

Committee for Education, Sport and Culture
Inspection framework for schools
25 April 2019

1. The NASUWT welcomes the opportunity to respond to the Committee for Education, Sport and Culture consultation on its proposed school inspection handbook.
2. The NASUWT is the teachers' union.

GENERAL COMMENTS

3. The NASUWT believes that as publicly funded institutions, schools should be held accountable. The Union's report, *Maintaining world class schools*, sets out essential features of an effective accountability system.¹ The report specifies that such a system must:
 - be fit for purpose and secures public trust and confidence in education;
 - secure greater parental and public engagement in, and support for, public education;
 - enable teachers to teach more and test less;
 - be driven by educational rather than political concerns; and
 - evaluate the quality of public education rather than merely measuring the performance of individual schools and colleges.

¹ NASUWT (2013). *Maintaining world class schools*. NASUWT; Birmingham.

4. The NASUWT believes that inspection plays a critical role in ensuring that accountability systems can reflect accurately the full contribution that schools make to the educational well-being of children and young people and enhancing their future life chances
5. It is, therefore, entirely legitimate for the Committee to make provision for the inspection of its schools. Without inspection, or some similar arrangement, accountability frameworks would place excessive reliance on performance tables, targets and thresholds, creating incentives within schools and the wider education system to narrow pupils' learning experiences and thereby deny them their entitlement to a broad and balanced curriculum.
6. The NASUWT notes that the Committee has determined that inspection of Guernsey's schools should be undertaken by Ofsted. The Union further notes that the proposed Guernsey inspection handbook draws heavily on the version Ofsted intends to introduce from September 2019 in England. As noted below, while this revised framework has important strengths, it is regrettable that the Committee did not take the opportunity to engage with stakeholders before deciding to implement a model based on that used by Ofsted in England, given that public consultation may have identified other options for the inspection of Guernsey schools.
7. In its response to the public consultation on the draft handbook for inspection in England, the NASUWT made clear that while important concerns about the inspection system had not been addressed, Ofsted's proposals were to be strongly welcomed in many important respects. In particular, the Union commented positively on Ofsted's planned approach to the inspection of: teacher workload and well-being; assessment policy and practice; the leadership and management of pupil behaviour; and the shift in emphasis on the formation of judgements of school effectiveness away from pupil performance data.
8. The NASUWT draws the Committee's attention to the Union's response to the consultation on arrangements for inspection in England as it provides a detailed analysis of many of the key proposals that are included in the

draft inspection handbook for Guernsey.² In this context, it is noted that the weight of substantial changes to the proposed handbook for England relate to structural differences between the education systems in England and Guernsey.

9. However, the application of much of the proposed handbook for England in the context of the Guernsey education system raises important specific issues to which the Committee should have regard. In particular, the current inspection model in Guernsey reflects the fact that the States has significant decision-making powers relative to those devolved to individual schools. Consequently, this model has included direct inspection of the States' discharge of its responsibilities. The revised approach to inspection proposed by the Committee focuses exclusively on schools rather than the States. An inspection approach constituted on this basis would, therefore, fail to hold to account those with considerable responsibility for the provision of education in Guernsey. It is essential that prior to the implementation of revised inspection arrangements, the Committee sets out what provisions will be made for inspection of the performance of the States in respect of the quality of education in the Island.
10. Other matters in respect of the specific circumstances of the Guernsey education system are considered in further detail below.

SPECIFIC COMMENTS

Schools' responses to the process of inspection

11. The NASUWT's experience elsewhere has been that many of the concerns that teachers and school leaders report about the inspection process relate not only to the demonstrable requirements of inspection but also to the ways in which schools choose to interpret these requirements. The Union's experience further emphasises that there is a significant

² NASUWT (2019). *NASUWT consultation response: Education Inspection Framework 2019: inspecting the substance of education*. Available at: <https://www.nasuwt.org.uk/uploads/assets/uploaded/4a16795a-af39-44f3-82219bd7ce2f44fd.pdf>, accessed on 25.04.19.

degree of variability in how different schools in objectively comparable circumstances respond to inspection.

12. In many cases, schools have sought to justify the imposition of practices that do not serve the best interests of pupils and teachers on the wholly inaccurate basis that they are expected by inspectors.
13. In England, Ofsted responded to these concerns by setting out clearly the precise requirements in respect of key elements of the inspection process. These requirements were described in a standalone document, *Clarification for schools*, that supported work to challenge schools when inspection was used inappropriately to justify the implementation and maintenance of unacceptable practices.
14. The NASUWT welcomes the replication of these provisions in paragraph 11 of the draft Guernsey inspection handbook. However, given that many staff in schools have little or no direct experience of Ofsted-led inspection, there is a risk that schools may seek to anticipate the requirements of inspection in ways that do not take sufficient account of these provisions.
15. There would, therefore, be merit in producing a document similar to *Clarification for schools*, for distribution to all those working in, or with responsibility for, Guernsey's education system.
16. In addition, it will also be essential for system-wide training and briefing support to be provided on the new inspection system. This support must include content on the provisions of paragraph 11 and its consequences for practice.

Teacher and school leader workload and well-being

17. While the support recommended above must secure thorough familiarity with the content of the inspection framework, key elements of the handbook merit particular emphasis.
18. In light of the proposal to retain the four-grade evaluation system used in England, albeit with differently titled descriptors, it will be particularly important for school leaders to recognise that the descriptor for excellent

leadership and management confirms that leaders in such settings ensure that highly effective and meaningful engagement with staff takes place at all levels. Further, it states that when issues are identified – in particular about workload – they are consistently dealt with appropriately and quickly.

19. In this respect, the Union notes that these requirements must be met in the proposed descriptors for use in England if the equivalent – outstanding - grade in the inspection framework is to be awarded. However, the draft Guernsey handbook states merely that a ‘best-fit’ approach to the achievement of the descriptors will be adopted in determining whether award of the highest grade is merited. The NASUWT can identify no justifiable reason for this variation and is clear that the Guernsey inspection handbook should align in this respect with that proposed for introduction in England. No school in Guernsey should be identified as excellent without meeting the above-noted requirement.
20. Familiarisation with the provisions of the handbook should also emphasise that schools will need to be able to demonstrate that leaders engage with their staff and are aware and take account of the main pressures on them in order to secure a judgement that the standard of leadership and management is good. Leaders must also be realistic and constructive in the way they manage staff, including in respect of their workload.
21. In conducting their evaluations of schools, it is welcome that the handbook confirms that inspectors will consider the extent to which leaders protect staff from bullying and harassment.
22. It is clear that for leadership and management in Guernsey schools to meet acceptable standards, those in senior roles will need to have effective strategies in place to address excessive workload and to support staff well-being. The handbook rightly recognises that such strategies are not only important in and of themselves but also relate directly to the capacity of schools to provide children and young people with the high-quality educational experiences to which they are entitled.

23. The NASUWT is not clear that all schools in Guernsey would meet this standard currently. The introduction of the new framework, therefore, provides a timely opportunity for the Committee to work with the NASUWT to establish consistent, system-wide expectations in these respects and to ensure that structures are in place to address ineffective practices in schools.

Assessment and data

24. Feedback from NASUWT members confirms that assessment practices in many instances are not fit for purpose in terms of the contribution they make to supporting pupil progress and achievement and add unnecessarily to teacher and school leader workload.

25. It is, therefore, helpful that the draft inspection handbook refers to the report of the Teacher Workload Advisory Group, *Making data work*, published in November 2018. This report was commissioned by the Secretary of State for Education in England to identify and address longstanding concerns about assessment and the use of data in schools. The Group's report was endorsed by the Department for Education (DfE), Ofsted and all nationally recognised trade unions that represent teachers and headteachers.

26. *Making data work* identifies commonly-recurring shortcomings in schools' data and assessment practice. Among its most important findings are that:

- there is no evidence that setting 'aspirational' data-related assessment goals for learners is motivating for them;
- 'flight paths' for pupils with similar starting points are not valid;
- more work needs to be undertaken to explore the implications of commonly-used target setting approaches in schools for pupils' mental health;
- teachers should undertake no more than two or three summative assessments per pupil, per class, per year;

- teachers should have goals that are within their control, that are closely tied to actionable behaviours, and that are aspirational and achievable;
- the performance of a single exam class should not be used as a principal measure of teaching quality in a performance management system;
- while data based on commercially produced predictions can play a helpful role in informing professional conversations about pupil achievement and the work of teachers, these systems produce ranges of grade estimates and inaccurate grade targets;
- current practice in using pupil attainment data in teacher performance management systems is often poor;
- research demonstrates that using quantitative metrics to judge teacher performance is difficult since few of the practices that can be codified and measured straightforwardly are highly correlated with teacher quality;
- pupil assessment scores, grades in lesson observations, and scores following book scrutiny are all quite poor proxies for whether or not somebody is teaching well; and
- if teachers are held to account for things that are largely outside their control, such as a pupil's test performance or progress based on flight paths, it is not only unfair but induces high levels of stress and is likely to lead to burnout and ultimately attrition from the profession.

27. While the Group's findings were developed in the context of the education system in England, consideration of *Making data work* confirms that its analysis sets out principles that are pertinent to assessment and data practice in Guernsey. The reference to it in its draft framework is, therefore, appropriate.

28. It is also welcome that the draft framework confirms that inspectors will investigate and, if appropriate, challenge schools that fail to take meaningful account of the Group's findings.
29. Specifically, the draft framework makes clear that inspectors will evaluate how assessment is used in schools to support the teaching of the curriculum, but not substantially increase teachers' workloads. Inspectors will consider whether schools' collections of attainment or progress data are proportionate, represent an efficient use of school resources and are sustainable for staff. In addition, inspection will interrogate schools' reasoning for the imposition of more than two or three data collection points in terms of what interpretations and actions are informed by the frequency of collection, and the time that is taken to collate, analyse and interpret the data created from these collections. The draft handbook is right to make clear that if a school's system for data collection is disproportionate, inefficient or unsustainable for staff, this conclusion will be reflected in inspectors' reports.
30. Further, schools will need to take particular note of the provision in the draft framework that inspectors will not consider schools' internal assessment data during an inspection, given that it may not be an accurate representation of the quality of education access by pupils.
31. The findings of *Making data work* and the above-noted contents of the draft handbook highlight the need for the States to review data and assessment practice in Guernsey schools before the implementation of the framework. In particular, the States will need to provide schools have access to the advice and guidance required to ensure that they can audit the quality of their provision, including its impact on teacher and school leader workload and well-being, and, if necessary, implement reforms. Such advice and support should be developed and made available well in advance of the introduction of the handbook's provisions.

Pupil behaviour

32. The draft handbook rightly places significant emphasis on the inspection of schools' approaches to the management of pupil behaviour.
33. The views of staff are a critical source of evidence in this respect. It will be important for schools to note that the survey distributed to staff will contain questions about behaviour and discipline, including how well supported and respected they feel in this respect.
34. Schools will also need to take effective note of the fact that inspectors will place particular focus in their discussions with staff on behaviour and discipline issues on 'those who are affected by pupils' challenging behaviour: trainees, supply staff, newly qualified teachers (NQTs), administrative support staff and catering staff'. The NASUWT welcomes the stress in the handbook on the need to ensure that schools provide support for these and other members of staff on the management of behaviour.
35. It is appropriate for the draft handbook to make clear that inspectors will meet with school leaders to account for the results of interviews with staff as well as the outcomes of the survey. For this reason, it essential that all schools are clear about the basis on which effective behaviour management policy and practice is established.
36. The NASUWT has identified eight key principles for behaviour policy and practice in schools that reflect the key considerations set out in the draft handbook.³ The Union would commend this statement to the Committee and believes that work should be taken forward work to ensure that its contents are reflected in the approach to behaviour management adopted in all schools in the Island.

³ NASUWT (2018). *Statement of principles for behaviour management*. Available at: (<https://www.nasuwt.org.uk/uploads/assets/uploaded/6afcf6095-f5a6-4c13-b9b69418b1bbbfce.pdf>), accessed on 12.04.19.

Inspection of the curriculum

37. As the NASUWT made clear in its response to the revised inspection handbook in England, the proposal to introduce a 'quality of education' judgement is welcome. This change recognises the need to shift away from the emphasis in inspection on performance data to a more holistic view of a provider's performance which recognises the centrality of the curriculum. This approach should allow inspectors to take account of a school's context when making judgements about quality. It is right that this emphasis on the quality of curricular provision over crude performance data is reflected in the proposed Guernsey inspection framework.
38. However, it is critical that schools respond proportionately and in a considered way to this proposed dimension of inspection.
39. The draft handbook makes clear that inspectors will bear in mind that developing and embedding an effective curriculum takes time and that leaders may only be partway through the process of adopting or redeveloping their schools' curricula. The Committee must, therefore, ensure that both inspectors and school leaders understand what this means in practice. For example, it is vital that inspectors and school leaders understand that inspection reforms should not result in increased workload for teachers or school leaders – changes to the curriculum should be planned to take place over time. This consideration will also need to be communicated clearly to teachers and school leaders prior to implementation of the handbook.
40. Inspectors will need to recognise that the focus on the curriculum could have implications for leadership roles and responsibilities in schools. For example, school leaders may need to pay less attention to data management and have greater pedagogical oversight of the curriculum, including its design and implementation. The NASUWT believes that consideration should be given to how schools are managing this change as part of judgements about the quality of education and leadership and management. Inspectors should evaluate whether school leaders are taking actions which help teachers to teach and learners to learn.

41. The NASUWT welcomes Ofsted's recognition that the curriculum should remain as broad as possible for as long as possible and that disadvantaged learners and learners with special educational needs and disabilities (SEND) should not be offered a reduced curriculum. The NASUWT also welcomes the guidance in the draft handbook which makes clear that inspectors will expect a school that has shortened key stage 3 to demonstrate that pupils can still study a broad range of subjects in years 7, 8 and 9. However, the Committee will need to provide unequivocal guidance to schools about how this requirement should be interpreted in practice.
42. This consideration is particularly important in the context of the Guernsey education system. While there are clear similarities between the education systems in Guernsey and England, there are key distinctions that the process of inspection should take into full account. The curriculum offered in Guernsey schools is a matter for local policymakers, and it is critical that decisions in this respect are driven by aims and objectives that reflect the needs and aspirations of the Island's stakeholders and are not driven to a disproportionate extent by models in place elsewhere. It is critical that the concept of curricular breadth and balance is understood in a way that reflects the imperatives of the Guernsey education system, not that of England.
43. Consequently, it will be essential to ensure that inspectors are aware of the distinctive features of the Guernsey education system and undertake inspection, including the formation of judgements, accordingly.

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