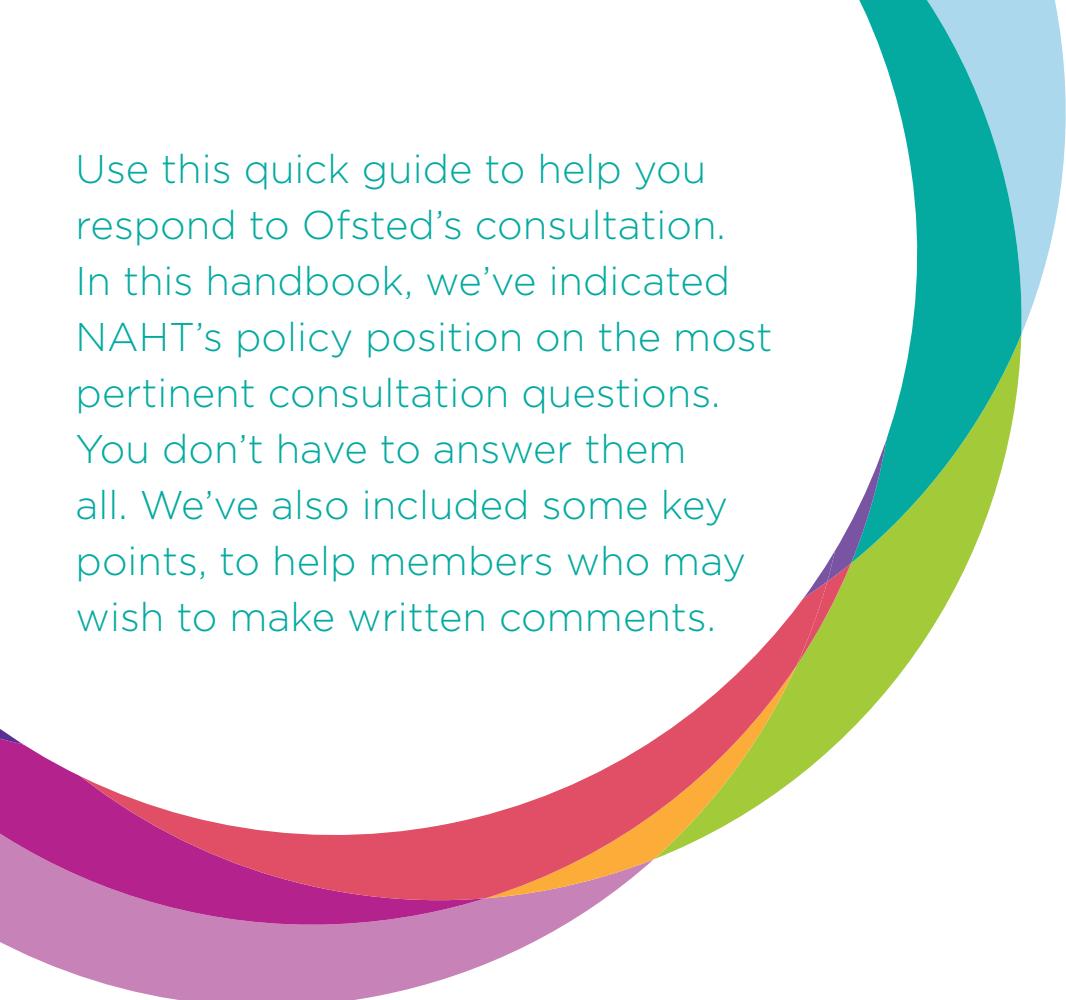


MARCH 2019

# OUR GUIDE TO OFSTED'S CONSULTATION

FOR MAINTAINED SCHOOLS  
AND ACADEMIES





Use this quick guide to help you respond to Ofsted's consultation. In this handbook, we've indicated NAHT's policy position on the most pertinent consultation questions. You don't have to answer them all. We've also included some key points, to help members who may wish to make written comments.

### CONSULTATION PROPOSAL 1

To what extent do you agree or disagree with the proposal to introduce a 'quality of education' judgement?

**How NAHT will respond:**  
Disagree

Although NAHT supports the shift in emphasis towards a greater professional discussion on curriculum structure, coherence and sequencing, we're not able to support the introduction of a 'quality of education' judgement in the form proposed.

- As constructed, our view is that this judgement may drive new workload and create a new set of perverse incentives that will skew schools' work, limit ambition and stifle innovation.
- The proposed judgement has too much content – nothing has been taken away and more has been added, giving inspectors too much ground to cover in a single judgement.
- The weight of pupil outcomes on forming the overall judgement is not clearly articulated. Both schools and inspectors need more detail.
- The evaluation criteria and grade descriptors are imprecise and open to subjective interpretation. We're concerned that it will be very difficult to achieve consistency across the inspection workforce.
- It is far from clear that these proposals will level the playing field for schools serving challenging communities. There seems to be a toughening up of expectations - for example, that all pupils will meet age-related expectations in reading irrespective of starting points (p88, para 285, impact bullet one) - making it even harder for schools in challenging circumstances to be treated fairly.

**If you accept some, or all, of these points,  
you may wish to choose 'disagree' or 'strongly disagree'.**

### RESPOND TO THE CONSULTATION ONLINE:

[www.smartsurvey.co.uk/s/EIFConsultation/](http://www.smartsurvey.co.uk/s/EIFConsultation/)



## CONSULTATION PROPOSAL 2

To what extent do you agree or disagree with the proposed separation of inspection judgements about learners' personal development and learners' behaviour and attitudes?

How NAHT will respond:  
Agree

NAHT does not object to this proposal.

- Personal development and behaviour are different and important aspects of a school's work, so there is little sense in putting them together.
- However, a point to note is that a consequence of catering for these two separate judgements is that curriculum; pupil outcomes and teaching, learning and assessment are crammed into the proposed single quality of education judgement.

If you accept some, or all, of these points,  
you may wish to choose 'disagree' or 'agree'.

3 This question covers whether the education inspection framework 2019 judgements are appropriate for early years settings.

## CONSULTATION PROPOSAL 4

To what extent do you agree or disagree with the proposed focus of section 8 inspections of good schools and non-exempt outstanding schools and the proposal to increase the length of these inspections from the current one day to two days?

How NAHT will respond:  
Strongly Disagree

It's a real shame that the original intention of short inspection, as a light touch health-check seems to have been lost. NAHT's view is that doubling the length of section 8 inspections when nine in ten schools are rated 'good' or better is a backward step.

- Given the limited resources at Ofsted's disposal, the case for expanding the framework and increasing the inspection tariff for 'good' schools is weak.
- There's a developing consensus that Ofsted should instead focus its resources on providing a stronger diagnostic insight for those schools which are struggling to improve.
- Increasing the burden of inspection on 'good' and 'outstanding' schools is a step in the wrong direction; in contrast to Ofsted's stated intentions this once again raises the stakes of inspection.
- NAHT's Accountability Commission was clear that the inspectorate should only conduct a light touch inspection for 'good' and 'outstanding' schools to check that standards are not slipping.

If you accept some, or all, of these points,  
you may wish to choose 'disagree' or 'strongly disagree'.

## CONSULTATION PROPOSAL 5

To what extent do you agree or disagree with the proposed introduction of on-site preparation for all section 5 inspections, and for section 8 inspections of good schools, on the afternoon prior to the inspection?

**How NAHT will respond:**  
**Strongly Disagree**

NAHT is opposed to shortening the notice of inspection. Despite Ofsted reducing the scope of the activities to be covered from early drafts, NAHT's view is that this proposal constitutes near no-notice inspections.

- It is misleading or naïve to believe that 'on-site inspection preparation' (as Ofsted calls it) would not inevitably turn into inspection activity. Such inspection creep would increase the tariff to two and half days.
- This fails to acknowledge the practicalities of school leadership, and could negatively impact on teaching, learning or meetings with external agencies – particularly problematic in smaller schools.
- This proposal is likely to drive unintended consequences and additional workload because, understandably, schools in the inspection window may well feel compelled to maintain constant inspection readiness.
- System leadership and other forms of collaboration are likely to be impacted - many leaders will not wish to be away from their school if it is in an inspection window.
- All of the activities described in the draft inspection handbook can be conducted using the existing telephone call – there is no need to increase the cost of inspection, or the burden on schools, school leaders and governors by requiring the lead inspector to be on the school site.

**If you accept some, or all, of these points,  
you may wish to choose 'disagree' or  
'strongly disagree'.**



## CONSULTATION PROPOSAL 6

To what extent do you agree or disagree with our proposal not to look at non-statutory internal progress and attainment data and our reasons why?

**How NAHT will respond:**  
**Disagree**

NAHT welcomes Ofsted's intention to 'dial down' the influence of data and reduce associated workload. This recognises the impact of previous inspection practice on schools.

- While we recognise the limitations of internal data, we believe schools have a right to be able to present their own in-year analyses for the consideration of inspectors if they choose to do so.
- This is particularly important for small schools, those with high pupil mobility, those working in challenging circumstances and those on rapid improvement journeys where national data provides an incomplete picture.
- NAHT believes that comparative performance data should be used (based on a three-year average) to ensure all schools are fairly treated.

**If you accept some, or all, of these points,  
you may wish to choose 'disagree' or 'strongly disagree'.**

**7 to 8 These questions cover how the proposals would work in non-association independent schools.**

**9 to 11 These questions cover further education and skills.**



## **NAHT**

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