

Submitted via email

Friday 11 April 2025

ADCS response to the Ofsted consultation on changes to education inspection

1. Introduction

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 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.

In March, ADCS held an extraordinary meeting of the Education and Standards, Performance & Inspection Policy Committees to consider this consultation. The discussions there forms the basis of this response.

2. Inclusion

ADCS members welcome the stronger focus on inclusion in the proposed changes to the education inspection framework, and the emphasis on inclusion threaded throughout the different toolkits for inspectors. This is needed and indeed will be necessary as reforms to the system and support for learners with additional learning needs and disabilities begin to take shape. It is important that Ofsted's final definition aligns with the government's vision and reform plans, which are expected to be set out in a new white paper later this year.

In order for inspectors to have an accurate picture of inclusion and belonging, the group talked about the importance of not focusing solely on learners at the school but also considering the experiences of those who were not admitted to the school, who have been excluded, off rolled or left to home educate.

LAs have previously been asked to volunteer soft intelligence about schools during an inspection, ADCS members believe systemising this process as part of updates to the framework and ways of working would be more transparent and consistent.

A discussion about the data and insights LAs hold that would be useful for inspectors to see or access in coming to a judgement about inclusive practices at a school or other education setting followed, these included:

- Elective home education where the reason provided for this move is school dissatisfaction or the school cannot meet needs
- Number of education, health and care plans (EHCPs) where the school cannot meet needs
- Percentage of children on roll who have SEND support or an EHCP
- Number of directions the school has had for learners with SEND
- Number of moves into and out of school
- Number of learners with SEND arriving outside of usual school admissions window
- Timeliness for children starting part-time timetables

- Fair access protocol admissions for vulnerable children e.g. children in care
- Number of learners reintegrating into the school following an alternative provision (AP) placement and the use of AP
- School attendance data (national data are not yet robust)
- Number of children suspended, excluded and supported to avoid an exclusion.

It was noted that there could be some specific challenges to navigate in the minority of LAs with a grammar school system, which is exclusive by definition.

The consultation includes a working definition of inclusion; during the meeting there were mixed views about this. While some felt it accurately described an inclusive provider, others felt it does not necessarily accurately define inclusion. Where there were concerns about the definition, these largely related to the need for more specificity in order to make a judgement about how welcomed and valued learners feel, this is subjective. Loose terminology could result in misunderstandings, dissatisfaction and increased complaints

Finally, the group noted the importance of training and development for the inspection workforce around inclusion and the role or, of links to, LAs here.

3. Report card approach

While there was support for the development and use of a more nuanced approach to describing performance, including strengths as well as areas for development, there was some concern that the report card proposals are overly complex. A couple of unintended consequences were raised here in terms of the wellbeing of school leaders and the risk of mid-range schools becoming less inclusive in order to improve.

Report cards allow parents and carers to focus more on what is important to them and their child/ren, whether that's the curriculum, wellbeing or inclusion. However, there are multiple audiences for report cards and it is not clear that the needs of parents, school leaders, teachers and government can be met with a single approach.

4. Evaluation scale

The group supported the break with the longstanding four-point scale. "Good" under the current inspection regime is a broad church – over three quarters or 77% of all state funded schools are currently rated as Good. The proposed new approach effectively splits this grading and raises the bar for "Outstanding," which again was welcomed. The need for clear grade descriptors and the differentials between each grading was underlined.

Plans to share the best or exemplary practice via the Ofsted Academy are helpful as are plans to include contextual information about the school and the community it serves as part of the evaluation and reporting process.

Some schools in a category of concern have very significant challenges the leadership of the school, the LA or the trust cannot easily address e.g. high levels of deprivation and generational inequalities or highly transient populations. It is helpful, and indeed fair, to recognise this reality. Contextualising judgements is vital in understanding how services are developed, delivered and are performing. Considering demographics and the local needs profile in education inspections would offer insights into inclusion.

5. Inspection methodology

On monitoring, ADCS members felt six visits in a two-year period could be excessive given parallel oversight from, and work with, the DfE's new RISE teams. There is a risk that servicing the demands of monitoring and inspection take focus away from the day job and the improvement journey. A focus on the areas in need of greatest improvement as well as flexibility about the duration of monitoring is helpful, particularly in those schools judged as "Requires Improvement," may help mitigate here.

Coordination will be important to ensure that the demands of this process does not add to either longstanding workload or wellbeing concerns related to inspection. There was a query raised about the capacity of Ofsted to service this intensive regime as settings judged to be "Requires Improvement" as well as "Inadequate" will be subjected to monitoring.

6. Workload and wellbeing

Plans to reduce the administrative burden and expectations in terms of written evidence as part of the inspection of education settings were welcomed by ADCS members.

There were some concerns about the proposed timeline set out in the consultation for both the development, piloting and introduction of the new framework and approach could add to the anxiety and stresses school leaders in particular feel. There are significant changes planned to both what is looked at in an inspection, the methodology and approach as well as reporting, with piloting happening in parallel with the consultation and the new regime due to be introduced from November. This does not leave much time for planning and preparation.

7. Equality impact assessment

The diversity of Ofsted inspectors was raised during discussions and the need to focus on cultural competency in training and ongoing development of the existing workforce in order to guard against structural biases.

To discuss any of the points raised in this consultation response, please contact the relevant ADCS policy officer in the first instance via katy.block@adcs.org.uk.