
Ymateb i Ymgynghoriad / Consultation Response

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Pwnc / Subject:	School improvement guidance

Background information about Estyn

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Introduction

We welcome the guidance and agree with the broad direction it sets out based on a collaborative approach and a culture of trust and respect between organisations at all tiers of the Welsh education system. We agree that effective self-evaluation processes are key to school improvement and that these processes should draw on a wide range of evidence and not focus narrowly on measures which may drive unhelpful behaviours. We welcome the proposal to remove categorisation and do not think it should be replaced by another labelling activity.

The guidance could be strengthened by referencing suitable resources such as the National Evaluation and Improvement Resource. More practical advice and guidance on school improvement activities could also be included or be provided in future. We don't think that the intention is for all evaluation activities to be 'enquiry-based', rather than being evidence-based, and this could be made clearer in the text.

We welcome the move to more regular inspection. The rationale for more frequent and varied engagement between inspectors and the education sector is that it would enable inspections to become less high-stakes, more preventative and timely, and would also allow other support services to focus their efforts more fully on improvement activity. While the distinction between accountability and its relationship with evaluation and school improvement is helpful, it needs to be remembered that accountability is itself a form of improvement activity.

We would welcome clarity about the status of the National Model for Regional Working in light of this guidance. We would also like to see a consistent approach between this guidance and the guidance on evaluation, improvement and accountability for local government set out in the in the draft statutory guidance on the performance and governance of principal councils. The guidance could also take more account of the Local Government and Elections (Wales) Act in relation to the potential for Corporate Joint Committees.

Consultation questions

Question 1 – Do you agree with the importance of robust self-evaluation and improvement planning by schools, which draws on a broad range of evidence, as set out in the *School improvement guidance*?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments (no more than 250 words)

We agree that:

- Self-evaluation and school improvement processes are highly important. Our school inspections have regularly identified these aspects as requiring improvement over many years. For example, in the commentary about leadership in secondary schools in HMCI's most recent annual report, it states that only a

'majority¹ of schools have appropriate improvement processes in place to identify specific areas needing improvement and to plan those improvements'.

- The text generally sets the right tone for high level guidance regarding evaluation and improvement, for example, by emphasising that *'the majority of the energy and focus in the system should be on delivering school improvement, guided by effective self-evaluation, improvement planning and support in all schools'*. (P2).
- Evaluation work should draw on a broad range of reliable evidence from a range of sources and not be overly reliant on narrow measures such as examination result data only.
- The reference to supporting schools to understand Welsh Government's expectations about the use of information (P9) is helpful in setting the right tone.

However:

- Overall, the title of School Improvement Guidance does not match fully the content. The document provides a framework of roles, responsibilities and expectations. It is not guidance about how to undertake improvement activity. It might be useful to clarify what this document is and is not. It might also be helpful to signpost the user to sources of more detailed practical guidance, for example, the National Evaluation and Improvement Resource (NEIR) when it becomes available.
- Care should be taken in referring to improvement planning as if it is the improvement process. Identifying priorities and planning to address them is only a part of this process. It is also important to consider the capacity of schools to implement improvement strategies to realise improvement.
- There is potential for confusion over the term 'enquiry-based'. Enquiry may not be necessary for all aspects of evaluation. Maybe 'evidence-based' would be a better term. The NEIR does not specify that all self-evaluation is enquiry-based. The aspiration of the NEIR is to support schools to improve wellbeing and outcomes for learners. If referring to enquiry-based approaches, it may be helpful to define what this means in practice.

Question 2 – Do you agree that the national categorisation system should end, but be replaced by a similar process, led by regional consortia, in which consortia agree with schools the support they need to improve, as set out in the *School improvement guidance*?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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Comments (no more than 250 words)

We agree that the national categorisation system should end. It is helpful that the proposed arrangements for a similar process would not result in a published label for a school. However, we do not think that it should be replaced by a similar labelling process.

It is unclear why a different process would not lead to similar issues that exist with the national categorisation system. The guidance states that "regional consortia should consider the elements of a school that are 'Leading', 'Improving' or 'Needing more intensive support'". We do not think that it will be helpful to use these labels, as it could be seen as a revised version of categorisation. These labels could lead to competition

¹ Estyn uses majority in our inspection work to mean over 60% but less than 70% of providers.

between schools rather than collaboration, and could lead to third parties creating league tables of schools based on these labels. It is likely to be burdensome to operate this type of system in the flexible way suggested in the guidance, where schools can regularly move between different categories within a year.

We think it is most important that regional consortia are clear about the strengths of schools and their areas for improvement. This will help consortia to facilitate high quality school-to-school support. Being clear about strengths will help identify schools who have particular expertise or experience to share. Being clear about areas for improvement will help consortia to know the most appropriate support each school needs and in which areas. This will help consortia to plan strategically and use their resources effectively. All schools will have some aspects of strong practice which others could benefit from learning about. It is important to build on the strengths across the system to bring about improvement and create the collaborative, supportive system described.

We think that the more regular inspection identified in the framework will allow schools causing concern to be identified early so that appropriate support can be identified. We believe that there is a danger that by regional consortia also assigning labels to schools it will make it difficult to move away from this operating like accountability rather than evaluation and improvement.

Question 3 – Do you agree with the distinction between evaluation and improvement activities, and the accountability system, as set out in the *School improvement guidance*? Is this distinction made clear?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments (no more than 250 words)

The guidance helpfully distinguishes between evaluation, improvement activities and accountability, and supports the aspiration for a cultural shift away from a narrow range of accountability measures. We agree strongly that accountability should not drive negative behaviours. The accountability system should work alongside improvement. It should complement and inform it, when appropriate. We believe that accountability to learners and the moral responsibility to do what is best for them should be a priority. Accountability should drive improvement when appropriate.

There are valid, positive messages to challenge existing perceptions of data in this guidance that support a move from using data for accountability to using it for evaluation and improvement. For example, the final paragraph on page 10... *Published external examination indicators are designed for a specific purpose, which is to frame data in a manner appropriate for self-evaluation and as a starting point for analysis and planning. The information is, therefore, limited by design in what it can convey. It should not be used in isolation or out of context, nor presented as evidence of how effective a school is. In this way, the information is useful for self-evaluation, but should not be used in isolation, either for this purpose or for accountability.* Turning this aspiration into practice will be challenging and it is likely to take time to change for example, the 'conflation of transparency and accountability'. Schools could remain competitive because pupil numbers generate income, especially in areas where there is significant demographic change. They may look for opportunities to publicise their strengths, academic outcomes being a prime example.

Messages in the guidance could be clearer, particularly in relation to the overlap between accountability and transparency, as set out on page 8. For example, *'The accountability system, in contrast, is the safety net for when evaluation and improvement is not functioning effectively. It should not drive school improvement activity, although it should ensure that problems are identified and addressed'*. (P2). For the many schools that don't need a safety net, accountability can still add value and support them on their ongoing improvement journey. In cases where accountability identifies problems and supports them to be addressed, it is driving improvement, and the inspection outcome can be a catalyst for the required improvements. Accountability information should be used appropriately to support improvement otherwise the school just stays in the 'safety net'.

Question 4 – Do you agree that the accountability system set out in the *School improvement guidance* will align with the new Curriculum for Wales and its principles?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments (no more than 250 words)

We agree that the accountability system set out in the *School improvement guidance* is likely to support the new Curriculum for Wales and its principles, because its overall intention and likely effect are to establish a collaborative culture between organisations at all tiers of the Welsh education system. The proposals are also likely to encourage greater innovation and flexibility in teaching and learning which are at the heart of the new Curriculum for Wales. In particular, the proposal to remove aspects of the current accountability system that have focused too much on measuring particular outcomes, is helpful. The current accountability system is not fit for purpose to evaluate how well schools and the education system as a whole support learners to be:

- ambitious, capable learners who are ready to learn throughout their lives
- healthy, confident individuals who are ready to lead fulfilling lives as valued members of society
- enterprising, creative contributors who are ready to play a full part in life and work
- ethical, informed citizens who are ready to be citizens of Wales and the world.

The proposed accountability system also builds on self-evaluation processes that stress the need to draw on a wide range of evidence and not focus narrowly on measures which may drive unhelpful behaviours.

Question 5 – Do you agree with the roles and responsibilities assigned to different bodies within the education system as set out in the *School improvement guidance*?

Agree	✓	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Comments (no more than 250 words)

We agree that it is useful to clarify the roles and responsibilities of all those involved in school improvement.

Governors

We agree with how the roles and responsibilities of governors are set out. Not all schools have strong governing bodies that are capable of securing school improvement or ensuring local accountability as set out in the guidance. It may be useful to review whether the current model and legislation for school governance is fit for purpose or whether other potential models could be considered in future, such as professional school boards or adding independent professional capacity to the existing model.

Local authorities

We agree with the guidance.

Regional consortia

This guidance does not state that this replaces the National Model for Regional Working (last updated in November 2015). This guidance covers a lot of the same ground, but each document also covers other matters exclusively. The National Model for Regional Working cannot continue to guide the work of regional consortia if this guidance is introduced as written. However, there is content in the National Model for Regional Working that is not covered in this guidance, so Welsh Government could consider one of the following approaches:

- Replace the National Model for Regional Working with this guidance, but expand this guidance to fully capture the content of the model (where still relevant)
- Alongside this guidance, publish a revised National Model for Regional Working

The guidance states that 'local authorities do not need to create additional processes to oversee the work of regional consortia'. We think it is important to consider why local authorities may have done this in the current system. The existing accountability arrangements have not always proven to be effective enough to address weaknesses in school improvement services provided by regional consortia, leading to individual local authorities setting up their own processes for holding their consortium to account. We think that Welsh Government could provide more support for effective governance of regional services in Wales.

While local authorities have their statutory duties for schools as set out in the Education Act 1996, they should reserve the right to take whatever action is necessary to ensure that their schools meet the needs of the population of their area, including action to ensure that the regional consortium is working effectively on its behalf. This action should only be time-limited as necessary, however, as we agree that local authorities should not establish routine processes for holding their consortium to account that are separate from the regional processes. This guidance may need to be updated or future proofed to consider any implications for arrangements should Corporate Joint Committees for school improvement services be legally created in any region.

The guidance references the Local Government and Elections (Wales) Bill (now an Act). However, the guidance does not refer to the recently published 'Draft statutory guidance: Performance and governance of principal councils'. It would be very helpful to set this education guidance about evaluation, improvement and accountability within the wider context of evaluation, improvement and accountability of principal councils.

Diocesan authorities

We agree with the guidance.

Estyn

We agree with the guidance.

Question 6 – We would like to know your views on the effects that the framework for evaluation, improvement and accountability, as set out in the *School improvement guidance*, will have on the diverse needs of individual learners, including those from disadvantaged backgrounds and those who share protected characteristics².

Comments (no more than 250 words)

Evaluation, improvement and accountability arrangements should promote equity and inclusion, and take account of groups of learners where there have been concerns about their outcomes. The impact the framework will have on the diverse needs of individual learners will be influenced by the application of guidance and policy in practice, that is how well all partners apply this framework and more detailed school improvement resources, such as the NEIR.

The current arrangements have not driven enough progress for pupils eligible for free school meals. In supporting schools to consider the experiences of disadvantaged learners more holistically, the new arrangements should enable schools to be better informed about more aspects of their work that affect disadvantaged learners. We also know that under the current system, the progress and attainment of this group in particular has received a lot of scrutiny and there is a risk that they might receive less attention.

Outcomes for some learners with protected characteristics and those with additional learning needs (ALN) have also been a concern. It is not fully clear from the guidance how regional consortia and local authorities will work together to provide holistic support to schools to support their improvement.

Question 7 – We would like to know your views on the effects that the *School improvement guidance* would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Comments

If the guidance is implemented effectively, then this should support improvements in opportunities for people to use Welsh and treat Welsh no less favourably than English within the education system. We recognise that in some areas of Wales there have been challenges in brokering support for Welsh-medium schools causing concern. We welcome

² The Equality Act 2010 places a duty on governing bodies to ensure that their school meets the requirements of equality legislation. The Act protects pupils from discrimination and harassment based on 'protected characteristics'. These protected characteristics are disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

the encouragement within the guidance for regional consortia to look beyond their own region to broker support for schools.

Question 8 – Please also explain how you believe the proposals contained in the guidance could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Comments

We don't think any changes are necessary.

Question 9 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Welsh Government has continued to chair termly 'Review and challenge' events with each regional consortium, as referenced in the National Model for Regional Working. This guidance does not refer to these events, yet they are part of the wider accountability system at present. Welsh Government could be clearer about its future intention for such events, including their purpose, their transparency, who should take part in them and how they fit in to the new accountability system. If this continues to be a part of the accountability arrangements for school improvement, it would be helpful to strengthen the role that Estyn's evidence base can play in informing the discussions.

On page 11, the guidance implies that information should not be used for multiple purposes, such as using the same information for evaluation and improvement activities and also for accountability. While we agree in principle, sometimes information is used legitimately for multiple purposes. For example, outcomes in qualifications are published for transparency, they are used to support evaluation and improvement activities and they are also considered within accountability processes. The key issue is the way in which the information is used for these different purposes rather than whether it is used.

On page 16, it is stated that this guidance will replace Welsh Government guidance 'School development plans' (SDP). We agree that the SDP guidance is out of date and either needed to be updated or replaced. We note that it contained more detailed operational guidance for schools that is not contained within this new guidance. It would be helpful to consider transferring and updating the useful and relevant content from the SDP guidance to this guidance, or signposting from this new guidance to another place, for example the NEIR where similar operational guidance could be posted (and, to some extent, is already included in the pilot resource).

On page 18, the guidance states that Estyn should rely on the evaluation and improvement arrangements set out in the guidance 'in order to use Schools' Development Plan (SDP) as pre-inspection information. We agree that we should use the evaluation and improvement arrangements to support the inspection process. However, while the SDP is important and we would consider it as part of our inspection process, we would not expect the SDP to cover all aspects of the school's work. Inspectors discuss with the school why it is currently working on the priorities set out in the SDP and the progress it is making in with the action it

is taking and the impact on learners' outcomes. Inspection will not promote the SDP as a high-stakes document and inspectors will be more concerned about what is happening in the school than what is written on paper.

While we fully support transparency of information about education, we need to be careful not to place too great an emphasis or expectation on documents for the public, where schools, local authorities and regional consortia spend too much time proving what they have done or creating glossy plans for what they will do, rather than spending the time on evaluation and the business of improving schools.

The guidance implies that Estyn will inspect regional consortia regularly (p28). We currently inspect regional consortia in two ways: firstly through our Local Government Education Services inspections that involve individual local authorities; secondly through our thematic work, as set out in the annual remit to Estyn. We do not currently have a cycle of regular inspections of individual regional consortia. It would be helpful if this guidance clarified expectations of Estyn in relation to inspecting regional consortia.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: