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Thursday 3 April 2025

## **ADCS response to the DfE consultation on accountability in schools**

The Association of Directors of Children's Services Ltd. (ADCS) is the national leadership organisation in England for directors of children's services (DCSs). Under the provisions of the *Children Act (2004)*, the DCS acts as a single point of leadership and accountability for services for children and young people in a local area, including children's social care and education. ADCS welcomes the opportunity to respond to this important consultation by the Department for Education (DfE).

ADCS held an extraordinary meeting of the Education and Standards, Performance & Inspection Policy Committees in March to consider the proposals set out in this consultation. The discussions in this forum have informed the national response to this exercise.

### **1. Accountability in the state-funded school system**

While there was general support for the purpose and principles set out in the consultation document, there was an ask for the DfE to embed these within a clear framework for accountability. Plans do not yet clearly set out who is in charge or approaches to convening and securing consensus about improvement plans, or how to maintain this consensus over time. ADCS recognises that RISE Teams are still in the very early stages of operation, it will be important to set out who they are accountable to, and what they are accountable for, as well as at what stage they will engage with the LA in their work. A lack of clarity about roles and responsibilities in the education system in recent years has resulted in confusion, as well as drift and delay, which ultimately had a detrimental impact on children's outcomes.

ADCS members would advocate for RISE Teams to work in a place-based way, working alongside the LA and local family of schools, rather than working with individual schools in response to a crisis, typically a poor inspection outcome. In an increasingly academised system, the LA may not always be the accountable body for a school, but due to local democratic structures, as well as a range of statutory duties, we are accountable to local residents when a school is struggling. Ofsted also has clear expectations of the LA in terms of championing children's outcomes and influencing local schools, regardless of status. Greater clarity around governance structures here would be welcome too.

ADCS members felt there should be stronger linkages to wider guidance, services and support to help learners to succeed, such as safeguarding, plus greater connectivity and read across to wider DfE aims and objectives, such as improving school attendance. It is also important to fully recognise the role and contribution of LA services and teams in this space.

### **2. School profiles**

It is helpful that a more nuanced and rounded view of school impact and performance will be on offer in the future beyond a single worded judgement and that school profiles will draw on Ofsted's report card, which is in development. However, ADCS members were unsure whether a single approach or publication could meet the different needs and interests of parents and carers, who would likely be more interested in academic measures, behaviour as well as support for learners with special educational needs, compared to say the LA, DfE itself or teachers looking for a new role, for example. It would be helpful to better describe the audience under the purpose and principles of accountability in the school system.

There are some unintended consequences to guard against here; this development may raise interest in specific schools and create unrealistic expectations as not all parents and carers will get their first choice of school. We do not yet know how this additional information will influence parental choice or whether there will be sufficient understanding of the impact of certain variables within a school profile. And, if some schools are deemed to be less popular as a result of broader information this could impact on individual school financial viability and capacity to improve and impact on the LA sufficiency duty. It could also lead to an increase in complaints and/or parents and carers not choosing to send their child to their allocated school, resulting in more children missing education or home educating.

### **3. Intervention**

This section received the most thorough debate in the meeting, with a general consensus that structural intervention is just one tool in the box and the focus must always remain on the delivery of swift improvements for the benefit of learners, rather than structures. The conversion and rebrokerage process can distract focus and attention from the improvement journey, so it is helpful to add in further steps in the intervention process via RISE Teams where significant improvements are required. However, the group noted that structural reform is not a silver bullet, with examples shared in the meeting of individual schools being rebrokered half a dozen times, or more, with no significant improvement in performance during this time.

“Stuck schools” are often located in geographically isolated areas with entrenched, intergenerational challenges, including high levels of poverty and poor economic prospects. Ofsted research in this space found there are generally two types of “stuck schools,” the first is chaotic and change fatigued, the second has a resistant and embedded culture, many are also in towns and small cities with highly transient pupil populations ([Ofsted, 2020](#)). This wider context makes it challenging to recruit and retain strong leaders and classroom teachers.

The plans set out here do not recognise this reality and it is unclear how a RISE advisor would affect change within two years when the LA, trust or diocese, may have been offering support over a number of years. ADCS members felt it would be helpful to articulate “what good looks like” in this space alongside an analysis of the myriad interventions and initiatives over the years in this space to inform a theory of change.

On plans for RISE Teams to work with schools where they have concerns about pupil attainment, the group reflected on the need to take a broad lens on attainment, including vocational qualifications. Further, some year-on-year changes in examination outcomes can be expected due to differences in the ability mix of the pupils, changes in teaching staff or to qualifications, for example.

Our exam system uses norm referencing via the adjustment of grade boundaries so broadly similar percentages of each grade are awarded each year. So, different cohorts of pupils with the same scores and almost identical coursework may receive different grades, giving an inaccurate view of pupil's abilities over time. And, as disadvantaged pupils often achieve on grade boundaries, schools in deprived areas could be more impacted by changing grade boundaries and as result the proposed accountability measures, raising questions about equality and fairness.

Finally, there were some concerns about the plans for regular Ofsted monitoring visits in addition to DfE challenge and reporting potentially impacting on capacity of school leaders to do the improvement work. This could also act as a disincentive to some sponsors where a structural intervention has been deemed as necessary. A question about the capacity of Ofsted to fulfil this new monitoring duty was also raised.

#### **4. Additional questions**

ADCS is committed to the principles of equity, diversity, and inclusion which are fundamental to all areas of our work. We are committed to highlighting issues of disproportionality, discrimination and systemic barriers that limit opportunity where they exist, recognising that not all children, young people and families are impacted equally. It was disappointing to see that the equalities section did not set out an initial assessment of impact for comment, rather than seeking the views of responders. ADCS members specifically raised the importance of ensuring there is diversity amongst RISE Team advisors in terms of employment histories as well as personal characteristics and the need to focus on cultural competency in training and ongoing development of this workforce in order to guard against structural biases.

In terms of workload and wellbeing of staff, in particular school leaders, the impact of monitoring on top of other forms of scrutiny and challenge may result in leaders being increasingly focused on the demands of demonstrating progress, instead of making the progress itself. Additional improvement funding and support could usefully be provided for cover to allow for staff to attend training.

For further information on any of the points raised in this response, please contact the relevant policy officer in the first instance via [katy.block@adcs.org.uk](mailto:katy.block@adcs.org.uk).