

How do you solve a problem like OFSTED?

A consultation paper and survey

July 2023



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EXECUTIVE SUMMARY

In recent weeks, there have been wide-ranging calls for England's Office for Standards in Education, Children's Services and Skills (OFSTED) to be abolished, reformed – or simply paused until there has been a review into OFSTED's policies and practices.

In June 2023, OFSTED announced a number of tweaks to its policies and practices, in response to growing unrest within the sector. While these changes are welcome, there is a widespread sense within the teaching profession that they don't go far enough.

This consultation paper is an attempt to kick-start a conversation, drawing together voices from throughout the educational community to explore how we might work together to create a more helpful, humane approach to school accountability.

The paper is organised around four broad questions:

1. What does OFSTED do?
2. Why does OFSTED need to be reformed?
3. How might we improve school accountability?
4. How should we implement the change process?

We identify several reasons why OFSTED needs to be reformed:

- It doesn't achieve its stated aims
- The way in which OFSTED grades schools is not valid or reliable
- The information provided to parents is unreliable and often outdated
- OFSTED's remit is too broad
- The pressure and stress experienced by headteachers and senior leaders
- OFSTED marks its own homework
- The misconception that there is a 'correct' way to teach
- The myth of choice
- There is no evidence that an organisation like OFSTED is necessary

To address these concerns, we propose the following changes to policy:

- Slim down OFSTED's remit to focus primarily on safeguarding
- Rebrand OFSTED as the Schools Safeguarding Advisor (or similar)
- Review safeguarding definitions and inspection practices
- Introduce a grace period
- Improve the quality and range of information provided to parents
- Stop grading schools

- Establish a national School Accountability Network
- Establish a new framework for school self-evaluation
- Change the name of inspectors to advisors
- All inspectors should be headteachers or former headteachers and have relevant experience of the schools they are inspecting
- Extend the notice period to five working days
- Introduce greater flexibility around deferrals
- Make post-inspection surveys anonymous and independent
- Create an independent complaints procedure

We also set out some principles for how to implement the change process.

As you read the paper, if you have any thoughts on the questions it raises, please share them using the accompanying survey: bit.ly/epa_ofsted. You do not have to answer all questions – only those on which you have a view that you feel is worth sharing. Equally, if you notice any errors in this consultation paper, please share them with us using survey question 18.

The consultation is open until July 31st, 2023. We hope that many people will respond to the survey – and therefore contribute to the writing of our policy proposal. Please feel free to take issue with any of the proposals we have suggested here – we welcome and encourage people to share a wide range of views.

INTRODUCTION

In recent weeks, following the tragic death of Ruth Perry, the former headteacher of Caversham Primary School in Reading, there have been wide-ranging calls for England's Office for Standards in Education, Children's Services and Skills (OFSTED) to be abolished, reformed – or simply paused until there has been a review into OFSTED's policies and practices. Teacher and leader unions the NEU, NAHT and ASCL all called for inspections to be halted.

Nobody thinks that schools should be unaccountable as public institutions responsible for the education, safety and wellbeing of children and young people. However, it is widely acknowledged – including by the current Chief Inspector, Amanda Spielman – that a culture of fear has developed around OFSTED.¹ In recent weeks, a growing number of headteachers and former headteachers have spoken out about the impact 'being in an OFSTED window' has had on their mental and physical health.^{2, 3, 4, 5}

In June 2023, OFSTED announced a number of 'tweaks' to its policies and practices, in response to growing unrest within the sector.⁶ These are as follows:

- Schools judged to be inadequate will now be reinspected within 3 months of the report's publication, rather than within 30 months.
- When a school is judged to be inadequate, the Department for Education (DfE) issues an order that the school should become an academy or move to another trust. Where a school has successfully addressed safeguarding concerns, these academy orders can now be revoked at the discretion of the secretary of state.⁷
- The inspection handbook will be updated to offer schools 'greater clarity' about what constitutes effective and ineffective safeguarding.⁸
- There will be a consultation to look at OFSTED's complaints procedure.⁹
- Schools will be given more information about the 'broad timing' of when they will next be inspected, although they will still only have one day's notice.

¹ <https://www.telegraph.co.uk/news/2023/04/23/OFSTED-inspections-culture-of-fear-schools-teachers/>

² <https://twitter.com/BBCBreakfast/status/1642455909510021121>

³ <https://www.thetimes.co.uk/article/OFSTED-stress-teachers-anxiety-medication-inspections-uk-2023-pfbbnf9l>

⁴ <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/OFSTED-stress-gave-heart-condition-26640489>

⁵ <https://www.theguardian.com/education/2023/mar/26/colleague-had-heart-attack-in-front-of-me-horrific-toll-of-ofsted-inspections>

⁶ <https://schoolsweek.co.uk/ofsted-considers-safeguarding-inspection-tweaks-after-heads-death/>

⁷ <https://schoolsweek.co.uk/the-7-ofsted-inspection-changes-following-ruth-perrys-death>

⁸ Ibid.

⁹ You can contribute to this consultation here: <https://www.gov.uk/government/consultations/changes-to-ofsteds-post-inspection-arrangements-and-complaints-handling-proposals-2023>

- There will no longer be an embargo preventing headteachers from sharing the outcome of an OFSTED inspection before the publication of the report.
- Reports will be ‘depersonalised’ such that, when discussing areas of weakness, inspection reports ‘will refer to “the school” by default, rather than individuals’.¹⁰

While these changes are welcome, there is a widespread sense within the teaching profession that they don’t go far enough – primarily because concerns about the use of one-word judgments has not been addressed.¹¹ Even the former chief inspector Michael Wilshaw recently observed that highlighting areas for improvement would be ‘better than calling someone inadequate’.¹²

This consultation paper is an attempt to kick-start a conversation, drawing together voices from throughout the educational community to explore how we might create a more helpful, humane approach to school accountability. (NB: this paper does not address the question of accountability in children’s social care or Special Educational Needs and Disabilities (SEND) local area support services, and focuses solely on OFSTED’s activities that relate directly to schools). The paper is organised around four broad questions:

1. What does OFSTED do?
2. Why does OFSTED need to be reformed?
3. How might we improve school accountability?
4. How should we implement the change process?

Through this consultation, we aim to harness the views of a wide range of stakeholders in shaping a positive, pragmatic vision for school accountability. We hope that this will include current and former:

- Politicians and policymakers
- His Majesty’s Inspectors (HMI) and OFSTED inspectors
- Headteachers and senior leaders
- Classroom teachers
- Support staff
- Parents and carers
- Children and young people

¹⁰ <https://schoolsweek.co.uk/the-7-ofsted-inspection-changes-following-ruth-perrys-death/#respond>

¹¹ e.g. see <https://rebeccaleek.blogspot.com/2023/06/one-word-judgements-who-needs-them.html>;
https://twitter.com/dave_mcpartlin/status/1668373259769769984;
<https://twitter.com/TimesRadio/status/1668340601379594240>;
<https://www.theguardian.com/commentisfree/2023/jun/12/the-guardian-view-on-ofsted-radical-change-is-needed>

¹² <https://www.theguardian.com/education/2023/jun/16/former-ofsted-chief-school-inspections-should-change-after-headteacher-death>

- Researchers, psychologists, and other education professionals

As you read the paper and consider the questions it raises, please share your thoughts by completing the accompanying survey (bit.ly/epa_ofsted). The consultation will be open until July 31st 2023. Following this, we will collate the findings and write a set of costed policy proposals that we hope will be implemented by the current or incoming Secretary of State.

1. WHAT DOES OFSTED DO?

OFSTED performs two roles.

Firstly, it provides information to parents/carers about schools. For example, a 2017 YouGov poll found that just under half of parents/carers look at OFSTED reports to inform their choices about which schools to send their children to.¹³

If OFSTED is to be reformed or replaced, parents will still need to be provided with information about schools. However, as we will see in Section 2, the *quality* of information currently provided to parents is highly questionable. In Section 3, we will consider what information parents/carers need to make reliable, well-informed decisions – and how we might build on current practice to provide better information to parents/carers.

**Q1: What information do parents/carers need when choosing schools?
Why do you think this?**

Secondly, OFSTED provides information to the regulator (the Department for Education). Ministers rely on OFSTED to provide them with information about whether to intervene in a school. For example, when a school is judged to be ‘Inadequate’ currently, it is often taken over by an academy trust, or moved from one trust to another.

As public institutions responsible for the safety and well-being of children and young people, it is important that schools are regulated and that steps can be taken to intervene where necessary. If OFSTED is to be reformed or replaced, schools will still need to be regulated. However, the question remains open as to whether schools should be regulated by a national body, or more locally (e.g., by mayors or county equivalents).

¹³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698913/Ofsted_Annual_Parents_Survey_2017.pdf

Q2: Should schools be regulated by a national body, or locally (e.g., by mayors or county equivalents)? Why do you think this?

2. WHY DOES OFSTED NEED TO BE REFORMED?

2.1 It doesn't achieve its stated aims

On its website, OFSTED states that it 'aims to improve lives by raising standards in education and children's social care.'¹⁴ However, there is no evidence that OFSTED raises standards. According to a 2018 report by the National Audit Office, 'OFSTED does not know whether its school inspections are having the intended impact: to raise the standards of education and improve the quality of children's and young people's lives. It has not had clear performance indicators or targets to track progress towards these high-level aims. Its performance measures have instead focused mainly on activity and processes.'¹⁵

OFSTED does not directly intervene to improve schools, and nor does it specify what action or actions need to be taken once it has completed an inspection. It is therefore not possible to evaluate the extent to which any improvements made following an inspection were caused by OFSTED, or whether they were already planned or underway when the inspection took place.

2.2 The way in which OFSTED grades schools is not valid or reliable

The judgment a school receives following an OFSTED inspection impacts the school and its local community in a range of important ways, including how many student applications (and therefore how much funding) the school receives in the subsequent years, the recruitment and retention of teachers and support staff, and house prices in the local community.¹⁶

Given the significant impact OFSTED judgments have on a school and its local community, it is imperative to ensure that those judgments are sound.

¹⁴ <https://www.gov.uk/government/organisations/ofsted/about>

¹⁵ [National Audit Office \(2018\) OFSTED's inspection of schools](#)

¹⁶ [Hussain, I. \(2022\). Housing Market and School Choice Response to School Quality Information Shocks. University of Sussex.](#)

Snapshot inspections, carried out in a day and a half once every four or five years, cannot provide a reliable evaluation of a complex, dynamic organisation like a school. The four areas that are graded under the current framework – Quality of education, Behaviour and attitudes, Personal development and Leadership and management – are complex, highly subjective and cannot be reliably measured on a four-point scale (Outstanding, Good, Requires Improvement or Inadequate).

In the 31 years since its creation, OFSTED has not published any evidence to support the notion that their judgements accurately reflect the quality of education that a school provides.¹⁷ In contrast, a recent study by the University of York found that ‘differences in school quality, as indexed by OFSTED ratings, have little relation to students’ individual outcomes’.¹⁸

There is also evidence that schools with a higher proportion of disadvantaged pupils are disproportionately awarded low ratings by OFSTED. Secondary schools with at least 30% of students eligible for Free School Meals (FSM) are 15 times more likely to be rated ‘Inadequate’ than schools with less than 4% FSM.¹⁹ This raises the question: are teachers and school leaders who work in disadvantaged schools consistently worse at their jobs than those who work in other areas – or are OFSTED’s judgments biased against schools serving disadvantaged communities?

In social research, there are two important constructs: reliability (the consistency of a measure), and validity (the accuracy of a measure). If OFSTED judgments have ‘little relation to students’ individual outcomes’, we cannot say they are valid. If schools in disadvantaged areas are significantly more likely to receive an ‘Inadequate’ rating, we cannot say they are reliable either.

2.3 The information provided to parents is unreliable and often outdated

A recent study of over 2,500 secondary schools found that ‘parents selecting secondary schools using OFSTED judgments will often be basing their decision on dated information. Indeed, half the time, this will be based on a period in which the school had a different headteacher.’²⁰

¹⁷ [EDSK \(2019\) Requires Improvement: A new role for Ofsted and school inspections](#)

¹⁸ [von Stumm et al \(2020\) School quality ratings are weak predictors of students’ achievement and well-being](#)

¹⁹ [Education Policy Institute \(2016\) School inspection in England: Is there room to improve?](#)

²⁰ [Bokhove et al \(2023\) How Useful are Ofsted Inspection judgements for Informing Secondary School Choice?](#)

The researchers continue: ‘We find there are almost no differences in future academic, behavioural, school leadership and parental satisfaction outcomes between schools rated as good, requiring improvement and inadequate in the inspection data available to parents at the point of school selection. That is, parents who choose a “good” secondary school for their child will not leave with appreciably better outcomes than a parent who selects an “inadequate” school.’

The argument that OFSTED must continue in its current form because it provides valuable information to parents and carers is therefore highly questionable. Given the concerns about the validity and reliability of OFSTED’s judgments outlined above, there is a strong case for improving the quality of the information provided to parents and carers about their local schools. OFSTED often cite their own survey evidence that at least some parents and carers use OFSTED ratings when making decisions about school choice. However, as we have seen, that information is unreliable, often outdated – and therefore of questionable use.

If the stated aim of Ofsted is to ‘raise standards’, it is difficult to see how labelling schools as ‘inadequate’ – thus making it harder for them to employ good teachers and attract aspirational parents – will help them to improve.

2.4 OFSTED’s remit is too broad

Currently, OFSTED looks at a wide range of a school’s activities, including quality of education, behaviour and attitudes, personal development, and leadership and management. In addition, OFSTED carries out and commissions research relating to early years, schools, further education and social care, and publishes research reviews on a wide range of topics, from knife crime to off-rolling.²¹

In 2012, it was decided that OFSTED would not have to inspect ‘outstanding’ schools as frequently as others. As a result, at the time of writing, some schools have not been inspected for 17 years.²² Despite this, in the intervening 11 years, OFSTED has only been able to inspect the remaining, non-outstanding schools once every four or five years.

In 2019, OFSTED was given an additional £24m to ensure that ‘all formerly exempt (i.e., outstanding) schools will receive an initial graded or ungraded inspection before August 2025’.²³ However, by December 2022, OFSTED was already 2,000 schools behind target.²⁴

²¹ [OFSTED \(2021\) Curriculum research reviews](#)

²² <https://www.gov.uk/government/statistical-data-sets/monthly-management-information-ofsteds-school-inspections-outcomes>

²³ <https://www.gov.uk/guidance/inspecting-schools-guide-for-maintained-and-academy-schools>

²⁴ [SchoolsWeek \(2022\) Ofsted already nearly 2,000 inspections behind school target](#)

In short, OFSTED's remit has become so broad that it cannot carry out its basic duty to ensure that all schools are keeping their pupils safe. In the recent inspection of Caversham Primary School, the school was downgraded from 'outstanding' to 'inadequate' following its first full inspection in 13 years. If safeguarding is so important to OFSTED's work, the infrequency with which it inspects schools suggest that it is failing in its basic duty to ensure that children and young people are safe from harm.

As stated above, in 2019 the exemption for outstanding schools was ended, and from now on all schools are supposed to be inspected once every four or five years. But even this is too infrequent. When a school appoints a new headteacher, or when it becomes part of an academy trust, its culture and practices can change overnight. If safeguarding is so important to OFSTED's work, there is a strong case for carrying out a safeguarding inspection of every school annually. To achieve this, its remit needs to be significantly slimmed down (see Section 3).

2.5 The pressure and stress experienced by headteachers and senior leaders

Following the recent inspection of Caversham Primary School, the headteacher, Ruth Perry, took her own life while awaiting the publication of the OFSTED report in which the school was to be downgraded from 'outstanding' to 'inadequate'. Ruth's sister, Professor Julia Waters, has given interviews in the media in which she said that the OFSTED judgment had weighed heavily on Ruth's mind in the weeks leading up to her death. A family statement said: 'We are in no doubt that Ruth's death was a direct result of the pressure put on her by the process and outcome of an OFSTED inspection at her school.'

This was not an isolated incident. In 2013, headteacher Helen Mann took her own life when OFSTED announced that her school would lose its top-level rating.²⁵ In 2015, award-winning headteacher Carol Woodward took her own life following an OFSTED inspection that downgraded her school to inadequate.²⁶ Indeed, a recent investigation by the Hazards Campaign and the University of Leeds found that 'Stress caused by OFSTED inspections was cited in coroners' reports on the deaths of 10 teachers over the past 25 years.'²⁷

²⁵ <https://www.theguardian.com/uk-news/2015/nov/20/headteacher-killed-herself-after-ofsted-downgrade-inquest>

²⁶ <https://www.theguardian.com/uk-news/2015/nov/20/headteacher-killed-herself-after-ofsted-downgrade-inquest>

²⁷ [Revealed: stress of OFSTED inspections cited as factor in deaths of 10 teachers | The Guardian \(2023\)](#)

In 2017, OFSTED's own survey of teachers and school leaders found that 76% thought school inspections were 'highly stressful for everyone'.²⁸ OFSTED has not asked this question since. However, as noted above, in recent weeks, a growing number of headteachers and former heads have started to speak out about the impact of OFSTED on their mental and physical health.^{29, 30, 31, 32} We can no longer afford to ignore the evidence that in recent years, OFSTED has become toxic to the teaching profession and to the children and young people it claims to serve.

2.6 OFSTED marks its own homework: feedback from schools

In a recent statement, OFSTED's outgoing Chief Inspector, Amanda Spielman, said: 'Our current inspection process was introduced in 2019 after extensive consultation with the education sector, and we have had good feedback from the vast majority who have experienced a new-style inspection.'³³ This claim is based on the post-inspection survey that OFSTED ask all headteachers to complete immediately following an inspection.³⁴

At first glance, the post-inspection survey data does appear to support the notion that the 'vast majority' of recently inspected headteachers provide good feedback. However, under closer scrutiny, this claim starts to look highly questionable.³⁵

For example, in the latest data available, only 48% of schools responded to the survey. The claim that 'we have had good feedback from the *vast majority* who have experienced a new-style inspection' (emphasis added) can therefore not be true; the best we can say is that the statement applies to most of the minority who responded to the survey.

Among social researchers, it is widely acknowledged that the people who choose to respond to a survey often have different views to those who choose not to respond. We therefore cannot assume that the views of the 48% who responded to the survey are representative of the wider population.

²⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/626645/Ofsted_Teachers_Attitude_Survey_2017.pdf

²⁹ <https://twitter.com/BBCBreakfast/status/1642455909510021121>

³⁰ <https://www.thetimes.co.uk/article/OFSTED-stress-teachers-anxiety-medication-inspections-uk-2023-pfbbnf9l>

³¹ <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/OFSTED-stress-gave-heart-condition-26640489>

³² <https://www.theguardian.com/education/2023/mar/26/colleague-had-heart-attack-in-front-of-me-horrific-toll-of-ofsted-inspections>

³³ <https://schoolsweek.co.uk/ofsted-considers-safeguarding-inspection-tweaks-after-heads-death/>

³⁴ <https://www.gov.uk/government/publications/responses-to-post-inspection-surveys-inspections-and-visits-between-1-april-2021-and-31-march-2022>

³⁵ <https://www.independent.co.uk/voices/ofsted-inspections-headteachers-ruth-perry-schools-b2319161.html>

For example, the post-inspection survey is not anonymous. Some school leaders may be concerned that if they provide negative feedback, this may prompt the inspection team to revise the OFSTED grading – or that it may negatively influence the content of the inspection report. It is therefore likely that schools that have had a positive inspection outcome are a) more likely to respond to the survey, and b) more likely to give provide a positive account of the inspection process.

There are also concerns about the way in which the post-inspection survey has been written. For example, all the statements are worded positively: ‘The lead inspector organised all aspects of my inspection well’, ‘Inspectors took a good account of the view of parents/carers’, ‘Overall, I am satisfied with the way in which the inspection was carried out’ and so on.

In social research, there is an important effect known as the ‘agreement bias’. This is the tendency for a respondent to agree with any statement put in front of them, and it is often influenced by the respondent’s beliefs about what they think the researcher wants to hear.³⁶

There are ways to overcome this problem when constructing a survey, a discussion of which is beyond our purposes here. But until post-inspection surveys are a) administered anonymously, and b) constructed by professional, independent researchers with an understanding of how to overcome things like agreement bias, we should meet any claims that the ‘vast majority’ of school leaders are satisfied with OFSTED with scepticism.

This scepticism is further warranted by recent research conducted with headteacher associations, trust and school leaders in the East of England. In this study, the responses of 528 school leaders revealed significant concerns around the consistency of judgments, the effectiveness of OFSTED as an organisation and the ‘fear, stress and damage’ caused by the organisation to the teaching profession in recent years. In this survey, when asked about the process of being inspected, ‘respondents used words such as bullying, dehumanising, demoralising, dangerous, destructive and punitive’.³⁷

2.7 OFSTED marks its own homework: complaints

OFSTED recently admitted that its complaints procedure ‘is not working’ and is under review. In the 2021-22 academic year, just 17% of the 718 complains had aspects upheld. Because this is currently under review, there is no need to expand on it further here. However, in the spirit of the transparency and accountability that OFSTED demands of schools, there is a strong case that any complaints about OFSTED should be investigated not by the

³⁶ <https://www.sciencedirect.com/topics/computer-science/acquiescence-bias>

³⁷ Eastern Leaders Ofsted Survey (2023). Available at: <https://drive.google.com/file/d/17m3wF4Z4JT7XW3ZNk3H4NUzgoMtFmcY2/view>

organisation itself, but by an independent regulator.

2.8 The misconception that there is a ‘correct’ way to teach

With each new framework that it publishes, OFSTED creates a sense that there is a ‘correct’ way of teaching, or of leading a school. Research has revealed the ways in which OFSTED frameworks influence the ways in which teachers plan and deliver lessons, and many school leaders have described how ‘being in an OFSTED window’ prevents them from doing what they believe to be in the best interests of their pupils; instead, they focus on ‘playing the game’ of passing the OFSTED inspection.³⁸ One study of inspection practices in seven countries – including England – found a ‘clear association between increasing pressure in a school inspection system and an increase in the narrowing of the curriculum and instructional strategies in the school’.³⁹

The notion that there is a ‘correct’ way to teach is undermined by the fact that OFSTED frameworks change as often as they do; in the 31 years since its creation, there have been 15 different frameworks. The school population is incredibly varied, and the expertise of teachers, school leaders and support staff is similarly diverse. This diversity is a great strength of our system; efforts to standardise what happens in schools stifle innovation and prevent teachers and school leaders from thinking creatively about how best to serve the children and young people in their care.

2.9 The myth of choice

OFSTED often point out that they provide parents and carers with invaluable information to help them make informed decisions about school choice. However, school choice is often extremely limited, and mostly determined by where people live and local transport routes. In research carried out by the National Foundation for Educational Research, the two most important criteria cited by parents when choosing a school for their child were ‘school that most suits my child/children’ and ‘location’.⁴⁰ Furthermore, as stated above, a recent study of over 2,500 secondary schools found that parents selecting schools based on an OFSTED rating often do so on the basis of outdated information. This study also found that there are almost no differences in the future academic, behavioural, school leadership and parental satisfaction outcomes between schools rated as good, requiring improvement and

³⁸ [Hutchings \(2015\) Exam factories? The impact of accountability measures on children and young people](#)

³⁹ [Jones et al \(2017\) The unintended consequences of school inspection: the prevalence of inspection side-effects in Austria, the Czech Republic, England, Ireland, the Netherlands, Sweden, and Switzerland](#)

⁴⁰ [NFER \(2015\) School Choice: The parent view](#)

inadequate.⁴¹

2.10 There is no evidence that an organisation like OFSTED is necessary

Many countries with high-performing education systems use different methods for school improvement and accountability.⁴² For example, in Singapore, Estonia and Finland, underperforming schools are primarily identified through self-evaluation. A variety of methods may then be used to improve those schools. These include deploying teachers and school leaders from high-performing schools to provide advice and support (Finland, Germany, Singapore and Taiwan); school-to-school collaboration via clusters of schools (Singapore); building learning communities with schools engaged in similar projects (Taiwan); and providing additional resources for schools operating under difficult circumstances (Finland, Singapore).

3 HOW MIGHT WE IMPROVE SCHOOL ACCOUNTABILITY?

3.1 Slim down OFSTED's remit to focus primarily on safeguarding

Perhaps the most pressing concern outlined in Section 2 is that in its current form, OFSTED's remit has become so broad that it cannot carry out its basic duty to ensure that children and young people are safe. To address this serious concern, we propose that OFSTED's remit is significantly narrowed to focus solely on safeguarding, and that there should be a one-day audit of every school, every year. There is also a case for changing the way in which OFSTED conceptualises and operationalises safeguarding inspections (see Section 3.3). The focus on record-keeping would be to ensure that the school is using best practice to keep accurate records about a range of performance indicators (see Section 3.5).

Q3: Do you agree that OFSTED's remit should be narrowed to focus primarily on safeguarding and the accuracy of record-keeping? If so, why? If not, why not?

⁴¹ [Bokhove et al \(2023\) How Useful are Ofsted Inspection judgements for Informing Secondary School Choice?](#)

⁴² [DfE \(2019\) School improvement systems in high performing countries](#)

3.2 Rebrand OFSTED as the Schools Safeguarding Advisor (or similar)

If OFSTED is to be significantly reformed, this raises the question of whether it should be rebranded. Since there is no evidence that OFSTED raises standards (see Section 2.1), the case for rebranding the 'Office for Standards in Education' is compelling. We propose that it should be rebranded as the Schools Safeguarding Advisor, or similar.

Q4: Should OFSTED be rebranded as the Schools Safeguarding Advisor (or something similar?) If so, why? If not, why not?

3.3 Review safeguarding definitions and inspection practices

The way in which OFSTED currently conceptualises and operationalises the aspects of inspections relating to safeguarding should be reviewed. Under the current framework, there are serious concerns that some schools have been rated as 'Inadequate' on the basis of questionable reasoning and evidence, and/or on the subjective opinion of the lead inspector. We propose that an All Party Parliamentary Group (APPG) for school accountability should be convened to create new guidance on how the safeguarding of children and young people in schools is defined and operationalised (see also Section 3.5).

Q5: Should OFSTED review its safeguarding definitions and inspection practices? If so, why? If not, why not?

3.4 Introduce a grace period

Under the current framework, if a school is graded as 'requires improvement' or 'inadequate', it can take up to 30 months (two and a half years) for OFSTED to re-inspect the school and change its judgment.⁴³ As mentioned in the Introduction, OFSTED recently announced that it will now re-inspect any school graded as 'inadequate' within 3 months of the publication of the report. It is not currently clear whether this will also apply to schools rated as 'required improvement'.

⁴³ <https://www.gov.uk/government/publications/school-inspections-a-guide-for-parents/school-inspections-a-guide-for-parents>

If, following an inspection, a school addresses any concerns raised within a matter of weeks, this again means that the information OFSTED provide to parents is out of date and has an unnecessary negative impact on admissions, funding and local house prices.

We propose that, following a safeguarding inspection, schools are provided with clear guidance on how they can improve any areas identified as needing improvement. Following this, the school should be given a 28-day grace period to implement the recommended changes – before the publication of the report. At the end of the 28-day grace period, the school may need to be visited again, or the evidence of improvement could be provided remotely.

If a school is not able to provide evidence that it has met the required standards by the end of the grace period, this would provide a sound justification for publishing a report to inform parents and carers that there are ongoing safeguarding concerns at the school. At this point, the regulator (the Department for Education) should intervene to ensure that changes are made to address the concerns raised as soon as possible – as is currently the case. This is likely to result in rapid changes to leadership and governance. However, as soon as the school is able to provide evidence that it has addressed any concerns raised, the published report should be updated accordingly.

Q6: Should we introduce a 28-day grace period? If so, why? If not, why not?

3.5 Improve the quality and range of information provided to parents

Alongside a renewed focus on safeguarding, there remains an important need to provide parents and carers with high quality, up-to-date information about schools. We propose that this could take the form of a colour-coded report card, with red/amber/green used to denote each school's performance on a number of indicators that parents and carers may find helpful when choosing a school. Again, we recommend that an APPG for school accountability would determine how these criteria should be measured and reported on (see also Section 3.3), through collaboration with the academic research community. However, the report card may include the following measures:

1. Academic progress (an overall contextual value-added score for the school)
2. Breadth of curriculum
3. Inclusion / percentage with SEND / diversity of intake

4. Extracurricular provision
5. Discrimination practices (e.g., anti-racism, anti-sexism)
6. Staff retention
7. Student retention (to guard against off-rolling)
8. Parent satisfaction (based on an anonymous survey)
9. Pupil satisfaction (based on an anonymous survey)
10. The attainment of pupils from disadvantaged backgrounds

Much of this information can be provided remotely; some areas (such as discrimination practices) could be looked at as part of the annual safeguarding visit.

Currently, there is one framework for all schools. Instead, we propose that the content of the report card should vary to reflect a range of education providers (e.g., early years, primary, secondary, special schools), with slightly different criteria to recognise important differences between these settings.

Q7: Should we introduce a colour-coded report card to provide parents and carers with a range of up-to-date information about their local schools? If so, why? If not, why not?

3.6 Stop grading schools

Considering the serious concerns around the reliability and validity of school gradings – and the pernicious effect one-word grading system has on the school system and on school leaders – we recommend that this practice should be abolished in favour of the scorecard system outlined above.

Q8: Should we stop grading schools? If so, why? If not, why not?

3.7 Establish a national School Accountability Network

So far, we have recommended that OFSTED's remit (or the remit of the body that replaces OFSTED) should focus primarily on a) safeguarding and b) providing reliable, high-quality information to parents and the regulator. To compensate for this slimmed down role for the watchdog, we propose that there should be a national School Accountability Network.

Under this scheme, each school would be paired up with a neighbouring school of a similar kind (but from a different trust). These two schools would support one another as

accountability partners for a period of three years. After this, the school pairings would be re-allocated, and the cycle would begin again. This allocation could be administered by the Department for Education.

Each school would establish an Accountability Partnership Team (APT) comprising representative stakeholders from throughout the school community. The size of the APT would vary depending on the size of the school; we recommend that there would be around 4-6 people in a primary school APT, and around 6-8 people in a secondary school or sixth form college. The APT may include some or all the following people:

- Headteacher
- Senior leaders
- Middle leaders
- Experienced teachers
- Early career teachers
- The Special Educational Needs and Disabilities co-ordinator
- A Teaching Assistant or Learning Support Assistant
- Parents/carers
- Pupil representatives
- Governors

The APT would be appointed by the senior leadership team at each school through a competitive selection process, to ensure that a range of views and perspectives are represented. Each year, all schools would undertake three accountability exercises (one per term): a one-day safeguarding visit from the Schools Safeguarding Auditor, a one-day APT visit to another school, and a one-day APT visit from another school.

These visits should focus on a strategic aspect of school life, informed by school self-evaluation (e.g., behaviour, curriculum, or aspects of teaching and learning). They should be strengths-based, improvement-focused, and conducted in a spirit of appreciative inquiry. The peer review visit would involve a combination of lesson observations, interviews with pupils, teachers and support staff, and a review of policies and record-keeping. This would be informed by the prior sharing of school improvement planning, attainment data and survey data, administered by the host school.

Within 28 days of a peer review visit, the visiting APT should write a report summarising the school's strengths and areas for development. The written reports should be quality-assured by OFSTED (or its replacement) and published on a national School Accountability Network database, which would be publicly accessible. An annual self-evaluation report would also be published to the database (see section 3.7). In this way, schools could learn more effectively

from one another, as well as holding one another to account in a supportive, rather than a punitive, way.

To ensure that members of the APT are skilled in collecting data and holding others to account, they should be required to complete an online training programme before undertaking their first visit. This training should also be taken by anyone joining the APT, should any team members need to be replaced during a 3-year cycle.

Q9: Should we establish a School Accountability Network, based on peer review? If so, why? If not, why not?

3.8 Establish a new framework for school self-evaluation

Self-evaluation should be at the core of accountability, as is the case in many countries with high-performing education systems. The content of the self-evaluation framework should be determined by an APPG for School Accountability.

Recently, a draft framework for self-evaluation called the Review for Progress and Development (RPD) was published by the social enterprise States of Mind, in collaboration with young people, teachers, headteachers and former OFSTED inspectors.⁴⁴ The RPD outlines seven aspects of school to be evaluated: mental health, student-teacher relationships, student interactions, teacher autonomy, student satisfaction, life skills, and personal development. The RPD also includes data collection tools for evaluation these seven areas.⁴⁵

The RPD framework remains in draft. However, we believe it provides a helpful basis for further research and development by the APPG for School Accountability. We also recommend that schools should also be able to adapt the self-evaluation framework to meet the needs of their community. Both the self-evaluation and the APT peer review report should include a one-page summary that parents and carers can use to inform school choice, alongside the report card proposed in section 3.5.

Q10: Should we establish a new framework for school self-evaluation? If so, why? If not, why not?

⁴⁴ [States of Mind \(2022\) DRAFT Review for Progress and Development](#)

⁴⁵ [States of Mind \(2022\) DRAFT Student Survey - Review for Progress and Development](#)

3.9 Further suggestions for minor reforms

3.9.1 Change the name of inspectors to advisors

Language is incredibly important, and the word ‘inspector’ suggests someone who is looking to find fault. Instead, we propose that OFSTED inspectors are renamed School Safeguarding Advisors, or School Improvement Advisors.

Q11: Should we change the name of inspectors to advisors? If so, why? If not, why not?

3.9.2 All inspectors should be headteachers or former headteachers and have relevant experience of the schools they are inspecting

Currently, to become an Ofsted inspector, you need to be a qualified teacher and to have ‘at least 5 years’ experience of leadership in a relevant job like headteacher or senior manager’.

⁴⁶ There are also many reports of former secondary school teachers inspecting primary schools or early years settings, and vice versa. We propose that all school inspectors should be current or former headteachers with relevant experience in the kinds of schools they are advising. Not only would this increase the likelihood that they would better understand the organisation they are advising, but it would bring about more faith in the inspection process.

Q12: Should all inspectors should be headteachers or former headteachers and have relevant experience of the schools they are inspecting? If so, why? If not, why not?

3.9.3 Extend the notice period to five working days

Currently, schools find out that they are to be inspected when they receive a phone call the day before. Schools currently receive ‘the call’ on either a Monday, Tuesday, or Wednesday. This creates huge levels of stress and anxiety among school leaders. One headteacher recently wrote ‘Each day you dread the call & then breathe a sigh of relief at 12pm Wednesday when you know you’ve survived another week. It’s no way to live.’⁴⁷

⁴⁶ <https://nationalcareers.service.gov.uk/job-profiles/ofsted-inspector>

⁴⁷ https://twitter.com/dave_mcpartin/status/1638280890265620487

Once news of 'the call' has been shared throughout the school, this often induces a highly stressful situation where teachers suddenly have to work late, and often work late into the evening marking books and writing detailed lesson plans. The one-day notice period suggests that OFSTED inspections adopt a 'deficit' approach, where the role of inspectors is to 'catch schools out' doing the wrong thing. It is indicative of an institutional lack of trust in the teaching profession.

We recommend that instead, schools should be notified five working days before the visit is to take place. We believe there is also a case for notifying schools by email, rather than by phone. If the school does not confirm receipt of the email within 24 hours of it being sent, a follow-up phone call may be necessary. This would end the situation whereby headteachers experience a shock of adrenaline whenever the phone rings on certain days of the week.

Q13: Should we extend the notice period to five working days? If so, why? If not, why not?

Q14: Should schools be notified by email instead of by phone? If so, why? If not, why not?

3.9.4 Introduce greater flexibility around deferrals

Currently, there are many accounts of schools requesting a deferral for entirely understandable reasons, such as the absence of the headteacher due to illness, or because longstanding commitments have been calendared – only to be told that a deferral will not be possible. This practice is demeaning to headteachers and suggests that OFSTED inspectors view their role as trying to catch school leaders out when they are off-guard. Instead, we propose that the school inspectorate should publish a reasonable set of clear criteria for acceptable deferrals, and that when they initially contact a school, it is to agree a mutually convenient date for the safeguarding visit.

Q15: Should we introduce greater flexibility around deferrals? If so, why? If not, why not?

3.9.5 Make post-inspection surveys anonymous and independent

Currently, the post-inspection survey is not anonymous. It is likely that making this survey a) anonymous and b) administered by an independent research organisation would significantly increase the accuracy, reliability and validity of the data.

Q16: Should post-inspection surveys be anonymous and independent? If so, why? If not, why not?

3.9.6 Create an independent complaints procedure

As stated in section 2.7, currently OFSTED ‘marks its own homework’ and only a small number of complaints have aspects upheld. In the spirit of ‘watching the watchers’, we recommend that the school inspectorate should be subject to the same levels of transparency that they demand of schools. To achieve this, we propose that an independent body be set up to investigate any complaints made following a school safeguarding audit.

Q17: Should we create an independent complaints procedure? If so, why? If not, why not?

4 HOW SHOULD WE IMPLEMENT THE CHANGE PROCESS?

This consultation paper sets out a number of wide-ranging reforms to the way in which we hold schools to account in England. The aim of this paper and the accompanying survey is to capture the thoughts and the wisdom of the wider education community, to determine whether there is an appetite for such reform, and to establish a consensus view around the way in which we should and could hold schools to account.

Once the consultation period has concluded, we plan to write a policy proposal based on the responses we receive, combined with the proposals outlined above. Naturally, the content of the policy proposal will determine the way in which any change is implemented. Similarly, the likely cost of any proposed reforms cannot be determined at this stage.

However, we can at this stage identify three important principles to ensure that any changes are implemented smoothly, with minimal disruption to people’s lives and without losing the important roles that OFSTED currently serves.

1. Establish an APPG for School Accountability to make recommendations to the Department for Education around three key areas: how to define and operationalise safeguarding inspections; the information to be included in a report card for parents and carers; and to develop a new framework for school self-evaluation.
2. The work of the APPG should be supported and informed by a range of representative stakeholders as outlined in section 3.6, alongside policymakers from all political parties and civil servants from the Department for Education. The aim of this approach is to garner the widest range of views and to guard against falling into groupthink, since there is compelling evidence that decision-making is more robust within diverse groups. The APPG should write a comprehensive 3-year plan for how to transition from where we are to where we need to be in the least disruptive way possible.
3. To minimise disruption, any new approaches to school accountability should be fully developed, piloted and scaled up before any existing practices are dismantled or reformed.

ABOUT THE EDUCATION POLICY ALLIANCE

The Education Policy Alliance is a grass-roots think tank dedicated to creating an education system that works for all young people. We consult with a wide range of people to evaluate current practice and to generate and evaluate new ideas for policy. Our work is rooted in a vision of the near future that places human flourishing at the heart of the education system.

Our initial aim is to publish a series of consultation papers and policy proposals relating to five key areas: OFSTED and accountability; wellbeing and mental health; recruitment and retention; autonomy, innovation and diversification; and the policy environment.

Further details of our work can be found at educationpa.org.