

## *Better inspection for all* – response briefing notes

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*Better inspection for all* sets out Ofsted's vision for a new framework of inspection from September 2015. In particular, it outlines proposals for the following:

- A common inspection framework for all (early years settings on the early years register, maintained schools and academies, non-association independent schools and FE and skills providers)
- The introduction of short inspections for maintained schools, academies and FE and skills providers that were judged good at their previous inspection
- Full inspection of non-association independent schools within a three-year period

The consultation also seeks views on inspection methodology and whether the quality of curriculum provision should be a separate judgement. You can find the full consultation documentation and questionnaire on the [Ofsted website](#).

This document outlines NAHT's policy position on key areas of the consultation which members may wish to reflect in their own responses.

When completing the Ofsted consultation, it would be helpful if you could provide evidence from your own school to reinforce the points you make.

### **The effectiveness of leadership and management**

NAHT believe this heading should be reconsidered. School leadership and school governance are distinct roles within a school. While the best schools combine excellence in both - in many cases, strong school leadership compensates for a lack of skill, experience or engagement in the governing body. In other cases, determined school governors can overstep their remit to the detriment of the school as a whole. For that reason, NAHT is suggesting that either the effectiveness of school governance should be a separate inspection judgement, or separate grades for leadership and governance should be provided as subheadings within the overall judgement.

### **The quality of the curriculum**

All children are entitled to access a broad and balanced curriculum. Too often, however, external accountability drivers and/or specific religious agendas have resulted in a narrowing of the school curriculum. In some cases this has resulted in

children missing opportunities to engage in sports, the arts or other enriching activities.

This is also a time of enormous upheaval in terms of curriculum and assessment, with significant change occurring in every sector.

For these reasons, NAHT is advocating a separate, graded judgement for the quality of the curriculum.

### **Shorter inspections**

NAHT has long advocated a proportionate approach to school inspection and so is broadly supportive of this measure.

### **Inspection of non-association independent schools**

NAHT believes all schools inspected by Ofsted should be inspected under the same conditions and so is broadly supportive of this proposal.

### **Development of inspection methodology**

This section of the consultation asks for specific suggestions about how Ofsted can make its judgement more reliable and robust. NAHT would suggest the following:

- **Reserve the use of no-notice inspection for occasions where there are serious concerns about the safeguarding of children.** All evidence suggests that no-notice inspection causes a number of logistical challenges and presents a barrier to the involvement of school leaders, governors and parents. It would be very difficult for a school to make any material change to the work it is routinely engaged in within the current notice period
- **Do not proceed with an inspection without the head teacher (or acting head teacher) being present.** It is unfair and unwise to attempt to evaluate the work of the school without the head teacher on site to answer questions and direct inspectors towards sources of information. Ofsted must be cautious in assuming that primary schools are able to devolve leadership in the same way as large secondary schools
- **Ensure the lead inspector is always a specialist from the sector and phase they are inspecting.** If inspectors are to make robust judgements about the quality of teaching and learning they are observing, it is vital they have practical experience of working within the sector they are inspecting
- **Give greater weight to school generated / commissioned data –** especially when it is methodologically more robust than Ofsted's. This is particularly the case when considering parent feedback when school commissioned data routinely has higher response rates and is more comprehensive than ParentView
- **Consider evidence from peer review.** NAHT believes a system of accredited peer review should be the first line of inspection, moderated by HMIs and reinforced by HMI-led inspection of failing or high risk schools.

There are many emerging examples of peer review, including NAHT's Instead project, which could provide a proof of concept.

While this is not yet the case, we believe evidence of engagement with peer review should be considered by inspectors, where available. The readiness of the school to hold itself to account by seeking support from local schools, whether through formal or informal clusters, provides evidence of proactive improvement. Documentation from any such review should also be considered valuable evidence of the school's achievements and the action it is taking to address issues identified. Additionally, the contribution the school is making to support other institutions should be considered when making judgements about its strength of leadership and contribution to the community

- **Consider group inspection for federations and trusts.** NAHT believes Ofsted should consider the group inspection of schools in federations and trusts. We accept that each individual institution will need a separate report, but believe that group evidence should contribute to the leadership and management judgement. The strength of leadership across a group of schools that work closely together can be a key factor in the school's ability to improve or maintain standards
- **Evaluate a school's ability to work towards their own targets.** NAHT is calling for an end to national floor standards as triggers for intervention, in the belief that floor standards are either disappointing, because they represent a minimum, or they are not floor standards at all. Instead, NAHT believes each school should sign up to a path towards an ambitious goal, with the rate of improvement on this path based on evidence of sustainable rates of improvement at different levels of performance.

While floor standards remain, we believe Ofsted's methodology should also take account of the extent to which schools are working towards their own targets and their ability to set targets which are both stretching and attainable. This should include benchmarking against peers rather than the national average. We believe this evidence will demonstrate the school's depth of understanding about its performance and progress, and its ability to sustain improvement at an appropriate rate. As such, this evidence should significantly influence judgements based on performance against the floor standards and national averages

- **Balance evidence on core subjects and broader learning.** Time spent gathering data on attainment and progress should strike a greater balance between the focus on core subjects and broader learning, such as sport and health, art and performance, civic responsibilities and PSHE. While we agree that progress in core subjects is important, we believe a rounded and robust picture of school performance will only be achieved by giving appropriate attention to a balance of subjects
- **Make qualitative judgements leading to narrative reports.** NAHT believes accountability should move to a system more strongly connected with

qualitative judgements. While we agree data is vital, we wish to avoid crude targets, and therefore propose that schools publish rich and detailed data on progress, attainment and attendance in return for more narrative accountability measures

Until this system of accountability is in place, we believe qualitative judgements are still vitally important, particularly on the broader aspects of achievement such as pupils' resilience, confidence and empathy. Evidence of this development should be less reliant on specific events, opportunities or lessons, and more on the underlying culture of the school. So not what the school does, but how they do it

- **Provide an appeal process** – separate from the complaints process – for cases where there are significant concerns about mis-use of data by an inspector
- **Establish an independent complaints process and publish its findings**