

Responses to the consultation on Estyn's new inspection arrangements

1 Introduction

During October–December 2019, we conducted a public consultation asking people about their views on Estyn's inspection arrangements for maintained schools from September 2021. This was the second in a series of consultations about how inspection can best support schools and other providers to manage the many changes taking place in education. Our first consultation in summer 2019 explored what we should do to support schools during our transition year when we will pause inspections in schools. This report is one of two on our most recent consultation. The other report was produced by Arad.

2 Background and context

In 2017, we introduced new inspection arrangements. Around the same time, and in the context of ambitious education reforms, Her Majesty's Chief Inspector commissioned an independent review of school inspection in Wales. The review's report, 'A Learning Inspectorate',¹ was published in June 2018. The report makes a series of recommendations on how we might adapt our work in order to contribute constructively to education reform. This consultation is part of our response to 'A Learning Inspectorate', focusing specifically on inspection arrangements.

Between 2020 and 2024 we plan to make the following changes to our work:

- In our transition year 2020–2021, we propose to pause our maintained school² and PRU inspections so that inspectors can visit schools to discuss and prepare for curriculum changes.
- In September 2021, we propose to amend our inspection arrangements for schools, to align with the changes to education in Wales.
- Before 2024, we will pilot inspections that focus on schools' self-improvement processes.

At each stage, we will work with you to shape our plans.

This consultation was aimed at learners, education professionals, parents/carers and anyone with an interest in education and our future inspection arrangements.

These new arrangements will apply to the following sectors:

- primary schools, including nursery schools
- secondary schools
- all-age schools

¹ Donaldson, G. 2018. *A Learning Inspectorate: Independent review of Estyn*. [Online]. Available from:

<https://www.estyn.gov.wales/sites/www.estyn.gov.wales/files/documents/A%20Learning%20Inspectorate%20-%20en%20-%20June%202018.pdf>

² In the rest of this report, the term 'schools' is used to refer to maintained schools and PRUs.

- special schools
- pupil referral units
- independent schools.

Non-maintained nursery settings, initial teacher education, Welsh for Adults and local authorities are not included in the scope of this consultation, but the feedback may also inform future inspection arrangements in these sectors. We will hold a consultation for Further Education colleges, Adult Learning and work-based learning providers later in 2020. We will pilot any potential changes with independent schools at a later date.

3 Methodology

The consultation took the form of a questionnaire that was available to complete either online or offline (a Word document could be completed and returned via e-mail or by post). There was also a youth version of the consultation, designed by an external company to be accessible to younger respondents. We launched the survey on 4th October 2019 and it closed on 2nd December 2019.

The analysis in this report is structured according to the questions in the consultation document:

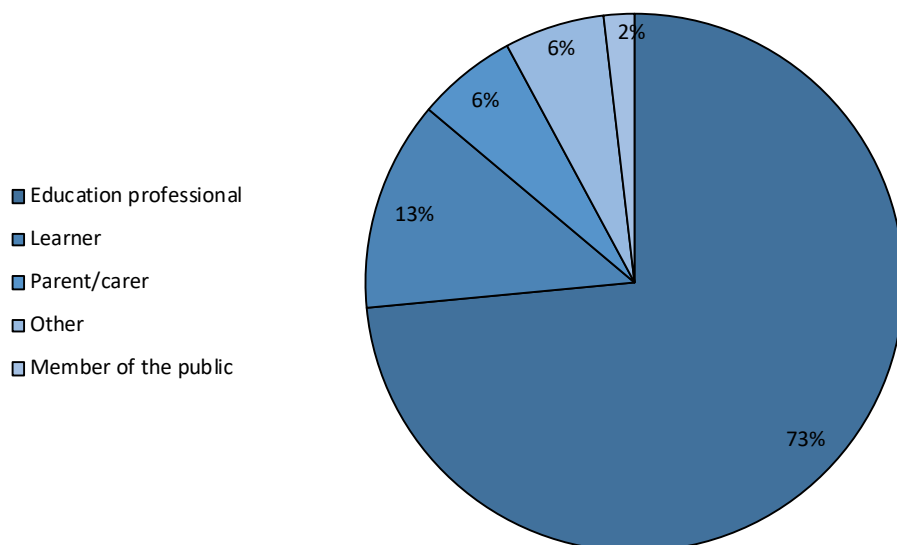
- Estyn's common inspection framework
- Summative gradings
- Follow-up activity in maintained schools
- Sixth forms in inspection reports
- Notice period for inspection
- General comments about our inspection arrangements
- How the proposals will affect the Welsh language.

Responses are analysed overall and by respondent type, where there is variation in messages from different groups.

4 Profile of consultation respondents

We received 815 responses to the consultation. Fifteen per cent of these respondents used the Welsh version of the survey.

Respondents



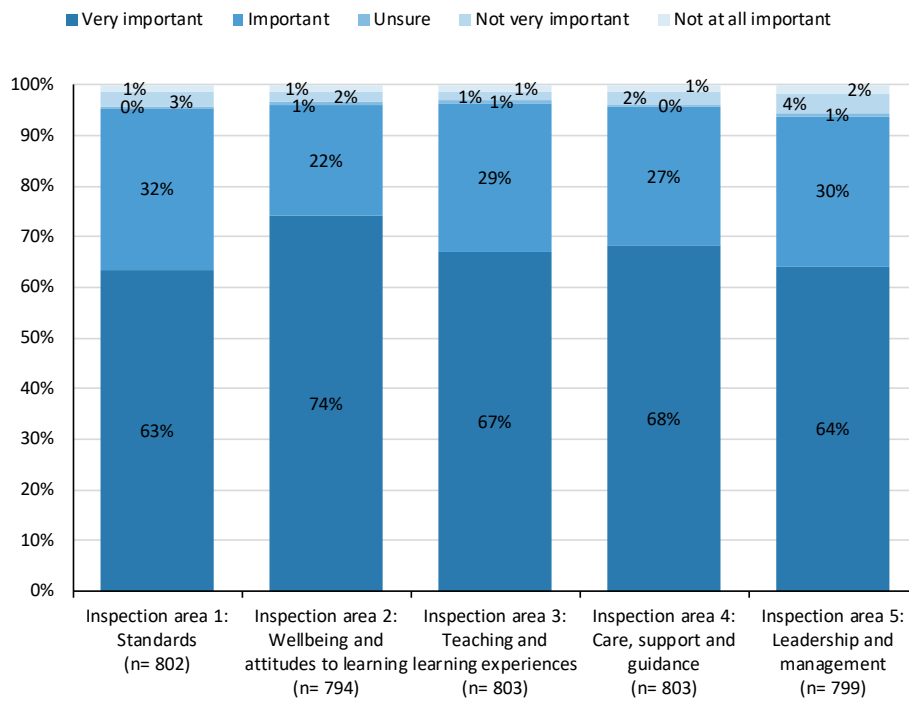
5 Results

5.1 Inspection framework

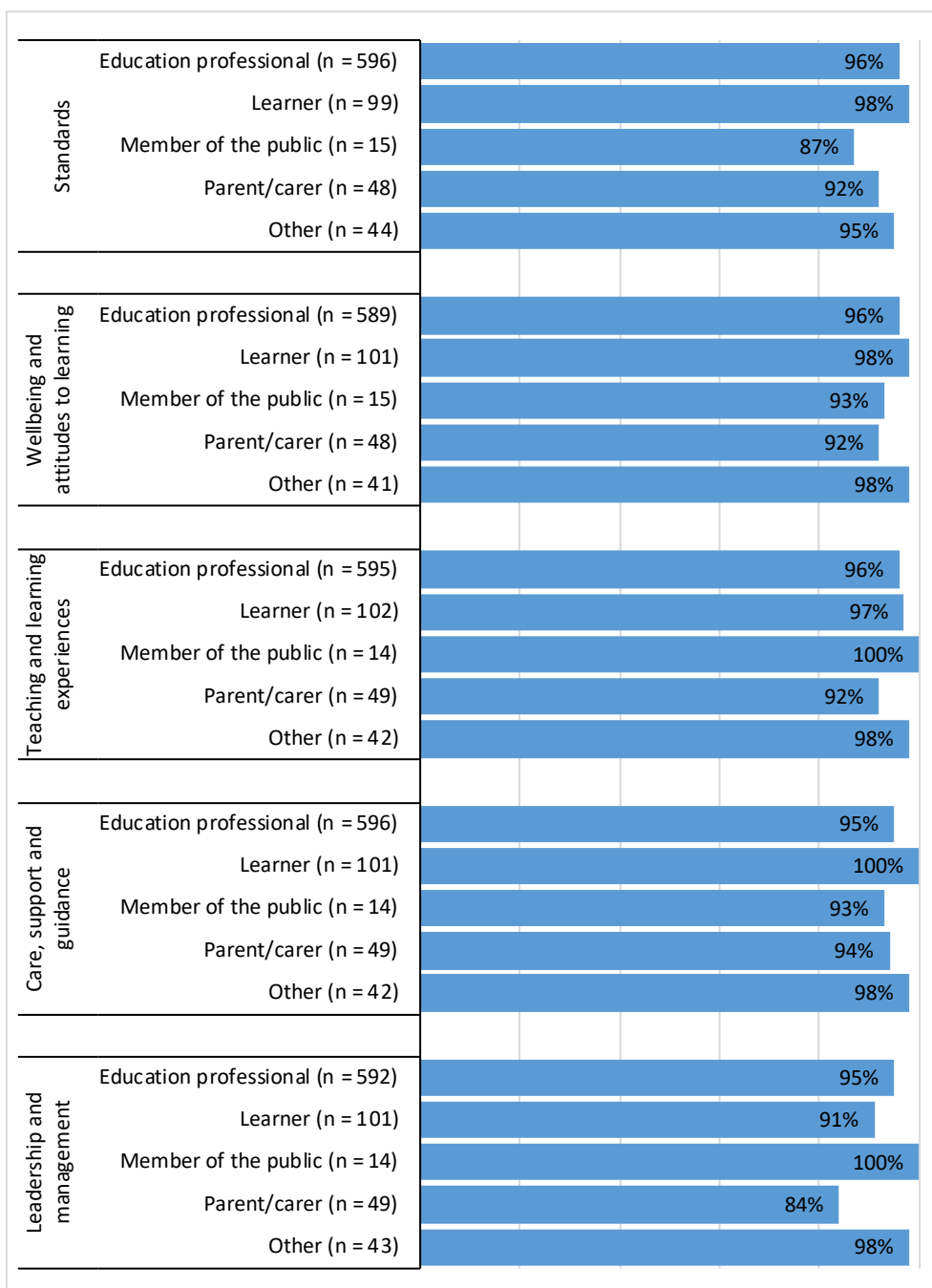
Estyn's current inspection framework comprises five inspection areas:

- Inspection area 1: Standards
- Inspection area 2: Wellbeing and attitudes to learning
- Inspection area 3: Teaching and learning experiences
- Inspection area 4: Care, support and guidance
- Inspection area 5: Leadership and management.

We provided a brief description of each area and asked people how important they think it is that we continue to inspect each of these areas.



The breakdown of responses by respondent group and inspection area can be seen below:



We also asked if respondents had suggestions about areas we should prioritise more during inspection, or areas on which we should place less emphasis. These comments are analysed in the following section.

5.1.1 Areas which we should prioritise more

A main message across all respondents was the need to prioritise wellbeing and mental health. Education professionals, members of the public and other respondents emphasised the need to consider staff wellbeing and workload. Education professionals, parents/carers and other respondents noted the need to

prioritise learners with SEN/ALN (Special educational needs/additional learning needs) and/or SEBD (Social, emotional and behavioural difficulties).

A key message from education professionals was that we should continue to prioritise all five current inspection areas. We should also place more emphasis on a school's socio-economic context and learners' individual journeys. Professional development and managing resources and budget were other suggestions of areas we should prioritise. Education professionals added that we need to place more emphasis on learner voice, vulnerable learners, self-evaluation and support from local authorities. They added that we should also prioritise the world of work, skills and school ethos. Other suggestions were learners' physical health, transition between key stages, collaboration, staffing, attendance, and exclusion and managed moves.

Main messages from parents/carers were that we should prioritise accessibility for learners with disabilities and emphasise learners' progress. We should also place more emphasis on learners' attitudes, leadership and school governance. Themes from learners were that we should prioritise behaviour and safety in school. Repeated messages from other respondents were the need to place more emphasis on vulnerable learners, learner voice, and children's rights.

5.1.2 Areas on which we should place less emphasis

A key message from education professionals and parents/carers was that the inspection areas 'wellbeing and attitudes to learning' and 'care, support and guidance' could be merged due to overlap. Education professionals and other respondents felt that we should place less emphasis on data and performance outcomes, especially at key stage 4.

Main messages from education professionals were the need for less emphasis on comparing schools, summative assessment, lesson observations and attendance. Parents/carers noted that we should place less emphasis on healthy living, noting that it is not schools' responsibilities. Recurring messages from these respondents were that we should place less emphasis on physical health, leadership and the learning environment.

5.2 Summative gradings

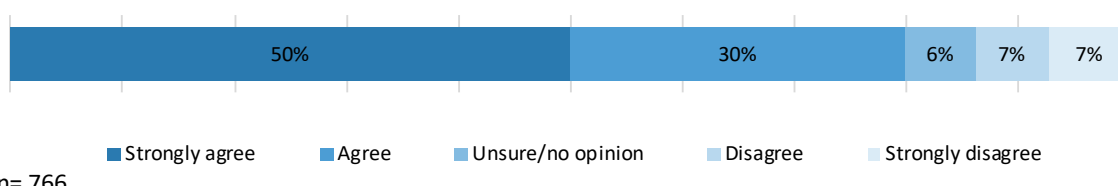
We currently use the following summative gradings during inspections to describe aspects of providers' work.

Summative gradings	What the judgement means
Excellent	Very strong, sustained performance and practice
Good	Strong features, although minor aspects may require improvement
Adequate	Strengths outweigh weaknesses, but important aspects require improvement

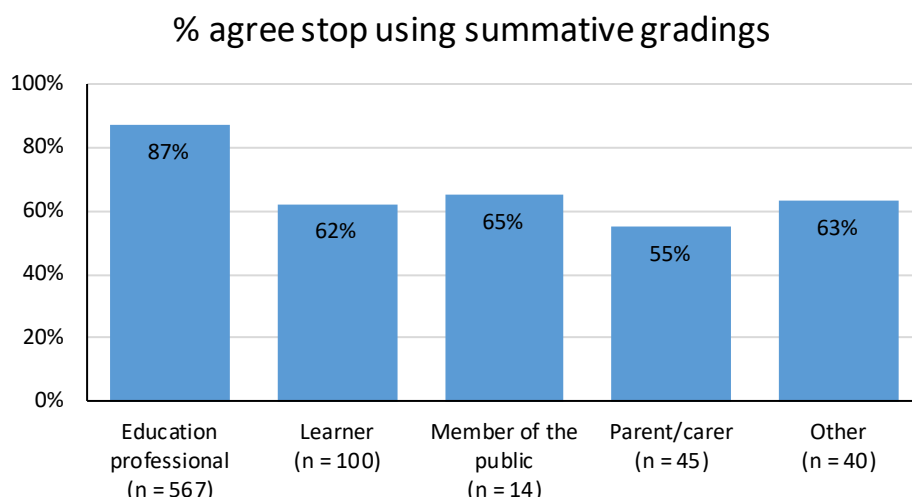
Unsatisfactory Important weaknesses outweigh strengths

We are proposing to stop using these four judgements for each inspection area from September 2021. Instead, we would write our evaluations and judgements within the narrative. We would continue to provide a summary identifying the school/PRU's strengths and priorities for improvement. We would also continue to make it clear in an inspection report when a school requires significant improvement or special measures.

We asked respondents to what extent they agreed with our proposal to stop using summative gradings for each inspection area. Eighty per cent of respondents 'strongly agreed' or 'agreed' with our proposal to stop using summative gradings.



Those who agreed can be broken down as:



We asked respondents to give reasons for their choices, if they wished. Comments from education professionals and other respondents were mostly in favour of removing summative gradings. Comments from parents/carers were mixed and comments from learners were also mixed, but with more in favour of abolishing summative gradings. Most comments from members of the public were against the proposal. These comments are analysed in the following section.

5.2.1 In favour of removing summative gradings

One of the main messages from education professionals, parents/carers, learners and other respondents who were in favour of removing summative gradings, was that currently, the gradings are often viewed in isolation, without context. Removing the gradings would encourage schools to read a report in its entirety. Education

professionals, learners and other respondents felt that summative gradings are too simplistic. The single grading can detract from other messages and nuances in a report, and these respondents emphasised the limited value of a single word summarising the complex nature of a school. Removing the gradings could encourage people to take a more holistic view of schools. Another main message from education professionals and other respondents was that removing summative gradings would be a positive cultural change, helping to remove high stakes accountability, and moving towards a more supportive way of inspecting. This would also reduce pressure on staff.

Education professionals felt that removing summative gradings would help lessen competition between schools and encourage co-operation and collaboration. They noted that a judgement remains for several years, during which time things may change at a school, and as a result, such gradings can be misleading for parents. They added that gradings can also be used in a damaging way, or for the wrong purpose and that they are the only things people remember. These respondents therefore felt that a narrative including strengths and areas for improvement would be more beneficial in helping schools improve.

Another theme from education professionals was the perception that sometimes the content of a report can be altered to fit a judgement. They felt that gradings don't help a school, can have a negative impact on staff morale, well-being and mental health, and the gradings can become a focus for the school, rather than improvement. These respondents alluded to the possible issue of schools becoming complacent following an 'excellent' rating. They also felt that the spectrum is too wide within grades such as 'good', and noted the limitations of a term such as 'adequate', which can have negative connotations. Repeated messages from these respondents was that removing summative gradings would be fairer on schools in areas of higher socio-economic disadvantage and that 'excellent' can feel unattainable. However, these respondents noted that an alternative model would need to be accessible and understandable for parents.

Parents/carers in favour of removing summative gradings felt that the gradings are meaningless and do not provide relevant information. Learners noted that removing gradings would help improvement and suggested a number scale as a possible alternative. Main messages from other respondents were that the media can misconstrue gradings and that schools/parents are more concerned about a judgement than the messages in a report.

5.2.2 Against removing summative gradings

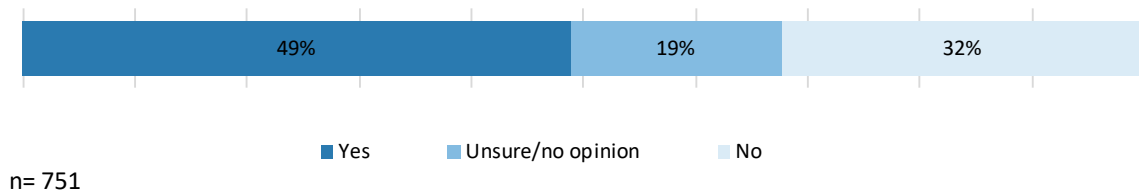
Main messages from education professionals, parents/carers, members of the public and other respondents who were against removing summative gradings were that the gradings are a quick, accessible and helpful way for parents and the wider public to make decisions about schools and standards. They added that they are an easy way of comparing schools 'at a glance.' Education professionals, parents and members of the public noted that narrative can be misinterpreted, depending on the reader. They emphasised the importance of clarity and transparency regarding how a school is performing and noted that summative gradings help achieve this.

Education professionals and learners noted that schools need to know what they need to improve, and summative judgements help with this.

Education professionals suggested a fifth grading, such as 'very good'. They felt that removing gradings wouldn't make a difference as the judgement would be inferred from the language of the report. Common messages from learners were that summative gradings can motivate schools/teachers, while members of the public expressed concerns about reduced accountability if they were removed. Parents noted that gradings are a way of assessing school improvement and ensuring that schools don't only focus on the positive parts of a report.

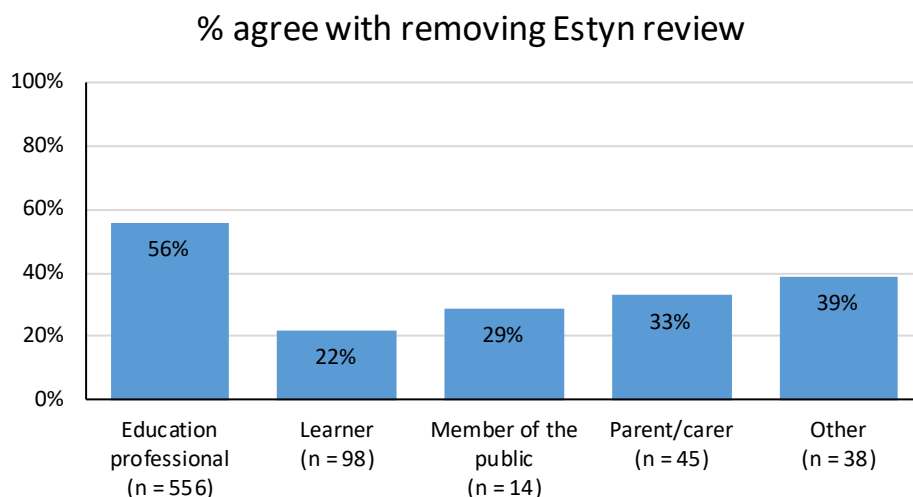
5.3 Estyn Review

During an inspection, inspectors consider whether a school needs any follow-up activity. 'Significant improvement' and 'special measures' are statutory levels of follow-up, prescribed in legislation. We asked if we should remove Estyn Review. This is a non-statutory level of follow up where inspectors check on the progress of schools through a desk-based review, and may visit the provider a year or so after the inspection. Currently, Estyn Review is for providers where there are strengths in aspects of the schools work but inspectors identify important areas for improvement.



Forty-nine per cent of respondents agreed that we should remove Estyn Review, 32% disagreed and 19% were unsure or had no opinion.

Those who agreed can be broken down as:



Respondents were invited to provide further comments or suggestions relating to this proposal. Comments from education professionals, parents/carers, members of the public and other respondents were mixed. The majority of comments from learners were against removing ER. The following section analyses these comments.

5.3.1 In favour of removing Estyn Review

Main messages from education professionals, members of the public and other respondents were that removing Estyn Review would free up more of our time and resources to dedicate to schools in statutory follow-up categories. Themes from education professionals and learners were that there is already a lot of pressure on schools and Estyn Review can add even more pressure. Education professionals and other respondents suggested that such a review should be the role of the regional consortia, which would reduce the duplication of scrutiny that underperforming schools receive. However, these respondents added that the regional consortia would need the capacity to do this. Main messages from education professionals and parents/carers were that schools should drive their own improvement, providing that the leadership team is strong enough to ensure this.

Education professionals emphasised the limitations of a desk-based strategy and noted that such work is currently duplicated by the consortia. Common messages from other respondents were that Estyn Review is unnecessary if the narratives in an inspection report explain what is needed for a school to improve.

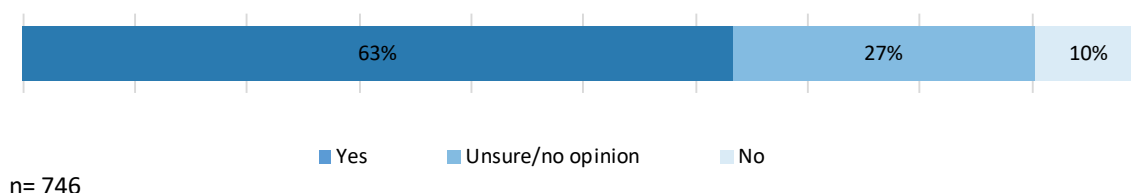
5.3.2 Against removing Estyn Review

Main messages from education professionals were that Estyn Review has helped schools to improve and could continue to do so. They described Estyn Review as an incentive and catalyst for change, providing a clear message that change is needed. Other themes from these respondents were that if Estyn Review is removed, standards in some schools could deteriorate further. They added that without it, there wouldn't be a mechanism of support for schools who are struggling but aren't in a statutory category. A recurring message from these respondents was that there is a need for a mechanism to support all schools, such as Estyn Review, to ensure accountability. They added that currently, the review is a good support for the leadership team. Some education professionals proposed that the timescale for monitoring should be shorter, that visits should be more frequent and that we should work with the regional consortia. Other messages from these respondents were that Estyn Review could be lighter touch.

Recurring messages from parents/carers were that Estyn Review is helpful in motivating under-performing schools to improve. They added that without Estyn Review, schools could decline further. Main messages from learners were that there is a need to monitor schools to see if improvements and changes are working, and that we should not leave poorly performing schools without support. They also noted that we should work closer with regional consortia and local authorities as part of Estyn Review. Members of the public noted that Estyn Review is necessary to maintain standards and expressed concerns that if it is removed, a school's standards could decline. Messages from other respondents were that it is important to maintain a consistent standard of follow-up, adding that Estyn is the only organisation with the necessary knowledge to do so. However, they added that we could work with local authority and regional consortia as part of the process.

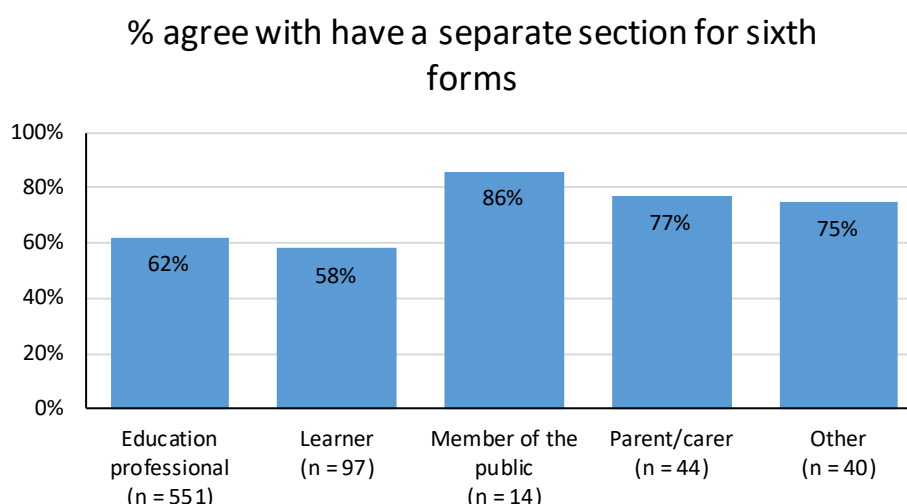
5.4 Section on sixth forms in inspection reports

We currently write about the sixth form across all inspection areas but this information is not collated into an overall summary of the sixth form. We would like to report on sixth-form standards and provision separately to the main report narrative. We asked respondents if we should have a separate section on sixth forms in secondary school inspection reports.



Sixty-three per cent of respondents felt we should have a separate section in secondary school inspection reports to capture standards and provision in the sixth form, 10% disagreed and 27% were unsure or had no opinion.

Those who agreed can be broken down as:



We asked respondents for any further comments or suggestions about the proposal. The majority or all comments across respondent types were in favour of a separate section on sixth forms in inspection reports. These comments are analysed in the following section.

5.4.1 In favour of a separate section on sixth form reports

A key message from education professionals, parents/carers, learners and other respondents in favour of a separate section for the sixth form in inspection reports, was that sixth forms are of a different nature to the rest of the school. They referred to differences in relation to nature and funding, especially in the context of a new post-compulsory education body. They added that a separate section could be helpful in highlighting any specific issues in a sixth form. Another main message from

these respondents was that a separate section on sixth forms would be helpful for parents and learners selecting post-16 provision, enabling them to compare providers. Education professionals and learners emphasised the importance of the sixth form in learners' education, and noted that a separate section in a report could help highlight its performance, increasing accountability. These respondents added that it would also be helpful for schools and local authorities when forming school improvement plans and would be particularly important in the context of schools losing sixth forms.

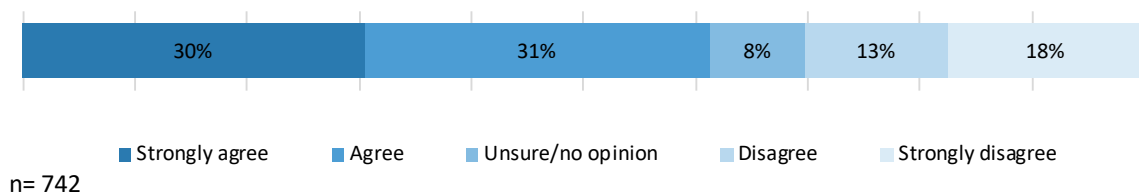
A repeated message from parents/carers was that a separate section on sixth forms could help to clarify issues with off-rolling and resource management. Learners felt that having a separate section on sixth forms in inspection reports would make this information more clearly available. Main messages from other respondents were that learners in the sixth form have different rights and a separate section in an inspection report would better capture this.

5.4.2 *Against having a separate section on sixth forms*

Some education professionals argued against having a separate section for sixth forms in inspection reports. They noted that sixth forms are an integral part of a school, and should therefore feature throughout a report. They added that having a separate section could be problematic for schools without post-16 provision. Other messages from these respondents were that people might compare sixth form reports with FE college reports, without taking into account differences in funding and provision.

5.5 Notice period

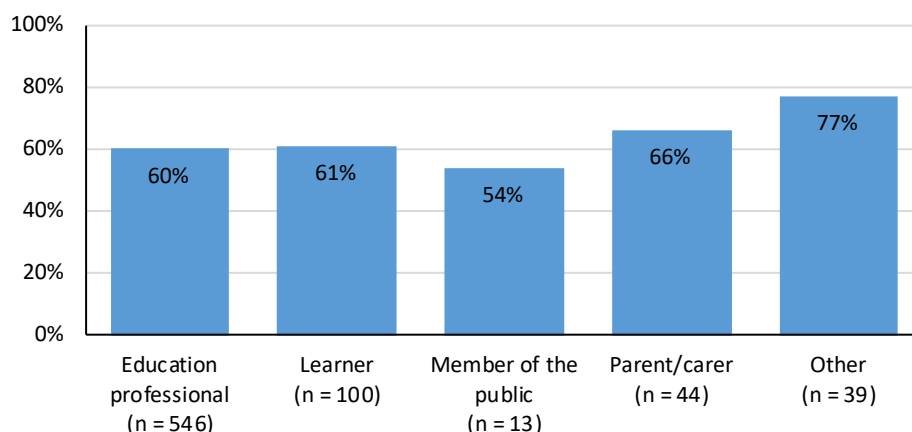
We currently give schools 15 working days' notice (three weeks) of an inspection. We asked respondents if they agreed with our proposal of reducing the notice period to 10 working days from September 2021.



Sixty one per cent of respondents strongly agreed or agreed with the proposal to reduce the notice period to 10 working days. 31% disagreed or strongly disagreed, with 8% unsure.

Those who agreed can be broken down as:

% agree with reducing the notice period to 10 working days



We also gave respondents opportunity to add comments in relation to this question. Comments from education professionals were mixed, but predominantly negative and comments from parents/carers and members of the public were also mostly negative. Learners' comments were mixed but slightly more positive and those from other respondents were mainly positive. These comments are analysed in the following section.

5.5.1 In favour of reducing the notice period

Of those respondents in favour of reducing the notice period to 10 days, main messages from education professionals, parents/carers and learners were that reducing the notice period would give a more accurate picture of a school and would reduce the practice of schools 'putting on a show' for Estyn. Education professionals, members of the public and other respondents noted that reducing the notice period would still allow sufficient time for schools to prepare for inspection and complete the relevant documents. Key message from education professionals and other respondents were that reducing the notice period could also prevent schools from doing additional work in preparation for inspection, which would reduce staff workload and stress.

A main message from education professionals was the shorter the notice period, the less stressful and disruptive inspection would be for schools. They added that reducing the notice period for schools would bring it in line with non-maintained sector inspections, which currently receive 10 days' notice.

5.5.2 Against reducing the notice period

Of those respondents against reducing the notice period, a main message from education professionals, parents/carers, learners and other respondents was that this could make schools more stressed, have a negative impact on staff wellbeing and increase staff workload. They noted that 10 days would not be enough time to prepare for inspection, including re-organising existing commitments and allowing for

contingency for illness. They added that some head teachers might also use a shorter notice period as an excuse to keep staff on high alert. Some education professionals argued that the success of reducing the notice period would depend on our expectations and what paper work is required, for example the quantity and timing of pre-inspection questionnaires. A common message from other respondents was that 10 days would not be long enough to engage with parents and pupils.

However, a contrasting message from other education professionals, parents/carers and learners was that the notice period should be shorter, with suggestions including 5 days, a model similar to Ofsted's, or no notice at all.

5.6 Additional comments on inspection arrangements

We asked respondents if they had feedback on any other aspect of Estyn's inspection arrangements. Themes from education professionals and learners were that when inspecting, we must ensure that we always consider schools in their context. Themes from education professionals, learners, parents/carers and members of the public were the need for more consideration of learner voice and more interaction with learners, including the school council. Education professionals and parents/carers noted the need for a more supportive approach to inspecting, and sharing effective practice.

A key message from education professionals was the need to ensure consistency amongst inspectors, suggesting that having the same lead inspector inspecting a cluster of schools could help with this. They emphasised the need to incorporate adequate time during inspection to meet with staff, including support staff, and the need for more frequent inspections, possibly of shorter length. They added that we should not duplicate the role of the regional consortia, and some suggested visiting schools with the regional consortia. Common messages from these respondents were that we should continue to share effective practice in a celebratory way and produce guidelines for expectations before, during and after inspection. Some also suggested the need for a different inspection framework for smaller schools, and publishing inspectors' names on inspection reports to increase accountability.

Parents/carers suggested a different framework for rural schools and the need for a parent panel to seek these stakeholders' views on provision. Themes from learners were that we should observe a range of subjects during inspection and should also seek to reduce paperwork. Repeated messages from these respondents were that we should take a more holistic view of schools and should consider the UNCRC (United Nations Convention on the Rights of the Child) and children's rights.

5.7 Effects on Welsh

We asked respondents if they thought the proposals in this consultation would have any effect on the Welsh language, and how any positive effects could be increased and any negative effects mitigated.

The main message across respondents was that the proposals would have no impact on the Welsh language. Education professionals noted that there would be no

negative effects on Welsh providing that there are enough Welsh-speaking HMI to inspect schools effectively through the medium of Welsh, and they highlighted the implications for resources and training. They added that we should consider the linguistic context of each school's area, particularly schools close to the border, bearing in mind that some schools have fewer Welsh speaking staff or Welsh speaking learners. Some education professionals noted that the proposals might have a positive effect on the Welsh language, help improve the quality of Welsh in schools and the use of Welsh in English-medium schools.

A theme from learners was that the proposal could have a positive effect on the Welsh language, encouraging people to speak Welsh and that inspections promote bilingualism.

6 Next steps

The findings of this consultation will help inform our inspection arrangements from 2021, which we will be piloting from summer 2020. We will hold another consultation on inspection arrangements for further education colleges, adult learning and work-based learning providers later in 2020.