

## Consultation on identifying schools for improvement support

### Response of the Association of School and College Leaders

#### A. Introduction

- 1 The Association of School and College Leaders (ASCL) represents over 19,000 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 Overall, this consultation is a welcome reflection of the Secretary of State's positive ambition to reduce the toxicity of the current high-stakes accountability system. In particular, ASCL welcomes the recognition in the consultation that schools have experienced a lack of clarity arising from different organisations holding them to account, sometimes in contradictory ways.
- 3 We further welcome the acknowledgement that schools should be offered support in circumstances where pupils' outcomes need improvement, as opposed to a threat of intervention with the resulting anxiety and workload pressures.
- 4 However, we do not accept the proposal in the consultation that a single trigger is required if the purpose of that trigger is to indicate eligibility for support, as opposed to intervention. It seems to us that in the process of moving from 'multiple sources of accountability' to a 'single offer of support', the option for 'multiple triggers for support' has been too readily dismissed.
- 5 Our view is that if schools need support then they should be offered it as soon as possible, whether indicated by inspection or via performance measures. There can be a considerable gap between inspections, potentially too long if a school's outcomes start to decline and support becomes urgent. This may be exacerbated by the uncertainties and potential inconsistencies arising from the introduction of a new Ofsted framework.
- 6 We do accept, however, that a 'Requires Improvement' judgement should form one component of such a trigger.
- 7 The consultation proposes removing the floor and coasting thresholds. At Key Stage 4, more schools have fallen below these lines since the introduction of reformed GCSEs in 2017. This has caused larger variance in results between schools, rather than any decline in performance. Given the arbitrariness of the current floor and coasting definitions, their lack of recognition of the context of the school (such as the mix of disadvantaged and EAL pupils in a school's cohort which are known to have a large

effect on Progress 8 and the primary progress and attainment measures) and the impact of reforms on those thresholds which are beyond schools' control, ASCL welcomes their removal.

- 8 Unfortunately, the consultation stops short of addressing our main concerns, namely the nature and quality of the support being offered (whatever form the trigger takes) and the implications if a school chooses not to take up the offer of support, particularly at their next inspection.
- 9 We do not want this decision to become another form of accountability in itself. A 'Requires Improvement' judgement is a broad church, particularly where Leadership and Management is considered to be good.
- 10 ASCL members who are currently National Leaders of Education, and who will be responsible for delivering the support offer, have expressed concerns over the limited nature of the support being proposed, both in time and scope. They feel the parameters being suggested for the support offer are narrow and prescriptive, whereas creative and flexible solutions may be required given each school's circumstances. The fact that the nature and scope of the proposed support to be offered was not made clear in the consultation is perceived to be a serious flaw.

## **B. With reference to your specific questions**

**1) The Government has committed to introducing a single transparent method to identify schools eligible for improvement support, as set out in paragraph 11. Do you support the proposal to use Ofsted *Requires Improvement* judgements to identify schools eligible for these DfE offers of support?**

- 11 Yes. However, as outlined above, we believe this should be one component of a broader trigger for support, supplemented by a suitable use of performance measures.

**2) Do you agree we should remove coasting and floor data standards?**

- 12 Yes. However, in the process of removing these standards, we must avoid replacing them with offers of support which are in name only, and themselves turn into accountability drivers.

**3) Do you see any disadvantages to removing coasting and floor data standards?**

- 13 No.

**4) Do you think that the changes outlined in paragraphs 9, 11, 26 and 30 will give schools greater clarity on which are eligible for improvement support?**

- 14 Yes. However, clarity is not the issue here, if this offer is genuinely about support rather than accountability in a different form. Combining an Ofsted judgement with a suitable performance measure threshold, for example, would remain perfectly clear to school leaders and their governing boards. Clarity has become a problem only in the context of multiple sources of accountability.

## **C. Conclusion**

- 15 We are grateful for the opportunity to contribute to this consultation, and hope that this response is of value to the process. ASCL is willing to be further consulted and to assist in any way that it can.

Duncan Baldwin  
Deputy Director of Policy  
Association of School and College Leaders  
22 March 2019