



House of Commons

Children, Schools and Families
Committee

**School Accountability:
Responses from the
Government and
Ofsted to the First
Report of the
Committee,
Session 2009–10**

**Third Special Report of
Session 2009–10**

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The Children, Schools and Families Committee

The Children, Schools and Families Committee is appointed by the House of Commons to examine the expenditure, administration and policy of the Department for Children, Schools and Families and its associated public bodies.

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Third Special Report

On 7 January 2010 we published our First Report of this Session, *School Accountability*.¹ The Government's response was received on 4 March 2010; Ofsted's response was received on 8 March 2010. The two responses are published as Appendices 1 and 2 to this Report.

Appendix 1

Government's response to the First Report from the Children, Schools and Families Committee, Session 2009–10

The Select Committee's recommendations are in bold text.

The Government's response is in plain text.

Some of the recommendations and responses have been grouped.

Introduction

1. We are satisfied that schools should be held publicly accountable for their performance as providers of an important public service. We concur with the views expressed in evidence to us that the two major consequences of the accountability system should be school improvement and improvement in broader outcomes for children and young people, including well-being.

The Government welcomes this, in particular the references to school improvement and improvement in broader outcomes for children and young people, including well-being.

2. The New Relationship with Schools policy was a laudable attempt by the Government to simplify the school accountability system, particularly in relation to inspection. However, the Government has continued to subject schools to a bewildering array of new initiatives and this has in many ways negated the good work started in New Relationship with Schools.

The New Relationships with Schools made successful strides towards establishing a more intelligent, evidence-based accountability framework and securing better alignment between schools' priorities and the priorities of local and central government. Significantly it also introduced a school improvement partner (SIP) for every school to provide support to the school, helping its leadership to evaluate its performance, identify priorities for improvement, and plan effective change. We reject the view that schools have been subjected to a 'bewildering array' of new initiatives, and make no apology for the Government's commitment to securing continuing improvements for children and young people.

¹ First Report from the Children, Schools and Families Committee, Session 2009–10, *School Accountability*, HC 88-I and -II

The good work started through the New Relationship with Schools has not been negated. Instead, as the 21st Century Schools White Paper sets out, the schools system needs to build on the successes to date, and develop this good work further, for example by strengthening the role of SIPs as the single agent for challenge and support to schools. For all significant business, we expect local authorities, Non Departmental Public Bodies and DCSF to observe the gate keeping role of SIPs. The SIP role will not be to implement national policy, but to ensure that schools are identifying and tackling their own priorities with pace, rigour and ambition. In addition, schools will have more control and resources at school level, enabling them to focus on their individual improvement priorities and tailor support more easily to their particular needs.

The good work of the New Relationships with Schools continues as well in the refinements we are making to the accountability system, particularly through the development of the School Report Card. This School Report Card will form a central component of the developing framework for school accountability, building on the reforms started by the New Relationship with Schools rather than replacing or competing with it. For Ofsted the School Report Card will support the school inspection process and the intention is that the indicators that underpin the School Report Card will form the core of the process of risk assessment that Ofsted will use to select schools for inspection.

The White Paper also charges the Implementation Review Unit (IRU) with the task of producing a national review of obstacles to delivery. The review will 'undertake a thorough audit of how our policies are implemented to identify any obstacles which prevent effective delivery', reporting in Spring 2010. The review is in line with the conclusions of Sir Michael Bichard's April 2009 report on the Operational Efficiency Programme, a key recommendation of which was to '*introduce reviews of burdens from a frontline perspective on a rolling basis, with short, intensive reviews that should be sector led*'. The review will also consider how to rationalise the overall range of policy documents which schools are required to produce in response to recent recommendations in Sir Alan Steer's *Learning Behaviour* report.

The IRU also has an ongoing role to monitor and assess the implications of any new DCSF initiatives.

3. We are concerned that the Government's 21st Century Schools White Paper signals even greater complexity in an already overly complex system of school accountability and improvement initiatives. There is a real danger that schools may become overwhelmed by the intricacies of the proposed reforms and that School Improvement Partners and local authorities may not have sufficient time or resources to mediate effectively between schools and the myriad providers of school improvement support.

The White Paper heralds a simplification of the accountability and improvement system by devolving resources and decision making to schools and setting the School Report Card at the heart of accountability, aligned with Ofsted, to come to a clear consistent view of each school's performance. We recognise the importance of ensuring that LAs are sufficiently resourced to fulfil their roles, and that they have sufficient time to plan for the new SIP role, evidenced by the consultation currently running on the SIP role and the expectation that the SIP reforms will be in place by September 2011.

The revised School Improvement Partner (SIP) role will support and empower SIPs to mediate effectively between schools and the providers of school improvement support. SIPs will have responsibility for working with schools to identify what improvement support they need and responsibility for brokering in that support. SIPs will broker schools' access to school-to-school and other support arrangements, drawing on a national offer of assured providers of paid for improvement programmes, supplemented by free draw-down school improvement products via the web. This will lead to a brokerage offer which will allow schools and SIPs to focus on a common school improvement agenda when reflecting on a school's support needs.

In the revised SIP model, SIPs will have more time to mediate effectively between schools and the providers of school improvement support. SIP days will be increased on a sliding scale with more SIP days for all schools and for the very lowest performing schools a level of support comparable to that provided by National Challenge Advisers.

Schools Self-Evaluation, Self-Improvement Partners and Local Authorities

4. We note that Ofsted is actively considering ways of involving governing bodies more in the inspection process, particularly where inspections are conducted without notice. However, it would have been preferable had the 2009 inspection framework been introduced following a satisfactory resolution of this issue. We recommend that Ofsted bring forward at the earliest opportunity firm proposals setting out how governing bodies will be appropriately involved in all inspections.

We agree with the Committee's views on the importance of governors being involved in inspections of their schools. When the Committee conducted its evidence sessions, Ofsted were considering inspecting without notice as a routine approach to regular inspection of schools. This would have limited the opportunity for governors and others to properly engage in the inspection of their schools. We welcome the fact that HM Chief Inspector decided to continue with short notice for most inspections, which allows parents, governors and others to contribute effectively to the inspection.

5. We urge the Government to reconsider the proposals to place additional statutory duties on governors. We support the principle of better training for governors, but we recommend that the Government set out a detailed strategy for encouraging governors to take up training opportunities without training requirements becoming a barrier to recruitment.

It is important that governors have the support and training that they need to perform their duties effectively and to this end we are reviewing our training programmes. We are working with the National College for Leadership of Schools and Children's Services (National College) and other partners to develop the new training and considering ways to make it more flexible and accessible.

The initial training local authorities provide for governors will focus more on the central task of providing effective challenge and support, holding to account and making effective use of data and information to manage performance. Although we will expect that all new governors will undertake induction training this will continue to be on a voluntary basis.

However, the chair of governors plays a pivotal role in supporting the school to raise standards and improve outcomes for children. We believe that the level of knowledge and skills required of a successful chair are sufficiently challenging that we will require all chairs to undergo specific training for this role.

6. We are persuaded that self-evaluation—as an iterative, reflexive and continuous process, embedded in the culture of a school—is a highly effective means for a school to consolidate success and secure improvement across the full range of its activities. It is applicable, not just to its academic performance, but across the full range of a school’s influence over the well-being of the children who learn there and the community outside.

7. We believe that Ofsted should do more to encourage schools to be creative and produce evidence of the self-evaluation process which works for them and speaks to the true culture and ethos of their own school. Ofsted should ensure that its own inspection processes are flexible enough to accommodate and give appropriate weight to alternative forms of evidence of self-evaluation.

We welcome the Committee’s views about the effectiveness of school self-evaluation.

Self-evaluation is central to Ofsted inspection arrangements and this focus has been strengthened over successive cycles and changes to frameworks. There needs to be some consistency in approach so that schools and inspectors are clear about expectations. Outcomes from the self assessment need to be summarised in a consistent format so that they can be considered for the inspection and that is the purpose of the school self evaluation form (SEF). But there is no specified approach for how schools should evaluate their performance; that is a matter for each individual school to determine as part of its internal review processes and procedures

The evaluation section of the SEF now mirrors the inspection evaluation schedule which is helpful for schools as they can see exactly how the assessments in the SEF relate to the inspection assessments.

8. We are attracted to a model of accountability which encourages and supports schools towards a meaningful, continuous self-evaluation process, evidenced in a form which the school considers most appropriate and verified through inspection. We are persuaded that true self-evaluation is at the heart of what a good school does. For a school which is performing at a good level, embedding processes which encourage continuous self-improvement are likely to be of far more practical benefit than an inspection every few years. The latter is necessary mainly as a check to see that a school is performing at the appropriate level. Inspection should be a positive experience, reinforcing good practice and fostering dialogue with schools in relation to areas where further improvement can be made. The Government and Ofsted should endeavour to do more to help schools which have not yet come to terms with the concept of self-evaluation in its fullest sense.

The Chief Inspector’s latest Annual Report shows that the quality of self-evaluation was outstanding or good in over 70% of schools inspected last year. It also points to a steady

trend of improvement in school self evaluation over the past ten years. Ofsted does assist schools by providing guidance on effective self evaluation and during inspection, through the dialogue which inspectors have with head teachers and staff.

Self-evaluation should not just, or primarily, be a preparation for Ofsted inspection. In the model of school improvement set out in the White Paper, with every school responsible for driving its own improvement, and seeking to improve continuously, a continuous self-evaluation process by each school will be crucial in every school. The School Improvement Partner will play an integral role in supporting a school's self-evaluation, supporting each school to develop its own improvement priorities across the full range of Every Child Matters outcomes.

9. We welcome the fact that the National College for Leadership of Schools and Children's Services is being asked to review its training and accreditation procedures to support School Improvement Partners in their new role.

The National College is carrying out an in depth review of training and accreditation procedures, including as part of the current joint consultation process on SIPs between the DCSF and the National College, comprising an online consultation, focus groups, and regional conferences.

10. The Government must take care that it does not exacerbate the existing problems with recruitment of School Improvement Partners by increasing the training burden and introducing requirements that existing School Improvement Partners be reaccredited and that they all carry an ongoing licence to practice.

It is essential that quality is at the heart of the revised SIP model, and training will be reformed and SIPs will be reaccredited to ensure they are constantly of a high enough standard. However, SIP recruitment is a key priority and all changes to the revised model will take into account the recruitment of SIPs. Reforms to the SIP model, including reforms to training and introducing reaccreditation, should in fact help support recruitment by helping to ensure the SIP role is seen as high skill, important, value adding, well supported, and career enhancing.

11. We recommend that the Government produce clear plans to show how and from where enough School Improvement Partners (SIPs) with appropriate skills and experience will be recruited with sufficient time to dedicate to the expanded remit for SIPs which is proposed in the Government's White Paper.

The National College and the DSCF will produce detailed plans to show how and from where enough SIPs with appropriate skills and experience will be recruited. The increase in SIP days, operating on a sliding scale with more days for the most at risk schools, will allow SIPs sufficient time to dedicate to their expanded remit.

12. We agree with the Audit Commission that local authorities should be more involved with monitoring, supporting and, where necessary, intervening in school budgets and finance. It is indefensible that the expenditure of such vast sums should attract so little scrutiny. Central government should make clear that schools must make a proper accounting of their expenditure to local authorities; and that local authorities should be as engaged with the monitoring of finance as they are expected to be with the

monitoring of performance and standards. We do not advocate an erosion of schools' autonomy, but we consider it important that the correct level of financial support is available to them in order to derive maximum value for money from the schools budget.

The Government agrees that local authorities should properly monitor, scrutinise and challenge schools' expenditure. For financial purposes, maintained schools are part of local authorities, spend on behalf of them and therefore must also be fully accountable to them. Local authorities already have responsibility for this through the Chief Finance Officer's statutory role under Section 151 of the 1972 Local Government Act, with schools' expenditure being subject to scrutiny through internal and external audit as with any other local authority service. The Chief Finance Officer has to sign off the grant return confirming that the Dedicated Schools Grant (DSG) has been properly deployed. Each local authority must also set out its financial relationship with schools in a Scheme for Funding Schools and the Government has set out in regulations and statutory guidance what should be included in the Scheme. This includes provisions on monitoring, budgeting, and approval of deficits.

The Government has introduced a number of measures in recent years to strengthen school financial accountability. All schools are now required to achieve the Financial Management Standard in Schools (FMSiS); this requires schools to demonstrate to an independent assessor that they are competent in financial management, reporting and governance. Schools are also required to complete Consistent Financial Reporting (CFR) returns—these show expenditure and income under headings which are nationally consistent and allow schools' spending patterns to be benchmarked against each other. Local authorities are active in using this tool with their schools.

The Government has recently published a discussion paper on the better use of resources in schools—*Securing our future: using our resources well*. This sets out a number of areas which offer the greatest scope for savings in schools. The paper looks to local authorities to share good practice, identify schools most needing help in their resource planning and promote discussion with their Schools Forum.

The Government has introduced new powers to enable local authorities to intervene in schools' financial management where necessary. Local authorities are now able to issue a Notice of Financial Concern where they have significant financial concerns about a school but where withdrawal of delegation is not justified. This has given local authorities an alternative to the "last resort" option of withdrawing delegation.

The Government publishes annually the budget, outturn and balances of every school, taken from local authority section 52 returns, on the DCSF's website. The number of schools with excess balances has in fact been far greater than the number of schools in deficit. We have stressed to schools the importance of effective planning and that revenue funding should be spent on the pupils of today. Local authorities are now required to have a mechanism to claw back from schools excess uncommitted surplus balances, and we know that a number have used this power; this has resulted in a fall in overall net balances in 2008–09 for the first time since 2002–03 and the lowest number of schools with excess balances in ten years.

13. We approve of the collaborative approach to school improvement taken by some local authorities; and we consider that partnership working between local authorities and all schools in the local area is a valuable means of providing support and spreading best practice. We urge central and local government to work together to ensure a more consistent approach across local authorities in this regard.

The Government agrees in the importance of collaboration between local authorities and schools to drive school improvement and it is our intention to facilitate the formation of more and better school partnerships. The White Paper sets out the intention to make collaboration central to the organisation of the school system. Over recent years, schools have increasingly chosen to become involved in collaborations in order to achieve more for children and young people by working together and we will continue to encourage this approach.

By strengthening the existing powers of local authorities to direct schools to form federations or trusts with stronger partners we are seeking to increase the range of improvement options available to schools that are causing concern. This intervention will serve to provide the schools in question with additional resource and thus support drawn from recognised, accredited education providers. However, we do not wish this route to be used only by poorly performing schools. The Department will develop administratively the means for setting up Accredited Schools Groups. Accredited Schools Groups are intended as a reserve pool of educational providers who are known to have high standards and can help other schools raise their own performance—whether those schools are poor performers that need help, or ambitious schools wishing to do even better. Accredited Schools Groups are emphatically not restricted to schools that are performing poorly—good schools that wish to improve further may take control of their own development and decide to form a federation with an accredited provider.

14. We urge the Government to recognise the good work done in the local authorities which demonstrate a systematic, collaborative approach towards the identification of schools in need of improvement and the provision of support in raising their standards of performance. We recommend that the Government should be sparing in the use of its extended statutory powers to intervene in relation to school improvement. We consider that these powers should be used only in cases where the relevant local authority has failed in its duty to secure school improvement. They should not be used as a mechanism for central government to increase its control over the way in which schools are managed.

These powers are indeed reserve powers, to be used only in extreme circumstances. We agree, and have always made clear, that we expect LAs to work with schools, supporting and challenging them to meet the needs of all pupils. We also recognise that many local authorities are doing this well and indeed we will look to these LAs to share their learning with others. However, we must stress that if an LA is failing to tackle underperformance effectively, the Government should not and will not hesitate to step in and take swift and effective action to ensure underperformance does not become entrenched. The decision to intervene will not be taken in isolation. A wide range of stakeholders will provide evidence for consideration. This will include attainment and progression data; contextual information and detail on the LA's capacity to support

improvement in schools that are underperforming or are at risk of underperforming in the future.

The Inspectorate

15. In general terms, we support the approach to inspection set out in the 2009 inspection framework. We consider that a frequency of inspection in proportion to a school's current levels of performance is sensible, although some concerns remain about identification of schools where there is an unexpected slide in performance. We consider that a short notice period for inspection is sensible, but schools must be given sufficient time to collate all the necessary evidence and ensure attendance of key personnel. Without-notice inspection is appropriate where there are particular concerns about performance, and safeguarding in particular, but this approach should not be used without good reason.

We note the Committee's general support for the new inspection arrangements and agree with the Committee's conclusion that there is a place for 'without notice' inspection, particularly where there are concerns about a school. Ofsted did pilot inspection without notice in the lead up to implementing the new arrangements but concluded that routinely inspecting without notice would limit the opportunity for parents and governors to contribute to inspections. We welcome Ofsted's decision to retain short notice as the norm for its regular inspection of schools. This is consistent with the legal provisions relating to the Chief Inspector's functions to have a user-focus in carrying out her functions and the more specific provisions relating to section 5 inspections where HMCI has a duty to have regard to the views of certain persons, including parents, pupils and the governing body.

16. If visits to schools are to be as short as two days—and bearing in mind that some of those days will be taken up by preliminaries rather than by inspection itself—inspectors will need to be highly trained and well qualified if they are to make an accurate evaluation of school provision.

We agree with the Committee on the importance of inspectors being suitably qualified and that is why the Education and Inspections Act 2006 Schedule 12 contains a requirement that the Chief Inspector must ensure that inspectors have the qualifications, experience and skills necessary to perform required functions in an effective manner. The lead inspector does make contact with the school prior to the start of the inspection including an extended telephone call to the headteacher to discuss evidence and issues so that the inspection time is not taken up with preparatory tasks.

17. We remind Ofsted of the need for transparency and publicity for the way in which inspection data are combined to form final judgments on schools.

We support the Committee's conclusions on the need for transparency and publicity. This is consistent with the principles for public service inspection which state that inspection should disclose the criteria used for judgements and be open about the processes involved. Ofsted publishes all of its supporting guidance to inspectors so that schools and others can familiarise themselves with these.

The concerns raised in the report regarding schools being "tripped up" by limiting judgements seem to relate to more general misunderstandings about how the judgements

were being applied. Ofsted has since issued further clarification for schools on its inspection of attainment and achievement, and on safeguarding.

18. We support the principle of increased emphasis on the views of pupils and parents, but we have some reservations about the level of responses to questionnaires, particularly for schools with a challenging intake. We urge Ofsted to make transparent the approach that inspectors will take when forming judgements on schools where there has been a low level of response to questionnaires from parents; and it should not rule out the possibility of meetings with parents.

Parents' views form an important part of inspection evidence, as do the views of pupils. Ofsted is under a statutory duty to have regard to the views of parents and pupils. However, parental views can only ever inform the judgements of inspectors and always need to be considered against the other evidence obtained as part of the inspection. We know, for example, that poor performing schools can often have very supportive parents and the feedback from parents would not necessarily give an indication of the weaknesses in the school but inspectors will, of course, take account of the level of response from parents when forming their judgements. Since September 2009 inspection reports have contained a summary of the responses given by parents to the parental questionnaire. Where parents want to meet inspectors to discuss matters, every effort is expected to be made by the inspection team to accommodate this.

19. We are persuaded of the need for an inspectorate, independent of government, which can assure the quality of provision in individual schools, as well as producing more general reports on aspects of the education system at a national level. We consider that the latter are particularly important, not least because they should provide a sound evidential basis for policy-making by the Government.

We welcome the Committee's recognition of the need for a separate inspectorate which has independence from government. That independence is essential in terms of the professional judgements which inspectors make and the reporting of findings, which Ofsted needs to be in a position to make without fear of favour. Ofsted has complete independence in these matters. However, Ofsted is a non-ministerial government department and one of the key functions of the Chief Inspector is to provide advice to the Secretary of State on matters within Ofsted's remit.

We agree also with the Committee's view about the importance of Ofsted reporting on the system as well as on individual schools. Much of the former needs to come from evidence drawn from the regular inspection of schools, but there are also targeted survey visits which take a more focused look at specific aspects or individual subjects.

20. Both Ofsted and the Government should be alert to any sign that the growth of Ofsted's responsibilities is causing it to become an unwieldy and unco-ordinated body.

We note the Committee's observations about the expansion of Ofsted's remit potentially leading to competing priorities and a loss of direction. With Children's Services increasingly being delivered collaboratively there is a strong rationale for having a single inspectorate overseeing all relevant services. Further, with the raising of the participation age and the need to ensure that there are suitable education and training options available for young people, having one inspectorate overseeing the services which will be delivering

to meet this need will enable an overall assessment to be made on how the needs are being met.

The Committee has an important role to play in reviewing the inspectorate and its work and we will continue to draw on the evidence from the Committee's work in considering this matter.

21. We believe that Ofsted should aspire to have HMIs lead all inspections. Schools causing concern should always be inspected by a team headed by an HMI.

We note the Committee's conclusion here but also noted with particular interest the reference (paragraph 126) to there being little direct evidence of any major gulf between the quality of HMI inspectors and those supplied by external contractors. HMI have been involved in leading many inspections since September 2005, working alongside additional inspectors and as the report shows, HMI also have a role in supervising and 'signing off' all additional inspectors as being suitable to deliver inspections and quality assuring reports. Prior to this, the role of HMI in regular school inspections was much more limited.

There are many effective and highly qualified additional inspectors who have delivered very good inspections and reports since the introduction of the Section 5 Inspection system. The option of additional inspectors also provides the opportunity for existing headteachers and teachers to spend periods of time as inspectors, which benefits the inspection system and the schools. We would not want to lose this valuable element of professional development.

We do not concur with the view that monitoring visits of schools causing concern should always be carried out by teams headed by an HMI. If an additional inspector is competent enough to lead an inspection which results in a school being placed in a category of concern, they should be suitably qualified to lead any subsequent monitoring of such a school.

22. We note that Ofsted has a duty to encourage improvement in schools. However, we do not accept that Ofsted necessarily has an active role to play in school improvement. It is Ofsted's role to evaluate a school's performance across its many areas of responsibility and to identify issues which need to be addressed so that a school can be set on the path to improvement. Ofsted has neither the time nor resources to be an active participant in the improvement process which takes place following inspection, aside from the occasional monitoring visit to verify progress.

23. We recommend that Ofsted's role in school improvement be clarified so that the lines of responsibility are made clear to all those involved in the school system. Ofsted's function is a vital one: it is, in the purest sense, to hold schools to account for their performance. It is for others—schools themselves, assisted by School Improvement Partners, local authorities and other providers of support—to do the work to secure actual improvement in performance. The Chief Inspector already has a wide and important remit: she should feel no compulsion to make it wider.

We agree with the Committee's conclusion about separating the actions to secure improvement from the inspection function of recommending areas for improvement. That separation is an important aspect of the credibility of the independence of the inspectorate,

which would otherwise be at risk of offering direct advice to schools on how to take forward its recommendations and so open to criticism that it was then involved in inspecting against its own advice.

What is important is that inspection results in clear, meaningful recommendations which enable schools to take the necessary action to bring about improvement quickly, where necessary with support from other agencies.

The White Paper clarifies the accountability system that we want for schools, including the role of Ofsted within it. It points to the central principle that each school is responsible for its own improvement. It also explains that the School Improvement Partner, whose role is to support and challenge schools, is the appropriate resource to directly assist schools in securing improvement. We are broadening the role of the SIP so that SIPs are responsible not only for monitoring and challenge, but also have a wider role of brokering support. SIPs will work with school leaders to identify what support is needed to generate improvement.

24. We recommend a review of the data underlying comparator measures or sets of measures to ensure that they accurately reflect the range of factors that can impact on school performance.

If the focus for inspection is on pupil outcomes, in assessing academic performance in a school, inspectors need to work from the data which is available. Whilst attainment data is important evidence for inspectors, inspection does take a wider view, considering the learning and progress of pupils, reflecting and using the wider range of factors that can impact on school performance. It is achievement rather than attainment which is the prime judgement and which informs the overall effectiveness of the school.

The introduction of an overall score or summary sheet on the School Report Card would provide inspectors, parents and other interested parties with a good understanding of a school's achievements compared with equivalent schools.

25. We consider that the quality of school provision beyond the teaching of academic subjects is extremely important and that Ofsted has a duty to reflect this in a fair and balanced manner in its inspection reports.

26. We urge Ofsted to rebalance its inspection framework in two ways, in order to reflect better the true essence of the school. First, when evaluating academic attainment, we recommend that Ofsted gives less evidential weight given to test results and derivative measures and gives more weight to the quality of teaching and learning observed by inspectors in the classroom. Second, when evaluating a school's performance in terms of pupil well-being and other non-academic areas, we recommend that Ofsted should move beyond the search for quantitative measures of performance and that it should focus more effort on developing qualitative measures which capture a broader range of a school's activity.

In 2005 the legislation governing school inspections was amended to give Ofsted an explicit duty to inspect and report on the contribution each school makes to the well-being of its pupils. The framework now gives greater prominence to wider aspects of well-being including behaviour and attendance, pupil safety, the extent to which pupils adopt healthy

lifestyles, develop workplace and other skills that will contribute to their future economic well-being, and their spiritual, moral, social and cultural development. All of these are reflected in the outcomes section of the inspection and reports. The Children's Plan (December 2007) set out our proposals to ensure that schools are being measured and rewarded for their contribution to children's overall well-being as well as to standards achieved. To achieve this we committed to developing strong school-level indicators that, taken together, measure a school's contributions to pupil well-being and to reflecting those indicators on the School Report Card.

Performance data is a key source of evidence for inspectors and needs to be considered alongside other evidence including direct observation of teaching and learning, self evaluation evidence and discussions with staff and pupils. Pupils' attainment remains an important consideration because it has a direct impact on their life chances. However, inspectors consider this alongside evidence relating to teaching and learning. Good teaching and learning leads to strong pupil achievement and these too are important aspects of the inspection arrangements. If these are effective, this will be reflected in pupils' attainment. We do not think there is a need to rebalance the relative weight given to attainment and learning and progress. The framework enables good teaching and learning to be recognised and rewarded even where attainment is low.

Achievement and Attainment Tables and the School Report Card

27. Performance data have been a part of the educational landscape in England for some years. Like it or not, they are a feature of the school accountability system and we recognise the manifest difficulties in retreating from that position, even if a watchful eye should be kept on the consequences of the abandonment of performance tables linked to test results in other parts of the United Kingdom. If such data is to be collected, much can be done to mitigate the more unfortunate aspects of the publication. We take a pragmatic view and believe that the focus of debate should move towards a more fruitful discussion of the types of data and information collected and the method of presentation.

28. The Achievement and Attainment Tables present a very narrow view of school performance and there are inherent methodological and statistical problems with the way they are constructed. For instance, they are likely to favour independent and selective schools, which have a lower intake of deprived children or of children with Special Educational Needs. It is unsurprising, therefore, if such schools consistently top the academic league tables. Yet most of those who may wish to use the Tables, particularly parents, remain unaware of the very serious defects associated with them and will interpret the data presented without taking account of their inherent flaws. As a result, many schools feel so constrained by the fear of failure according to the narrow criteria of the Tables that they resort to measures such as teaching to the test, narrowing the curriculum, an inappropriate focusing of resources on borderline candidates, and encouraging pupils towards 'easier' qualifications, all in an effort to maximise their performance data. There is an urgent need for the Government to move away from these damaging Achievement and Attainment Tables and towards a system which gives a full and rounded account of a school's provision.

39. We are pleased that the Government is now moving away from the Achievement and Attainment Tables based on a narrow set of measures of academic achievement derived from test results. We believe that the move towards the broader evidence base proposed for the school report card is a step in the right direction. However, we reiterate our warning to the Government that it should not make claims for the school report card which do not stand up to scrutiny. It will never constitute a definitive view of a school's performance but it might, if properly constructed, be a useful tool in assessing a broader range of aspects of a school's performance than is possible at present.

40. At the start of the pilot study of the school report card, it is too early for us to make detailed recommendations about its precise contents. At this stage, we simply urge the Government to take account of the concerns raised by witnesses to this inquiry. There is still much work to be done in developing the school report card into a workable format.

We believe that the Achievement and Attainment Tables have served a vital role in raising standards. They help concentrate the debate on standards through the provision of hard information on achievement strengthening the accountability of schools, colleges and local authorities. However, as set out in the White Paper, the time has come for a radical review of our use of school performance data in the accountability system.

We share the Committee's view that the Achievement and Attainment Tables present a narrow view of school performance and that the media's focus on attainment presents parents and the public with an unfair picture of the quality of provision in some schools.

We welcome the Select Committee's support of the introduction of the School Report Card to replace the Achievement and Attainment Tables and understand their caution in offering full support until the detail has been worked through.

The School Report Card will provide a broad and balanced picture of each school's performance—ranging from exam data to pupil well-being—in one place. It will provide a single, clear and prioritised set of outcomes against which schools will be judged by all parts of the system with predictable outcomes for both excellent or poor performance.

We fully intend to engage all stakeholders in the development of the School Report Card. We are currently engaged with 700 schools involved in the Report Card pilot which offers an opportunity to work closely in consultation with them, their parents, governors, associations and LAs on the development of the important detail on which the success of the School Report Card will stand or fall.

We note the Select Committee's warning not to overplay the outcomes shown on the School Report Card. As set out in the School Report Card prospectus, the annual assessment or publication of data will be a complement to Ofsted inspection. Ofsted inspection provides an in-depth, qualitative professional judgement of a schools' effectiveness through observation, discussion, questioning and challenge, using data as a starting point. The School Report Card will be published on an annual basis and provide a clear, quantitative assessment of the outcomes achieved by a schools' pupils. Both provide vital information from which to draw conclusions about a school's overall performance.

29. We urge the Government to work closely with Ofsted in order to produce a model of the school report card appropriate for use by the inspectorate. However, if in Ofsted's view the school report card ultimately takes a form which is unsuitable for the purpose of risk assessment, as an independent regulator, Ofsted should not feel compelled to adopt the school report card as a replacement for its interim assessment.

35. There is potential for substantial confusion to be introduced if the reasons for differences between scores on the school report card and Ofsted judgements are not clear, leading to a perception of incoherence in the accountability system. This would be unfortunate, as the success of any accountability system depends on the extent to which users have confidence in it. We recommend that DCSF and Ofsted work together to find a way to eradicate, or at least minimise the impact of, this problem. If the Government accepts our recommendation not to include an overall score in the school report card, the potential for conflicting accounts of school performance would be greatly reduced.

We agree that working with Ofsted is important. Both the initial consultation document on the School Report Card (published in December 2008), and the School Report Card Prospectus (published June 2009) were joint DCSF/Ofsted consultations, and jointly badged.

It is essential, for schools, parents, governors, LAs and for Government that all parts of the accountability system give the same messages about what the priorities are. That means the School Report Card and Ofsted inspections both need to start from a common approach in the use of school performance data. The School Report Card Prospectus set out our clear intention that the School Report Card should be designed so that it can underpin Ofsted's risk assessment for deciding which schools to inspect. The School Report Card will not replace risk assessment in its entirety. There will always be other data that Ofsted use in addition—for example, concerns reported by the local authority or a change in leadership, to determine when a school should next be inspected. But, of course, we recognise that as an independent regulator Ofsted has the right to take a different approach than to use the School Report Card—though we will continue to work closely with Ofsted to seek to ensure that that will not have to be the case.

We acknowledge the potential for confusion if the reasons for differences in outcomes on the School Report Card and Ofsted judgments are not clearly explained. We do not underestimate the communications challenge in doing so and agree with the Select Committee that the explanation that such differences must on occasion be expected (for instance, when there is a significant space in time between publication of an inspection report and of a School Report Card) and what they mean will be critical to the success of the School Report Card.

30. We welcome in principle the introduction of the school report card as a rationalisation of current accountability mechanisms and an attempt at providing a broader evidence base for assessing schools' performance. However, the Government must take care in developing its proposals that it tailors the school report card to the particular needs of the English schools system. Lessons can be learned from international practices and the case of the New York school report card will be

particularly relevant; but the Government should not assume that what works elsewhere will necessarily work in the English system.

We welcome the Committee's support of the School Report Card as a rationalisation of current accountability mechanisms. We take note of the Select Committee's note of caution that the School Report Card be tailored to the particular needs of English schools. The School Report Card is being developed for schools in England to deliver the priorities of our White Paper. Its design will be open to wide consultation and subject to thorough scrutiny during the current pilot running to Autumn 2011. We are determined that the Report Card will meet the needs of the English education system.

31. Schools should be strongly incentivised by the accountability system to take on challenging pupils and work hard to raise their levels of attainment. To this end, we support the proposals to introduce credits on the school report card for narrowing the gaps in achievement between disadvantaged pupils and their peers. However, we strongly caution the Government against the introduction of any penalties for increasing gaps in achievement. If the Government were to attach such penalties, it is likely that schools would seek to deny school places to challenging pupils in order to avoid the risk of a lower school report card score. They might also create incentives for schools not to push gifted and talented students to reach really high levels of achievement.

We welcome the Committee's support for our proposals to reflect schools' contribution to narrowing gaps between disadvantaged pupils and their peers through the introduction of a credit system on the School Report Card. It has always been our intention that the School Report Card must reflect schools' success in improving the attainment of disadvantaged pupils alongside, and not at the expense of, their peers—no school should gain credit for narrowing the gap by “levelling down”. We wholly agree that the use of penalties would be inappropriate. The School Report Card Prospectus made clear that we would not do so because of the risks of creating perverse incentives; whereas a credit-only system might help change behaviour and help to secure fair access to all schools for children from disadvantaged backgrounds.

32. We have been struck by the weight of evidence we have received which argues against an overall score on the school report card. It is true that Ofsted comes to an overall judgement on a four point scale, but this judgement is meant to be the result of a very extensive analysis of a school's provision across the board, relying on quantitative and qualitative evidence and first-hand experience of the school at work. A school report card is not, and in our view never can be, a full account of a school's performance, yet the inclusion of an overall score suggests that it is.

33. The range of discrete measures proposed for inclusion in the school report card certainly present a broader picture of a school than the current Achievement and Attainment Tables; but they cannot be the basis for a definitive judgement of overall performance in the same way as we are entitled to expect an Ofsted judgement to be. On balance, we think that parents and others should be able to decide for themselves those measures of performance most important to them. We approve of the proposal both to grade and rate performance in each category on the school report card, but we are not persuaded of the appropriateness of and need for an overall score.

We agree that parents and others should be able to decide for themselves those measures of performance most important to them. That is why the outcomes for each performance category will be prominent on the face of the School Report Card, and all underpinning data will continue to be publicly available. Understanding the strengths and weaknesses across the range of a school's responsibilities will be an important aspect to all users of the Report Card.

We welcome the Committee's approval of our intention to both grade and rate performance in each category on the School Report Card.

We recognise the Select Committee's concern about the need for an overall score, which has been the most controversial aspect of our consultation. We have, and continue to, take the concerns raised by stakeholders very seriously. However, we continue to believe that the inclusion of an overall—or summary—score is of great importance if the School Report Card is to deliver the improvements we want and redress the problems the Select Committee itself has identified. Without an overall score, we believe that there is an overwhelming danger that public attention will continue to focus on a single indicator—raw academic performance—as summarising a schools' overall performance, ignoring the different challenges schools face, the progress their pupils make, and their contribution to children's wider well-being.

An overall score—or summary statement—will make our priorities clear and visible to all. It will stress the importance of schools' contributions to all aspects of children's development. This will be vital if we are to ensure, as we must, that there is a consistent approach across school accountability and improvement.

Nevertheless we are alert that the introduction of an overall score is not without risk—not least the communications challenge in explaining how a score based solely on data sits alongside Ofsted's holistic judgement on a school's performance. We have made clear that a final decision on inclusion of a single overall score will not be made until after consultation has been completed. We believe that it is critical that we continue to develop proposed indicators and explore the options around an overall score, in consultation with all stakeholders, before coming to a final conclusion.

34. We recommend that the Government guards against serial changes to reporting criteria for the school report card once it is introduced nationally. The ability to track school performance on a range of issues over time is potentially a valuable feature of the reformed system, but this will not be possible if the reporting criteria are in a constant state of flux.

We fully agree that stability over time is essential to the success of the School Report Card. It is our intention that one of the main features of the School Report Card will be that it allows year-on-year comparisons for each of the performance categories. It will be important to ensure that the right categories and indicators are in place from the outset, and are not subject to repeated change. Naturally over time new priorities and expectations of schools will arise, one aspect of our consultation on the School Report Card is to consider over what cycle the indicators it uses should be refreshed and we will take account of the Committee's views.

36. The Government must address the methodological problems inherent in basing important indicators on survey evidence. It is unacceptable that schools with the most challenging intakes might suffer skewed performance scores because of a low response rate to surveys for the purposes of the school report card.

37. Academic research in the field of school effectiveness is lacking in the field of pupil well-being and wider outcomes beyond assessment results. In the absence of robust, independent research evidence, the Government should exercise great caution in pursuing its otherwise laudable aim of widening the accountability system beyond simple test scores.

38. We do not believe that the indicators based on parent and pupil surveys, together with data on attendance, exclusions, the amount of sport provided and the uptake of school lunches, provide a balanced picture of a school's performance. In the absence of a set of performance indicators which are able to provide a fully rounded and accurate picture of how well a school is supporting and enhancing the well-being and outcomes of its pupils, the school report card should not purport to give a balanced view of a school's overall performance in this or any other area. The Government should make clear on the face of the school report card that its contents should only be considered as a partial picture of the work of a school. This is not to say that we do not consider the inclusion of well-being indicators to be a welcome development: we are merely concerned that parents and others should understand the limits of the information which is presented to them on the school report card.

We welcome the Select Committee's support for the inclusion of a category for pupil well-being in the School Report Card. Without this important aspect the School Report Card would fail in its objective of providing a balanced view of schools' performance across the range of their responsibilities. The development of pupil well-being indicators will allow us to reflect performances across that wider range of responsibilities. We do not underestimate the challenge of devising performance indicators for pupil well-being based on survey data. We agree that the new indicators should measure the contribution a school makes to pupil well-being and must not simply reflect the area they serve. We will work closely with professionals in the field to rigorously test that our potential indicators offer a true reflection of a school's performance rather than its circumstances.

As stated earlier in our evidence, we have taken care to make clear that an annual assessment based on data alone will not give a full picture of a school's performance. Only Ofsted inspection can provide a holistic judgement across the full range of a school's responsibilities. A clear explanation to this effect will be included on the School Report Card.

Conclusion: complexity, consistency and coercion

41. The complexity of the school accountability and improvement system in England is creating a barrier to genuine school improvement based on the needs of individual schools and their pupils. We support the message in the 21st Century Schools White Paper, that schools should be empowered to take charge of their own improvement processes. However, the Government's continuing tendency to impose serial policy initiatives on schools belies this message and the relentless pace of reform has taken its

toll on schools and their capacity to deliver a balanced education to their pupils. We urge the Government to refrain from introducing frequent reforms and allow schools a period of consolidation.

We appreciate the Committee's concern for allowing schools time to adjust to the new system that empowers them to take charge of their own improvement processes. We are committed to securing continuing improvements for children and young people and will, in the pursuit of making this the best place to grow up in the world, continue to introduce reforms that are imperative to achieving this goal.

42. Inconsistencies in the approach to school accountability and improvement and inconsistencies in the judgments which are made in different parts of the accountability system are both confusing and damaging. Confusion undermines the credibility of the accountability system and schools which find themselves pulled in different directions are unlikely to be able to give their full attention to the fundamental task of providing their pupils with a broad and balanced education.

The Government agrees in principle that the accountability system needs to give a single, clear message about the performance and improvement priorities of each school. As set out above, the Government's belief in the importance of including a single score or summary sheet on the School Report Card is intended to address precisely this point, making priorities clear. This will be vital if we are to ensure, as we must, that there is a consistent approach across school accountability and improvement.

43. We recommend that the Government revisits the proposals for reform of the school accountability and improvement system set out in the 21st Century Schools White Paper with a view to giving more substance to its claims that schools are responsible for their own improvement. We have received strong evidence that schools feel coerced and constrained by the outcomes of Ofsted inspection and programmes set up by central government, such as National Challenge. We have consistently noted the adverse effects that targets have had on the education of children and young people. The Government should seek means of delivering support and challenge to schools without what many witnesses perceived as a harmful 'naming and shaming' approach endemic in the current system.

We believe that the schools White Paper sets the right balance between the accountability and the improvement system, one which offers schools greater freedom to evaluate their own progress across the broad spectrum of learning and development, while continuing to hold schools clearly and rigorously to account for the outcomes achieved by their pupils. We have made great progress in raising overall standards, but recognise that more needs to be done to ensure that all children and young people benefit equally in receiving a high quality learning experience, and support to tackle barriers. The new support and challenge mechanisms will be a valuable enabler for schools. But we cannot sit back, where there is evidence that children and young people are not receiving the development and learning experience that they deserve. That is why, sharply focused, time limited, programmes like National Challenge have an important part to play in tackling significant underachievement. Far from shackling schools, such programmes are proving to be important change catalysts in driving improvements, and children's life chances.

44. The problem with the Government’s assessment of the accountability system is that it implies that schools welcome the opportunity to take “ownership of their own improvement” but then provides the perfect example of how they have been prevented from doing just that. The “flexibility” of the system, allowing a constant shift in priorities by central government, is precisely the reason why schools are struggling to engage with the accountability regime and myriad school improvement mechanisms. The Government refers to the flexibility of the accountability system as if this is an inherent benefit. The opposite is true. Schools and, indeed, local authorities are in sore need of a period of stability so that they can regroup, take the necessary time to identify where their priorities lie and then work, with appropriate support, to secure the necessary improvements.

We recognise the importance of schools having a clear and consistent understanding of how they will be held to account, so that they can plan with confidence for the future. The reforms in the White Paper—in particular, the introduction of the School Report Card as the single source of data on outcomes against which schools’ performance will be judged—will help to provide this confidence. As set out above, an important aspect of the current School Report Card consultation will be to consider, after its introduction, what the most appropriate frequency for making changes to the categories of data presented on the School Report Card should be, and we will take account of the Committee’s views.

The need for stability needs to be balanced against the importance of ensuring that the accountability system is judging schools against current expectations, rather than outdated expectations. If the basis against which schools are judged did not keep up with the reality of changing practice and performance in schools, it would become a barrier to the improvements we want to see, not a support for it. In an ever-changing world, the Government’s view is that an appropriate balance between consistency and change is needed. Schools in other countries are not standing still; nor can English schools.

45. It is time for the Government to allow schools to refocus their efforts on what matters: children. For too long, schools have struggled to cope with changing priorities, constant waves of new initiatives from central government, and the stresses and distortions caused by performance tables and targets.

46. The Government should place more faith in the professionalism of teachers and should support them with a simplified accountability and improvement system which challenges and encourages good practice rather than stigmatising and undermining those who are struggling. In doing so, it is vital for effective accountability that the independence of HM Inspectorate be safeguarded and maintained at all times. We believe that the Government should revisit the plans set out in its 21st Century Schools White Paper and simplify considerably the accountability framework and improvement strategies it proposes.

Devolution of resources and decision making to schools, with a clear and suitable statement of priorities through the School Report Card and accountability system as well as improved challenge and support from their SIP, presents individual schools with a simpler system in which they can identify and tackle the specific challenges and needs of their pupils.

The White Paper reforms are intended solely to keep the focus on children and provide them with the best support possible to help them fulfil their potential, and so meet the Children’s Plan goal of making this the best place in the world for children and young people to grow up.

Appendix 2

Ofsted’s response to the First Report from the Children, Schools and Families Committee, Session 2009–10

1. We recommend that Ofsted bring forward at the earliest opportunity firm proposals setting out how governing bodies will be appropriately involved in all inspections. (Paragraph 45)

Ofsted’s response

We welcome and agree with the emphasis that the Committee gives to the importance of governors’ involvement in inspections. Both the previous and new inspection arrangements (introduced in September 2009) have made this explicit. For example, our three main inspection guidance documents for inspectors² make it clear that evidence gathering includes discussion with, and feedback to, governors.

The revised inspection framework includes a discrete judgement about the work of governors. Specifically, when making a judgement about the effectiveness of governance, inspectors evaluate: how effectively governors help to shape the direction of the school; how rigorously governors and supervisory boards challenge and support leaders and managers; and how well governors and supervisory boards fulfil their statutory responsibilities. These are all crucial elements of effective governance and we believe that it is right they have a clear focus in the inspection framework.

Ofsted’s decision to continue some, albeit less, notice of section 5 inspections ensures that governors and other stakeholders are able to contribute evidence to school inspections. Some governors also choose to attend the inspection feedback.

2. We believe that Ofsted should do more to encourage schools to be creative and produce evidence of the self-evaluation process which works for them and speaks to the true culture and ethos of their own school. Ofsted should ensure that its own inspection processes are flexible enough to accommodate and give appropriate weight to alternative forms of evidence of self-evaluation. (Paragraph 59)

Ofsted’s response

We support the Committee’s view that self-evaluation is ‘at the heart of what a good school does’. Self-evaluation is now a well-established activity in maintained schools. It provides the basis for their planning for development and improvement, and is crucial if there is to be effective assessment of the quality of the education and care provided and outcomes for all pupils.

2 *The evaluation schedule for schools; Conducting school inspections; The framework for school inspection.*

Self-evaluation also remains at the centre of the inspection process; it provides the starting point for professional dialogue between inspectors and senior managers and helps to identify areas for investigation. Inspection takes account of, and contributes to, a school's self-evaluation. This is a key contributory factor to school improvement.

The self-evaluation form (SEF) provides schools with a vehicle for summarising strengths and areas for development. The new SEF has been streamlined and simplified; it is not intended that the SEF is used as a store for all of the school's evidence, but rather that it indicates where a school's own evidence might be found. Crucially, the form emphasises the importance of a school justifying its *own* judgements about the quality of its work. In order that schools might see how their own assessments relate directly to inspection judgements, the revised SEF mirrors the evaluation schedule of judgements used by inspectors. In addition, the on-line version of the SEF has help-button guidance which brings up the relevant descriptors for each judgement. The SEF does not prescribe how the school should carry out its self-evaluation.

The use of the SEF is non statutory and where a school chooses not to summarise outcomes of its self-assessment in a SEF, inspectors are guided to focus on the school's alternative approach.

3. The Government and Ofsted should endeavour to do more to help schools which have not yet come to terms with the concept of self-evaluation in its fullest sense. (Paragraph 63)

Ofsted's response

Ofsted's Annual Report for 2008–09 highlights that there is an improving trend in the quality of school leadership and management. It also confirms that effective leadership remains central to school improvement and to sustaining high levels of performance. As well as the proportion of schools with good/outstanding leadership and management being higher than those inspected in the previous year, self-evaluation remains a crucial leadership tool. Inspection evidence shows self-evaluation has improved over time. In 2008–09 it was judged good or better in 76% schools, compared with 64% in 2005. Back in 1997 inspection evidence suggests it was good in only 31%. Over the years inspection has done much to stimulate and encourage school self-evaluation.

As previously stated, inspection takes account of and contributes to a school's self-evaluation. At the heart of the new 2009 inspection framework is a strong emphasis on the importance of leadership in driving improvement and 'narrowing the gap', particularly for potentially vulnerable groups. There is also a sharper focus on the leadership of teaching, and its impact on learning. The greater level of engagement with senior leaders, particularly headteachers, recognises their crucial role in self-evaluating, determining and taking the right action, and in driving the school forward.

4. In general terms, we support the approach to inspection set out in the 2009 inspection framework. We consider that a frequency of inspection in proportion to a school's current levels of performance is sensible, although some concerns remain about identification of schools where there is an unexpected slide in performance. We consider that a short notice period for inspection is sensible, but schools must be given sufficient time to collate all the necessary evidence and ensure attendance of key

personnel. Without-notice inspection is appropriate where there are particular concerns about performance, and safeguarding in particular, but this approach should not be used without good reason. (Paragraph 111)

Ofsted's response

We are pleased that the Committee supports Ofsted's approach to proportionate inspection. This is a key element of the new framework, designed to increase the impact of our work by focusing inspections on schools where there is the greatest scope for improvement. We understand the Committee's concern about schools where there is an unexpected decline in performance. However, it is important to recognise that Ofsted now carries out robust risk assessments of schools—including those previously judged to be good or outstanding. Where there is a steep decline in a school's performance or where there are other serious concerns, for example about pupils' safety or well-being, an early inspection will be considered.

We are pleased that the Committee recognises that short notice periods for inspections are sensible. This arrangement, which builds on the 2005 model, applies to all routine school inspections carried out under section 5 and to the first three monitoring inspections of schools requiring special measures. We are confident that one to two days' notice does provide sufficient preparation time for lead inspectors and schools. It is important that inspectors see schools as they really are and that school staff don't feel pressured into making special arrangements for the inspection. Inspectors do not require much documentation and the things that they do need to scrutinise—for example, the school improvement plan—should be readily available and not require much collation. One of the key features of the new framework is the opportunity for an extended pre-inspection discussion between the headteacher and the lead inspector. The early feedback we have received suggests that this is providing a valuable opportunity to plan inspection activities, including meetings with key staff. It is also important to recognise that while inspectors do need to look at some documents and hold some meetings, the new framework places a much greater emphasis on spending time in classrooms observing practice.

We agree with the Committee that no-notice inspections are important where there are particular concerns about a school and this is one of the reasons why most monitoring inspections of inadequate and satisfactory schools are unannounced. Furthermore, these monitoring inspections are sharply focused on the few key areas for improvement from the previous inspection and involve a small inspection team—sometimes just a single inspector. Consequently, they require much less pre-inspection planning than a full section 5 inspection and so the no-notice arrangement is more appropriate and manageable. Ofsted reserves the right to carry out inspections that are unannounced where we consider there are serious concerns about the welfare of pupils.

5. If visits to schools are to be as short as two days—and bearing in mind that some of those days will be taken up by preliminaries rather than by inspection itself—inspectors will need to be highly trained and well qualified if they are to make an accurate evaluation of school provision. (Paragraph 112)

Ofsted's response

The Committee comments on the time taken up by 'preliminaries' on a two-day inspection. We would want to stress that the guidance³ we have provided for inspectors makes clear that this should be kept to a minimum. The lead inspector's pre-inspection preparation ensures that both the school and the inspection team are clear, in advance, about the main inspection issues and the trails to be pursued so that the inspection can get off to a rapid and purposeful start.

We agree that highly trained and well-qualified inspectors are a prerequisite for a robust and consistent inspection system. Ofsted places a high priority on training inspectors and a comprehensive programme was put in place in the months before the implementation of the new inspection framework. High quality training materials were developed and refined throughout the different phases of pilot inspections in 2008–09 and used for training both HMI and Additional Inspectors (AIs) employed by the Inspection Service Providers (ISPs). There are tight contractual arrangements with the ISPs and one of their Key Performance Indicators relates to their capacity to provide a suitable trained inspection workforce.

Furthermore, Ofsted has in place a comprehensive programme of quality assurance for school inspections including those led by AIs. When HMI are leading inspections they quality assure the work of the AIs on their team and, in particular, check the suitability of new AIs before signing them off for further deployment in school inspections. Many of the current cohort of AIs have substantial experience of school inspections, often working with HMI since 2005. This helps Ofsted to ensure that all its inspections remain of high quality.

6. We remind Ofsted of the need for transparency and publicity for the way in which inspection data are combined to form final judgments on schools. (Paragraph 113)

Ofsted's response

Ofsted is committed to making all its guidance for inspectors publicly available. In the case of maintained schools, guidance for inspectors for school inspections carried out under section 5 has been available to all on the Ofsted website since 2005; prior to that, the main inspection handbook was available in printed form.

Occasionally it is necessary to revise inspection guidance during the year or to issue supplementary background guidance to inspectors. These revisions are always included in our publication, *Schools & Inspection*, which is available on our website and for which email alerts are sent to anyone who requests this. Revisions are then included in published termly updates of our inspection guidance.

Inspectors make use of national performance data in the RAISEonline package but also gather other forms of data and information whilst in the school. How data is used, and how it informs judgements, is explained in the main guidance publications. However, it is important to stress that the inspection team considers all the available evidence to reach a professional judgement. Data and other information are considered by the inspection team as part of a professional process whereby evidence is weighed up to reach a professional

judgement. Under the new framework, school senior managers can now engage in these discussions with the inspection team, promoting an understanding of how final judgements are reached. We consider that this provides a high level of transparency about how judgements are reached. All the feedback Ofsted is receiving about the new framework suggests that the greater engagement of senior staff with the inspection team is highly valued by headteachers and staff.

The Committee report identifies concern about schools being ‘tripped up’. We believe that this relates to misunderstanding by some schools of the new framework. We have taken steps to clarify inspectors’ approach to aspects of the new framework like attainment, achievement and safeguarding. We have also responded to queries expressed about safeguarding requirements by publishing FAQs on the Ofsted website. We know that these are seen as a valuable source of factual information.

7. We support the principle of increased emphasis on the views of pupils and parents, but we have some reservations about the level of responses to questionnaires, particularly for schools with a challenging intake. We urge Ofsted to make transparent the approach that inspectors will take when forming judgements on schools where there has been a low level of response to questionnaires from parents; and it should not rule out the possibility of meetings with parents. (Paragraph 114)

Ofsted’s response

We have for some time monitored the level of parents’ responses to questionnaires and issued guidance to inspectors about the ‘benchmarking’ of such information. We accept this can provide only limited information about parents’ views in schools where there is a low level of response.

In addition to the questionnaires sent out at the point of inspection, inspectors also discuss with the school its own knowledge about parents’ views and the evidence it holds. This is a key feature of the inspection framework and schools are guided to include evidence of the views of users and stakeholders in their self-evaluation form and what they have done in response to these. Issues arising from a questionnaire are followed up as inspection trails and inspectors are asked to triangulate the views shown in the questionnaires with the views of parents and pupils that they meet, and the conditions they observe in the school. If it is particularly important to meet a group of parents, inspectors make arrangements to do so.

8. We are persuaded of the need for an inspectorate, independent of government, which can assure the quality of provision in individual schools, as well as producing more general reports on aspects of the education system at a national level. We consider that the latter are particularly important, not least because they should provide a sound evidential basis for policy-making by the Government. (Paragraph 121)

Ofsted’s response

We welcome the Committee’s recognition of the important role that Ofsted plays. Ofsted is responsible for independently evaluating schools and provides public accountability, reporting without fear or prejudice. However, the Chief Inspector must remain appropriately accountable to Parliament.

We are pleased that the importance of our independent reports on aspects of education is recognised, particularly the way in which they provide a firm evidential basis for policy making. As the Committee is aware, Ofsted has a full programme of subject and aspect surveys in addition to the regular inspections we undertake of individual schools. In the last year this has included reports on: the National Strategies; workforce reform in schools; citizenship; creative approaches to learning; education and sustainable development; gifted and talented pupils; English; Art; and Physical Education. In addition, we also published reports on twelve outstanding special schools, and twenty outstanding primary schools, following on from our well-received report the previous year on outstanding secondary schools. Furthermore our future plans for this area of work will strengthen Ofsted's ability to report on a broad range of aspects from a larger evidence base.

9. Both Ofsted and the Government should be alert to any sign that the growth of Ofsted's responsibilities is causing it to become an unwieldy and unco-ordinated body. (Paragraph 122)

Ofsted's response

Since April 2007, Ofsted has had responsibility for the inspection of childcare, children's social care, education, and adult learning. We are aware of the need as an independent inspectorate to reflect continuously on what we are doing and improve upon our practice, but we would not recognise any characterisation that equates our expanded remit with a lack of focus and co-ordination.

The new organisation has continued the regular programmes of inspections of individual providers carried out by predecessor inspectorates, in many cases using the same professional inspectors with relevant specialist skills and experience. In order to ensure the arrangements under the new Ofsted represent continuous improvement, we have reviewed the way we carry out inspection and regulation work.

The feedback Ofsted receives from the vast majority of schools that respond to our questionnaires is that they find the process fair and insightful, and we can provide many positive comments from post-inspection surveys. Of headteachers who have just experienced inspection, nine in ten respondents are satisfied with the way their inspection was carried out and almost all plan to use the inspection recommendations to move the school forward. The new inspections of early years' providers, learning and skills providers and the new short unannounced inspections of child protection in local authorities have all been widely welcomed.

By having wider responsibilities, we can now look across the different sectors in our remit and focus on key issues such as safeguarding to get a more holistic view for children and their families. We can also join up the picture of provision and inspect its impact on the individual child or young person—for example, a child in care, in a way that was never done before. This should generate greater improvement.

It is particularly important that poorer pupils, for example, have effective welfare provision if they are to have the chance to achieve in school.

It is worth noting that the new Ofsted is carrying out the work of its four predecessor inspectorates in a way that is bringing about significant improvements at much less cost.

About one in three people in England benefit from our work to make sure care, education, and skills are as good as they can be, and this is carried out at a cost to the taxpayer of around 30% less than it did seven years ago. Since 2003–04, £80 million has been cut from the budget.

10. We believe that Ofsted should always aspire to have HMIs lead all inspections. Schools causing concern should always be inspected by a team headed by an HMI. (Paragraph 127)

Ofsted's response

We are pleased that the Committee has such high regard for the work of HMI, but feel strongly that this should not detract from the valuable contribution made by additional inspectors (AIs). While most monitoring inspections of schools causing concern are led by HMI, a significant number are successfully led by suitable experienced AIs who are also likely to serve as team members on HMI-led inspections. Again, Ofsted places a high priority on training and quality assurance to ensure that all monitoring inspections are conducted to a high standard.

We do not believe, therefore, that there would be any great advantage to having all inspections led by HMI—particularly if this diminished their critical role in quality assurance. We are also concerned about the feasibility of the Committee's suggestion and estimate that implementation would require the recruitment of a minimum of 150 more HMI.

11. We note that Ofsted has a duty to encourage improvement in schools. However, we do not accept that Ofsted necessarily has an active role to play in school improvement. It is Ofsted's role to evaluate a school's performance across its many areas of responsibility and to identify issues which need to be addressed so that a school can be set on the path to improvement. Ofsted has neither the time nor resources to be an active participant in the improvement process which takes place following inspection, aside from the occasional monitoring visit to verify progress. (Paragraph 137)

We recommend that Ofsted's role in school improvement be clarified so that the lines of responsibility are made clear to all those involved in the school system. Ofsted's function is a vital one: it is, in the purest sense, to hold schools to account for their performance. It is for others—schools themselves, assisted by School Improvement Partners, local authorities and other providers of support—to do the work to secure actual improvement in performance. The Chief Inspector already has a wide and important remit: she should feel no compulsion to make it wider. (Paragraph 138)

Ofsted's response (grouped for paragraphs 137 and 138)

We agree that one of the key purposes of inspection is to '... evaluate a school's performance across its many areas of responsibility and to identify issues which need to be addressed so that a school can be set on the path to improvement'. The new inspection framework encourages lead inspectors to discuss areas for improvement with the headteacher and provide detailed recommendations which pinpoint what the school needs to do most to improve so that it is set on the path to improvement. However, as the

Committee notes, it is for others—not the least the school itself—to bring about such improvement in practice.

Ofsted's survey work often provides schools with useful resource for their own improvement planning by identifying specific examples of effective practice—for example, in the recent set of publications on outstanding schools in challenging circumstances.

12. We recommend a review of the data underlying comparator measures or sets of measures to ensure that they accurately reflect the range of factors that can impact on school performance. (Paragraph 150)

Ofsted's response

The performance report compiled jointly by Ofsted and the DCSF (RAISEonline) provides a comprehensive set of contextual and performance data, including those related to test and examination results. The contextual value-added (CVA) measures included in RAISEonline take account of a wide range of contextual factors which are known to be statistically related to the standards reached by pupils. These factors include (among many others) gender, ethnicity and entitlement to free school meals as well as prior attainment. The weighting of these factors and the coefficients used in the CVA are subject to regular review and, where appropriate, adjustments are made. For this reason inspectors are guided to be cautious about comparing CVA measures for different years.

The Committee rightly points out that contextual factors are statistically related to schools' performance in the narrow sense of pupils' attainment. However, our inspection evidence shows clearly that even in schools in the most challenging circumstances, highly effective leadership can ensure that teaching is excellent so that pupils' learning is outstanding and they make rapid progress. It is this which shapes inspectors' judgement about a school's overall performance—not test and examination results, important as they are.

The Committee suggests that such indicators and measures are 'central to the inspection process' when, in fact, inspectors use a much wider range of evidence and a more sophisticated approach to judging pupils' achievement and schools' effectiveness. As well as the historic data included in RAISEonline, inspectors consider more recent data gathered by the school about pupils' attainment and progress, and any analysis of this data undertaken by the school. Critically, inspectors take account of the standards of pupils' work and the quality of learning which they observe during the inspection. These are key factors in determining judgements about pupils' achievement and the overall effectiveness of the school. These judgements are certainly not 'fixed' by test and examination results.

13. We consider that the quality of school provision beyond the teaching of academic subjects is extremely important and that Ofsted has a duty to reflect this in a fair and balanced manner in its inspection reports. (Paragraph 157)

Ofsted's response

We believe that a key inspection priority must relate to the evaluation of teaching and learning and a focus on the classroom. Our recent work, including the report *Twelve outstanding secondary schools—Excelling against the odds* demonstrates that a key feature of schools' success, is that they fulfil individual potential by providing outstanding

teaching, rich opportunities for learning, and encouragement and support for each student. This evidence has informed our methodology and is one of the reasons for increasing the proportion of time spent observing lessons in the classroom.

However, while we believe that school inspections should prioritise the evaluation of teaching and learning and, we agree it is important that inspectors also evaluate the quality of all of the school's provision and its impact on the achievement and wider well-being of pupils, and report on this unequivocally. The new framework emphasises the importance of the wider well-being outcomes, including behaviour and attendance, the extent to which pupils feel safe, the extent to which they adopt healthy life styles and skills that will contribute to future economic well-being, and the pupils' own contribution to the school and wider community. Each has a discrete judgement which is reported for every school.

14. We urge Ofsted to rebalance its inspection framework in two ways, in order to reflect better the true essence of the school. First, when evaluating academic attainment, we recommend that Ofsted gives less evidential weight given to test results and derivative measures and gives more weight to the quality of teaching and learning observed by inspectors in the classroom. Second, when evaluating a school's performance in terms of pupil well-being and other non-academic areas, we recommend that Ofsted should move beyond the search for quantitative measures of performance and that it should focus more effort on developing qualitative measures which capture a broader range of a school's activity. (Paragraph 161)

Ofsted's response

We believe that the new inspection framework responds appropriately to the Committee's conclusions. The new school inspection framework explicitly guides inspectors on 'how to balance' evidence about the track record of schools in both attainment and progress, over a three year period, with direct inspection observation of *current* levels of attainment and progress as evidenced through the inspection of teaching and learning. Learning is about more than passing tests at particular levels, and so we have re-emphasised the importance of this as envisioned in the *Every Child Matters* outcome, 'enjoy and achieve'. Our guidance to inspectors over the last three years has made clear that exam and test data can only be seen as a partial view of how the school was at the time.

Direct observation is necessary both to establish where the school is at the present time and also to identify the key strengths and weaknesses in its performance. Our view is that attainment data may provide insight into a school's historical performance, but only inspection can provide informed diagnosis, analysis and explanation based on what is seen in the classroom. In fact our early analysis of the new arrangements suggests that inspectors are observing around twice as many lessons as in the previous inspection framework.

Ofsted's new framework gives prominence to greater use of qualitative measures of well-being and the broader *Every Child Matters* outcomes. Our work to develop the self-evaluation form has also emphasised the importance of schools themselves using such approaches to assess and structure their own plans.

15. We urge the Government to work closely with Ofsted in order to produce a model of the school report card appropriate for use by the inspectorate. However, if in

Ofsted's view the school report card ultimately takes a form which is unsuitable for the purpose of risk assessment, as an independent regulator, Ofsted should not feel compelled to adopt the school report card as a replacement for its interim assessment. (Paragraph 184)

Ofsted's response

Ofsted is working with the DCSF to support its work to develop the school report card. Although the school report card is owned by the DCSF, it is unlikely that the indicators would be unsuitable for our risk assessment process because they will, in general, provide useful information about aspects of the school's performance and wider outcomes for pupils. Nevertheless much work remains to be done before Ofsted could say it is sure it could act as a replacement for the interim assessment.

16. There is potential for substantial confusion to be introduced if the reasons for differences between scores on the school report card and Ofsted judgements are not clear, leading to a perception of incoherence in the accountability system. This would be unfortunate, as the success of any accountability system depends on the extent to which users have confidence in it. We recommend that DCSF and Ofsted work together to find a way to eradicate, or at least minimise the impact of, this problem. If the Government accepts our recommendation not to include an overall score in the school report card, the potential for conflicting accounts of school performance would be greatly reduced. (Paragraph 217)

Ofsted's response

It is possible that for some schools there may be a difference between the school report card indicators which are largely based on data, and Ofsted judgements which are based on an holistic view of the school gathered through first-hand observation and evidence. We are working with the DCSF so that reasons for differences between scores on the school report card and Ofsted judgements can be clearly explained.

17. We recommend that the Government revisits the proposals for reform of the school accountability and improvement system set out in the 21st Century Schools White Paper with a view to giving more substance to its claims that schools are responsible for their own improvement. We have received strong evidence that schools feel coerced and constrained by the outcomes of Ofsted inspection and programmes set up by central government, such as National Challenge. We have consistently noted the adverse effects that targets have had on the education of children and young people. The Government should seek means of delivering support and challenge to schools without what many witnesses perceived as a harmful 'naming and shaming' approach endemic in the current system. (Paragraph 260)

Ofsted's response

This statement that schools feel 'coerced and constrained' is not reflected in the evidence collected from post-inspection school surveys or from the three year independent research project carried out by the National Foundation for Educational Research (NFER) between 2006 and 2009. The final NFER report, published in June 2009, confirmed inspection is

seen to have a direct, positive impact on school improvement—particularly for improving assessment practices, the quality of teaching and attainment.

The responses from the post-inspection school surveys show that the large majority of schools believe their inspections identified clear recommendations for improvement and would use these to move the school forward

Teachers in the classroom are also positive about inspection. In particular in the NFER survey of teachers' views on Ofsted's inspections of schools published in April 2009 found that almost 90% of teachers thought that inspection helps their schools set new priorities for the future. The survey also found that 85% of teachers agreed that inspection led to improvements in teaching and learning.

18. The Government should place more faith in the professionalism of teachers and should support them with a simplified accountability and improvement system which challenges and encourages good practice rather than stigmatising and undermining those who are struggling. In doing so, it is vital for effective accountability that the independence of HM Inspectorate be safeguarded and maintained at all times. We believe that the Government should revisit the plans set out in its 21st Century Schools White Paper and simplify considerably the accountability framework and improvement strategies it proposes. (Paragraph 266)

Ofsted's response

Ofsted values its independence and continues to speak without fear or favour on the basis of wide-ranging evidence gathered during inspection. We are committed to improving the lives of all the children, young people and adult learners who use the services we inspect and will continue to build and maintain trust by behaving fairly and impartially in everything we do.