

Bailiwick of Guernsey Draft Inspection Framework consultation

Response of the Association of School and College Leaders

1. The Association of School and College Leaders (ASCL) represents more than 19,000 members, including education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase.
2. ASCL currently represents 32 school leaders on Guernsey. This places the association in a strong position to consider this issue from the viewpoint of school leaders.
2. ASCL welcomes the Committee for Education, Sport and Culture's consultation on the Bailiwick of Guernsey's Draft Inspection Framework. As an association, we have long argued for intelligent, proportionate accountability. In keeping with our support for Ofsted's broad direction of travel in England, we believe the proposed framework for Guernsey is right to focus on the quality of education.
3. In particular, we note there is no plan to introduce an overall effectiveness grade because the use of such a grade in England has, according to the Committee for Education, Sport and Culture, "tended to place too much weight on test and exam results, increasing workload and pressure on teachers and detracting from the importance of what children are learning and how well they are progressing." We strongly support this decision and share the Committee's concerns about the distorting influence of overall effectiveness grades as used in England.
4. It is, therefore, essential that stakeholders in Guernsey recognise this decision and do not seek to use one of the graded judgements as a proxy for an overall effectiveness grade. As stated in the consultation, assessing the strengths and weaknesses of schools is a complex activity and not one that is easily or reliably reduced to a single grade or measure. The decision not to have an overall effectiveness grade is a welcome recognition of this fact and must be respected.
5. This is particularly important in the context of the educational reforms taking place on Guernsey. School leaders are working in a challenging local context at a time of significant change and it is crucial that these challenges are recognised by inspectors as well as those using Ofsted's reports.
6. We note that the proposed framework shares many common threads with the approach due to be adopted in England from September 2019, and is based on the same underlying research. Our understanding of this underlying research and our views on the implementation of Ofsted's vision for inspection have informed our response to this consultation regarding inspection on Guernsey.

7. If the premise of the framework is to produce graded judgements, the foci of 'quality of education', 'leadership and management', 'behaviour and attitudes' and 'personal development and welfare' seem appropriate. However, as noted above, we urge caution in how these judgements are applied and interpreted. The context on Guernsey is very different to that in England and it is essential that Ofsted inspectors understand this when reaching judgements about schools. Ofsted should only use inspectors who have the necessary contextual knowledge, experience and training in order to ensure judgements are applied fairly and consistently.
8. On a wider point, there are growing concerns in England about the distorting impact of Ofsted grades, including the use of sub-judgements. We encourage policy makers in Guernsey to consider whether graded judgements are the best and most appropriate form of inspection outcome and whether they sufficiently support school improvement.
9. We also note the language in the consultation is inconsistent in relation to the outcomes of inspection. The handbook clearly refers to the 'judgements' schools will receive in relation each of the four areas, whereas the wording in the consultation occasionally refers to these as 'indicators'. The semantics here are important, as they will influence how stakeholders treat the inspection findings. We suggest that the term 'indicators' is used consistently throughout.
10. Our support for the inspection of the 'quality of education' is contingent on Ofsted maintaining, both in policy and in practice, its stated aim to avoid prescription of a preferred curriculum model. We believe that leaders are best placed to make decisions about the right curriculum for their pupils.
11. It is essential that Ofsted gives schools time to properly consider their curriculum. Again, the context here is different from that in England, where there has been much discussion with the inspectorate about the curriculum over recent years. As Ofsted's inspection of schools on Guernsey is in its infancy, it must not be assumed that schools in Guernsey have engaged with Ofsted's research, publications and methodology. In England, Ofsted has addressed the need for a phased implementation of the quality of education judgment by incorporating transitional text, in bracketed sections, relating to curriculum intent. ASCL finds some reassurance that a similar approach is being proposed for Guernsey. However, as noted above, Guernsey schools must be inspected within their local context and the timeline may need to be different than that outlined for English schools. We believe this transitional period on Guernsey may have to be considerably longer than the one year being proposed.
12. It is essential that the review process at the end of the transition year is given proper consideration, within the context of Guernsey, and the outcome is not pre-determined. ASCL looks forward to being involved in discussions relating to this issue in due course.
13. The proposal to consider the progress of pupils with SEND is welcome, as is the recognition that all pupils, including high prior attaining pupils, should receive a good quality of education. However, as stated above, there are significant reforms taking place on Guernsey, particularly affecting secondary schools, and it remains to be seen what the impact of these changes will be on the capacity of schools to meet the needs of all pupils. It is not right that schools are held to account for decisions made beyond their control. We therefore urge Ofsted to consider the challenges leaders face, and to ensure that due credit is given to schools doing the best they can for their pupils in a challenging context.

14. In terms of the length of Key Stage 3, the new framework must not result in a *de facto* prescription that all schools must run a three-year Key Stage 3 and a two-year Key Stage 4. Many effective schools operate a shortened Key Stage 3 while maintaining breadth, and must be allowed to continue to do so where leaders consider it to be in the interests of pupils. Judgements made on over-simplistic facets, such as the duration of a key stage, neglect subtler issues such as the distribution of curriculum time and the quality of the curriculum itself. Similarly, schools must be supported in making decisions to develop a bespoke curriculum where this is in the interests of children. For example, many schools will provide some pupils with extra time on literacy, in order to ensure they can access the full curriculum. As stated above, school leaders are best placed to decide the curriculum that is most appropriate for their pupils.
15. The effective and consistent implementation of the new framework will depend on the quality and training of inspectors. As such, training and supporting materials must be created across the curriculum to support inspectors working in non-specialist subject fields.
16. The handbook states that inspectors will seek individual interviews with members of support staff. Research indicates that such staff may be more likely to give a negative reflection of behaviour in the school. Inspectors should not, therefore, place undue weight on this evidence, given the research indicates it is to be expected. Inspectors should be mindful of the context of the school as well as the views and perceptions of other stakeholders.
17. ASCL supports the recommendation in the proposed handbook there should be no more than two to three data collection points per year. We also recognise the need for inspectors to consider carefully the reliability and validity of all evidence they use during an inspection.
18. However, we believe the proposal that inspectors refuse to look at schools' internal data at all takes this too far, and is unhelpful to both schools and inspectors. It risks putting more emphasis on historic outcomes – the opposite of Ofsted's ambition. This is particularly concerning given the limited use of national data when judging the progress of particular groups of children, such as SEND pupils, for whom internal data may provide more valid evidence of progress.
19. Secondly, alternative inspection activities, such as work scrutiny, do not appear to be any more valid or reliable, according to the available evidence. The draft handbook makes no mention of sample size or other safeguards which would prevent an inspector from drawing inaccurate inferences from pupils' books.
20. There is a significant risk that, were this proposal to be implemented, schools in a category of concern would find it more difficult to demonstrate swift improvement.
21. It would be much better, in our opinion, for inspectors to triangulate internal data and make an informed assessment of its reliability, rather than completely ignore it and risk undermining the security of the judgement.
22. With regards to the notice period for inspection, ASCL agrees that inspection should not create additional workload for leaders and teachers. We recommend that the proposed two-day notice period is trialled during the pilot phase and, if maintained, also reviewed at a later date in order to assess its impact on schools and staff.

23. The proposed interval of four years between inspections seems sensible, but should be reviewed in due course to ensure it provides the assurance stakeholders seek without adversely impacting on schools and pupils.

24. I hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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Association of School and College Leaders
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