

# A guide for ASCL members to responding to Ofsted's Big Listen: schools, colleges and SEND and AP provision

## About this guide

At ASCL's Annual Conference 2024, HMCI Sir Martyn Oliver launched [Ofsted's Big Listen](#), describing it as a comprehensive listening exercise to hear from a full range of stakeholders. Ofsted says it welcomes feedback and criticism, and that it is interested in ideas for small changes as well as major reforms.

You can **take part in the Big Listen** [here](#), and the consultation **closes on 31 May 2024**. We strongly encourage all members to take part.

ASCL will, of course, be submitting our own response to the Big Listen. This document is not that response.

Instead, this guide is intended to raise some key points or considerations that members may wish to make in your own responses to the questions in the 'Schools', 'Colleges' and 'SEND and alternative provision' sections of the survey. These prompts are based on ASCL's [Future of Inspection](#) policy paper, which was warmly received by the sector when published in 2023. They are also informed by our ongoing discussions with [ASCL Council](#) and broader membership.

We hope this document will be useful to senior leaders in the final month of the Big Listen.

There is a separate [guide to the section on safeguarding in schools](#).

## Question 1 | Reporting

### **Please tell us what you think Ofsted's priorities should be when reporting on inspection and regulation, and why, and what we can improve.**

In each section, the survey lists several aims that Ofsted believes every inspection report should achieve. It asks respondents to indicate how important each aim is to them, on a five-point scale, then invites open comments.

Although not mentioned explicitly, this is the section of the Big Listen where any suggestions around single-phrase judgements could be made. It is our policy to lobby for the removal of all graded judgements, especially the overall effectiveness judgement. We will make clear in our submission that we are disappointed that a question about single-phrase judgements was not included; members may wish to do the same.

The survey explicitly asks for feedback on the four areas of the framework. We would encourage you to reflect on whether you think these work. Are all judgements given sufficient time during inspection?

In terms of reporting on how schools keep children safe, note there is a separate section on safeguarding in schools.

The focus on SEND and disadvantaged learners in the current EIF was welcomed as highly inclusive, but some school leaders serving disadvantaged communities have expressed concern that this places unrealistic and unfair expectations on them. You may want to reflect your experience of this in your response here.

When the previous HMCI came into post, she said she wanted to make a distinction between the two pillars of accountability: Ofsted inspection and DfE performance data. This section of the Big Listen is an opportunity to reflect on whether this distinction is helpful, and whether DfE data should be given more or less value during inspection.

The questions ask about wider contextual data – what do you think this should be like in terms of reporting? What wider contextual information would you want to see on your report (if any)?

## **Question 2: Inspection practice**

### **Do you have any comments on Ofsted's current inspection practices and whether they should change?**

The surveys again list several inspection practices that Ofsted believes all inspections should follow. It asks respondents to indicate how important each of these are, then invites open comments.

Most of the concerns members raise with ASCL about Ofsted relate to practices. We therefore urge you to share your experience of inspection – both the positive and the negative – in your response to these sections.

The question of consistency between different phases and types is an interesting one. We know that smaller primary schools find the current EIF more challenging than some secondaries (given its focus on disciplinary knowledge and sequences). You may want to consider the strengths and drawbacks of having separate handbooks for different phases, including special and alternative provision. ASCL's [Future of Inspection](#) paper proposes that the lead inspector should have relevant leadership experience of that phase of education.

Regarding length of inspections, many members comment that two days feels too short to adequately demonstrate what they do. We have not, however, explicitly argued for longer inspections, as this may increase consistency, but may also increase workload, and would inevitably mean asking Treasury to invest more in Ofsted. But would the benefits outweigh these concerns? You may wish to reflect on this.

Many members talk about their week being one of two halves: Monday – Wednesday (when they're expecting the call) and Wednesday – Friday (when they can get on with leading their schools). This section is an opportunity to consider how the notification period could help this situation. Would it be better, for example, if there was a guarantee that schools would be told by 2pm on Monday if they'll be inspected that week?

In terms of notice periods, it's tempting to argue that these should be longer in order to give schools greater certainty about when inspection will take place. However, this has to be balanced against the inevitable additional workload, and the reliability and validity of inspection. Where should that balance fall, in your view?

## **Question 3: Impact**

### **How do you think Ofsted could best raise standards and improve lives for children and learners?**

These sections list ways in which Ofsted can be a 'force for good' and invites respondents to indicate the extent to which you agree or disagree with these six statements. It then invites open comments on how Ofsted could raise standards and improve lives.

This question is largely about the intended or unintended consequences of inspection on schools' behaviours. Would you want to highlight anything that may be missing from their list? Are there any unintended consequences of the EIF that Ofsted are not aware of?

Notably, the consultation does not discuss the impact on regulation, such as the fact that schools with two consecutive RI judgements will almost certainly be issued with an academy order. While this is not strictly within Ofsted's remit to control, it is a clear 'impact' of inspection. You may want to comment on this and other consequences of inspection.

We'd encourage members to give your own views as to whether Ofsted's definition and approach to 'off-rolling' has increased or decreased the number of exclusions, etc.

The last of the six statements – that Ofsted should be able to inspect groups of schools – is a big one. Currently, Ofsted can only conduct optional MAT summary evaluations. You may want to reflect here on the potential implications of making these compulsory inspections. Would this increase workload for MAT and school leaders, and also for teachers, or reduce the burden of inspection in school?

## Question 4: Culture

### Do you have any comments on Ofsted's openness, and how easy it is to provide feedback to help us improve?

Ofsted has committed to publishing all its training materials, though this has not yet happened. We would strongly encourage members to use your response to this question to request that Ofsted publishes these materials ASAP, in the interest of transparency.

Many members have had recent experience of the culture of inspection. We hope you share your experiences without fear or favour, and can describe what it feels like to be a school leader during inspection.

Equally, we also represent many serving OIs at ASCL. As you will know, Ofsted is keen to hear from you directly about your experience of inspecting; we encourage you to be completely honest in your feedback.

Since Ruth Perry's death, and the coroner's report, Ofsted has implemented a range of strategies to support headteachers during inspection. This includes a named contact, independent from the inspectorate teams, whom heads can contact if they have any concerns. If you have been inspected since January 2024, it would be helpful to reflect here on your experience of the changes made.

This is also the only opportunity to raise concerns about Ofsted's complaints procedure. Since Easter, Ofsted has operated a new complaints process, which separates out factual accuracies from complaints about the inspection itself. Schools can also escalate a complaint directly to ICASO, which regulates Ofsted. However, ICASO cannot overturn a judgement; many members are concerned that it's still a case of Ofsted 'marking its own homework'. What would you like to see in terms of a transparent and independent complaints procedure; or do you think the changes are sufficient?

Likewise, this is the opportunity to raise concerns about the significant increase in parental complaints about schools directly to Ofsted. ASCL's suggestion is that, before a complaint can become 'qualifying', parents should have to submit evidence that they have been through the school's published complaints process.

### Final question: Is there anything else you'd like to tell us?

The title of this consultation is the Big Listen – if there is anything at all that you want Ofsted to know, this is your opportunity.

Whether you were inspected between 2021 and 2023, since the changes made in 2024, or are awaiting inspection, we believe that Ofsted genuinely wants to hear your views.

Additional comments could include anecdotal evidence of inspection (or waiting for an inspection), ideas for small or significant reforms, or reflections on the impact of inspection on the wellbeing, recruitment and retention of staff.

We hope this guide is helpful, and that our prompts have triggered some discussions or thoughts. If you have strong views about the key points ASCL should be making in our own response to the Big Listen, please email [tellus@ascl.org.uk](mailto:tellus@ascl.org.uk) We're not able to respond to most of the emails we receive into this inbox, but they are extremely helpful in enabling us to better understand members' concerns and thoughts.



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