

Education Inspection Framework 2019: inspecting the substance of education

Response of the Association of School and College Leaders

1. The Association of School and College Leaders (ASCL) represents more than 19,000 members, including education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes Ofsted's consultation on the 2019 education inspection framework. As an association, we have long argued for intelligent, proportionate accountability. The next incarnation of Ofsted's inspection framework, and particularly the introduction of a 'quality of education' judgement in place of an outcomes judgement, is a welcome step towards this goal.
3. The proposals in this consultation can only go so far in reforming the broader accountability system, and there is much more that needs to be done. We will continue to work towards wider accountability reforms on behalf of our members. In this response, however, we have principally focused on providing clear feedback on the specific consultation proposals.
4. The decision to publish not only the draft framework but also the draft handbook and underlying research suggests that Ofsted has taken a genuinely consultative approach to the significant changes it proposes. Given this, it is our expectation that further amendments to the proposals will be made in light of the consultation process.
5. We are a representative, member-led organisation. The views expressed here are a result of extensive consultation with ASCL Council, our policy-making body, which consists of around 60 ASCL members elected to represent their region or sector. We have also drawn on discussions with around 1000 members during our series of regional information conferences in the autumn term, and a further 400 members at ASCL events since the consultation was formally launched.
6. In reaching the conclusions outlined in this response we have scrutinised the draft framework, handbooks and research commentary published by Ofsted on 16 January 2019. In addition, we have considered the evidence gathered through ASCL's involvement in focus groups and policy discussions, as well as through attending Ofsted's curriculum advisory group and inspector training. We have also gained insights from our Curriculum and Inspection policy specialist having shadowed a pilot of the new section 5 framework, giving us a view of how the theory of the framework plays out in reality. This has also informed our response.

7. ASCL supports Ofsted’s ambition to ensure that the inspection system is responsible, focused and intelligent, as laid out in the inspectorate’s 2017 corporate strategy. The direction of travel towards an inspection system which goes beyond performance measures and focusses more on the curriculum, as part of a broader evaluation of school effectiveness, is welcome.
8. This bulk of this response comprises our comments in relation to the substantive questions posed in the consultation, as well as some specific proposals where we think that changes are required. We also include some more general comments at the end.

Proposal 1: To what extent do you agree or disagree with the proposal to introduce a ‘quality of education’ judgement?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don’t know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. The introduction of a new ‘quality of education’ judgement is welcome. Analysis from a range of commentators, and ASCL’s own work ¹, indicates that overall inspection judgements under the current framework are too dependent on historic outcomes. In turn, this has impacted adversely on schools with particular demographics, meaning that some schools are disproportionately less likely to achieve the best inspection judgements ². It is our hope that introducing the quality of education judgement, and removing the outcomes judgement, will help to redress the inequalities in inspection judgements which reflect demographics rather than quality of provision. We are encouraged by the conclusion of Ofsted’s phase 3 research that curriculum quality is not correlated with deprivation. This should mean that schools serving deprived communities will have a better chance of receiving positive inspection outcomes than under the current framework.
10. Our support for the introduction of a quality of education judgement is contingent on Ofsted maintaining, both in policy and in practice, its stated aim to avoid prescription of a preferred curriculum model. We believe that leaders are best placed to make decisions about the right curriculum for their pupils.
11. It is essential that Ofsted undertakes a phased approach to the proposed changes, to give schools time to properly consider their curriculum. This is something which ASCL has strongly encouraged the inspectorate to do. It is imperative that schools feel supported in thinking deeply about any changes they wish to make to their curriculum, and are given time to do this, rather than rushing into change, or trying to second guess what inspectors will be looking for. This is a process which can take several years, and schools must be able to feel confident that inspectors will recognise and support this process.
12. Further to this issue, the wording on the phased approach in the draft handbook states that ‘the bracketed sections are transitional only, and Ofsted will review the handbooks before September 2020 to identify whether they should be deleted’. It is essential that this review process is given proper consideration and the outcome is

¹ [How do Ofsted ratings relate to Progress 8 scores?](#) FFT Education Datalab. 11 October 2017.
² [Graphically exposing Ofsted bias?](#) Leading Learner. 12 June 2018.

not pre-determined, as it is possible that a longer transitional period may be required. ASCL looks forward to being involved in discussions relating to this issue in due course.

13. We gained insights into how the introduction of the quality of education judgement might work in practice through shadowing a pilot section 5 inspection. During this inspection, we were able to observe the methodology inspectors will use to drill into curriculum subjects, known as a 'deep dive'. This provided encouragement that this methodology can yield worthwhile insights into the quality of curriculum leadership and design. Inspectors gathered a range of evidence from leaders, pupils, pupil work and teachers, which was triangulated successfully and led to a valid assessment of the intent, implementation and impact in the subjects explored. Feedback from the pilot school indicated it had found the process to be worthwhile in helping it to identify strengths and weaknesses, and to consider next steps.
14. However, we are concerned that there are unresolved contradictions running through the quality of education section of the revised framework, particularly in relation to school autonomy. In particular, paragraph 160 states: 'The inspectorate recognises the importance of schools' autonomy to choose their own curriculum approaches'. This seems at odds with statements about the length of Key Stage 3 and EBacc entry, which seem to suggest schools need to make particular curricular choices in order to receive a favourable judgement.
15. In terms of the length of Key Stage 3, the new framework must not result in a de facto prescription that all schools must run a three-year Key Stage 3 and a two-year Key Stage 4. Many effective schools operate a shortened Key Stage 3 while maintaining breadth, and must be allowed to continue to do so where leaders consider it to be in the interests of pupils. Judgements made on over-simplistic facets, such as the duration of a key stage, neglect subtler issues such as the distribution of curriculum time and the quality of the curriculum itself. Similarly, schools must be supported in making decisions to develop a bespoke curriculum where this is in the interests of children. For example, many schools will provide some pupils with extra time on literacy, in order to ensure they can access the full curriculum. As stated above, school leaders are best placed to decide the curriculum that is most appropriate for their pupils.
16. With regard to the EBacc, ASCL recognises that this is a government ambition rather than an Ofsted policy. However, its inclusion in the criteria for the quality of education is untenable. Firstly, the wording in the handbook refers to 75% entry by 2022, but does not make it clear to inspectors that this is a national ambition, to which individual schools should not be tied. This is a significant error which is likely to lead to unintended consequences during inspection. It was encouraging that the EBacc did not seem to be a decisive factor in the inspection we shadowed, but this only served to underline how the inclusion of the EBacc is likely to lead to inconsistency, with some inspectors placing more weight on it than others. This inconsistency will not lead to the responsible and intelligent inspection to which Ofsted aspires in its strategic plan.
17. It is also notable that, in a framework intended to be research-informed, there is no evidence in Ofsted's own research commentary that supports the inclusion of the EBacc in the framework and handbook.
18. Moreover, we do not believe that there are sufficient, or sufficiently evenly distributed, teachers of modern foreign languages in the system to meet the government's EBacc target. Consequently, some schools and regions are disproportionately likely to suffer

adverse judgements for reasons beyond their control. It cannot be acceptable that schools will be judged by criteria they have no means of achieving. If this is the case, this framework will fare no better than its predecessor in supporting schools working in the most challenging areas.

19. During the current recruitment and retention crisis, it is vital that leaders maintain curriculum and teaching quality as well as breadth. The increased focus on the EBacc risks incentivising schools to make curricular choices that cannot be delivered satisfactorily due to system issues beyond their control. This is not in the interests of pupils. The high-stakes nature of inspection should not be used to leverage increased EBacc entries.
20. We believe that any reference to the EBacc as part of inspection is flawed, and runs counter to Ofsted's strategic aim of providing responsible, intelligent and (appropriately) focused inspection.
21. The effective and consistent implementation of the new framework will depend on the quality and training of inspectors. As such, training and supporting materials must be created across the curriculum to support inspectors working in non-specialist subject fields. These materials should be published in order to allow for scrutiny from the disciplinary communities.
22. The focus on literacy in the framework has been noticeably strengthened, but mainly in terms of reading. Inspectors' assessment of literacy development should be more flexible so as to take account of how schools are developing other aspects of literacy, particularly oracy.
23. In terms of curriculum design, we recognise that school leaders have an important role to play in ensuring the curriculum meets the needs of SEND pupils. The lack of any reference in the handbook to the SEND code of practice seems odd and should be addressed.
24. **ASCL proposes:** Ofsted should remove discrete paragraphs and criteria in relation to the EBacc. Monitoring of EBacc take-up, if that is a government priority, can be done via the school census and should not form any part of the inspectorate's remit.

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

25. ASCL supports the separation of behaviour and attitudes from personal development. Evidence from the shadowed pilot demonstrated that this enabled inspectors to better inspect and comment on each area on their own merits.
26. However, we are concerned about the wording of some parts of the behaviour and attitudes section. For example, the section on 'pupils who are not in school during the inspection' seems predicated on mistrust of school leaders. While ASCL would join Ofsted in unequivocally condemning the small minority of cases where these

practices take place, the tonal underpinning of the handbook risks creating a false perception that leaders are widely engaged in these behaviours.

27. Inspectors must be attuned to the challenging contexts in which many schools operate. Inspectors should seek to understand and reflect positively where schools are putting in place strong provision, particularly in areas of deprivation. It is particularly important that inspectors understand that cuts to local services have reduced the external resources schools can draw on, and this must be taken into account when forming judgements. Inspection must support inclusivity, not punish schools which prioritise it.
28. The handbook states that inspectors will seek individual interviews with members of support staff. As the research indicates, such staff may be more likely to give a negative reflection of behaviour in the school; inspectors should not, therefore, place undue weight on this evidence, given the research indicates it is to be expected. Inspectors should be mindful of the context of the school as well as the views and perceptions of other stakeholders.

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

29. ASCL tentatively supports the increase for section 8 inspections to two days. Feedback from ASCL Council and other members indicates support for longer section 8 inspections on the understanding that it leads to better quality inspection.
30. Evidence from the shadowed pilot demonstrated the methodology inspectors will use to drill into curriculum subjects. However, the explanation of this process, is not clearly written into the draft handbook. If retained after the consultation, the 'deep dive' methodology should be added into the final version of the handbook so there is transparency and understanding between schools and inspectors about this important process of gathering and comparing evidence.
31. Our observation of the pilot inspection indicated that the deep dive methodology could provide a suitable structure for exploring how curriculum intent is implemented in practice. However, it was clear that following the preferred order of the methodology posed logistical problems due to timetabling and the availability of leaders, teachers and pupils. This was just about achievable in the two-day timescale but would have been almost impossible in a single day. Given that two-day inspections appear to be necessary in order for the deep dive methodology to work, we tentatively support this proposal.

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

32. ASCL disagrees with the proposal to introduce on-site preparation. Although the initial proposal had the worthy intention of strengthening the professional dialogue between leaders and inspectors, we know from members that the sheer impracticalities brought about by same-day notice negate the intended benefit. They risk adding to the stress and workload of leaders and teachers.
33. Worryingly, the move to same-day notice might be interpreted as a sign of mistrust in the profession and risks undermining the professional two-way relationship between the school or college leader and the inspector. Although the activity is called 'preparation', the reality for leaders is that, once inspectors are on site, the inspection has started.
34. Same-day notice poses a profound challenge to the normal running of schools, and risks compromising the provision for pupils. Given that many leaders teach classes and supervise lunch/breaktimes, same-day notice will inevitably lead to disruption for pupils. A central tenet of current practice is that pupils should not be adversely affected by inspection activity. Putting this at risk is not consistent with Ofsted's intention to deliver responsible inspection.
35. The proposal is also likely to make schools 'in window' for inspection less open to collaborative work and CPD, due to concerns that such work would risk leaders being off-site during the vital opening phase of an inspection. This would not be in the interests of schools, teachers or pupils. And, in terms of the inspection workforce, the implication that inspection would take up three days for serving school leaders carrying out inspections might dissuade leaders from being inspectors.
36. We understand that, according to statements by Ofsted, around half of schools which have participated in pilots have commented favourably on the experience of on-site preparation. However, it must be taken into account that pilot schools have known for weeks in advance of their inspection and so, in this regard, the same-day notice has not been properly tested.
37. Insight gained from shadowing the pilot inspection indicated that there was value in inspectors and leaders having an introductory conversation longer than is currently the case. It allowed the leader and inspector to co-construct aspects of the inspection schedule. However, this was made easier because the school was expecting the inspection and so had carried out some preparation work.
38. While there is value in ensuring inspectors and leaders have better quality dialogue at the start of inspection, the issues with same-day notice offset any benefit.
39. **ASCL proposes:** The same-day on-site preparation proposal should be dropped.

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?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

40. ASCL supports the recommendation of the Department for Education workload advisory group that there should be no more than two to three data collection points per year. We also recognise the need for inspectors to consider carefully the reliability and validity of all evidence they use during an inspection.
41. However, we believe the proposal that inspectors refuse to look at schools' internal data at all takes this too far, and is unhelpful to both schools and inspectors. It risks putting more emphasis on historic outcomes – the opposite of Ofsted's ambition. This is particularly concerning given the limited use of national data when judging the progress of particular groups of children, such as SEND pupils, for whom internal data may provide more valid evidence of progress.
42. Secondly, alternative inspection activities, such as work scrutiny, do not appear to be any more valid or reliable, according to the available evidence. The draft handbook makes no mention of sample size or other safeguards which would prevent an inspector from drawing inaccurate inferences from pupils' books.
43. There is a significant risk that, were this proposal to be implemented, schools in a category of concern would find it more difficult to demonstrate swift improvement. This could make such schools less attractive to sponsors, and have an adverse impact on school improvement.
44. Fundamentally, there is a tension between the ambition to make inspection more valid and reliable, while potentially ignoring information which could help to achieve this objective. It would be much better, in our opinion, for inspectors to triangulate internal data and make an informed assessment of its reliability, rather than completely ignore it and risk undermining the security of the judgement.
45. We believe the proposal as it stands does not reflect Ofsted's ambition for inspection to be intelligent.
46. **ASCL proposes:** Ofsted should amend this proposal to reflect the established evidence-gathering protocol that states that, while inspectors can't ask for internal data, they will look at the evidence a school provides – including internal data.

Proposals 7 and 8 relate to non-association independent schools

Proposal 7: To what extent do you agree or disagree with the proposal that inspectors should normally use the non-specialist curriculum as their primary source of evidence in assessing the extent to which the school meets the quality of education criteria?

Strongly agree <input type="checkbox"/>	Agree <input checked="" type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
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47. ASCL supports the proposal that inspectors should normally use the non-specialist curriculum as their primary evidence. Given the specialisms such schools can offer, it would be practically very difficult to find inspectors with the expertise necessary to judge the quality of this specialist provision while also being able to inspect all facets of the non-specialist curriculum.

48. However, we also share Ofsted's concern that all pupils should study a broad, rich curriculum, alongside their specialist education. Where significant aspects of the required subjects are being delivered through the specialist curriculum, therefore, it is right that inspectors are able to draw evidence from both the non-specialist and the specialist curriculum in order to reach a judgement.

Proposal 8: To what extent do you agree or disagree that where non-association independent schools have been found to improve or decline at an additional inspection, Ofsted should provide up-to-date judgements about the school's current performance?

Strongly agree <input type="checkbox"/>	Agree <input checked="" type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
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49. ASCL supports the proposal to provide more timely judgements for non-association independent schools which have declined or improved. It is important that parents and other stakeholders have confidence that graded judgements provide the most up-to-date insight into the quality of provision. This is particularly important with regards to providing up-to-date information on the effectiveness of safeguarding, and this should be reflected in the school's overall judgement.

Proposals 9, 10 & 11 relate to further education and skills. The response to these proposals is provided jointly on behalf of ASCL and the Principals' Professional Council (PPC).

Proposal 9: To what extent do you agree or disagree that the proposal to reduce the types of provision we grade and specifically report on will make our inspection reports more coherent and inclusive?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

50. We agree in principle with the proposal to reduce the number of areas of judgement from six to three. This will provide a helpful consolidation and simplification of the categories of provision.
51. However, we query the inclusion of 14-16 provision within the broader category relating to education programmes for young people, when most of that category is about 16-18 education. The compulsory nature of the 14-16 programme makes it different to the 16-18 study programme or the 16-19 traineeships.
52. We suggest that the inclusion of 14-16 education programmes within the broader category of education programmes for young people should be extensively trialled before being rolled out, to ensure the results are not skewed by judgements about programmes for the next phase of education (16-18), which are fundamentally different.
53. In terms of apprenticeships, we agree that all apprenticeship programmes from level 2 to level 5 should be judged together.
54. In terms of adult learning programmes, we agree that adult provision should be categorised with 19-24 traineeships as these programmes share an ethos and structure.
55. In terms of SEND provision, which is so broad, we agree that this strand should run through all categories of provision, rather than stand separately. This seems consistent with ensuring an inclusive approach to inspection and reporting.
56. However, we suggest that, as with inspections of educational provision for 14-16 noted above, inspection and reporting of educational provision for SEND students as part of each category of provision should be trialled significantly prior to September 2019.
57. In relation to the inspection of T levels, we agree that T level inspection judgements should not be incorporated into the inspection framework until 2020. We would, in fact, go further, and suggest that this should be delayed until 2021, when the first T level students will be completing their programmes. Learning from inspections of T levels will be important to the sector as a whole.

Proposal 10: To what extent do you agree or disagree with the proposed model for short inspections?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

58. We agree that the change to the inspection framework from September 2019 will have an impact on short inspections. The proposed focus on quality of education and training, safeguarding and effective management seems appropriate.

59. However, in effect, the new approach will reduce the period between notification and inspectors arriving on site. While we recognise the new focus may require evidence to be gathered differently, and this may be more time-intensive compared to the previous framework, a reduction in the notice period may present logistical challenges for providers. We note that piloting is ongoing and Ofsted expects to make refinements to this approach. Accordingly, it is difficult to conclusively agree or disagree until the results of the pilots have been shared and the final details are known.

60. We would urge Ofsted to listen to the feedback from the pilots and to engage with ASCL and PPC in constructive dialogue about the shape of the final version of these plans in due course.

Proposal 11: To what extent do you agree or disagree that the timescale within which providers that are judged to require improvement receive their next full inspection should be extended from '12 to 24 months' to '12 to 30' months'?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

61. We agree that this is a sensible approach. The extension of time should give providers a better opportunity to show improvements in the quality of education and address any weaknesses identified in their previous inspection.

62. We also welcome the suggestion that separate inspections and separate judgements will be carried out at campus level for those college groups where there are two or more colleges which have come together. In college group structures, different colleges or campuses may have very different provision, and the quality of that education may also vary significantly. It would not be helpful to the sector to give a college group only one grade. We note that this will not happen until 2021, which is two years after the introduction of the new framework. We suggest that this proposal could be bought forward to ensure that single colleges and college groups are inspected on the same basis during the new inspection cycle.

General comments

63. ASCL supports the greater nuance in the draft documents around safeguarding, so that some schools might receive a requires improvement judgement, where children are not at risk of harm.
64. It is worth noting that Ofsted's equality, diversity and inclusion document statement makes reference to protected characteristics but does not include them all. We believe this important statement should be amended to include all protected characteristics.
65. As mentioned in paragraph 26 above, too much of the draft handbook is written in language which undermines the integrity and professionalism of leaders. While ASCL would join Ofsted in unequivocally condemning the small minority of cases where unethical practices take place, the tonal underpinning of the handbook risks creating a false perception that leaders are widely engaged in these behaviours. In our view, the language in these sections fosters a climate of suspicion, rather than inspection, and undermines the opportunity to improve the professional working relationship and dialogue between leaders and inspectors.
66. There is a new focus on the management of teacher workload in the draft handbook. While ASCL strongly wishes to see the workload of teachers and leaders become much more sustainable, and supports strategies to reduce workload, we are concerned about the possibility of school leaders being penalised for factors which are outside their control. Inspectors must take into account the pressures placed on schools by systemic issues, not least of which are severe funding constraints and teacher shortages. Individual schools, and their leaders, must not become scapegoats for failures of government policy.
67. We expect any concerns about workload to be viewed within the context in which the school is operating, listening to the views of leaders and taking into account the pressures caused by Ofsted's own judgements. This should include some appreciation that the expectation of rapid improvement the inspectorate places on schools in a category of concern, as well as those judged to require improvement, is itself a driver of workload.
68. It is important that inspectors are mindful that expectations around the workload of staff do not inadvertently increase the workload of leaders, many of whom have already had to reduce the size and capacity of leadership teams as a result of funding pressures. Inspection must be nuanced enough not to incentivise leaders to transfer to themselves the workload of staff.
69. While ASCL strongly condemns off-rolling, the explicit focus on off-rolling in the draft handbook is concerning for several reasons.
70. Firstly, as noted above, the sharp focus on this issue, as represented by a discrete section in the handbook, appears to indicate this practice is widespread. However, Ofsted's own data analysis does not bear this out.
71. Secondly, Ofsted's definition of off-rolling is problematic. Members tell us they are fearful that legitimate practices, such as the appropriate use of alternative provision, risk being unhelpfully swept under the banner of 'off-rolling'. This would not be in the interests of vulnerable children. More work needs to be done by Ofsted to understand what is and is not off-rolling, and whether the definition outlined in the handbook is sufficiently developed. ASCL is in discussions with Ofsted about off-rolling and

strongly suggests this part of the handbook is not included until clearer guidance has been issued and its robustness of application has been properly tested.

72. As already highlighted, the successful delivery of the framework and handbook will depend on the expertise of inspectors. ASCL understands that training has been underway for some time in relation to aspects of the quality of education judgement. However, given this is a new judgement, arguably more reliant on inspector inference, we seek reassurance from Ofsted that there are sufficiently fair, rapid and responsive support procedures in place both during and after inspection to support schools and inspectors. In particular, we seek reassurance that Ofsted has put in place appropriate quality assurance and complaints processes which reflect the need to ensure consistency in inspection outcomes.

Conclusion

73. ASCL believes that the introduction of a quality of education judgement, along with some of the other proposals in these documents, is a step in the right direction.
74. However, these proposals only go so far towards the much deeper reform of the accountability system we believe is needed. A longer-term vision for school accountability is required, forged between government and the profession, which better supports schools and colleges to deliver the best possible education for their pupils. In part, this will require a recalibration of the relationship between schools and those to whom they are accountable.
75. I hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

Stephen Rollett
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Association of School and College Leaders
5 April 2019