

Key stage 4 performance measures and targeted RISE extension

Consultation response from the National Governance Association, 30 April 2026

Introduction

The National Governance Association (NGA) is the sector body for school and trust governance in England, representing the interests of school governors, trustees and governance professionals across all types of schools and school structures. As the membership organisation for school governance, we support and champion good governance.

Our longstanding position has been for school and trust effectiveness to be judged on both attainment and contextually sensitive measures to ensure the organisation's impact can be properly assessed. It is well evidenced that KS4 attainment outcomes are strongly correlated with pupils' prior primary school attainment and socioeconomic status, which means that an emphasis on raw scores often results in the sector passing judgements on a school's pupil intake, and not their contribution to teaching and learning. For this reason, NGA is pleased to see the ambition of the proposed new progress measure, but we remain wary of attainment scores informing external intervention by RISE teams.

Developing well-rounded citizens will always be a priority for our schools and trusts, hence our calls for a broad and balanced curriculum that restores the value of arts. Approaches of this kind are essential for pupil wellbeing and self-expression and can prevent stress or burnout often associated with purely academic, exam-heavy timetables.

NGA continues to participate in ongoing discussions around the suitability of the current examination system. The continued disparity and outperformance of girls compared to boys as well as the well-documented struggles of certain disadvantaged groups remain a cause for concern. The examination system should give all pupils the opportunity to maximise their potential. For example, an excessive focus on memory recall is unnecessary in the modern age and could be replaced by a greater emphasis on applying knowledge. Pupils need to be given the best possible opportunity for a successful life after school and the qualification system must therefore offer both high-quality vocational and academic qualifications.

Improving Progress 8 and Attainment 8 measures

Question 11. How far do you agree that these changes to the Progress 8 model strike a better balance between breadth and flexibility compared with the current P8?

Please explain your views, limiting your response to 3000 characters or less.

NGA has long advocated for a broad and balanced curriculum that provides pupils with the best opportunity for a successful life after school. We support the move away from a more restrictive model that prioritised a narrow set of subjects, as our research shows these measures have unnecessarily constrained student choice and hampered progress in subjects that strengthen our economy and society, such as the arts. While we recognise the importance of an academic core, a system that encourages ambition without narrowing choice is essential for today's children.

Our support for this better balance is based on several key principles identified through our engagement with governing boards:

- Restoring parity of esteem: In recent research, 30% of governor and trustee respondents identified a greater focus on non-core subjects as a top priority for curriculum improvement. By refreshing the Progress 8 model to reward breadth and choice, the government helps restore "parity of esteem" between academic, creative and vocational pathways.
- Supporting wellbeing and engagement: Participation in creative subjects like music and art is linked to improved self-expression and greater pupil wellbeing. Moving away from a high-stakes focus on a limited range of subjects allows schools to offer a curriculum that is rich and broad, inclusive and innovative, which is critical for maintaining student engagement.
- Empowering strategic governance: An intelligent form of accountability should measure what the sector truly values rather than simply what can be measured easily. This revised model empowers governing boards to make contextually sensitive curriculum decisions that serve their specific local communities rather than merely chase external targets.
- Inclusion for all learners: The previous narrow focus often excluded groups of pupils - particularly those from disadvantaged backgrounds or with SEND who would benefit from more practical, hands-on learning. A more flexible model supports a personalised pathway that can increase motivation and achievement for all.

Question 12. What are your views on the inclusion of a fourth category (science) for breadth slots 5 and 6?

Unsure

Please explain your views, limiting your response to 3000 characters or less.

While NGA recognises the importance of science and STEM subjects in a modern curriculum and society, we have concerns that adding a fourth category for science in the breadth slots could inadvertently undermine the goal of restoring 'parity of esteem' for creative and performance-based subjects. Our research indicates that creative arts are already frequently pushed aside in a culture focused on high-stakes attainment data.

A primary driver for these reforms should be to ensure that subjects like music, art and drama - which 30% of respondents in our survey identified as a top priority for curriculum improvement - have a guaranteed place in a student's education. We worry that if science subjects are included in the breadth slots alongside humanities, languages and the arts, the incentive to maintain a truly broad and balanced curriculum may be weakened, particularly if schools prioritise specialism in science over engagement with the arts. Furthermore, our 2024 Annual Governance Survey data shows that 53% of secondary school governors already struggle with a lack of qualified teachers

in science and computing; adding further pressure to these subjects within the breadth slots could exacerbate these recruitment challenges while further depleting the arts.

Question 13. Do you agree that Progress 8 should allow technical awards in the breadth and choice slots, with a maximum of two across all slots?

Strongly agree

Please explain your views, limiting your response to 3000 characters or less.

NGA maintains as a core position that to provide pupils with the best possible opportunity for a successful life after school, the qualification system must offer both high-quality vocational and academic qualifications. We strongly support the inclusion of technical awards in these slots as a vital step toward recognising the value of vocational routes alongside academic ones.

Our research highlights that the previous narrow academic focus excluded groups of pupils who benefit from more practical, hands-on learning, particularly those from disadvantaged backgrounds, those with SEND, or those at risk of disengagement.

Allowing technical awards formally recognises achievement across a more inclusive and personalised pathway, which can increase motivation and achievement for pupils who may not thrive in a purely academic setting. We believe that providing a mix of assessment modalities – moving away from a system purely based on memory recall toward the application of knowledge – is essential to help all pupils maximise their potential.

Question 14. Do you have any comments on the minor methodological adjustment?

If yes, please provide your views, limiting your response to 3000 characters or less.

We support adjustments that improve data transparency. Governing boards must have access to high-quality and comparative performance data to fulfil their accountability role. If ranking schools by percentiles provides a more useful spread of bandings and makes the data easier for boards and parents to interpret compared to complex confidence intervals, it is a positive step toward intelligent accountability

Question 15. Do you have any other comments on the proposed changes?

If yes, please provide your views, limiting your response to 3000 characters or less.

While we agree with most of the structural balance of the new model, we urge the Department to ensure these changes are supported by sufficient funding and a strategy to address staffing difficulties. Our 2024 Annual Governance Survey data shows that 59% of boards have had to reduce subject offerings due to budget constraints, and many face critical challenges in recruiting qualified teachers for non-core subjects.

Wider academic performance measures

Question 16. What are your views on introducing a ‘best-fit’ progress measure for pupils with low prior attainment?

Please give your views, limiting your response to 3000 characters or less.

Findings from a recent NGA survey of 1,300 respondents indicate a broadly balanced perspective on this proposal. While 46% agreed that such a measure could support more effective oversight of pupils facing greater barriers to learning, an equal proportion neither agreed nor disagreed, and 10% disagreed.

Overall, governors and trustees are supportive of the principle behind introducing a new progress measure. There is strong recognition of the need to ensure that all pupils, particularly those with low prior attainment who may not be fully represented in existing national data, are visible within accountability frameworks. Respondents emphasised the importance of recognising and valuing the progress of every pupil, regardless of their starting point. A shift towards measuring progress, rather than attainment alone, is widely seen as a fairer reflection of a school's impact, particularly for pupils with SEND or those affected by socioeconomic disadvantage.

However, several important concerns were consistently raised regarding implementation:

- **From measurement to meaningful support:** respondents highlighted that improved monitoring alone will not lead to better outcomes. Any new metric must be accompanied by sufficient resources, including funding, specialist staff and support services, to address systemic challenges such as unmet needs. Without this, there is a risk that the measure will become a reporting exercise rather than a driver of improvement.
- **Workload and administrative burden:** there is significant concern that introducing an additional measure could increase workload for school staff and governing boards. Many respondents felt that the system already generates substantial data, and that greater emphasis should be placed on making effective use of existing information.
- **Defining progress holistically:** for pupils with low prior attainment, progress should not be defined solely in academic terms. Respondents stressed the importance of recognising wider developmental gains, including improvements in attendance, independence, life skills and emotional wellbeing.
- **Risk of unintended consequences:** there is concern that a narrowly defined measure could lead to perverse incentives, such as curriculum narrowing or disproportionate focus on specific pupil groups at the expense of others.
- **Need for clarity:** many governors and trustees reported limited understanding of how the measure would operate in practice. Greater clarity is required on methodology, implementation, and its relationship with inspection frameworks.

In summary, while there is support for the aim of improving inclusivity and recognising individual progress, respondents emphasise that any new measure must form part of a well-resourced and balanced system. It should enable and support schools to meet pupils' needs, rather than add pressure through additional accountability requirements.

Question 17. What (if any) impact do you think an additional best-fit progress measure (alongside Progress 8) would have on the qualifications for which schools enter low prior attainers?

Please explain your views, limiting your response to 3000 characters or less.

We believe this measure will incentivise schools to provide a more inclusive and personalised pathway. By removing the "penalty" for empty slots, schools will feel empowered to offer a mix of high-quality vocational and academic qualifications that align with a pupil's strengths and future aspirations. We know that groups of pupils who benefit from practical, hands-on learning have previously been excluded by a narrow academic focus. This measure should encourage the use of technical awards and other qualifications that increase student motivation and achievement without the fear that attempting an ambitious but potentially incomplete curriculum will damage the school's headline data.

Question 18. The government's ambition is that the vast majority of pupils will take at least 8 qualifications at KS4, but what considerations would be important in deciding which pupils would be likely to study fewer than 8 qualifications?

Please explain your views, limiting your response to 3000 characters or less.

Reducing the scope of a child's education should only be a last resort after other interventions have proven unsuccessful, but is sometimes necessary.

Ethical and fair decision-making is essential. Governing boards must ensure that decisions are made in the best interests of the pupil, not for performance data reasons or accountability pressures. Several important considerations should therefore be taken into account when deciding which pupils may study fewer than 8 qualifications:

- Student wellbeing and engagement is a key factor. A full timetable of eight qualifications might prove unsustainable for some pupils, potentially leading to stress, burnout, disengagement or even school avoidance. In these cases, reducing the number of subjects may be necessary to maintain motivation and support mental health.
- Individual learning needs, including special educational needs and disabilities (SEND), are also important. Some pupils may struggle with the demands of a full academic curriculum and would benefit from a reduced number of subjects to allow more time for targeted support and skill development.
- Future pathways and life outcomes should be considered. For some pupils, particularly those who may follow vocational routes or apprenticeships, a reduced academic workload may be more appropriate. This allows them to focus on qualifications that better support employment skills, independence or further training.
- Curriculum suitability is another factor. Some pupils may not respond well to a heavily academic, exam-based curriculum, and may benefit from a more tailored programme that prioritises applied learning or practical skills.
- Resource and support availability must also be considered. A reduced curriculum should only be offered where the school can provide appropriate support, such as specialist staff or targeted interventions, to ensure the pupil still receives a high-quality education.

In summary, pupils who may take fewer than 8 qualifications are those whose individual needs, wellbeing and future pathways suggest that a reduced and more tailored curriculum would better support their success.

Question 19. Should this measure be visible to schools only, or also visible to parents and the wider public?

Schools and parents

Please provide further comments, limiting your response to 3000 characters or less.

NGA believes that this measure should be visible to both schools and parents. This position reflects a commitment to transparency, ethical governance, and a more balanced and meaningful approach to accountability.

Transparency is a core responsibility of governing boards. Openness about performance data enables parents and the wider community to better understand how schools are supporting their pupils and helps to build trust between schools and families. Making this measure available aligns with the expectation that schools are clear and accountable in how they communicate their effectiveness.

Greater visibility would contribute to a more comprehensive understanding of school performance. Current accountability measures can place disproportionate emphasis on headline attainment data, which does not always capture the full picture. Publishing a best-fit progress measure would highlight the progress of pupils with low prior attainment, ensuring that the impact of schools on those who start furthest behind is recognised alongside other outcomes.

Respondents in our recent survey also emphasised the importance of recognising incremental and non-linear progress. Many pupils make meaningful gains that are not reflected in standard attainment benchmarks. Making this measure public would allow schools to demonstrate the value they add over time and help shift perceptions away from narrow definitions of success based solely on threshold outcomes.

However, while there is support for public visibility, it is essential that the data is presented with appropriate context. Performance measures can be misinterpreted if viewed in isolation, particularly in schools serving high proportions of pupils with complex needs. Any publication of this measure should therefore be accompanied by clear explanatory information and ideally sit within a broader framework that reflects the school's context and pupil profile. This should be a key consideration in the development of the new school profiles.

In addition, NGA supports a phased implementation approach. Providing this data to schools initially, before wider publication, would allow leaders and governing boards to understand the methodology, test its application, and ensure they are well placed to communicate it effectively to parents.

Question 20. Do you think there is merit in an adaptation to this proposal that includes science as a required subject for pupils entered for 5 or more GCSEs/other approved qualifications?

Disagree

Please provide further comments, limiting your response to 3000 characters or less.

NGA does not support the proposal to make science a mandatory subject for pupils entered for 5 or more GCSEs or other approved qualifications. While science is an important subject, we believe the accountability system should focus on ensuring a broad and balanced curriculum without introducing additional subject requirements. With the current, appropriate requirements on maths and English, adding science to the mix would mean that 60% of the subjects entered by a pupil doing 5 GCSEs would be mandated, limiting choice and flexibility.

This proposal would excessively narrow the curriculum for pupils entering a relatively small number of GCSEs. Making science compulsory in this way could create a “mini-EBacc” effect, where schools feel pressured to prioritise certain subjects over others. This could reduce time and resources for creative, vocational and performance-based subjects, limiting pupil choice and a well-rounded education.

Another important issue is equal value for vocational pathways. Many pupils, particularly those with lower prior attainment or SEND, benefit more from vocational qualifications that are practical and engaging. Requiring science could discourage schools from offering these pathways and reduce opportunities for pupils whose strengths lie outside traditional academic subjects.

There are also practical staffing concerns. Many schools already face shortages of qualified science teachers. Introducing a requirement for science at this level could increase pressure on staff and negatively affect the quality of teaching and learning.

Student wellbeing is another factor. A more rigid set of subject requirements could increase academic pressure for some pupils, leading to stress, disengagement, or reduced motivation, particularly for those who struggle with exam-heavy subjects.

Finally, NGA supports flexible and intelligent accountability, where governing boards are trusted to make decisions based on the needs of their pupils rather than fixed national requirements. This allows schools to design a curriculum that reflects their context and supports all learners effectively.

In conclusion, while science should remain an important option within the curriculum, making it compulsory for most pupils is not necessary and could reduce flexibility, inclusion and pupil choice.

Question 21. Do you have any other comments on the proposed changes in this chapter?

If yes, please provide your views, limiting your response to 3000 characters or less.

Not Answered

Extending Targeted RISE to low-attaining schools

Question 22. Do you agree that from January 2027 Targeted RISE should be deployed to low achieving schools so that they can get the support they need to improve?

Neutral

Please provide any additional comments - if you disagree, please explain why briefly. Please limit your response to 3000 characters or less.

NGA continues to recognise the potential benefits of timely support for schools facing persistently low attainment, particularly where pupils are at risk of falling behind the government's ambition for every child to achieve more. However, as set out in our 2025 consultation response to the DfE's proposed accountability system, we remain concerned that a separate intervention mechanism based primarily on attainment data risks creating additional complexity, uncertainty and workload burdens for schools.

We are particularly cautious about any approach that relies too heavily on performance thresholds without sufficient regard to context which includes pupil intake, percentages of pupils with SEND, staffing challenges, governance changes and the school's current improvement trajectory. In the first instance, schools and trusts must first be empowered to respond through their own leadership capacity and governance oversight before external intervention is escalated.

Where targeted RISE is deployed, it must be tightly focused on cases of clear and sustained concern and designed as a supportive capacity-building mechanism without being than an additional layer of pressure associated with high-stakes accountability. In practice, this should include close engagement with governing boards as the responsible bodies. We would imagine this collaboration to include a review of existing school improvement plans, identifying where governance oversight can best complement adviser support as well as agreeing to clear and proportionate monitoring metrics.

RISE advisers must also make full use of contextual judgement to avoid overemphasis on absolute attainment measures, which the Department has rightly acknowledged disadvantages some pupil groups. As such, we welcome the proposed discretion for advisers to waive mandatory support where a school is already on a sufficient improvement trajectory or where headline data is significantly affected by a high proportion of pupils with additional needs. Mandatory intervention should only occur where circumstances clearly warrant it, as an overly prescriptive model risks stifling school autonomy and locally dependent pedagogical practice.

Question 23. Do you agree that we should mandate engagement with RISE but that a failure to improve will not automatically lead to structural intervention?

Neutral

Please provide any additional comments - if you disagree, please explain why briefly. Please limit your response to 3000 characters or less.

We welcome the recognition that a failure to improve through RISE should not automatically trigger structural intervention. This is consistent with our long-standing view that sustainable school improvement is best secured through targeted support that strengthens leadership and governance in the first instance, before more structural interventions are considered.

We also welcome the government's intention to apply mandatory engagement only in the most serious cases, alongside contextual safeguards intended to ensure intervention is proportionate. In particular, exemptions following recent changes in responsible body and the recognition of strong progress trajectories are sensible features that should help avoid a purely mechanistic approach based on raw data thresholds alone.

However, NGA remains concerned about the cumulative accountability burden that mandatory involvement could create for identified schools. Schools in this position will simultaneously face RISE intervention and additional Ofsted monitoring activity. While it is right that these schools receive additional attention, it must be proportionate and not counterproductive. This results in risks of increased workload, confusion and pressure on leaders, staff and governing boards at the point they need the most capacity to improve. Coordination between Ofsted, RISE and other external scrutiny is therefore essential.

The consequences of participation also remain somewhat unclear. If structural intervention is not automatic, there should be transparent guidance on what happens where improvement is limited, including information on how progress will be judged and how long support will remain in place.

Question 24. Do you agree that primary schools should be selected based on the percentage of pupils meeting the expected standard in reading, writing and maths but schools that have made sufficient progress in each subject will not be included?

Neutral

Please provide any additional comments - if you disagree, please explain why briefly. Please limit your response to 3000 characters or less.

NGA acknowledges the importance of ensuring that children leave primary school having secured the expected standard in reading, writing and mathematics, particularly as these foundational skills are critical to a successful transition into key stage 3 and to future learning more broadly. As such, it is understandable that the government wishes to prioritise support where attainment in these subjects is particularly low.

There is also evidence that this remains a significant area of concern across the sector. Recent Ofsted report cards have consistently indicated that achievement is among the areas most likely to be graded 'needs attention', while our 2025 Annual Governance Survey found that 51% of those governing in a primary phase identified attainment as a strategic priority within their school or trust. This suggests a broad recognition that raising outcomes in core subjects remains central to school improvement.

If this proposal is to proceed, we welcome the inclusion of a progress safeguard. Recognising schools that are making sufficiently strong progress, even where headline attainment remains

low, is a more balanced approach than relying on attainment data alone and should help ensure support is directed where it is most needed.

However, we remain cautious as attainment thresholds cannot provide a complete picture in isolation. As mentioned in earlier responses, numerous other factors including cohort demographics, can all affect outcomes. For that reason, any eligibility model should continue to allow room for contextual judgement and engagement with governing boards as responsible bodies before intervention is confirmed.

Question 25. Do you agree that a good starting point for primary school eligibility is where fewer than a quarter of a school's pupils have met the expected standard?

Agree

Please provide any additional comments - if you disagree, please explain why briefly. Please limit your response to 3000 characters or less.

We can agree in principle that a threshold of fewer than 25% of pupils meeting the expected standard is a reasonable starting point for identifying a very small number of the lowest-attaining schools most in need of support. Arguably, this level appropriately focuses the intervention on the most extreme cases, where targeted support is most likely to be justified and impactful. We also note that nationally 62% of pupils met the expected standard in reading, writing and maths last year, which suggests that this threshold would capture only a small minority of schools – consistent with the stated intention that eligibility should be limited to a narrow group.

However, NGA's agreement to this question reflects support for the principle as opposed to the rigidity of the measure itself. As set out previously, attainment thresholds cannot be interpreted in isolation. Even at this lower end of the distribution, cohort composition, SEND prevalence, deprivation levels etc can all materially affect outcomes. This means that it will remain important that any application of this threshold is complemented by the contextual assessment of RISE advisors.

Question 26. Do you agree that secondary schools should, from January 2027, become eligible for Targeted RISE based on their Attainment 8 data before reverting to a progress measure from January 2028?

Disagree

Please provide any additional comments - if you disagree, please explain why briefly. Please limit your response to 3000 characters or less.

We would echo our previous concerns about the use of absolute attainment data as the primary basis for determining eligibility for intervention. While Attainment 8 can provide a useful broad indicator, we remain cautious about approaches that rely too heavily on single-year or headline performance measures to trigger external support. Clearly, there is a balance to be struck between intervening quickly to avoid children being failed and rushing into change too quickly based on a single cohort.

NGA recognises that the proposed move towards an improved progress measure from 2028 represents a positive development. If implemented effectively, this could help mitigate some of the limitations associated with absolute attainment data by providing a fairer reflection of a school's impact, particularly for pupils with SEND or those from socioeconomically disadvantaged backgrounds who may not be fully captured by existing data measures.

This is particularly important given that attainment outcomes are strongly shaped by prior attainment, with FFT analysis highlighting a strong correlation between Attainment 8 results and pupils' prior key stage 2 attainment, meaning raw scores often reflect intake and not a school's contribution to teaching and learning.

There are also concerns about the transitional period and the time it will take for the new progress measure to become embedded and reliable. In the interim, schools are already navigating significant change across accountability frameworks and curriculum expectations. Against this backdrop, there is a legitimate question as to whether the addition of mandatory RISE support during this period risks adding further pressure at a time of substantial system-wide reform.

On balance, while we support the direction of travel towards more balanced measures, we cannot ignore the uncertainty in this transition period and the potential cumulative burden of change on schools over the next few years.

Question 27. Do you agree that for secondary school eligibility a good starting point is an Attainment 8 score of below 35.0?

Disagree

Please provide any additional comments - if you disagree, please explain why briefly. Please limit your response to 3000 characters or less.

While we understand the intention to identify a clear threshold for schools most in need of support, we do not consider a cut off of 35.0 to be an appropriate basis for eligibility. Attainment 8 is inherently shaped by intake and so offers an incomplete picture of school performance when used as a standalone trigger. As mentioned, FFT analysis shows a strong relationship between Attainment 8 outcomes and prior attainment of pupils meaning that schools serving lower prior-attaining or more disadvantaged cohorts are structurally more likely to fall below any fixed threshold.

This is further complicated by the fact that around 400 schools in 2025 recorded below-average Attainment 8 scores despite having achieved above-average Progress 8 outcomes the previous year. This would suggest that a rigid threshold risks misidentifying schools that are demonstrating strong signs of progress.

For these reasons, we would encourage the government to carefully consider how it identifies the appropriate schools where additional capacity could help strengthen improvement. While NGA recognises the intention to move towards a progress-based measure in 2028, we should avoid, in the interim, relying too heavily on a single attainment threshold that risks ignoring a school's actual progress. Given the potential risks of additional workload and burden on schools, alongside

the finite capacity and resources within RISE teams, it is important that the identification system remains robust and proportionate.

Question 28. Do you agree that primary schools with cohorts of fewer than 11 children should not become eligible for Targeted RISE on the basis of their pupil achievement if their performance was much higher in previous years?

Agree

Please provide any additional comments - if you disagree, please explain why briefly. Please limit your response to 3000 characters or less.

It is sensible that the government recognises that, especially in very small cohorts, a single year's data cannot reliably reflect a school's overall performance. As such, we welcome the government's acknowledgement that attainment in these cases should be interpreted with caution and considered alongside previous performance. This is a proportionate and evidence-based approach. However, NGA would argue that it also reinforces the wider point that attainment data should not be used in isolation, and that context and trends over time remain the most important in identifying where support is ought to be deployed.

Question 29. Do you think there are any types of school that should not be eligible for Targeted RISE support on the basis of their levels of pupil achievement?

Please give your views, limiting your response to 3000 characters or less.

Not Answered

Impact

Question 30. Do you believe the proposed changes (any or all) will have a specific impact on particular groups of learners or staff because of their protected characteristics?

Please explain the impact, specifying which proposal your response relates to. Please limit your response to 3000 characters or less.

NGA recognises that the proposed changes are intended to promote a more inclusive and flexible system. However, their impact on groups with protected characteristics will depend heavily on implementation, particularly in relation to assessment design and resourcing.

Learners with SEND are likely to be most directly affected. While increased flexibility in curriculum pathways and recognition of progress is welcome, the continued reliance on assessment approaches that prioritise written examinations and memory recall may limit the extent to which these reforms improve outcomes for this group. Without parallel reform to assessment methods, some barriers to attainment will remain.

There may also be differential impacts linked to socioeconomic disadvantage, which often intersects with protected characteristics. Access to a genuinely broad curriculum, particularly in creative, technical or practical subjects, can be constrained by cost, availability of specialist staff,

and local provision. This risks limiting the intended benefits of increased curriculum flexibility for some groups.

From a workforce perspective, staff working closely with pupils with additional needs, particularly SENCOs and pastoral staff, may experience increased demands. Any new measures that require more detailed tracking of pupil progress must be accompanied by sufficient capacity and specialist support.

Overall, while the direction of reform is positive, its impact on protected groups will depend on whether structural barriers, particularly in assessment and resourcing, are addressed alongside accountability changes.

Question 31. Are there any risks that the proposed changes could unfairly impact on certain types of schools or on certain groups of pupils (e.g. those from disadvantaged backgrounds, those with SEND)?

Please explain the impact, specifying which proposal your response relates to. Please limit your response to 3000 characters or less

NGA generally feels that while the proposed reforms aim for greater inclusion, their actual impact on specific groups will remain limited unless the fundamental nature of assessment undergoes a shift. The current heavy reliance on rote memorisation in examinations continues to act as a significant barrier for many, including learners with various disabilities or specific educational needs.

There is also a strong sense within the governing community that a child's socioeconomic background still heavily influences their ability to access a truly broad curriculum. Even if the subject slots are updated, the hidden costs of equipment and resources for creative or technical subjects can still lead to the social exclusion of disadvantaged students.

The aspiration for a broader curriculum and more personalised pathways is at significant risk due to existing workforce and budget challenges. With many boards already forced to cut subjects due to financial constraints and a lack of qualified teachers, there is a risk that these changes will place unattainable expectations on schools without the means to deliver them.

Question 32. Do you have any suggestions for how any potential negative impacts on particular groups of learners or staff could be mitigated, or positive effects enhanced?

Please give your views, limiting your response to 3000 characters or less.

To ensure the proposed reforms deliver their intended benefits, several mitigating actions should be considered.

Assessment reform should be aligned with accountability changes. A broader range of assessment approaches, including coursework, practical application and adaptive assessment methods would better support pupils with SEND and those who do not perform well in exam-based systems.

Targeted funding is essential to support equitable access to a broad curriculum. This should include support for subject-specific costs in areas such as the arts and technical education, ensuring that disadvantaged pupils are not excluded from participation.

Workforce investment is critical. Addressing shortages in key subject areas, alongside increased capacity for specialist roles such as SENCOs, will be necessary to deliver more personalised pathways effectively.

Implementation should be phased and supported by clear guidance. Governing boards and school leaders need time to understand new measures, embed them effectively, and ensure they are used to support improvement rather than compliance.

Question 33. What impact do you think the proposed changes will have on staff workload or wellbeing?

Please explain the impact, specifying which proposal your response relates to. Please limit your response to 3000 characters or less.

The prevailing feeling is one of caution regarding workload. While new methods for tracking progress are conceptually supported, there is a genuine worry that they will create additional administrative burdens for those already supporting the most vulnerable students. Without a significant injection of funding and specialist personnel, these new metrics may end up increasing the pressure on teachers and SEN coordinators without providing the practical help required to actually improve outcomes for their pupils.

Question 34. Are there particular types of schools or particular staff roles (e.g. subject leads, SEN coordinators) that may be disproportionately impacted by these changes?

Please explain the impact, specifying which proposal your response relates to. Please limit your response to 3000 characters or less.

SEN Coordinators (SENCOs) will likely face a significant increase in administrative data management to track the "best-fit" progress of their cohorts.

Similarly, leads in arts and science subjects may face increased pressure to deliver breadth in an environment where 59% of boards have already had to cut subjects due to budget constraints.

Question 35. Do you have any suggestions for how we can minimise any negative impacts on wellbeing?

Please give your views, limiting your response to 3000 characters or less.

Minimising negative impacts on wellbeing will require a deliberate focus on system design and implementation.

- Simplicity and clarity in accountability measures are essential. Avoiding unnecessary complexity and duplication in data collection will help reduce administrative burden and allow staff to focus on teaching and pupil support.

- A phased implementation approach would support wellbeing by giving schools time to adapt, build understanding and embed changes without excessive pressure.
- Investment in workforce capacity is critical. This includes not only addressing teacher shortages but also ensuring adequate provision of specialist roles such as SENCOs, pastoral staff and administrative support.
- Professional development and clear guidance should be provided to ensure that staff and governing boards understand how to use new measures effectively and proportionately.