

# An accountability model based on school report cards: an ASCL discussion paper

## Introduction

### The case for change

ASCL has been calling for some time for school and trust accountability to be based on a dashboard of measures, which would better reflect the breadth of the support and services they provide to children and young people.

In our 2021 [Blueprint for a Fairer Education System](#), we recommended the introduction of an ‘accountability dashboard’ or ‘balanced scorecard’ as the key accountability mechanism for all schools or groups of schools. We expanded on this recommendation as follows:

*This should include some nationally determined measures, based on the core curriculum, but also other measures that are nationally or locally considered important. Measures could include information on pupil outcomes (e.g. attainment measures, progress measures, destination data), on curriculum provision (e.g. subjects available, time allocations for different subjects), on staff development (e.g. teacher retention, time allocation for professional development), on inclusion (e.g. attendance rates, exclusion rates), and on the school or college’s impact on and engagement with the broader education landscape.*

*Evaluation of a school or college’s performance against the measures in this dashboard should form the core of the inspection process.*

We built on this in our 2023 paper on the [future of inspection](#), in which we called for the removal of graded judgements, with an accountability dashboard instead used as a basis for a narrative description of a school or college’s strengths and weaknesses in different areas. This would, we argued, give parents and other stakeholders a more nuanced understanding of the school or college’s effectiveness, build resilience and flexibility into the inspection process, enable all schools and colleges to play a greater role in supporting other institutions and in overall system leadership, and significantly reduce the pressure currently associated with inspection.

In our [response to Ofsted’s Spring 2024 ‘Big Listen’ consultation](#), we continued to advocate for a report card-based approach to accountability. In this response, we suggested that the role of inspection could be constrained to ensuring that schools and colleges have met or exceeded an agreed set of national standards. Schools and colleges would then be able to articulate their own strengths and weaknesses to parents alongside the report card, however they see fit. This would, we said, result in greater transparency, reliability and validity in inspection.

## The response from Ofsted, the government and the opposition

The previous Chief Inspector, Amanda Spielman, indicated some willingness to explore this idea, [describing the debate around reforming inspections to remove grades as a 'legitimate one'](#). But she also expressed concerns about whether this would make it harder for parents to judge the quality of a school, and for the government to identify and intervene in struggling schools. And she made it clear, rightly, that this is a decision that would need to be taken by the government itself, rather than by Ofsted.

The current Chief Inspector, Sir Martyn Oliver, pledged to look at single-word judgements in his [pre-appointment hearing with the Education Select Committee](#), saying that *"I do think it needs looking at, because I do think it leads to a sense of, is there a sense of trust in the system that you can move from one judgment to the other?"*. He has also, though, expressed similar concerns to the previous HMCI about what this might mean for regulation and intervention. Responses to the Big Listen are likely to inform Sir Martyn's further thinking in this area.

The current government has shown no interest in moving away from single-word judgements. In [interviews](#) following the death of headteacher Ruth Perry, Secretary of State Gillian Keegan described this approach as 'clear' and 'easy for parents to navigate', and expressed concerns about 'undermining Ofsted'.

Last year, however, the DfE produced new [trust quality descriptions](#), a report card-like mechanism for evaluating the quality of trusts. While the DfE is clear that these descriptions will not be used to make summative judgements about trusts, and they also ruled out any idea of inspecting trusts in the near future, nevertheless these descriptions are an interesting and important example of a report card-like approach now being used in the system.

The Labour Party, in marked contrast to the current government, has committed to a major reform of the inspection system should it form the next government, and to *"replace headline grades with a new system of school report cards, that tell parents clearly how well their children's school is performing"*. Shadow Secretary of State Bridget Phillipson announced this policy at ASCL's Annual Conference in March 2023, then cemented it in the publication of Labour's 'opportunity mission' a few months later, saying that Labour's report cards would:

- *identify where schools' practice is improving and where there are weaknesses, including where schools which are doing well can continue to improve*
- *reflect how well schools are supporting the attainment and inclusion of pupils eligible for free school meals and with special educational needs and disabilities, to ensure that everything possible is being done to break down the barriers to opportunity and close the attainment gap*

Labour committed, in the opportunity mission, to *"engage with experts across the education system, and with parents and school communities on this new system. Working together, we will ensure report cards capture the breadth of school life, while retaining triggers for intervention when serious failure is identified"*.

This commitment was then included in Labour's [manifesto](#) as follows:

*Accountability is non-negotiable, which is why Labour supports school inspection. Under the Conservatives our inspection regime has been broken. A system which declares nine in ten schools are good or outstanding fails to provide sufficient information on school performance. We will enhance the inspection regime by replacing a single headline grade with a new report card system telling parents clearly how schools are performing. We will also bring Multi-Academy Trusts into the inspection system and introduce a new annual review of safeguarding, attendance, and off-rolling.*

## **The need for further thinking**

If Labour forms the next government, therefore, an accountability system based on a report card model will almost certainly be introduced, although there is currently no indication of the timeframe for this change. This has the potential to lead to a more intelligent, nuanced and humane approach.

However, as with any major policy change, the way in which this is implemented is crucial. This is a complex proposition, with many potential unintended consequences. It is made even more challenging by the complex structures within which schools in England now operate, with some schools remaining under local authority oversight, and others part of multi-academy trusts with very different approaches to control and delegation.

This discussion paper explores different models of report card-based systems, considers the pros and cons of these models, and proposes some principles that should be applied to the introduction of such a system to schools in England. It also considers how the government could continue to ensure sufficient oversight of the system, and identification of schools in the greatest need of support, under a report card-based system.

The paper focuses on schools, as some of the considerations for other settings such as colleges and early years settings will be different. However, we would encourage the incoming government to consider how a similar set of principles could be applied to other settings.

This paper does not yet represent formal ASCL policy, but rather an indication of our current thinking and an invitation to others to contribute to our ongoing work in this area.

## **A note on terminology**

Labour currently uses the term 'report cards' to describe the broader approach to accountability that it plans to introduce. There are pros and cons to this term.

On the plus side, the term is clear, and implies the breadth that many people and organisations across the system wish to see. On the minus side, it can feel a little judgemental, could imply a process which is 'done to' rather than 'done with' schools, and could imply a numerical 'grading' of schools which could simply replicate the existing problems with graded inspections. There is also potential for confusion with parents, who might assume that a school report card refers to their child's progress.

Other terms sometimes used to describe this approach include 'balanced scorecard' and 'accountability dashboard', both of which we used in ASCL's Blueprint. A 'balanced scorecard' is a specific strategic performance management framework, first developed by [Robert Kaplan and David Norton](#) in the early 1990s, which helps businesses monitor and measure their performance across various key aspects or perspectives. This would need careful adaption to apply to education settings, and again risks a focus on numerical 'scores'. ASCL now generally prefers the term 'accountability dashboard', which implies that schools are active participants in the evaluation process – that they are in the driving seat, using the dashboard to evaluate their performance across a range of measures and adjust their focus accordingly.

Given Labour's use of the term 'report card', however, we will use this phrase in the rest of this paper, but would encourage any government considering introducing an approach along these lines to bear in mind the potential downsides to this term.

## Existing report card-like models

There are a range of existing approaches which could be explored in the development of a report card for the purposes of accountability in English schools. Some of these operate at an individual school level, and some at trust level. They include the following:

- a. DfE's trust quality descriptions (TQDs)
- b. The Confederation of School Trusts' 'building strong trusts' assurance framework
- c. ASCL's trust peer review assessment tool
- d. Individual multi-academy trust dashboards
- e. Independent school standards / Independent Schools Inspectorate framework
- f. The Education Policy Institute's effective school groups tool
- g. Challenge Partners' quality assurance review
- h. Professor Becky Allen's 'ungameable game'

The appendix below briefly describes these approaches. There is much to be learned from them. As the rest of this paper makes clear, we are particularly warm to an approach which mirrors, to some extent, the relationship between the statutory school standards and the inspectorate in the independent sector.

## Principles for a report card model

The decision as to what a national approach in English state schools will look like will obviously be one for any incoming government wishing to implement a report card-based model. We hope that this decision would be taken in deep collaboration with the sector.

In that spirit, we suggest that it should be based on the following principles:

- a. It should start from a clear articulation of what key stakeholders (government, pupils, parents, staff, employers, etc.) most value in the different phases of education, and should be aligned with any review of curriculum and assessment.
- b. This indication of priorities should be worked up into a new, statutory, set of standards for state schools. These should be as slim as possible, leaving space for schools to innovate around them.
- c. The standards should encourage collaboration rather than competition between schools, and include an expectation that all schools should be seeking to continually improve.
- d. They should also have a strong focus on provision for pupils with SEND and those living with disadvantage. This might include standards around inclusive admissions, access to the curriculum, and access to and engagement with extracurricular provision. The standards should recognise that many of the statutory responsibilities for children with SEND sit with LAs, rather than with schools or trusts.
- e. Schools should be held to account against these standards – and solely against these standards. Whether or not a school has met some standards (or elements of standards) is likely to be most effectively assessed through inspection; others through other forms of regulation such as financial or safeguarding audits. It is essential, however, that there is a clear, overarching structure within which these different forms of regulation operate.
- f. The government will need to identify, in collaboration with the sector, appropriate proxies to indicate whether or not a school has met these standards.
- g. The model must be flexible enough to work for schools in different circumstances, including maintained schools, single-academy trusts, schools in MATs which devolve significant responsibility to individual schools, and schools in MATs with more centralised control. It should also take into account local context and cohort characteristics, without lowering expectations for any pupils.

- h. Careful consideration should be given to whether there is a place for schools to include some of their own metrics as part of a national accountability system, or whether schools should be able to articulate this broader view of their strengths and weaknesses separately, as they see fit.
- i. It should be clear what the consequences of not meeting any of the standards would be. Intervention in these circumstances should be intelligent and proportionate, and focused on what individual schools most need in order to improve in their specific areas of weakness.

## How would intervention and improvement work?

One of the concerns often expressed about moving away from single-phrase judgements and towards a report card model is whether this would make it harder for the government to identify, intervene in and support struggling schools. This is an important consideration. It is essential, for the strength of the system and stakeholder confidence in it, that any new approach enables the government to maintain a strong oversight of the quality of both individual schools and the system as a whole, to identify when that quality is too low, and to intervene in a timely and effective manner.

It is ASCL's view that an approach as described above, based on schools being held to account against a statutory set of standards, would enable the government and its agencies to hold schools to account more effectively than is the case with the current single-phrase judgement-based approach. It would be clear which schools are meeting these standards and which are not, and – for those which are not – in which specific aspects of their operation they need support to improve.

How this support is delivered, and how directive it should be, needs careful thought. Our initial thinking is that there should be a clear distinction between schools which meet the standards and those which do not, and a nuanced, effective and supportive approach to intervention for the latter.

Schools which **meet or exceed all standards**, including our proposed standard around seeking to continually improve, should be trusted to identify, source and implement their own approach to ongoing improvement, within the parameters set by their oversight body/ies (trust, LA, diocese, etc.).

Schools which **do not meet all standards** should be supported to do so. In the majority of cases, the expectation should be that their oversight body/ies will provide or source that support. In a small number of cases, where there are concerns as to whether the relevant oversight body/ies can provide the necessary support, structural intervention may be appropriate, including potentially requiring the school to join a trust or move to a different trust. Such intervention should always be done with, rather than to, the school community.

Who decides whether or not a school which does not meet all the standards has the capacity to improve with the support currently at its disposal is crucial. This should not, in our view, be the role of the inspectorate. Ofsted's role should simply be to assess whether or not a school meets the statutory standards it is tasked with evaluating.

Labour, if it forms the next government, has committed in its manifesto to introducing "*new Regional Improvement Teams, to enhance school-to-school support, and spread best practice*". It is not clear whether these teams would also be expected to take on any regulatory role.

It is ASCL's strong view that regulation and school improvement are, and should be treated as, very different activities. We would suggest that, under a model as set out above, there would be an ongoing requirement for some form of regional evaluation of the capacity to improve of schools which are not meeting the standards, and for the implementation of structural intervention in the likely small number of cases where this was deemed necessary. This could be an evolution of the current DfE Regional Director role.

Labour's proposed Regional Improvement Teams could then be tasked with working alongside schools and trusts to build a strong network of support and professional development in a local area, and to connect schools with complementary strengths and weaknesses to encourage genuine school-led support and development.

## Summary

In summary, ASCL's view is that the incoming government should move away from the current school accountability system towards one based on report cards (though note our thoughts above on this terminology). This approach should:

- be based on a new, slim set of statutory standards, which all state schools would be expected to meet or exceed
- employ inspection and other regulatory activities intelligently to judge whether or not schools are meeting these standards, based on an appropriate set of proxies
- include an intelligent approach to improvement and intervention which trusts schools which meet the standards to implement their own approach to continual improvement, but employs appropriate mechanisms to ensure those which don't are supported to do so

ASCL would be delighted to work with the incoming government and other stakeholders to build on our thinking in this paper, and to develop a new strong, collaborative approach to school accountability.

## Appendix: Existing report card-like models

### DfE's trust quality descriptions

The DfE's trust quality descriptions (TQDs) are a [series of statements](#), under five headings (high-quality and inclusive education, school improvement, workforce, finance and operations, governance and leadership), which set out what the government thinks high-quality multi-academy trusts look like, and "*represent a clear and ambitious vision for the academies sector*". These are accompanied by a [range of metrics](#) which can be used to evidence the performance of trusts under each heading. These are divided into headline metrics, example verifiers, and qualitative information.

The TQDs are used by the DfE Regional Directors and their teams to make decisions about the [creation, consolidation and growth of academy trusts](#).

There is much to recommend the TQDs. The DfE engaged effectively with the sector in developing them, and the result is a broad, helpful and not overly complex set of statements. We would question the validity of some of the accompanying metrics, but this reflects our broader concerns about the current government's over-focus on some performance measures such as the EBacc and narrow attainment measures, rather than a concern about the descriptions themselves, or the approach behind them.

The descriptions are obviously currently designed to operate at a trust, rather than an individual school, level. They are also not currently intended to be used for accountability, but rather for 'commissioning' (though our view is that the line between these two purposes isn't as clear as the government contends). And some sections are more developed than others; the workforce section, for example, needs more careful thought.

However, with those caveats, we think there is merit in using the TQDs as a starting point for the development of a school report card, and for consideration of how a new accountability system could effectively operate for maintained schools, single academy trusts, and multi-academy trusts.

### The Confederation of School Trusts' 'building strong trusts' assurance framework

The Confederation of School Trusts' (CST) assurance framework provides a diagnostic tool for trusts to assess their organisational strength and identify areas for improvement across seven key domains:

1. Strategic governance
2. Expert ethical leadership
3. High-quality, inclusive education
4. School improvement at scale
5. Workforce resilience and wellbeing
6. Finance and operations
7. Public benefit and civic duty

For each domain, there are twelve elements that trusts should evaluate themselves on, for a total of fourteen elements across the framework. The tool provides a set of key questions to consider for each element, as well as descriptions of what 'needs attention' (red rating) and 'strong capacity' (green rating) would look like.

Trusts are invited to rate themselves on a four-point scale (red, amber-red, amber-green, green) for each element based on the provided questions and descriptions. The goal is to identify strengths to build upon and priority areas to target for improvement.

The framework is closely aligned with the DfE's trust quality descriptions but is positioned as a sector-led, developmental tool focused on building organisational capacity, rather than an inspection or accountability framework. It can be used for self-assessment, peer review and as the basis of a trust improvement work programme.

Key points:

- provides a common language and concepts to understand and build strong, resilient school trusts
- enables trusts to diagnose strengths and areas for improvement across multiple domains
- balances baseline standards to prevent harm with aspirational standards to promote excellence
- aligned to government definitions of quality but with a developmental rather than accountability focus
- can be adapted and used flexibly by trusts to support their improvement journey

## **ASCL's trust peer review assessment tool**

ASCL has developed a trust peer review assessment tool to help leaders self-assess the leadership and performance of their trust. The tool is intended for internal use by trust leaders, who have discretion over how the resulting information and reports are distributed.

The assessment criteria are closely aligned to the DfE's trust quality descriptions. ASCL has incorporated these five areas into our assessment framework but has added three others we believe are important:

1. public benefit and civic duty (drawing on work by CST)
2. an area of strength the trust would like to share with the wider school system
3. an area that is still developing where the trust would like support from the peer review process and broader system

For each of the eight sections, there are several themes and descriptors that trusts are invited to self-evaluate on. They can note strengths, areas for improvement, provide evidence, and give themselves a current rating for each descriptor.

The tool enables trusts to reflect in a structured way on their performance across a range of domains, celebrating effective practice and identifying priorities for further development. The optional sections on system-level contributions allow trusts to consider their wider civic role.

As a sector-led initiative focused on organisational improvement, the tool has a developmental focus rather than being a formal accountability measure. However, the close alignment to DfE quality descriptions ensures relevance to the evolving regulatory context for trusts in England. The tool can flexibly support trusts' ongoing self-assessment and improvement planning processes.

## **Individual multi-academy trust dashboards**

Most MATs have now developed their own dashboards, which enable their leaders and trustees to track and evaluate the performance of both the trust as a whole and the individual schools within it.

These dashboards vary widely, and often include some measures which aren't included in national metrics, but which individual trusts feel are particularly important for their communities. Having said that, however, increasing numbers of trusts are now starting to align their dashboards more closely with the DfE's TDQs.

We would strongly encourage any government planning to move to a report card model to explore a wide variety of trusts' own dashboards. A key aspect of this exploration should be the question of whether a national report card system could include some element of customisation at a school or trust level, and if so how this would work in practice.



## Independent school standards / Independent Schools Inspectorate framework

The government sets out in [legislation](#) a set of standards which independent schools must meet, and produces non-statutory [guidance](#) on adhering to these. The standards are in eight parts, as follows:

- Quality of education
- Spiritual, moral, social and cultural development of pupils
- Welfare, health and safety of pupils
- Suitability of staff, supply staff and proprietors
- Premises of and accommodation at schools
- Provision of information
- Manner in which complaints are handled
- Quality of leadership in and management of schools

The Independent Schools Inspectorate (ISI) inspects schools against these standards (see Appendix A of the [ISI framework](#) for how this mapping works in practice). Inspectors produce narrative [reports](#) on the extent to which the school meets the standards, areas for action, and recommended next steps.

The government tried to introduce a similar set of standards in their eventually withdrawn 2022 Schools Bill. This would have introduced a power permitting the Secretary of State to make regulations prescribing 'academy standards', which would have applied consistently across all academy trusts, together with a suite of intervention powers in relation to these standards. The Bill eventually fell partly because these standards were perceived as over-reaching the reasonable powers of the Secretary of State, including as they did detailed aspects of a school's operation such as the length of the school day, and the procedures and criteria for appointing staff and assigning them particular roles.

This has left the equivalent of the independent school standards for state schools scattered across various different documents, and largely reliant on individual funding agreements with trusts.

There is a strong argument for creating a (relatively slim) set of standards for state schools, inspecting schools against these, and using them as a basis for a report card.

## The Education Policy Institute's effective school groups tool

The Education Policy Institute (EPI) has developed a data tool to assess the performance of school groups in England. The tool presents multiple metrics across various categories to provide a multi-faceted view of the strengths and weaknesses of different school groups.

The data tool allows users to compare up to three school groups at a time, explore the relative position of a selected group within the distribution of all groups, and examine the raw metrics for a chosen school group. The metrics are calculated under five sub-groups: school choice and admissions, attendance and suspensions, pupil attainment and progress, workforce sustainability, and finance.

The tool presents the metrics as averages over the academic years 2016/17 to 2018/19, and only includes schools that have been in a group for at least two years. School groups need to have been operating at least two schools since 2015 to be included in the calculations.

The comparisons tab features a radar chart that indicates the decile in which a school group falls for each metric. The further a school group is from the centre of the chart, the higher it has scored on a given metric. However, for some metrics, such as unexplained exits, suspensions, and absence, being in a higher decile means the school group has a lower raw score.

The tool also provides contextual information about the school groups being compared, such as pupil demographics and geography, to ensure that comparisons take into account relevant factors.

The EPI's data tool offers a resource for assessing the performance of school groups in England, providing a multi-dimensional view of their performance across multiple metrics and categories.

## **Challenge Partners' quality assurance review**

Challenge Partners' quality assurance review (QA review), is a professionally-led peer review process focused on teaching and learning:

- The QA review is a collaborative process undertaken by a team of senior leaders from the host school and trained peer reviewers from other schools in the Challenge Partners network. It operates on a '50/50 model', balancing review of the host school with professional development for reviewers.
- The review takes place over 2.5 days and centres around the Pre-Review Analysis (PRA) meeting, Strategy and Impact meeting, Quality of Provision and Outcomes meeting, and a final whole-team discussion. Additional activities like learning walks are incorporated.
- Reviewers analyse school documentation, engage in professional dialogue with host leaders, conduct joint lesson observations, and collaborate to identify strengths and areas for development in the school's approaches.
- The review results in a report capturing agreed 'What Went Wells' and 'Even Better Ifs' to support the school's ongoing improvement. Peer evaluation estimates are also included.
- Reviewers benefit from the opportunity to reflect on their own leadership, gather evidence of professional development, and take learning back to their own schools.
- A trained Lead Reviewer guides the process, ensuring protocols are followed and reviewers are effectively deployed and supported.
- The handbook provides guidance on review structure, roles and responsibilities, agenda templates, questioning techniques, safeguarding and data protection.

Overall, the QA Review enables peer evaluation and sharing of effective practice through a structured, collaborative approach to school improvement.

The QA Review includes a form of scoring through peer evaluation estimates.

The handbook states: "*Peer evaluation estimates for leadership at all levels and the quality of provision and outcomes will be included as part of all reviews. If the school decides for any reason that they would like to opt-out of estimates, they should discuss this with their Lead Reviewers prior to the start of the QA Review.*"

The specific areas that receive peer evaluation estimates are:

- Leadership at all levels
- The quality of provision and outcomes
- The quality of provision and outcomes for disadvantaged pupils and pupils with additional needs

The handbook references 'QA Review peer evaluation estimate descriptors' which outline the evaluation criteria for each area of the report. These descriptors are used in discussions during the final reflection meeting on day 3 to gauge peer evaluations for each area.

So, while not a numerical scoring system, the QA Review does incorporate a framework for reviewers to collaboratively evaluate key aspects of the school's performance using standardised descriptors. However, schools can opt out of receiving these estimates if they wish.

## Professor Becky Allen's 'ungameable game'

Professor Becky Allen proposed a novel approach to school accountability in England where the metrics used to assess school performance are randomly selected each year. In her hypothetical scenario, a lottery machine picks six balls out of 49 possible measures, which could include things like standardised tests in specific subjects, pupil surveys, teacher turnover rates, and other non-attainment metrics.

The key principles of this 'ungameable' assessment system are:

1. Deliberate ambiguity in what is measured and how it is evaluated each year, making it impossible for schools to 'game' the system by focusing narrowly on specific metrics.
2. Schools are encouraged to focus on delivering a well-rounded education aligned with the National Curriculum and societal values, rather than optimising for particular performance measures.
3. The system allows for experimentation with new assessment methods, which can be added or removed from the pool of 49 metrics based on their effectiveness in capturing important aspects of schooling.
4. Schools are compared to their nineteen most demographically similar peers, rather than ranked nationally, to provide more meaningful feedback and opportunities for collaboration.
5. The inclusion of non-attainment metrics, such as teacher well-being and engagement in extracurricular activities, provides a more holistic view of school performance.

Allen argues that while this system of 'messy' regulation may be unpopular with politicians, inspectors, and the media due to its complexity and unpredictability, it offers a more honest and nuanced approach to judging the quality of education provided by schools. By embracing the inherent ambiguity in defining what makes a school 'good', the system removes incentives for gaming and encourages schools to focus on delivering a well-rounded education to all students.



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