

Ofsted Consultation: *The Future of Inspection*

Response of the General Teaching Council for England

Introduction

1. The General Teaching Council (GTC) welcomes the opportunity to respond to this Ofsted consultation on the future of inspection. Through its professional register, code and responsibilities for safeguarding competence and conduct, the Council is itself a key player in the accountability framework. However, as it has made clear so far, as part of its policy advisory remit the Council is also interested in developing and promoting the profession's capacity for self-evaluation and improvement, which will raise standards and raise the status of the profession.
2. The Council is pleased to respond to this critical consultation that heralds a changing role for Ofsted in the accountability framework. The GTC generally welcomes the thrust of the proposals for a more streamlined inspection system with shorter more focused external reviews.
3. The GTC has been working closely with a Collaborative Forum of stakeholder partners that it has brokered, on future accountability issues since Summer 2003, with Ofsted, the DfES, the TTA, the Audit Commission, NCSL schools, LEAs, parent, teacher, governor and local authority organisations and representatives of the research community. The Forum has gathered considerable evidence on inspection and school self-evaluation policy, practice and research that the Council is keen to feed into its consultation response to the future of inspection and to the DfES consultation on the Single Profile proposal.
4. In July the Council is committed to submitting advice to the Secretary of State on the future accountability framework and the role of school self-evaluation, again drawing on the work of the Collaborative Forum. Longer term, the GTC looks forward to providing further thinking on school self-evaluation alongside the experience of the eight pilot areas further developing the school improvement proposals announced in the North Of England speech in January, including those related to a changed inspection model for the future.
5. This response is organised into two main sections:
 - the Council's overall response to the direction of the consultation;
 - responses to the specific proposals.

The Overall Response of the GTC

6. The Council's starting point for responding to this consultation is its commitment to a three-level model of school self-evaluation involving:
 - rigorous internal self-evaluation involving all stakeholders;
 - monitoring of, and support for, the processes of self-review by external advisers;
 - external audit and quality assurance.

The purpose of the GTC's work with the Collaborative Forum is to develop school self-evaluation models based on processes which involve the gathering and evaluation of comprehensive evidence.

7. The Council welcomes the way in which the role of school self-evaluation is upgraded by the proposal in the Ofsted consultation. In particular the Council commends the references to inspection needing to complement school development planning and self-evaluation and to Ofsted wishing *explicitly to share the responsibility for improving all educational settings in a way we have not done up to now*. These statements represent a significant policy shift if carried through as Ofsted has often been criticised by schools for not supporting them sufficiently in addressing the improvements that inspection had identified as necessary. More detail is needed however, about how Ofsted intends to move forward on this change of role.
8. In addition, the Council supports the acknowledgement, in both David Miliband's North Of England speech and in the Ofsted consultation, of the need for an increased 'intelligent accountability' in education and the priority as Ofsted expresses it, *'to trust schools more and to draw on the professionalism of teachers'*. The GTC believes that school self-evaluation is as much about the need for schools to learn and develop professionally as the need for public accountability. Inspection that is rooted in self-evaluation will need to take account of this.
9. The need to promote and further engage teachers' professional judgement in school evaluative processes is a critical opportunity for Ofsted to begin to address a situation identified in the consultation document where some schools have not tackled specific performance weaknesses after two inspections.

Culture Change

10. However, the move towards greater public weight being given to schools' own self-evaluation judgements will not in itself change the way that Ofsted is viewed by many schools and teachers overnight. While Ofsted is right to acknowledge its contribution to generating more information about schools within the public domain, many schools and teachers continue to view the role of Ofsted as being a negative one. After a decade of 'high stake' Ofsted inspections and a legacy of public 'naming and shaming' of schools' shortcomings, it will not be easy for schools and teachers to trust in the new Ofsted role as more of a school development partner.
11. Ofsted will therefore need to demonstrate its commitment to a change of culture that goes beyond rhetoric. It will need to train its new teams very carefully and sensitively to carry out their role in the proposed arrangements where their

starting point is the school's self-assessment. Schools and teachers will also need considerable preparation for the proposed changes. If linking self-evaluation to inspection inhibits the honesty of the self-evaluation process, then it will undo the positive outcomes that professionally conducted processes can achieve. Much will depend on the quality of self-evaluation frameworks and the sensitivity of inspectors.

12. The development work going on in schools in the pilot areas will need to be widely developed and disseminated on a national basis. School self-evaluation materials being planned by the Department based on the pilots need to address the potential for schools and teacher development which evaluative activity will create. Evidence from eight GTC organised focus groups of teachers discussing school self-evaluation issues in 2003 suggested that the majority of them had experienced no school self-evaluation related professional development.

Membership of Inspection Teams

13. One key issue for the change of culture needed around the role of Ofsted and inspection, concerns the need to widen the membership of Ofsted teams. The Council supports the greater degree of HMI involvement in inspection teams and the need to reconsider the lay role in the inspection of schools. However, the GTC believes that if school self-evaluation and the external validation of such processes are to engage teachers more fully and professional learning and development is to take place, teachers and headteachers must play a greater role in the inspection arrangements.
14. The GTC Forum is looking carefully at the practice of the USA Rhode Island School Accountability for Teaching and Learning scheme involving 1200 teachers. One part of the scheme is a peer review visit of a school involving teachers from other institutions with a tight focus on learning and the kind of teaching that supports it. The Council will feed its fuller consideration on this practice into its advice to the Secretary of State.
15. The Council supports the development of a peer element in an inspection team where teachers engage in the process of the external evaluation of the self-evaluation carried out by another institution and its staff. The process of professional learning in which teachers are involved carries on when they return to their own school and apply the lessons of what they have seen to their own practice. The GTC would support teacher involvement in Ofsted inspections being organised on a secondment basis to avoid the practical problems of teacher supply and believes such professional experience should be formally recognised and accredited.
16. In addition to greater involvement of teacher peers in teams, the Council also supports a greater degree of specialism amongst members to accommodate the approach to working as recommended by *Every Child Matters*.

Implications for School Self-Evaluation

17. The implications for the kind of school self-evaluation to be carried out by schools in the context of a changed Ofsted role are not currently very clear and will need further development in the months to come. The GTC Forum has taken evidence from schools, LEAs and NFER in relation to a wide variety of practice

including the use of the Ofsted framework, LEA guidance and the use of the liP and Excellence frameworks.

18. One obvious implication of an increased role for self-evaluation for schools is in terms of their performance management processes. The development of shorter and more focused inspections will result in greater reliance on the schools' own evaluation of the effectiveness of its teaching and less dependence on direct teacher observation. The issue of which criteria will be used by teams to select a sample of teaching will need greater clarity prior to any changes being implemented.
19. Schools will need to ensure that their performance management arrangements and their observation of teaching and learning processes are rigorous and high quality and this could have implications for CPD in this area. Schools having greater responsibility for performance management also has implications for teacher time and funding which need to be taken into account.
20. However, the GTC has consistently argued that the observation of teaching and learning is a vital component of professional and peer learning and enquiry and is not merely a mechanism to serve the accountability process. It is important that any future school self-evaluation and CPD materials build on this premise.
21. A further implication of the arrangements for school self-evaluation is the importance of stakeholder evidence. Shorter inspections allow less time for direct contact of the team with parents and governors in particular, and result in greater dependence on the school's own evidence gathering processes. The Council believes the school's management of its stakeholders' perspectives is a crucial aspect of its self-evaluation and of a sense of ownership in the school that is broader than that belonging to professionals. The GTC's Forum has taken evidence from schools that are developing positive practice in relation to broadly-based stakeholder forums and comprehensive reviews.
22. The GTC is also committed to the role of pupils as stakeholders and has taken evidence from Professor Jean Rudduck on the use that can be made of pupils statements, questionnaires and reviews and the importance of pupils understanding the purpose of the consultative process in which they are involved. The Council will be giving more detail on this in its formal advice to the Secretary of State.

Responses to Specific Proposals

Shorter and More Frequent Inspections

23. The Council generally welcomes the proposal for shorter and more focused inspections and the three-year average for those schools other than those with serious weaknesses or in special measures. However, the proposals should give more acknowledgement of the need for greater flexibility for those schools that are carrying out effective school self-evaluation practice. In those cases the Council believes that re-inspection scheduling should be finalised through dialogue between the school and the inspection team.
24. Though inspections are to be shorter and slimmer in scope, they would be more frequent in this future model. As the Council stressed earlier, schools will need additional support to manage the proposed arrangements.

Little or No Notice

25. The consultation document appears to favour the development of '*Unannounced inspections within a notified window*' as '*normally happens in the case of childcare settings*'. Headteachers on the GTC Forum and teachers on the GTC Council are concerned about the short notice proposal resulting in schools finding the change an additional source of stress and involving a sense of being on permanent standby. Minimal notice is part of current practice elsewhere in the public sector, but the problem with it in the education service is its link with an existing accountability culture where inspection is an event to be feared rather than one where inspection is seen as a validation stage in ongoing school development and improvement. The proposal needs to be developed as part of the pilots and will need very careful management if it is to be introduced into all schools.

Reports

26. The Council welcomes the emphasis on inspection reports being brief and placed very centrally in the context of the schools' self-evaluation. It particularly commends the requirement that the concluding summary should include '*the overall contribution that services provided by the school make to the wider community*'.

27. In the light of the greater public weight being given to school self-evaluation, the Council believes that Ofsted need to be even more accountable to schools where there are differences between the school's own evaluation and that of the inspection team. Ofsted should consult on a revised appeals system for schools to challenge the judgements of inspection teams if they do disagree with them.

28. In the current framework many of Ofsted's judgments are occluded by the inadequacy of the performance indicators that are used. In particular, the PANDA is used as the basis for evaluative grades published in Ofsted reports though it contains very little data from which valid statistical conclusions can be drawn. Since the grades published do not therefore validly describe the performance of the school, their use invites erroneous and misleading conclusions.

29. The following anomalies need urgently to be addressed:

- a grading system (A* - E*) which does not take account of confidence intervals in the data, and from which no conclusions can therefore validly be drawn; (It is likely that only A* and E* grades are statistically significant – though there is no way of confirming this from the data.)
- comparison with "similar schools" identified by cliff-edge cut-offs in the input data. In extreme cases the inclusion or omission of one single pupil can move a school's grade from A to E; (or vice versa).
- use of raw score data, which results in unfairly low grades for inclusive schools with intakes with poor prior attainment;
- use of declared free school meals eligibility as a defining characteristic for "similar schools", which results in unfairly low grades for rural schools.

The continued use of these transparently inadequate data undermines the basis of many of the judgments made on schools by Ofsted teams. It is also a major source of the mistrust with which many teachers still regard the Ofsted process. In reviewing the framework for inspection, a review of the data used should take the highest priority.

Co-ordinated Approach to Inspection 0-19

30. The GTC welcomes Ofsted's commitment to an integrated approach to inspection across different services and to working with other inspectorates. In its response to *Every Child Matters*, the Council particularly focused on the inspection of Children's Trusts, the need to ensure that respective inspection agendas are in alignment and that a common language is developed across different professions in order to promote a seamless service for children.

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