

Official Response  
to the DfE Consultation

**Key Stage 4  
Performance Measures  
and  
Targeted RISE Extension**



## About Community Union

This is an official response on behalf of members of Community Union

Community is a general Trade Union affiliated to the TUC. We provide legal and casework support to our members and regularly engage with them in determining our response to policy proposals.

Community's Education and Early Years sector represent thousands of serving teachers and support staff, headteachers, lecturers, nursery and early years workers, nannies and other education professionals in schools and academies, nurseries and early years settings, colleges, and universities across the whole of the UK.

This evidence was submitted on behalf of our members working in Early Years and Education in England and as such represents the collective view of our membership.

The information shared within this response may be used and quoted as appropriate for the purposes it was gathered, with Community Union acknowledged as the contributor. We would be happy to discuss the comments in this response further, please contact us using the details supplied.

This Official Response will be published on our website following the close of the consultation period.

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# Questions

## Chapter 1

**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?**

Community are cautiously of the view that the proposed changes to the Progress 8 model represent something of an improvement in balancing curricular breadth and flexibility, particularly within the context of the current accountability system. The current Progress 8 framework has been widely criticised for privileging a narrow suite of academic subjects, most notably the EBacc. As we have previously noted this has constrained curriculum design, marginalised arts subjects and narrowed the educational experiences for many pupils resulting in reduced uptake of creative and vocational disciplines.

It is important to recognise that headline accountability measures based on raw attainment have historically lacked inclusivity. Disproportionately disadvantaging pupils with special educational needs and disabilities (SEND), as well as those in more socio-economically deprived contexts. Schools that adopt inclusive practices and admit a higher proportion of such pupils are at risk of being unfairly penalised in performance data, creating perverse incentives that may discourage inclusive admissions. For this reason, these proposals for Progress 8 – while an improvement on raw attainment measures – still will not fully mitigate these issues.

As already stated, the revised model's introduction of greater flexibility through subject "slots" is a positive development. And allowing approximately half of these slots to be filled by a broader range of subjects, including vocational and technical qualifications (VTQs), supports a more balanced curriculum and better reflects diverse learner needs and pathways. This aligns more closely with principles of equity, rather than simple equality, by recognising that different pupils require different types of provision to succeed.

However, there remain important considerations. The interaction between the revised Progress 8 model, the Curriculum and Assessment Review (CAR), and any changes to subject content will be critical. Without coherence across these policy areas, schools may struggle to implement meaningful curriculum reform.

Additionally, funding remains a significant constraint. Broadening the curriculum – particularly through VTQs, can require investment in specialist facilities, equipment, and staff expertise. Schools in disadvantaged areas, which often serve lower-attaining cohorts, may face the greatest barriers to implementation, and without targeted funding, the intended benefits of flexibility may not be fully realised.

Finally, while skills-based learning is particularly beneficial for pupils in deprived communities, it should not be seen as a second-class option. True equity requires that all pupils have access to both academic and vocational routes, without stigma or limitation.

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

*[Options: Support inclusion of a fourth category / Do not support inclusion of a fourth category / **Unsure**].*

The inclusion of a fourth category (science) within breadth slots 5 and 6 is, in principle, a sensible and constructive refinement of the model which Community broadly support.

Recognising science as a distinct category within the open slots reinforces its importance without reverting to the rigidity of earlier accountability systems. It ensures that pupils retain meaningful access to scientific study beyond the core, which is important for progression into STEM pathways and for developing scientific literacy more generally. In that respect, it supports both breadth and depth, rather than forcing schools into a binary choice between core academic subjects and wider curriculum offer.

In particular, the inclusion of computer science alongside other sciences is especially welcome. This reflects the evolving nature of the discipline and its growing importance within both higher education and the labour market.

From an inclusion perspective, however, Community have some questions. While expanding the science category may benefit many pupils, there is a risk that it could unintentionally narrow options for some learners if schools prioritise filling these slots with traditional science subjects at the expense of creative or vocational alternatives. This is particularly relevant for pupils with SEND or those who may be better served by more applied, skills-based pathways. Therefore we feel the flexibility within the remaining slots must be protected in practice, not just in principle.

There are other practical implications to delivering a broader science offer. This will require specialist teaching capacity, appropriate facilities, and ongoing investment in resources and professional development. Without adequate funding, schools in disadvantaged areas may struggle to deliver this entitlement equitably, which could widen existing attainment gaps.

**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?**

*[Options: Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree].*

Community broadly welcomes the proposal to allow technical awards within Progress 8. We feel this is a positive step towards recognising the valuable contribution that vocational and technical qualifications (VTQs) make to a broad and balanced curriculum within the English education system.

We have always been of the opinion that accountability measures reflect the full range of pupil strengths and destinations, rather than favouring a purely academic pathway. And note that VTQs, alongside arts subjects, provide opportunities for applied, experiential learning that develops practical skills, creativity, problem-solving, and collaboration that are sometimes absent from more academic qualifications. These skills are not only essential for progression into further education, apprenticeships, and employment, but also contribute significantly to pupil engagement, confidence, and overall wellbeing.

The inclusion of technical awards therefore supports a more equitable model of education which is aligned with the Government's drive towards a more inclusive vision of education.

However, Community notes some concern that the positioning of VTQs and arts subjects within the model risks appearing as an "add-on" rather than an integral component of curriculum design. Given their well-evidenced contribution to pupil health and wellbeing, as well as their role in fostering engagement and reducing disengagement, these subjects should be embedded more centrally within accountability structures. We have already noted that the seeming marginalisation of these subjects in previous iterations of Progress 8 contributed to a narrowing of the curriculum, with a measurable decline in arts uptake at both GCSE and A Level as well as fewer children learning musical instruments.

This is particularly significant in light of the arts and creative industries' substantial contribution to the UK economy. We feel that ensuring that young people continue to access high-quality provision in these areas is not only an educational priority but also an economic one. Limiting technical awards to a maximum of two slots may therefore constrain the extent to which some schools can fully realise a genuinely broad curriculum, particularly where there is strong pupil demand or local labour market relevance.

Finally, as previously mentioned with science, delivering high-quality VTQs and arts education also requires investment in specialist staff, facilities, and resources. Without sufficient funding, there is a risk that access will remain uneven, particularly in more disadvantaged areas, undermining the intended benefits of the reform.

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

No

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

No

## Chapter 2

### **Question 16: What are your views on introducing a 'best-fit' progress measure for pupils with low prior attainment?**

Community notes that there is merit in the proposal to introduce a 'best-fit' progress measure for pupils with low prior attainment to be positive in principle, but, despite the technical details provided, we are nervous about how this might work in practice.

The current Progress 8 framework does not always capture the more nuanced or non-linear progress made by learners with different starting points. Community recognise that a more tailored approach which recognises the progress they do make could therefore result in a fairer and more inclusive accountability system.

However, we feel that the proposal as it stands lacks sufficient detail. The methodology is complex, and without clear, accessible explanations, it risks being poorly understood by school leaders, practitioners, and other stakeholders. Key questions remain unresolved: what will this mean in practice for pupils' educational experiences and outcomes, and how will it influence school behaviour? Without clarity, there is a risk that the measure could create unintended consequences rather than addressing existing inequities.

Transparency is our critical concern. Community strongly believes that any new progress measure must be open and fully understood. Schools should have access to the underlying data and technical methodology so that they can replicate calculations, quality assure outcomes and use the information formatively to support teaching and learning. A system that is opaque, or worse, commercially managed, would undermine trust and limit its usefulness.

There is also a need to ensure that the model cannot be used for 'gaming' the system as we have noted in previous systems. As with any accountability framework, if incentives are not carefully designed, there is a risk that schools may adopt behaviours that improve headline measures but do not benefit pupils. Community would like to see safeguards be built in to ensure that the measure drives meaningful progress, rather than strategic compliance.

We would also like clarity on how a best-fit model would interact with existing accountability structures, particularly inspection frameworks. The relationship with Ofsted data is currently unclear, and there is potential for confusion or conflicting narratives if different measures are used simultaneously. Community is concerned that this could create tension particularly if they result in conflicting improvement priorities.

### **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?**

Introducing an additional best-fit progress measure alongside Progress 8 could have a significant impact on the qualifications schools choose for pupils with low prior attainment. However, Community has concerns that this risks making the system overly complex whilst still failing to reflect the nuance of pupil progress.

Community are unclear how the two progress measures interact and compliment or conflict with one another. This may make it harder for schools, parents, and pupils to

understand. If Progress 8 and a best-fit model produce different narratives about the same pupil, this could lead to confusion about what constitutes “success” and weaken the clarity of headline performance measures.

There is also a question about how this will affect the headline figures. If one measure becomes dominant in public reporting or inspection, as has happened in the past, schools may prioritise that metric, potentially distorting curriculum decisions.

Crucially, accountability measures have a direct influence on exam entry patterns. Community is clear that schools must be supported to offer a genuinely broad range of qualifications that include both academic routes and high-quality technical and vocational pathways. All pupils should have access to this breadth, and encouraged to follow their ambition, rather than being channelled into pathways based on prior attainment.

The previous emphasis on a limited set of academic subjects has led to a narrowing of the curriculum, reduced uptake in vocational and creative subjects, and, in some cases, constrained pupils’ future opportunities. Community has concerns that introducing an additional measure, if not carefully designed, could recreate similar pressures to consider certain qualifications more “valuable” within the new framework.

For pupils with low prior attainment, this is especially important. A system that is too blunt may fail to recognise the meaningful progress made through technical or applied learning. Equally, a system that is too complex may encourage risk-averse behaviour, with schools defaulting to “safer” qualification choices that protect performance data rather than maximise pupil outcomes.

**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?**

Community believes that it is not the volume of qualifications that matter but the value of those qualifications to the pupil. A uniform expectation around the number of qualifications risks overlooking the diverse needs, starting points and aspirations of pupils and might count against schools who prioritise pupil need over outcomes.

For some pupils, particularly those with SEND, lower prior attainment, or disrupted educational experiences, a reduced number of qualifications may be both appropriate and necessary. In such cases, prioritising depth of learning, consolidation of core skills, and the development of life skills can be more beneficial than pursuing a full suite of qualifications. Similarly, some pupils may benefit from combining core academic subjects with a smaller number of high-quality vocational or technical options that align with their interests and intended further study.

It is therefore essential that the qualifications available to these pupils carry real value. This applies both in terms of their currency for further education and employment, and their recognition within accountability measures. Historically, VTQs of varying sizes – such as certificates, diplomas, and extended diplomas – were offered and played a key role in engaging learners, supporting progress, and improving attendance and behaviour. These pathways enabled schools to construct programmes that were meaningful and motivating, particularly for those less well served by a purely academic curriculum.

Community is clear that the number of qualifications taken should not be used as a standalone headline performance measure. Such an approach would be overly simplistic and could create perverse incentives, pressuring schools to prioritise quantity over quality.

At the same time, safeguards are needed. Schools must be confident that where it is in the pupil's best interests, entering them for fewer qualifications will not negatively impact headline attainment, progress measures, or inspection outcomes. Without this assurance, there is a risk that accountability pressures will override professional judgement, to the detriment of pupils.

Community also raises an important tension regarding transparency. While the data gathered should be available to support understanding of school performance and inclusive practice, it should not be used in a way that drives competition between schools or creates reputational risk. If publicly reported without context, it could discourage schools from adopting flexible, inclusive approaches. Ideally, it should not be reported at all.

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

[Options: **Schools only** / Schools and parents / Unsure].

As previously mentioned, this additional measure needs to be for the benefit of the students first and foremost. By keeping it for schools only it will support schools to make the right decisions for their cohorts and support these decisions with data, but without the fear of being compared nationally.

**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?**

[Options: Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree].

Community agrees that there is merit in adapting the proposal to include science as a required subject for pupils entered for five or more GCSEs or other approved qualifications.

Science has long been considered a core component of a broad and balanced curriculum alongside English and mathematics. It underpins essential knowledge and skills that support progression into further education, training and employment but also helps to develop scientific inquiry, critical thinking, and other cross-curricular skills.

Community recognises that the science qualification landscape is diverse and therefore there needs to be flexibility in how this requirement is met. This should biology, chemistry and physics, combined (dual award) science, and appropriate applied or vocational science qualifications. Recognising a range of pathways is important to support inclusion and reflect different learner needs, aptitudes, and aspirations.

However, as with other elements of reform, implementation will be critical. Schools must be adequately resourced to deliver high-quality science education across different routes, including vocational pathways where appropriate. There must also be sufficient flexibility to ensure that the requirement does not disadvantage pupils with SEND or those for whom a highly tailored curriculum is more appropriate such as those in alternative provision.

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

No

### Chapter 3

**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?**

*[Options: Strongly agree / **Agree** / Neutral / Disagree / Strongly disagree].*

Community agree that targeted RISE intervention should be deployed to low-achieving schools and it makes sense that support is prioritised for those settings facing the greatest challenges. In theory, a targeted model should ensure that resources, expertise, and funding are directed where they can have the greatest impact.

However, we are not fully convinced that outcomes from Ofsted should be the sole or even the primary determinant for identifying schools in need of support. While inspection judgements provide a useful external benchmark, they represent a moment in time which may not fully capture the complexity of a school's context, trajectory, or capacity for improvement. Community feel a more balanced approach consisting of a broader range of indicators, including progress data, attendance, inclusion metrics, and local intelligence would be more appropriate.

It is important that "success" criteria are clear within the RISE framework. If success is defined narrowly through inspection outcomes or headline performance measures, there is a risk that schools will focus on compliance rather than sustainable improvement. A more robust definition should include improvements in pupil progress, curriculum quality, staff development, attendance, and inclusive practice, alongside longer-term capacity building within leadership and governance. It should also consider staff workload and pupil and staff wellbeing as improvement is impossible if staff are not supported and pupils are not engaged.

We acknowledge that Ofsted will continue to play a role in shaping expectations for school improvement, including identifying areas for development and setting out how these should be addressed. However, the inspection framework is still new and has experienced some implementation challenges and there remain concerns around consistency which raise questions about the stability of inspection as a consistent basis for high-stakes decisions such as RISE intervention.

Further uncertainty arises from proposed changes to Progress 8, which may alter how school performance is measured over time. If accountability metrics shift, the definition of "low achieving" and, by extension, "successful improvement" may also change. This reinforces the need for a flexible and multi-dimensional approach to evaluation within RISE.

Finally, there are concerns within the sector that the responsible body overseeing elements of school improvement is no longer perceived as fully independent. This creates a risk of perceived or actual conflicts of interest, particularly where advisory, accountability, and funding roles intersect. Maintaining transparency, clear governance structures, and separation of functions will be essential to ensure confidence in the system and to mitigate concerns about vested interests influencing decision-making.

**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?**

*[Options: Strongly agree / Agree / **Neutral** / Disagree / Strongly disagree].*

RISE has the potential to be a constructive source of expertise for schools that need support; however, it remains one part of the wider school improvement system rather than the only pathway. Schools already engage with a range of improvement partners, including trusts, local authorities, and sector-led bodies, each bringing different perspectives and approaches. These can differ significantly from the methodology or judgements of RISE teams or from the frameworks used by Ofsted. Community believes this diversity is important and should not be overridden by a mandated, one-size-fits-all requirement to engage with a specific programme.

Evidence suggests that school improvement is most effective where there is genuine professional collaboration and where schools retain agency in identifying their own needs and determining appropriate solutions. Community think that RISE teams should therefore operate as partners rather than enforcers, working alongside school leaders and staff to consider the evidence base and agree the most appropriate improvement strategy for that context. This approach recognises that schools are not uniform and that improvement pathways need to reflect local circumstances, workforce realities, and existing improvement capacity.

Engagement with RISE but not requiring schools to blindly follow their recommendations without challenge, is likely to lead to the greatest successes. If the RISE offer is genuinely valuable, schools should be able to choose to engage without coercion. Mandation risks reducing trust in the system and could undermine existing improvement work that is already delivering progress through other routes. It also risks creating duplication or conflicting advice where schools are already receiving structured support.

Similarly, a failure to improve following engagement with RISE should not automatically lead to structural intervention. School improvement is complex, often incremental, and influenced by multiple external factors including pupil intake. Community recommends a proportionate and diagnostic approach that reviews the quality and suitability of the support provided, considers alternative or complementary strategies, and allows sufficient time for interventions to embed.

**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?**

*[Options: Strongly agree / Agree / Neutral / Disagree / **Strongly disagree**].*

Community Union has serious concerns about this proposal.

We are particularly concerned that this approach will have a disproportionate and potentially damaging impact on small schools, rural schools, and settings with small cohorts where small variations in pupil outcomes can produce significant percentage swings that do not accurately reflect overall school effectiveness.

We also have similar concerns regarding those schools serving higher proportions of pupils with SEND. These schools often face additional and complex barriers to attainment, and a narrow focus on expected standards risks failing to recognise legitimate and sustained progress made by pupils with additional needs. Without careful design, this approach could inadvertently penalise schools doing highly effective work in challenging circumstances.

Community considers that reliance on a single percentage threshold could fail to accurately reflect the contextual factors or school improvement work already in progress. This could risk some providers attempting to game the system by adjusting cohort entry or assessment practices in order to avoid falling below thresholds, which would undermine the integrity of the system as a whole.

**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?**

*[Options: Strongly agree / Agree / Neutral / **Disagree** / Strongly disagree].*

As noted previously, Community feel that reliance on a single percentage threshold is too blunt an accountability tool and feel that there should be better recognition of progress and context to avoid unintended consequences especially in small cohort and rural schools and those serving pupils with high-needs.

**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?**

*[Options: Strongly agree / Agree / **Neutral** / Disagree / Strongly disagree].*

Community Union recognises the rationale for using Attainment 8 data as a transitional measure for identifying secondary schools eligible for Targeted RISE from January 2027, but while Attainment 8 may offer a more rounded view than some narrowly defined progress measures, it remains an imperfect and selective accountability metric which reinforces the high-stakes, performance-driven accountability system and drives competition between schools rather than the collaboration the Government is pushing for.

Community has particular concerns about the wider impact of this accountability approach on the curriculum. Over the past 15 years, successive accountability reforms have shaped curriculum design and narrowed the curriculum offer in many settings, with schools under pressure to prioritise subjects that contribute to performance measures. As already noted, this narrowing is reflected in declining entry rates in both VTQs and in creative and arts subjects.

Community notes that the Curriculum and Assessment Review presents an opportunity to address some of these issues and move towards a more balanced system. However, we have some concerns that current proposals do not go far enough in reversing the narrowing effects of accountability measures or in restoring genuine curriculum breadth and inclusion.

While Attainment 8 may be a more balanced metric than isolated progress measures, it does not adequately capture enrichment, personal development, vocational learning, or the wider outcomes that matter for young people's long-term success. Therefore, there is

a risk that linking eligibility for Targeted RISE to this measure will further entrench existing distortions in school priorities, rather than support meaningful improvement.

Community also emphasises that any transition to a progress-based measure from January 2028 must be approached with caution. Progress measures are highly sensitive to prior attainment data and can be significantly affected by cohort variation, particularly in smaller schools or those with complex intake profiles. Without careful design, there is a risk of reinforcing existing inequalities rather than addressing them.

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

*[Options: Strongly agree / Agree / **Neutral** / Disagree / Strongly disagree].*

Community recognise that, in broad terms, an average score of around 4.375 per subject (or a combination of grade 3s and 4s) may reflect meaningful achievement for individual pupils in context whilst appreciating that at cohort level, this level of performance would likely indicate significant concern and would not typically be viewed as a strong outcome.

Any use of the Attainment 8 benchmark needs to be interpreted alongside wider contextual information such as prior attainment on entry, the progress over time, SEND, levels of socio-economic disadvantage, and broader community factors affecting educational outcomes. Without this contextualisation, there is a risk that schools are assessed in a way that does not fairly reflect their circumstances or the complexity of their intake.

Community therefore considers that while an Attainment 8 threshold such as 35.0 may serve as a broad initial indicator, it should not be treated as a definitive or standalone trigger for eligibility.

**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?**

*[Options: Strongly agree / Agree / Neutral / **Disagree** / Strongly disagree].*

Community do not necessarily agree that a fixed exclusion rule based solely on a cohort size of fewer than 11 pupils is an appropriate threshold in isolation, however, we do recognise the need for a small-cohort adjustment.

It is well understood that in small primary school cohorts, individual pupil outcomes can have a disproportionate impact on overall percentage measures with minor variations in attainment, attendance, SEND need, illness, or other contextual factors materially distorting headline performance data. This makes small schools particularly vulnerable to volatility in accountability measures that are not specifically designed to reflect such small sample sizes.

Community therefore agrees with the principle of a small-cohort boundary below which caution must be exercised in interpreting data for intervention purposes. Whilst we acknowledge that a threshold around 11 pupils may represent a starting point for such a boundary, we would argue that a threshold closer to 15 pupils would be more appropriate. This could provide a more stable statistical base, reduce volatility in year-on-year

comparisons, and help mitigate the risk of individual pupil circumstances disproportionately influencing school-level judgments.

We are mindful of safeguarding and inclusion considerations. In very small cohorts, the visibility of individual pupils increases significantly, particularly those with SEND or additional needs. Increasing the threshold to 15 would also help reduce the risk of inadvertent identification of schools for intervention based on flawed data.

Community has consistently highlighted that small schools require careful and proportionate treatment within the accountability and intervention system. Any small-cohort adjustment must therefore be clearly defined, transparently applied, and designed to ensure that schools are not unfairly disadvantaged by statistical distortion.

**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?**

Community feels that particular care must be taken when considering data from Alternative Provision and other settings with a highly transient cohort, as well as schools that cater specifically to those with particular needs and special schools.

Whilst these settings must be monitored and inspected, and appropriate interventions initiated, where appropriate, these settings rarely have nationally comparable data making it difficult to determine progress and attainment.

**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?**

With proposed changes of such magnitude and potential impact on so many staff and pupils across the system, Community feel that it is vital to undertake a broad impact assessment before any changes are imposed. There is too great a risk to particular groups of learners or staff if such an exercise is not completed and the whole proposal reflected through its lens.

**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)?**

Community does have concerns about the proposed changes.

As already noted, we believe careful consideration must be given to the use of performance and progress data from Alternative Provision (AP) settings and other schools with highly transient cohorts. These settings often operate with frequent pupil movement, complex needs profiles, and disrupted educational histories, which make the production of stable, nationally comparable attainment and progress data inherently difficult. While these settings must be subject to appropriate monitoring, inspection, and intervention where necessary, it is inappropriate to rely solely on raw data.

Similarly, special schools and mainstream schools with enhanced resource provision or significant numbers of pupils with SEND are at risk if the data is not carefully considered in the wider context. These schools are increasingly central to the government's stated ambition of building a more inclusive education system, with more pupils being educated in mainstream settings where appropriate. However, if accountability and intervention frameworks do not adequately reflect the nature of SEND provision, there is a risk that schools will be judged in ways that do not fairly represent their work or the progress of their pupils.

Community is particularly concerned that schools such as these could be appear to be performing badly in accountability dashboards despite delivering strong, appropriate, and inclusive provision for their cohorts. This could have a negative impact upon inspection outcomes and school improvement decisions in ways that do not align with the broader policy objective of increasing inclusion across the system.

Community therefore believes that while monitoring and accountability are necessary across all settings, the design of any framework linked to RISE must be carefully calibrated to reflect the diversity of school types and pupil needs with safeguards to ensure that schools are not penalised for operating in complex contexts, such as areas of high deprivation, particularly where they are actively supporting national priorities around inclusion.

**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?**

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**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.**

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**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?**

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

Community Union considers that the proposals, as currently framed, risk adding further pressure to an already high-stakes accountability environment. We need a clear shift away from excessive data burden and towards a more proportionate and supportive to prioritise inclusion and recognise the negative impacts that 15 years of academic focus has had on pupil and staff wellbeing,

We have repeatedly stated that there must be a sustained commitment to reducing the overall testing burden placed on pupils. Our primary school pupils are some of the most tested children in Europe and the cumulative effect of frequent assessment, preparation for accountability measures, and repeated data capture has a significant impact on pupil wellbeing, particularly for those already experiencing disadvantage or additional needs. Any intervention framework linked to RISE should avoid adding further layers of assessment pressure at school or pupil level.

Staff workload remains a critical issue in recruitment and retention. Reducing data demands would reduce teacher workload. Community strongly supports a move away from unnecessary or duplicative data returns. Where data is required by the system, it should be collected at school level rather than pupil level wherever feasible. This would help reduce administrative burden, protect pupil privacy, and limit the extent to which individual learners become overly exposed within accountability systems.

As already noted, pupil wellbeing must be prioritised. This includes recognising the importance of a broad and balanced curriculum, reducing assessment pressure, and supporting the wider developmental needs of children and young people. A narrow focus on measurable outcomes risks undermining these broader educational aims.

In addition, staff workload must be a central consideration in the design and implementation of any RISE-related processes. Schools are already operating under significant pressure, and there is a real risk that additional data collection, reporting, and engagement requirements will fall on existing staff without sufficient capacity. Any new duties arising from these proposals must not be absorbed into already stretched workloads.

Finally, where additional expectations are placed on schools in relation to data collection, analysis, or engagement with intervention programmes, appropriate funding must be provided to support that improvement.