. However, from a leadership perspective, our members report concern about the size of the content in the national curriculum and the GCSE specifications for maths, history and the sciences in particular.
101. We think that the government should be explicit about how much of an average school timetable the national curriculum is expected to take up, and how much time should be developed locally and contextually. This would help schools and colleges benchmark their curricula, without holding them accountable in a punitive way.
102. We think that climate education and sustainability is lacking in the curriculum. We do not think this should be included as a subject in its own right, but it must have a more prominent place in other areas of the curriculum, such as science and geography, at every key stage.
103. Likewise, oracy is under-represented in the curriculum. Similarly, we don't think oracy should be taught as a discrete discipline, but rather woven throughout the curriculum.

This could be done through separate, non-statutory exemplification of how the curriculum could be taught, as outlined in our general points.

104. The sequencing of the national curriculum at each key stage could be presented better. For example, if there is content specified which requires firm prior knowledge to access, this should be made explicit. Optional assessments, which aren't used for accountability, should be made available to schools and colleges to help them assess whether pupils have the required knowledge to progress through the curriculum. This would help address gaps in knowledge and skills, and encourage a paradigm shift about how to approach teaching the national curriculum within schools and colleges.

Question 23: Are there particular changes that could be made to ensure the curriculum (including qualification content) is more diverse and representative of society?

105. The history and English curricula are seen as largely monocultural. We would welcome a recommendation to diversify the curriculum content of these subjects.
106. Again, more can be done to exemplify the way in which schools can deliver curriculum content through a more diverse lens, without needing to specify it through the statutory curriculum itself.
107. As mentioned above, we think sustainability is not well represented in the curriculum. This should be addressed in order to better reflect the needs and interests of both pupils and society more widely.

Question 24: To what extent does the current curriculum (including qualification content) support students to positively engage with, be knowledgeable about and respect others? Are there elements that could be improved?

108. The current national curriculum and qualification specifications do not represent a broad spectrum of society, especially ethnic minority groups, LGBT+ communities and individuals with disabilities.
109. There is a lack of time in the curriculum for PSHE, which is also often taught by non-specialists at both primary and secondary level. The Review should consider how PSHE and SRE education can be strengthened at each key stage, with a focus on respect for others.
110. The lack of digital literacy in the national curriculum means that young people are increasingly vulnerable to misinformation and fake news online, which can undermine efforts to engage with different people and different viewpoints. As part of our proposal for a new assessment of literacy (set out in our response to Section 4) we would like to see digital literacy, including assessing the veracity of an online article or post, form part of this specification.
111. Knowledge about and respect for others should not be a learning outcome in its own right, but should be woven through the disciplinary curriculum. Again, this comes down to how the new national curriculum is presented, and how inter-disciplinary skills are included in a meaningful way, alongside the exemplification of how content could be taught to foster these skills.

Question 25: In which ways does the current primary curriculum support pupils to have the skills and knowledge they need for life and further study and what could we change to better support this?

and

Question 26: In which ways do the current secondary curriculum and qualification pathways support pupils to have the skills and knowledge they need for future study, life and work and what could we change to better support this?

and

Question 27: In which ways do the current qualification pathways and content at 16-19 support pupils to have the skills and knowledge they need for future study, life and work and what could we change to better support this?

112. As set out in our answers to previous questions, there is little room in the curriculum to explicitly teach life skills, including (but not limited to) financial literacy, sustainability, first aid, research skills and oracy.
113. These skills should be embedded within the disciplinary curriculum. We would not welcome an approach that either attempted to teach these skills discretely or attempted to assess them, at either primary or secondary. Instead, the quality of education, including preparation for life, should be quality-assured against a revised national curriculum through inspection.
114. Allowing time in the curriculum for learners to work on 'real world problems' would be welcome. The current curriculum is often too full of content to allow time for learners to apply their learning in any meaningful way.
115. Vocational and technical qualifications are too based around written exams, which bear little resemblance to the vocation or technical skill being assessed. For example, in the computing science curriculum, coding is assessed through a pen-and-paper exam, rather than the genuine application of coding in real life. A key principle of the Review's recommendations should be that assessment is as valid and close to the discipline as possible, while still maintaining fairness, equity and accessibility.

Section 6: A broad and balanced curriculum

Question 28: To what extent does the current primary curriculum support pupils to study a broad and balanced curriculum? Should anything change to better support this?

116. The excessive burden of the KS2 national assessments means that many schools feel pressured to prioritise English and maths throughout this key stage. Reducing the content of end of KS2 assessments and addressing the high-stakes nature of these tests for schools would be a positive reform.
117. Requiring all state-funded schools to follow a slimmed down national curriculum will ensure a common entitlement for all pupils. Being clear about the amount of time that the national curriculum should usually constitute in a school timetable should support schools to offer a broad and balanced curriculum.
118. More support is needed for primary teacher development in non-core subjects. The primary ITT curriculum is already very full, and so greater investment is needed in the continual training of teachers in these subjects. This should form part of the RISE teams' local priorities for development.

Question 29: To what extent do the current secondary curriculum and qualifications pathways support pupils to study a broad and balanced curriculum? Should anything change to better support this?

119. Secondary performance measures have had a negative impact on the breadth of the curriculum. In particular, a focus on the Ebacc subjects has been to the detriment of other subjects, especially the creative arts and technology.
120. There is little opportunity to study technical, vocational and applied subjects in the secondary curriculum, which impacts students' learning and the qualification choices they make post-16. All schools should be required to provide, and recognised for providing, a vocational, technical and arts curriculum offer.
121. A lack of funding and the closure of community groups has undermined school and college attempts to create a rich extra-curricular offer. The Review should recommend the introduction of dedicated funding for schools and colleges from HM Treasury, focused on increasing engagement with and participation in arts, sports and other extra-curricular activities.

Question 30: To what extent do the current qualifications pathways at 16-19 support learners to study a broad curriculum which gives them the right knowledge and skills to progress? Should anything change to better support this?

122. Curriculum choice has been narrowed in recent years at 16-19. We are particularly concerned about the potential imminent defunding of applied general qualifications.
123. The narrowing of the curriculum at KS4 as a result of the Ebacc has had a knock-on effect on 16-19, as students have less access to a diverse range of subjects earlier in their educational experience.
124. The new requirement for students resitting English and maths GCSE to receive three and four hours a week of in-person teaching respectively in these subjects is damaging to the breadth of the curriculum. Previously, many schools and colleges used high-quality online provision or additional tutoring to meet this condition of funding, which they are no longer able to do. We would like to see the Review recommend a reversal of this policy.
125. There is little time for personal development in the 16-18 programme of study. The previous government's inclusion of dedicated personal development time in its proposed Advanced British Standard was welcome. In particular, we think that financial literacy and research skills are gaps in many sixth formers' knowledge and development.
126. The careers information, advice and guidance landscape has been dismantled over the last fifteen years. This means that CIAG is unequal across the country. CIAG in schools and colleges needs strengthening and properly resourcing, alongside a robust landscape and partners to support this.

Question 31: To what extent do the current curriculum (at primary and secondary) and qualifications pathways (at secondary and 16-19) ensure that pupils and learners are able to develop creative skills and have access to creative subjects?

127. As above, creative skills and subjects have been sidelined due to the burdens of the KS2 assessment at primary and the Ebacc at secondary. Please see our responses to

questions 28 and 44 for more evidence of this, and for our recommended policy reforms.

Question 32: Do you have any explanations for the trends outlined in the analysis and/or suggestions to address any that might be of concern?

128. As above – the accountability system has had a significant and negative impact on the breadth of the school curriculum and qualification entries.

Question 33: To what extent and how do pupils benefit from being able to take vocational or applied qualifications in secondary schools alongside more academically focused GCSEs?

and

Question 34: To what extent does the current pre-16 vocational offer equip pupils with the necessary knowledge and skills and prepare them for further study options, including 16-19 technical pathways and/or A levels? Could the pre-16 vocational offer be improved?

129. Not all secondary schools are able to offer vocational and applied qualifications due to a lack of funding, lack of expert teachers, or lack of specialist resources – or a combination of these reasons.

130. The current accountability arrangements do not incentivise schools to offer a broad range of vocational and applied level 2 qualifications.

131. Pupils who are able to take these qualifications benefit from the ability to broaden their skills and understanding, by applying their learning in real world contexts. This sets them up to thrive in a broader range of qualifications post-16.

132. UCAS entry data shows that a high proportion of disadvantaged students who achieve a place at university undertook at least one applied qualification during their time at school or college, showing the importance of these qualifications in promoting social justice.

133. Better pathways pre-16 are needed across the system to give more learners access to these valuable qualifications, and therefore future progression routes. The accountability system must incentivise and support schools to offer these.

Section 7: Assessment and accountability

Question 35: Is the volume of statutory assessment at key stages 1 and 2 right for the purposes set out above?

and

Question 36: Are there any changes that could be made to improve efficacy without having a negative impact on pupils' learning or the wider education system?

and

Question 3: Are there other changes to the statutory assessment system at key stages 1 and 2 that could be made to improve pupils' experience of assessment,

without having a negative impact on either pupils' learning or the wider education system?

and

Question 38: What can we do to ensure the assessment system at key stages 1 and 2 works well for all learners, including learners in need of additional support in their education (for example SEND, disadvantage, EAL)?

134. The volume of assessment, particularly at KS2, is too high for the purposes set out.
135. This narrows the curriculum and creates significant anxiety for children, parents and teachers.
136. Given the results of the KS2 assessments have little meaning for individual children, the balance here is wrong. If children don't meet the expected standards, they are labelled a failure at the end of primary school, which can result in a cycle of underperformance into secondary education.
137. There are elements of the KS2 assessments which are unrealistic to expect all pupils to understand, or which don't focus on the most important knowledge, skills and understanding children need to develop in order to succeed at secondary school and beyond.
138. For example, the reading paper often requires a high level of cultural capital, alongside the skills of decoding and comprehension. This disadvantages pupils from low-income backgrounds, and the schools that serve them.
139. There are also issues with the grammar, punctuation and spelling test and the writing assessment framework. School leaders and teachers (in both the primary and secondary phases) place a high value on the importance of grammar, but many are unconvinced that 11-year-olds require the detailed, technical grammatical knowledge needed to succeed in these national assessments. ASCL does not believe that assessing grammar in an isolated, decontextualised manner is the best way to judge a child's aptitude in this area.
140. The assessment system advantages learners who respond well to memorisation and terminal exams. To support learners with SEND and EAL, more should be done to build on the high-quality practitioner assessment that is a feature of the EYFS. This would ensure that all learners' abilities are recognised.

Question 39: Is the volume of assessment required for GCSEs right for the purposes set out above? Are there any changes that could be made without having a negative impact on either pupils' learning or the wider education system?

and

Question 40: What more can we do to ensure that: a) the assessment requirements for GCSEs capture and support the development of knowledge and skills of every young person; and b) young people's wellbeing is effectively considered when assessments are developed, giving pupils the best chance to show what they can do to support their progression?

and

Question 41: Are there particular GCSE subjects where changes could be made to the qualification content and/or assessment that would be beneficial for pupils' learning?

141. The volume of assessment at GCSE is far too high. Students sit an average of 31.5 hours of exams, usually over a three- or four-week period. This puts England at odds with almost all other similar jurisdictions.
142. In GCSE maths, it is possible to predict with 99.7% accuracy the overall grade a student will achieve, based solely on their first paper (see 'Striking the Balance', Cambridge University Press and Assessment, 2024), and yet we require them to sit a further two papers. This level of assessment is therefore clearly unnecessarily high. The same level of content can be assessed on a random basis, without the need for the 4.5 hours of maths exams students are currently required to sit.
143. As set out in Section 4, we strongly recommend the development of a new literacy and numeracy assessment at KS4, which we would expect a majority of students to achieve.
144. Exam-based terminal exams do not work equally well for all young people. Allowing pupils to take papers at the end of each year of a multi-year study programme, while applying a first-entry rule for accountability purposes, would reduce the burden of terminal exams in Year 11.
145. The claim that exams are the fairest way of assessing pupils needs to be clearly evidenced in any future reforms to the exams system.

Question 42: Are there ways in which we could support improvement in pupil progress and outcomes at key stage 3?

146. The DfE should better promote the Question Level Analysis tool as a mechanism for secondary schools to identify gaps in pupils' knowledge from primary.
147. When the mandatory national curriculum becomes a core entitlement for all young people, the outcomes, breadth and depth of the KS3 curriculum should be made clear.
148. There is an appetite for freely available, optional KS3 assessments, which would allow schools to benchmark their pupils in a meaningful way. However, these must not be used either to sort students for GCSE classes, or for school accountability purposes, but rather be ringfenced as a formative tool.

Question 43: Are there ways in which we could support pupils who do not meet the expected standard at key stage 2?

149. Many KS3 teachers do not engage in depth with the content earlier in the national curriculum. As above, the curriculum could be presented in such a way that flags the required knowledge before a pupil can move on. This would help close gaps in knowledge.
150. The use of the Question Level Analysis tool should be promoted, especially for any pupils who have not met expected standards.

Question 44: To what extent, and in what ways, does the accountability system influence curriculum and assessment decisions in schools and colleges?

and

Question 45: How well does the current accountability system support and recognise progress for all pupils and learners? What works well and what could be improved?

and

Question 46: Should there be any changes to the current accountability system in order to better support progress and incentivise inclusion for young people with SEND and/or from socioeconomically disadvantaged backgrounds? If so, what should those changes be?

151. Schools and colleges are significantly influenced by the accountability system, which has a direct impact on the curriculum.
152. In some ways Ofsted has had a positive impact on curriculum thinking in schools and colleges in recent years, due to its focus on the quality of education. However, KS2 and KS4 performance metrics have had a negative impact on the breadth of the curriculum, especially with regards to the arts and vocational and technical subjects.
153. Particularly for small schools, the national ambition of 90% of students taking a full complement of Ebacc subjects has a significant effect on the other options that schools can offer.
154. We strongly recommend the removal of the Ebacc entry and APS performance measures.
155. In order to incentive the take-up of arts and creative subjects, we would support an additional 'bucket' in Attainment 8 and Progress 8 calculations to include these subjects. A8 and P8 are average scores, so still allow schools and colleges flexibility and autonomy to design qualification routes that are right for young people.
156. The policies on the condition of funding for learners who haven't achieved a Grade 4 in English and maths should be reversed. The specified number of hours and reduction of the tolerance will have a significant impact on disadvantaged learners and learners with SEND.
157. We think that schools and colleges should be held accountable against a clear set of standards, in this case documented in the national curriculum. Additional curriculum expectations must not be placed on schools through a separate Ofsted framework or handbook.

Section 8: Qualification pathways 16-19

Question 47: To what extent does the range of programmes and qualifications on offer at each level meet the needs and aspirations of learners?

and

Question 48: Are there particular changes that could be made to the programmes and qualifications and/or their assessment that would be beneficial to learners?

158. ASCL members report that the current range of qualifications available for students at this stage is fit for purpose.

159. We are deeply concerned about the potential defunding of applied general qualifications. These have an essential role in the 16-19 landscape.
160. As a leadership organisation, we do not comment specifically on content within qualifications. However, we support the possibility of students being able to sit some or all of their qualification at the end of their first year of a multi-year study programme. Whether this is the reintroduction of the AS level coupled to the A level or a different form of modularity should be consulted on urgently.
161. As set out earlier, we support the development of a new universal qualification in literacy and numeracy for all learners.

Question 49: How can we improve learners' understanding of how the different programmes and qualifications on offer will prepare them for university, employment (including apprenticeships) and/or further technical study?

162. As above, the CIAG landscape has been reduced over the last fifteen years. It is only by reinvesting in this support that learners will have genuine and impartial advice on their next steps.

Question 50: To what extent is there enough scope and flexibility in the system to support learners who may need to change course?

163. We remain concerned that if applied general qualifications are defunded then the vast majority of students will have no choice but to set out on a route of either three academic A levels or a single T level. These routes are appropriate for many students, but by no means all. Applied general qualifications provide flexibility and allow students to move to more academic qualifications or more vocational opportunities, depending on their need. It is essential that they are retained.

Question 51: Are there additional skills, subjects, or experiences that all learners should develop or study during 16-19 education, regardless of their chosen programmes and qualifications, to support them to be prepared for life and work?

164. As we said in our response to the previous government's plans for an Advanced British Standard qualification, we support greater depth in the 16-19 stage. In particular, we think that all young people should be entitled to:
- a broader range than three subjects
 - personal development opportunities
 - high-quality CIAG
 - the development of research skills

Section 9 – Other issues

Question 52: How can the curriculum, assessment and wraparound support better enable transitions between key stages to ensure continuous learning and support attainment?

165. We would strongly encourage the Review to recommend the DfE looks closely at the alignment between the primary and secondary national curricula, and adjusts them as necessary. In particular, we would like to see careful consideration of content which is currently taught and assessed at primary but rarely, if ever, returned to at secondary (including some aspects of spelling, punctuation and grammar).

166. Conversely, we would also recommend an analysis of where content may be duplicated across KS2 and KS3. Ofsted's 2015 report on the 'wasted years' was provocative, but raised some important points about the extent to which students can become demotivated at KS3, partly as a result of the lack of alignment between their learning and experience at primary and secondary.
167. As set out previously, we think that the presentation of the national curriculum could include flagging requisite knowledge required to learn new knowledge or skills; this could be highlighted in a more meaningful way.
168. The development of non-statutory, optional assessments could aid transition between key stages.
169. Teacher development and CPD should include explicit teaching of what learners should be expected to know as they enter each key stage, and ways to assess this.

Question 53: How could technology be used to improve how we deliver the curriculum, assessment and qualifications in England?

170. The use of adaptive technology should play a pivotal role in future assessment reform. We must, however, ensure that students are not disadvantaged by a lack of devices.
171. Online teaching plays an important role in the provision for some vulnerable learners, although ASCL is clear that technology can never replace face-to-face teachers.
172. The regulation of online exams is challenging, but this is not a reason not to explore it. We welcome awarding organisations' suggestions as to how online or digital assessment may work in the future.

D. Conclusion

173. We thank the panel for undertaking this important work, and are pleased to contribute to this initial call for evidence. ASCL is happy to provide additional evidence as the Review continues, including the convening of groups school and college leaders if helpful.

*Tom Middlehurst, Curriculum, Assessment and Inspection Specialist
Association of School and College Leaders
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