

***A focus on improvement: proposals for maintained school inspections from
Sept 2009***

Response by the Association of Directors of Children's Services

The Association of Directors of Children's Services (ADCS) is pleased to submit this consultation response. ADCS is the national leadership organisation in England for directors of children's services appointed under the provisions of the *Children Act 2004* and for other children's services professionals in leadership roles. The Association provides a national voice as a champion for children, with local and central government, and with the public.

This response has been prepared by Professor David Hawker, Chair of the ADCS Standards, Performance and Inspection Policy Committee and Director of Children's Services for Westminster City Council. Any queries regarding this response should be addressed in the first instance to Robert Belli, Administrative Officer, ADCS (e) robert.belli@adcs.org.uk.

1 General

- 1.1 ADCS broadly welcomes these proposals. We support the intention to tailor inspections more to the needs of the school, to continue to adopt a proportionate approach, to involve both parents and school senior managers more in the inspection process, and to focus more closely on classroom practice, with a view to increasing the potential of the inspection process for contributing to school improvement. We also support the intention to report more explicitly on whether the school provides good value for money.
- 1.2 We have had a number of concerns about the current school inspection framework, in particular whether a six year cycle for schools assessed as good or outstanding leaves too great a risk of some of these schools starting to fail without any inspection picking it up at the early stages, and whether the very short inspections carried out in apparently successful schools are sufficient to pick up any problems that might not be evident from the data. We believe that the current proposals go some way towards addressing these concerns, while keeping the total volume of inspection at its current level. In particular, the proposal to publish a three yearly health check on schools which will be subject to the six year inspection cycle should help to prevent complacency in these schools, and the increased focus on classroom observation should help to improve practice where this is weaker.
- 1.3 None of these goals can however be accomplished without active collaboration between Ofsted and the local authority, working through its School Improvement Partners and its dedicated school advisory service. We

would therefore like to see in the proposals a much firmer statement of the value and aims of that collaboration.

2 Responses to the consultation questions

Q1 Is it appropriate to leave the inspection of good and outstanding schools for an interval of six years between inspections?

Q2 Are the proposals for what an Ofsted health check should include appropriate?

We agree with these proposals in principle. It clearly makes sense to use the increasingly rich dataset listed in para 22 to make intelligence led judgements about which schools need inspecting on a shorter cycle than six years. However, as the paper points out, there are other variables which may have an impact, and should therefore count as risk factors. We support the proposal in para 23 to research these other risk factors, and the extent to which they are picked up in other indicators. In particular we support the use of financial data to identify schools at risk. This research should result in an agreed risk assessment model for schools, supported by government, local authorities and the relevant professional associations, which will then form the basis of an open process of determining which schools should be inspected when.

We also support the idea of using the same dataset as the basis for the three yearly health check report for successful schools. Thought will need to be given to how that report is compiled, since the inspector will not have visited the school, but the SIP and local authority teams both will have done. It would make sense for the local authority to have the opportunity to comment on the draft report, in order to assist Ofsted in coming to an accurate and properly contextualised analysis of the school's strengths and areas for development. This then raises important issues about the future relationship between Ofsted and the improvement agencies on the ground. ADCS is of the view that a more holistic approach is needed, which, while respecting the separation of roles between Ofsted and local authorities, allows for a more joint approach to the assessment of individual schools.

Thought will also need to be given to what the procedure should be when analysis of the data means that, rather than a published health check, an inspection of the school needs to take place. Will the inspection report replace or subsume the health check report that would have been issued? We assume the latter. If so, will the reports from the more frequent inspections given to schools graded satisfactory or inadequate also include the material which would be included in the health check report for non-inspected schools? And would this then have implications for the length and style of the reports?

Q3 Are the proposals for targeting inspection at satisfactory and inadequate schools appropriate?

ADCS supports these proposals.

Q4 Is there a place for unannounced inspections?

We are not convinced of the case for such inspections as a normal rule. Their stated purpose, according to the consultation document is to 'see the school as it really is'. The document makes clear that the impetus for this is mainly from parents and pupils, who clearly feel, probably rightly, that a stage managed inspection does not get at what life is really like in the school. However, there is normally a great deal of intelligence at local authority level about how the school really is, gleaned from ongoing contacts, both formal and informal, on a range of issues. Our view is that Ofsted could exploit this intelligence more effectively by establishing a clearer partnership with local authorities. A no-notice inspection could potentially be used, under this scenario, to verify specific concerns which had been raised either by parents, pupils or the local authority, and which the school might have refused to recognise. While accepting that there may be some value in this as a measure of last resort, we would not advocate it as standard practice within the framework.

Q5 Do you agree that we should put in place a national survey which captures the views of children and young people?

Q6 Do you agree that we should put in place a survey which captures the views of school staff?

Q7 Do you agree that a national survey of parents should take place annually?

We fully agree that it is important to collect the views of parents, pupils and staff as part of the evidence base for both regular health checks and periodic inspections. In particular we support the use of parental surveys to ascertain their views on the school which their children attend.

We would like to see all these surveys designed and administered at local level, as part of the wider work of the Children's Trust. Our response to the Tellus consultation has been to advocate for a system which incorporates the national questions into local surveys, in order to provide the data required by both local and national government in putting together a picture of children's wellbeing at local level. We would support the use of data arising from such locally based surveys as part of the inspection framework. The surveys would need to include the key questions required by Ofsted for its evidence base, and we are happy to work with Ofsted and the DCSF to explore the potential for this approach. So far as school staff are concerned, they could be surveyed under this scenario as part of the local workforce development strategy. The possibility of building on existing work (for example the NFER already undertakes an annual survey amongst Headteachers) should be explored.

It may be that, in terms of the different data requirements involved, a single survey is not realistic once the idea is investigated. If that proves to be the case, we will lend our support to separate surveys. We would, however, be

strongly in support of a single survey approach for each of the three constituencies, even if this meant that some of the refinement which would arise from separate use-specific surveys is compromised in favour of practicality.

Q8 Should the senior management of the school play a greater part in inspection by shadowing the inspectors?

Yes. The consultation document sets out very clear evidence in support of this approach, and ADCS agrees.

Q9 Do you agree that inspectors should focus more attention on the achievement of different groups of pupils?

Q10 Do you agree that inspection should take more account of the capacity of the school to improve?

We fully support the intention that inspectors will spend more time in the classroom, inspecting the quality of teaching and learning on the ground. This will not necessarily reveal how successful the teaching is at helping specific groups of pupils to achieve, but it is an essential pre-requisite. Moreover, it is the most distinctively unique contribution an inspector can make to the whole improvement process.

So far as the achievement of individual groups of pupils are concerned, it is clearly right to focus on this as part of the drive to help every child succeed, and it is in line with the Government's commitment to closing the gap. Both comparative progress data and first hand classroom observation are needed to get a clear picture of how well as school is doing in this regard. For smaller schools, and with smaller specific pupil groups, the available data will be of less help than direct observation in getting at the reality of whether the school is providing appropriately for them.

The capacity to improve judgement now has a reasonably respectable pedigree in the system, and is clearly to be preferred over purely historical performance as a tool for improvement. The parallel proposals for Comprehensive Area Assessments are currently advocating that the direction of travel judgement should be a commentary rather than a grade. It is uncertain whether this approach would be possible so far as school inspection is concerned. As the consultation document rightly points out, self-evaluation is an important part of the system. The capacity to improve judgement should therefore take as its starting point the accuracy and quality of the school's own self evaluation, and then deal with the following domains:

- management strength;
- rigour of performance management arrangements;
- curriculum and workforce planning
- financial and development planning;
- pupil support and target setting;
- relationship with the local authority, other schools and other services; and

- competence and enthusiasm of the staff and governing body.

Q11 Should Ofsted continue to use CVA as a measure of schools' progress?

Q12 Do you agree that we should define minimum standards for learners' outcomes?

ADCS continues to support CVA as the most reliable way of judging schools on a like for like basis, using the progress being made by pupils. We recognise that CVA cannot capture the full breadth of a school's achievements, and must always therefore be seen as one piece of information alongside others, as a way of judging a school's effectiveness. We also recognise that any contextualised analysis of raw data depends on the weighting given to individual variables, and can theoretically be open to manipulation. However, we have no evidence that schools are using CVA as a way of excusing a lack of drive on their part to achieve the best possible results for their pupils in absolute terms. Indeed, the very construction of the CVA measure, based as it is on raw results data, makes it impossible to get good CVA scores without focussing on academic achievement. This point needs explaining rather more forcefully than has been the case recently. In our experience, where CVA is cited as evidence that, despite lower absolute results, a school is doing well, this is being done defensively, against an unjustified accusation that the school is 'failing' its pupils. CVA remains the most accurate indicator of a school's success in achieving good results for all its pupils, regardless of their prior achievement level.

By that logic, we are not in sympathy with a simplistic approach to judging the performance of schools, nor even the achievements of individual pupils, purely on their attainment of specific levels or grades. It is clearly helpful to have some benchmarks in the system, as the 5 or more A*-C grades at GCSE including English and Maths has now become, and it is also valuable to give this particular benchmark prominence in terms of the skills needed by young people for the adult world. But to make these the only, or even the principal, way of measuring school success is to devalue the rest of the system. We are therefore opposed to any further moves towards defining this particular benchmark as a 'minimum standard' which all learners have to attain.

Q13 Should we inspect the impact of partnerships on outcomes for children?

Yes. Partnership working is an essential element in promoting children's wellbeing, and is central to the operation of Children's Trusts, of which schools need to be an integral part. It would be impossible to comment on the effectiveness of a school's provision in promoting wellbeing without looking at the quality of its partnership with other agencies. We would therefore agree with the rationale for including this aspect of a school's work in the inspection framework. As para 50 states, the school's understanding of, and engagement with, the wider partnership in securing better outcomes for children, and in contributing to the learning outcomes in particular, is critical to their effectiveness as part of the local Children's Trust. We also support in

principle the idea of grouped inspections of schools and other organisations in a local area, as a way of assessing the overall impact of the partnership, and looking at the role of the partners in relation to one another as part of a whole system. This may be a somewhat ambitious aspiration, however, and there is a danger of creating extra bureaucracy for little extra benefit, so it would be wise to trial it and evaluate it thoroughly before making too firm a commitment to it. We do, however, fully support the joint inspection of schools which are federated or otherwise linked in their governance or management arrangements.

- Q14 Should the inspectors' recommendations focus more precisely on the action the school should take to become good or better?**
- Q15 Should we write a letter to parents, setting out what the school should achieve by the next inspection and the actions the school needs to take to make that improvement?**

If there is good liaison between the Lead Inspector and the local authority, it should be possible to write a very clear statement about the action the school needs to take in response to the inspection findings. ADCS would support such an approach. If not, there is a very real danger that the instructions written by the inspector might cut across the work that the SIP and the local authority are already doing to support the school and help it improve, and this would be deeply unhelpful. While, occasionally, an inspector visiting for a day or two might gain a clearer picture of what needs to be done and how than the local advisory team, in the vast majority of cases this will not be so. The resulting recipe for improvement would then risk failing to take account of all the factors involved or to recognise the work that is already being done, and could easily generate confusion about where the responsibility for driving forward improvement actually lies. We would therefore not support an independent stand alone prescription from the inspectorate.

We are also not convinced about the need for a separate letter to parents. In our view the report as a whole should be accessible to parents, and written in such a way as to highlight the school's strengths and weaknesses, and its areas for action, in a clear, unambiguous way, without the need for writing a further précis. If necessary, the key points could be put into a summary which might be detached from the main report and sent in letter form to parents by the school and the local authority.

As a separate observation, while Ofsted does now have responsibility, on behalf of the Secretary of State, for hearing parental complaints about schools, we hold the view that this should not replace the work of local authorities in being the main point of contact for local parents about the schools in their area (apart from Academies).

3 Conclusion

ADCS hopes that these detailed comments will help to refine the proposals in the consultation document. A number of local authorities have volunteered to host trials of the new framework during the current year, and we look forward

to seeing the outcome of those trials. We are keen that the new framework should be successful, and we believe that this will largely depend on establishing new collaborative arrangements between Ofsted inspectors and local authority school improvement teams, along the lines set out in this response. We believe now is the right moment to move towards a more integrated system, and we look forward to working with Ofsted to help bring it about.

Professor David Hawker
Chair of the ADCS Standards, Performance and Inspection Policy Committee
Director of Children's Services for Westminster City Council

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