

November 2, 2008

Dear Paul,

NALDIC Comments re Inspecting English as an additional language (School and Inspections, Issue 6, September 2008)

[http://www.ofsted.gov.uk/Ofsted-home/Publications-and-research/Documents-by-type/Newsletters/Back-Issues/Schools-and-Inspection-aka-Inspection-Matters/Schools-and-inspection-Issue-6/\(language\)/eng-GB](http://www.ofsted.gov.uk/Ofsted-home/Publications-and-research/Documents-by-type/Newsletters/Back-Issues/Schools-and-Inspection-aka-Inspection-Matters/Schools-and-inspection-Issue-6/(language)/eng-GB)

I am writing on behalf of National Association for Language Development in the Curriculum (NALDIC). NALDIC is the subject association for English as an additional language (EAL). It is dedicated to promoting the learning and achievement of bilingual pupils in schools and draws its membership from those who work in this field in schools, universities and other educational institutions.

Whilst we are delighted to note that OFSTED has issued new guidance to inspectors on this important issue, we would like to express our concern at some aspects of the recent guidance.

1. Our first concern is with the initial phrase in the Inspection Guidance paragraph '*Inspectors need not always investigate EAL provision in detail*'. Whilst we understand the time constraints in both Section 5 and reduced tariff inspections, we feel that this indicates to inspectors that EAL is a minor aspect of the inspection process. This can only contribute to the under-reporting of EAL issues in inspection reports. We have recently carried out surveys of inspection reports in a number of regions which indicate that although a reference to EAL pupils is a standard item when outlining the characteristics of a school, that is often the extent of the comment. At a time when EAL learners make up a greater proportion of the school population than ever before, we believe that the quality of reporting of EAL issues is declining rather than improving. Given the importance of EAL provision in supporting community cohesion and in raising achievement for all pupils, we are sure that this is not the intention.
2. We are pleased to note that the guidance rightly points out that '*Pupils learning EAL are not a homogeneous group*' and discusses the likely differences in some detail. We feel it would have been useful here to re-iterate previous guidance that

'Inspectors should be careful when interpreting the RAISEonline performance data for learners whose first language is not/is believed not to be English. RAISEonline does not group these learners based on their individual language needs and levels of proficiency. Consequently, in a given school, this group could include learners at the early stages of acquiring English along with advanced bilingual learners and those with basic literacy needs. As with all performance data, this grouping of learners will be helpful in identifying lines of enquiry that inspectors may wish to pursue. However, the particular context and circumstances of the school and its learners need to be taken into account when making judgements about learners' achievement' (Schools & Inspection An Information Service for Inspectors of Schools, December, 2007)

This highlights a central issue for inspection, and we believe, for the education system as a whole. Current performance data is based solely on pupils' performance in tasks and assessments that are based on the language acquisition of mother tongue English speakers, and no consideration is given nationally to the stage of language acquisition of EAL learners. Performance data which does not allow a ready distinction between the performance of 14 year old pupils learning EAL since the EYFS and those who have been using English for only a short time can only have a limited use in informing schools and inspectors.

3. We are disappointed that the guidance goes on to highlight and endorse the step descriptors from A language in common: assessing English as an additional language (QCA, 2000/584) to monitor the attainment and progress of pupils who may be at the earliest stages of learning English. This scale is not statutory and eight years after its introduction, its use is still strongly contested in many schools. Whilst we recognize that this scale is recommended in some documentation distributed by the DCSF, it does not appear to be considered reliable nor useful enough to be incorporated into DCSF systems of performance monitoring such as RaiseOnline. It is clearly at odds with the concepts of both personalisation and other endorsed approaches to assessment such as assessment for learning. It is based on an adaptation of the continuum of monolingual language acquisition which is inappropriate and unsound for bilingual learners.
4. It is disappointing that this OFSTED guidance has chosen to highlight this unfortunate summative scale and to discourage inspectors from investigating with schools their own assessment systems which, as teaching professionals, they consider to be 'fit for purpose'. The guidance appears to dissuade inspectors from commending other systems which are being used well to inform teaching and learning effectively for bilingual pupils. This seems odd when the inspection process is surely about disseminating and praising effective practice and runs counter to the statement in the opening paragraph where inspectors are urged to highlight '*particular strengths or weaknesses*'. Whilst QCA is endorsing the freeing up of the curriculum offer to meet pupils' individual needs, it seems perverse that OFSTED should be urging inspectors to constrain the assessment systems by which individual learner's progress is measured. This guidance also seems to run counter to the following paragraph which notes that '*The progress and attainment of all EAL learners, including those who are advanced bilingual learners, should be closely monitored so they are doing as well as they can*'. One means of achieving this is through appropriate pupil and context sensitive assessment. We would argue that urging schools to use assessment indicators which are clearly inappropriate in mapping the development of additional language acquisition is unhelpful and poorly considered.
5. We are also concerned by this point within the guidance '*Specialist EAL support should be available for new arrivals from qualified teachers or teaching assistants who have received appropriate training and support.*' This appears to suggest that new arrivals can be 'dealt with' solely by teaching assistants if they have received some, unspecified, training and support. As with any other aspect of teaching, teaching assistants, both bilingual and monolingual, are required to work at the direction of a qualified teacher. This sentence could be construed by inspectors as meaning that the teaching of newly arrived pupils can be adequate when this is solely in the hands of staff who are not qualified teachers. Despite workforce remodelling we do not believe that this is in line with approved practices and protocols, especially for this potentially vulnerable group of pupils. We believe that this is an example of how the brevity of the guidance is unhelpful.
6. We would also query the following statement from the guidance '*Any withdrawal of EAL learners from a mainstream class should be for a specific purpose, time limited and linked to the work of the mainstream class; the subject/class teacher should be involved in all the planning*'. This statement could be open to misinterpretation and does not reflect developments in the field in recent years. For example, it could lead to inspectors frowning on the provision of specialist courses and modules that particularly target the language learning needs of older early stage learners of English. Such programmes have been highlighted and endorsed by, among others, the National Strategies New Arrivals Excellence Programme. This statement would therefore benefit from further elaboration and discussion.

Whilst we are pleased that OfSTED has expanded on its previous guidance regarding EAL (Inspection Matters 13, 2007), we are sure you will agree that the content of the current guidance is insufficient to guide non-specialist inspectors in judging the work of schools in this area. Comprehensive guidance is additionally important because, as you have recognized, NC performance data is of limited use in this area. If we compare this guidance with that recently provided for inspecting learning difficulties and disabilities or community cohesion, it is apparent that it is not comparable in length nor detail. This seems inadequate for a group of learners that now makes up some 14% of the school population.

We know that OfSTED is keen to ensure that inspectors are well prepared to pursue all issues, including EAL, within the Section 5 inspection framework and the importance it places as an organization on its duties with regard to Race Equality and Community Cohesion. As inspectors are no longer 'endorsed' in EAL, a mandatory training course for inspectors would be of great benefit and would ensure that all inspectors are well prepared to understand, judge and report on the EAL reality in schools. It would also support the routine consideration of these issues in subject surveys. We would be delighted to support this training in any way possible and would be happy to arrange a meeting if you feel that it would be appropriate.

We look forward to hearing from you.

Yours sincerely

Helen Abji
On behalf of NALDIC Executive Committee