

# A NEW ACCOUNTABILITY SYSTEM FOR SCHOOLS

January 2024



**THE EDUCATION  
POLICY ALLIANCE**

# A NEW ACCOUNTABILITY SYSTEM FOR SCHOOLS

## What do we want to achieve?

- Create a robust accountability system for schools which:
- Improves the quality of information provided to parents/carers
  - Provides more accurate, timely information to the regulator
  - Prioritises the wellbeing of educators, children and young people

## Where are we now?

‘OFSTED is in need of major reform... it is currently seen as not fit for purpose, and as having a detrimental impact on schools which some perceive as toxic. We need to build trust back into the system... The need for change is compelling and urgent.’ (BEYOND OFSTED INQUIRY, 2023)

## How can we create a new accountability system for schools?

**Establish a Schools Governance Auditor (SGA). The SGA would serve three main functions:**

### A. Visit and audit the governance and safeguarding of all schools biennially

Visits would be completed in a single day by a team of two on 14 days’ notice. This would provide time for an anonymous pre-visit survey to be completed by leaders, teachers, support staff, parents/carers and pupils, and analysed by the SGA team. The aims of the visit would be to audit safeguarding policies and practices; to evaluate school governance, including improvement planning and record-keeping; to explore any issues raised in the pre-visit surveys; and to identify what additional support may be required. An ungraded report would be published, highlighting strengths and areas for improvement.

### B. Maintain a data dashboard on all schools

A data dashboard, administered remotely and updated annually, would provide parents/carers with up-to-date information on a range of metrics. For schools, this might include progress, attainment, attendance, destinations, breadth of curriculum, extracurricular provision, diversity of intake, staff retention, pupil retention, parent/carer satisfaction and pupil satisfaction. These data would be presented numerically, alongside national averages. The data dashboard should also include links to the school’s policies on behaviour and relationships, attendance, Special Educational Needs and Disabilities (SEND) provision, etc.

### C. Coordinate a network of Schools Accountability Partnerships

This would involve schools working in partnerships and clusters to conduct reciprocal peer review visits annually. These would be carried out over two days by an ‘Accountability Partnership Team comprising senior and middle leaders, the SEND coordinator, teachers, support staff and governors. The visits would combine lesson observations, surveys, interviews and focus groups with random samples of teachers, leaders, support staff, pupils and parents/carers. An ungraded report would be written by senior leaders from the reviewing school, highlighting strengths and areas for improvement around key areas such as leadership, curriculum, behaviour and relationships, attendance, mental health and wellbeing and SEND provision.

## Why do we need to change?

OFSTED’s remit has become so broad that it is unable to fulfil its most important role: to safeguard the wellbeing of children and young people.

A combination of more regular, focused audits, a data dashboard and a national network of Schools Accountability Partnerships would provide parents/carers and the regulator with more timely, high-quality information than is currently the case, within the same budget.

# A NEW ACCOUNTABILITY SYSTEM FOR SCHOOLS

## Introduction

This paper sets out a vision for a new accountability system for schools. It follows the publication of a public consultation paper <sup>1</sup> and survey <sup>2</sup> in July 2023, and is organised into eight sections:

1. Where have we been?
2. Where are we now?
3. Why do we need to change?
4. Where do we want to be?
5. How will we get there?
6. How will we know when we've got there?
7. How should we implement change?
8. About the Education Policy Alliance

## 1. Where have we been?

OFSTED, the Office for Standards in Education, Children's Services and Skills, was created by the Education (Schools) Act 1992. This followed the Education Reform Act (1988), which set the stage for a more marketised education system characterised by centralisation, public accountability and parental choice.

As a non-ministerial government department, OFSTED reports directly to Parliament and is responsible for inspecting education and training for learners of all ages in England, as well as inspecting and regulating services that care for children and young people.

When it was first formed, OFSTED would give schools a year's notice before an inspection. This was later reduced to two months. Week-long inspections were carried out by teams of up to fifteen inspectors, who would closely examine and report on every year group (primary) or subject (secondary).

In the 32 years since OFSTED was created, there have been fifteen different inspection frameworks – an average of one every two years. Throughout this period, there have been many significant changes to the nature of school inspections, including:

- Types of inspections
- The focus of inspections
- Frequency of inspections
- Length of inspections
- Size and make-up of inspection teams
- Amount of notice given
- The scale used to judge schools
- Length and format of inspection reports
- Complaints and appeals processes

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<sup>1</sup> See [bit.ly/epa\\_ofsted\\_paper](https://bit.ly/epa_ofsted_paper).

<sup>2</sup> See [bit.ly/epa\\_ofsted](https://bit.ly/epa_ofsted).

OFSTED's current policies and practices have largely been shaped by the Education and Inspections Act (2006) and the Education Act (2011). During this period, OFSTED inspections have become much more 'high stakes'. In 2012, the scale was reduced from a five-point scale to a four-point scale, with the 'Satisfactory' rating being changed to 'Requires Improvement'.

Since 2010, there has been a 'limiting judgement' on safeguarding. This means that if a school was judged to be 'Outstanding' in every category, but safeguarding was deemed to be 'Inadequate', the overall judgement would be 'Inadequate'.

## 2. Where are we now?

Until recently, inspection ratings were strongly influenced by attainment data. However, this changed in 2019. According to a press release issued at the time:

*'Ofsted inspectors will spend less time looking at exam results and test data, and more time considering how a nursery, school, college or other education provider has achieved their results.'*<sup>3</sup>

In practice, this means that under the current framework, the emphasis of school inspections has moved away from the (relatively) objective realm of attainment data, towards more subjective aspects of school life such as curriculum, behaviour, personal development and safeguarding.

The notice period has reduced significantly also. Whereas schools used to be given weeks or months to prepare for an inspection, they currently receive less than 24 hours' notice. 'No-notice' inspections may also be carried out if there are concerns about safeguarding, or if there has been a serious complaint.

On average, schools are currently inspected once every four years. However, in 2012, a new rule was introduced such that schools rated as 'outstanding' could go many years without being inspected. This policy changed in 2020. However, in December 2022, OFSTED was 2000 schools behind its target to inspect every school by 2025.<sup>4</sup> At the time of writing, one school has not had a full inspection for 17 years.<sup>5</sup>

As well as inspecting schools and children's services, OFSTED currently carries out and commissions research on a wide range of topics, from off-rolling to knife crime. It has also published curriculum reviews on a range of subject areas and age groups, from early years to further education.

In January 2023, Ruth Perry, the headteacher of Caversham Primary School in Reading, took her own life following an OFSTED inspection that downgraded her school from 'Outstanding' to 'Inadequate'. In December 2023, the coroner stated that the OFSTED inspection had 'likely contributed' to her suicide, adding that there is a 'risk of future deaths if there is only lip service paid to learning from tragedies like this'.<sup>6</sup>

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<sup>3</sup> [GOV.UK \(August 20, 2019\) Ofsted is changing how it inspects schools](#)

<sup>4</sup> [SchoolsWeek \(December 8, 2022\) Ofsted already nearly 2,000 inspections behind school target](#)

<sup>5</sup> [GOV.UK \(accessed 12<sup>th</sup> December 2023\) State-funded school inspections and outcomes: management information](#)

<sup>6</sup> [SchoolsWeek \(Dec 16, 2023\) Ruth Perry: 'Risk of future deaths' if lessons not learned, says coroner](#)

This was not an isolated incident. 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.’<sup>7</sup>

In the wake of Ruth Perry's death, there has been an outpouring of grief and anger within the teaching profession. Many headteachers have spoken out about the impact being in an ‘OFSTED window’<sup>8</sup> has on their mental health, as well as describing the way in which it distracts them from getting on with the business of school improvement.

There have been several reports into OFSTED in recent months, and a range of ideas have been proposed for how we might either reform the inspectorate or create a new accountability system for schools:

- The National Education Union’s BEYOND OFSTED inquiry reported in November 2023<sup>9</sup>
- The Institute for Public Policy Research (IPPR) also published a report in November 2023 which includes some suggestions for how to reform OFSTED<sup>10</sup>
- The UK Parliament Education Committee is currently undertaking an inquiry into OFSTED’s work with schools<sup>11</sup>

### 3. Why do we need to change?

Regarding its work with schools, OFSTED serves two main functions:

1. It provides information to parents/carers. 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.<sup>12</sup>
2. It provides information to the regulator (the Department for Education). Ministers rely on OFSTED to provide them with information about whether and when to intervene in a school. For example, when a school is judged to be ‘Inadequate’ currently, it is usually either taken over by an academy trust, or moved from one trust to another.

There are currently serious concerns about both functions:

1. OFSTED does provide information to parents/carers, but the quality and the timeliness of the information provided is highly questionable.<sup>13</sup> For example, 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 outdated information. Indeed, half the time, this will be based on a period in which the school had a different headteacher... 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*

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<sup>7</sup> [The Guardian \(Mar 25, 2023\) Revealed: stress of OFSTED inspections cited as factor in deaths of 10 teachers](#)

<sup>8</sup> A period lasting several months when a school can expect ‘the call’ at any moment.

<sup>9</sup> [Beyond Ofsted \(Nov 2023\) An inquiry into the future of school inspection](#)

<sup>10</sup> [IPPR \(November 2023\) Improvement through empowerment: Helping our teachers and schools be the best they can be](#)

<sup>11</sup> [UK Parliament \(2023\) Ofsted’s work with schools](#)

<sup>12</sup> [OFSTED \(2017\) Annual Parents Survey](#)

<sup>13</sup> We covered this in more depth in our consultation paper – see [bit.ly/epa\\_ofsted\\_paper](#).

*“good” secondary school for their child will not leave with appreciably better outcomes than a parent who selects an “inadequate” school.’<sup>14</sup>*

2. For the same reasons, the quality and timeliness of information provided to the regulator is highly questionable. Currently, schools are supposed to be inspected once every four years. However, at the time of writing, many schools have not received a full inspection for over ten years.<sup>15</sup> Even when schools are inspected every four years, this is too infrequent to ensure the safeguarding of children and young people, since a school’s culture can change very quickly under new leadership.

In addition, there is strong and growing evidence that OFSTED has lost the trust of the teaching profession. According to the recent BEYOND OFSTED inquiry:

*‘OFSTED is in need of major reform... it is currently seen as not fit for purpose, and as having a detrimental impact on schools which some perceive as toxic. We need to build trust back into the system... The need for change is compelling and urgent.’<sup>16</sup>*

## 4. Where do we want to be?

There is universal agreement that schools should be accountable for the work they do in educating and caring for children and young people – some of the most vulnerable people in society. However, there is also a growing consensus that the way in which OFSTED currently inspects and reports on schools is harmful to the wellbeing of teachers and school leaders, to teacher recruitment and retention, and therefore to children and young people.

We want to create a robust accountability for schools which:

- a. improves the quality of information provided to parents/carers;
- b. provides more accurate, timely information to the regulator; and
- c. promotes and prioritises the wellbeing of educators, children and young people.

We believe that the proposals set out in this paper would achieve these improved outcomes within the same or similar budget to that currently allocated to OFSTED.

## 5. How will we get there?

As well as inspecting schools and early years providers, OFSTED inspects initial teacher training providers, apprenticeship providers, prison education and children’s social care services. The recommendations that follow only relate to the role that OFSTED currently plays in inspecting schools.

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<sup>14</sup> [Bokhove et al \(2023\) How Useful are Ofsted Inspection judgements for Informing Secondary School Choice?](#)

<sup>15</sup> [GOV.UK \(accessed 12<sup>th</sup> December 2023\) State-funded school inspections and outcomes: management information](#)

<sup>16</sup> [Beyond Ofsted \(Nov 2023\) An inquiry into the future of school inspection](#)

As the BEYOND OFSTED report pointed out, OFSTED has become toxic within the teaching profession. It's time for a reset. There is also a strong case for revising the use of the word 'inspection', which is suggestive of finding fault.

We recommend that the arm of OFSTED that relates to schools should be rebranded as the Schools Governance Auditor (SGA). The SGA would serve three main functions: a) audit and report on the governance and safeguarding of all schools biennially; b) maintain a data dashboard on all schools; and c) coordinate a network of Schools Accountability Partnerships.

## **A. Visit and report on the governance and safeguarding of all schools**

Biennial visits would be completed in a single day by a team of two – a Senior Auditor and an Assistant Auditor – on 14 days' notice. This would provide time for an anonymous pre-visit survey to be completed by leaders, teachers, support staff, parents/carers and pupils, and analysed by the incoming team. The aims of the visit would be to:

1. audit safeguarding policies and practices;
2. evaluate school governance, including improvement planning and record-keeping;
3. explore any issues raised in the pre-visit surveys; and
4. identify what additional support may be required.

An ungraded report would be published, highlighting strengths and areas for improvement, and the regulator (the Department for Education) would be alerted to any serious concerns – as is currently the case.

Some people have suggested that every school should have a safeguarding inspection every year.<sup>17</sup> This would be expensive and is arguably unnecessary. Currently, on average, schools are inspected once every four years. Moving to a biennial model, where schools are audited every other year, would be a significant improvement on current practice.

## **B. Maintain a data dashboard on all schools**

A data dashboard, administered remotely and updated annually, would provide parents/carers with up-to-date information on a range of metrics. This might include:

1. Progress and attainment
2. Attendance
3. Breadth of curriculum
4. Enrichment / extracurricular provision
5. Representation of different pupil groups
6. Destinations
7. Staff retention
8. Pupil retention
9. Parent/carer satisfaction
10. Pupil satisfaction

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<sup>17</sup> [Beyond Ofsted \(Nov 2023\) An inquiry into the future of school inspection](#)

The data dashboard would be updated annually and presented numerically, alongside national averages.<sup>18</sup> The data dashboard should also include links to the school's policies on behaviour and relationships, attendance, Special Educational Needs and Disabilities (SEND) provision, etc.

Currently, there is one framework for all types of schools. We propose that the contents of the data dashboard should vary to reflect a range of education providers (e.g., early years, primary, secondary, pupil referral units, alternative provision), with criteria that reflect the important differences between these settings.

### C. Coordinate a network of Schools Accountability Partnerships

This would involve schools working in partnerships and clusters to conduct reciprocal peer review visits annually. These reviews would be carried out over two days by an 'Accountability Partnership Team' (APT). The APT should comprise representatives of a range of key stakeholder groups (e.g., senior and middle leaders, the SEND coordinator, teachers, support staff and governors). There is an open question regarding the extent to which pupils should be involved in the peer review process; we will return to this question in *Section 7: How should we implement change?*

To ensure that members of the APT are skilled in collecting data and carrying out the peer review process, all team members would be required to complete and pass an online training programme before undertaking their first review visit. The reviewing teams will also be provided with clear guidance on how to collect data during the peer review visit.

The peer review visits would combine lesson observations, surveys, interviews and focus groups with random samples of teachers, leaders, support staff, pupils and parents/carers. An ungraded report would be shared with the school within 28 days of the visit, written by senior leaders from the reviewing school and quality-assured by the SGA, highlighting strengths and areas for improvement around key areas such as leadership, curriculum, behaviour and relationships, attendance, mental health and wellbeing and SEND provision.

There is an open question as to whether peer review reports should be published in a central database, on the school's website, or whether they should simply be made available on request to prospective parents/carers. The aim of the peer review process is to highlight strengths and areas for improvement, and the primary audience for these reports is the school's leadership team. If the peer review reports were to be published in a national database as currently happens with OFSTED reports, this would likely affect how a school behaves during a peer review visit. Teachers, leaders and support staff may be less likely to speak openly and honestly about areas for improvement, undermining the focus on school improvement. There is also an open question regarding the extent to which the SGA should facilitate, guide and quality-assure the peer review process. We will return to these questions in *Section 7: How should we implement change?*

We propose that each school should work with a partner school for three years, before being allocated a new partner school to work with. The SGA would allocate these partnerships, and should ensure that they are always similar schools (e.g., primary schools partnered with primary schools). In areas where there is an odd number of schools, it may be necessary to create a cluster of three schools.

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<sup>18</sup> A similar service already exists, using data from the Department for Education and the Office for National Statistics. See [theschoolsguide.com](https://theschoolsguide.com).



## **D. End the use of one-word judgements**

We propose that both the SGA and the peer review reports should be ungraded. One-word judgements are pernicious and without merit. Given the distorting effect the current grading system has on the school system and on the mental health and wellbeing of school leaders – alongside serious methodological concerns about the reliability, validity and accuracy of grades – we recommend that the practice of grading schools should be replaced with the numerical dashboard system outlined above.

## **E. Review safeguarding definitions and inspection practices**

The way in which OFSTED currently evaluates safeguarding should be reviewed. Under the current framework, there are serious concerns that some schools have been rated as 'Inadequate' based on questionable reasoning and evidence and/or on the subjective opinion of the lead inspector. We propose that a working party (see Section 7b, below) should carry out a thorough review of OFSTED's current practices in relation to safeguarding, as well as looking at best practice from other organisations and from around the world, and write new guidance on how the safeguarding of children and young people in schools should be defined and operationalised.

## **F. Introduce a 28-day grace period**

Under the current framework, if a school is graded as 'Requires Improvement' or 'Inadequate', it can take up to two and a half years for OFSTED to re-inspect the school and change its judgement. 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 'Requires Improvement'.

Under the current system, if a school addresses any concerns raised within a matter of weeks of an inspection, this means that the information OFSTED provides to parents/carers is out of date and may have an unnecessary negative impact on admissions, funding, recruitment and retention.

We propose that, following an audit visit by the SGA, schools should be provided with clear guidance on what they need to do to address 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. The report may mention that there have been concerns, but that these have now been addressed. At the end of the grace period, the school may need to be visited again, or the evidence of improvement could be provided remotely.

If a school is unable to provide evidence that it has met the required standards by the end of the grace period, this would provide a sound justification for using the published report to inform current and prospective parents/carers that there are ongoing 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.

Introducing a grace period would provide a powerful incentive for schools to rapidly address concerns relating to safeguarding, leadership and governance.

## **G. Establish an independent body to process complaints and appeals**

As we discussed in our consultation paper,<sup>19</sup> currently OFSTED ‘marks its own homework’ and only a small number of complaints are upheld. We suggest that OFSTED should be subject to the same levels of transparency that they demand of schools. To achieve this, we propose that an independent body be established to investigate any complaints made following a safeguarding audit by the SGA.

## **H. Make post-inspection surveys anonymous and independent**

Currently, the survey completed by headteachers following an OFSTED inspection is not anonymous. There are also concerns with the way in which the items have been worded. It is likely that making this survey a) anonymous and b) administered by independent researchers would significantly increase the accuracy, reliability and validity of the data collected.

## **6. How will we know when we’ve got there?**

The work of the SGA should be reviewed by independent researchers annually. This should be tendered out to universities and other research organisations. The annual review might include the following measures of success:

- Annual surveys, focus groups and interviews with teachers, leaders, support staff, parents/carers, children & young people
- Anonymous post-audit surveys, designed by independent researchers
- Ongoing data collection relating to attendance, attainment, mental health and wellbeing, behaviour, safeguarding
- An analysis of complaints and appeals relating to SGA school audits

## **7. How should we implement change?**

### **7a. Only inspect safeguarding concerns as an interim measure**

There have recently been various calls to ‘abolish’ OFSTED, or simply to pause inspections. For example, there is currently a petition on the Government and Parliament website ‘calling for routine Ofsted inspections to be paused so that the recommendations of the BEYOND OFSTED inquiry can be implemented’.<sup>20</sup>

We do not advocate this position. In providing information about safeguarding to the regulator, OFSTED fulfils an important role and abolishing or ‘pausing’ inspections would increase the risk that safeguarding concerns would go unchecked.

However, given the coroner’s recent remarks that there is a ‘risk of future deaths’ if lessons are not learned from the tragedy of Ruth Perry’s death, allowing OFSTED to continue inspecting schools in their current form would be equally reckless.

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<sup>19</sup> See [bit.ly/epa\\_ofsted\\_paper](https://bit.ly/epa_ofsted_paper).

<sup>20</sup> [UK Government and Parliament Petitions \(Dec 6, 2023\): Pause Ofsted inspections and reform how school performance is evaluated](#)

During the COVID pandemic, emergency legislation was passed to suspend all OFSTED inspections unless there was a safeguarding concern. As an interim measure, we propose that in the light of the coroner's report into the death of Ruth Perry, similar emergency legislation is passed to ensure the safeguarding of educators as well as children and young people.

Any such inspections should focus only on investigating the safeguarding matters raised. If there are ongoing safeguarding concerns following the inspection, these should be reported to the regulator to take further action as necessary. In this way, we can ensure the safeguarding of educators, children and young people while mitigating the damaging effects of OFSTED's current policies and practices.

## **7b. Establish an interdisciplinary working party to plan and implement reform**

To ensure that any changes are implemented with minimal disruption to people's lives and without losing the important roles that OFSTED currently serves, we propose that the Secretary of State appoints an interdisciplinary working party to review the reforms outlined in this proposal – alongside those put forward by BEYOND OFSTED, the IPPR and the forthcoming report of the Education Committee – and to design a new accountability system for schools. This working party should include:

- Policymakers
- Researchers
- Executive headteachers / trust CEOs
- Headteachers
- Senior leaders
- Middle leaders
- Classroom teachers
- Support staff
- Parents/carers
- Children and young people

This multidisciplinary approach would enable the team to look at schools accountability from a range of perspectives, and would guard against falling into groupthink.

The working party should:

1. Write a comprehensive plan for how to transition from where we are to where we need to be.
2. Conduct a national consultation on that plan.
3. Revise the plan considering consultation feedback.
4. Oversee the implementation of the plan.

There are several open questions that require further investigation, including the following:

1. Is there a role for inspectors or advisors to work with the APTs to facilitate, guide and quality-assure the peer review process?
  - Advantages: Increase consistency and reliability across different APTs.
  - Disadvantages: There may be differences of opinion between the APTs and the advisors. There would also be a significant cost.

2. Should pupils be included in the APT teams?
  - Advantages: Pupils are already involved in inspections, as they are often interviewed and observed. Should they be involved in helping shape the peer review reports also? Pupils may be more likely to speak honestly and openly about their experience of school to other young people.
  - Disadvantages: It would require taking them out of lessons, and they would have to catch up on work missed.
  
3. Should the APT peer review reports be published and held in a central database? An alternative is that they could be published on each school's website, or they could simply be made available to prospective parents/carers on request.
  - Advantages: Greater public accountability; more information readily available to prospective parents/carers.
  - Disadvantages: Publication on a central database would be likely to affect the extent to which teachers, leaders and support staff would be willing to speak openly and honestly about areas for improvement during peer review visits, undermining the focus on school improvement.

These questions could be explored using pilot studies, with alternative approaches being trialled and evaluated in different parts of the country, or in different local authorities / trusts. We propose that the Education Endowment Foundation carries out this work.

## 8. About the Education Policy Alliance

The Education Policy Alliance is a grass-roots think tank dedicated to crowd-sourcing education policy. Our steering group comprises volunteer primary and secondary headteachers, classroom teachers, teacher trainers, educational psychologists, parents/carers and young people.

We have no political affiliation – we seek to work with politicians and policymakers from all parties to improve outcomes and promote wellbeing among educators, children and young people and their families.

For media enquiries, or for more information, visit [educationpa.org](https://educationpa.org).