

Response to Ofsted Draft Education Inspection Framework

Executive Summary

The Draft Education Inspection Framework and associated handbook does not currently support the development of an inspection system that is intelligent, responsible and focused or capable of supporting school improvement.

1. The support for certain curricula, within the inspection handbook, in particular the proposed implementation of the Ebacc, shows a lack of independence by the inspectorate and no evidential base. The Ebacc and new content heavy GCSE syllabi are limiting the range and balance of subjects studied and the completion of GCSE in two years; there is no recognition of this in the draft inspection framework or handbook.
2. Whilst the inspection handbook refers to a broad curriculum or broad range of subjects on nine separate occasions only once does it refer to a balanced curriculum. The support for the aesthetic aspect of the curriculum and the creative arts will be further undermined if this framework is implemented.
3. The juxtaposition between promotion of certain subject based curricula with the generic *intent, implementation and impact* is confused and unhelpful particularly when set against academy freedoms. The inspection handbook appears less applicable in an Early Years or Specialist School setting.
4. The proposed separation of inspection judgements about learners' personal development and learners' behaviour and attitudes; increased tariff for the Section 8 inspections, of good schools and non-exempt outstanding schools, and no notice inspections lack merit and a coherent rationale.
5. Proposals not to look at non-statutory internal progress and attainment data are understandable but not sensible. Work scrutiny has limitations that will lead to the same issues of unreliability that Ofsted is seeking to address through its current proposals.
6. The tone and content of the handbook is unacceptable, in part, particularly with respect to leadership; this raises concerns about its development, the lack of engagement with the wider profession during its writing and the likelihood of inconsistent and idiosyncratic implementation.
7. Safeguarding should be removed from the inspection framework and be externally audited as part of an on-going continuous improvement process.
8. Given the adverse impact of inspection on workload and recruitment & retention of staff, lack of efficacy for a number of "stuck schools" and absence of independent empirical evidence to support the four point grading system; full consideration should now be given to moving to a no grading inspection system with a narrative style report on a school's strengths and areas to develop.

The proposals from Ofsted include most of the demands of the current framework plus additional elements. The implementation of this draft inspection framework, as currently proposed, will add significantly to workload, at a time the Department for Education's Recruitment & Retention Strategy is promising a period of stability.

Prior to a far ranging review of the accountability system, including the current narrow use of metrics within performance tables, it would be preferable to adapt the current inspection framework.