**Shenfield High School**

**Headteacher’s Report**

**to the Governing Body**

**March 2019**

**Numbers currently on roll: 1281**

|  |  |  |  |
| --- | --- | --- | --- |
| Numbers on Roll | | | |
| Y7 | 246 | Y11 | 144 |
| Y8 | 224 | Y12 | 176 |
| Y9 | 178 | Y13 | 159 |
| Y10 | 154 | **TOTAL** | **1281** |

**Staffing – during Spring Term**

|  |  |  |  |
| --- | --- | --- | --- |
| **Member of staff** | **post** | **Reason for leaving** | **Notes** |
| Tracey Suett | Pastoral Secretary | Re-location | Replaced by Jenny Walker |
| Phil Ball | Performing Arts Technician | Mutual agreement (January 2019) | Replaced by Katie Raine – February 2019 |
| Janet Ellis | Pastoral manager | Looking for other opportunities | Replaced by Jenine Allen |
| Sam Murray | Pastoral manager | personal | Replaced by Kelly Kalaitzis |
| Jake Robinson | Data Assistant (temporary) | Returned to university | Replaced by Gayle Penn |
| Becky Lynch | Team Leader for Drama | personal | Replaced by Paul Tully from April 2019 |

**Staff Leavers and Appointments for September 2019**

|  |  |  |  |
| --- | --- | --- | --- |
| **Leavers** | **post** | **Reason for leaving** | **Replaced by:** |
| Aqsa Malik | English, i/c Literature A Level | Secured promotion at Valentines High School | Anne Quinlan, NQT plus internal appointment to i/c Literature A Level |
| Ellie Gibbons | PE | End of maternity leave contract and secured professional netball role | Jessica Matthews |
| Chris Robinson | Maths | retiring | Grace Dalton, NQT |
| Sarah Howard (maternity leave) | History | Maternity leave | Trudy Arnold  (to cover maternity leave) |
| Emilio Navarra | Teacher of MFL | Agency temporary contract. | Melissa Watson |

**Attendance Data**

|  |  |  |
| --- | --- | --- |
| **Report to Governors** | **DATE** | **DATE** |
|  | **3 Sept- 15 Feb 2019** | **Sept - 9 Feb 2018** |
| **Overall Attendance Yrs7-11** | 93.9% | 94.0% |
| **Overall PA (under 90%)** | 14.2% | 14.9% |
| **Overall PA (under 85%)** | 7.7% | 6.6% |
|  |  |  |
| **Overall Attendance by Year Group** |  |  |
| **Yr7** | 95.5% | 96.2% |
| **Yr8** | 95.3% | 94.2% |
| **Yr9** | 93.9% | 93.5% |
| **Yr10** | 92.7% | 92.8% |
| **Yr11** | 91.9% | 93.7% |
|  |  |  |
|  |  |  |
| **MECES open cases** | 1 | 6 |
| **Attendance of MECES open cases** | 75.7% | 77.0% |
|  |  |  |
| **Monthly Attendance Yrs 7-11** |  |  |
| **Jan** | 93.1% | 91.0% |
| **Feb** | 94.9% | 93.8% |
|  |  |  |
| **Attendance by category** |  |  |
| **BOYS** | 93.9% | 94.3% |
| **GIRLS** | 93.8% | 93.9% |
| **LAC** | 95.7% | 92.2% |
| **PP** | 89.0% | 90.0% |
| **SEND** | 92.6% | 92.4% |
| **EAL** | 93.9% | 94.1% |
| **OASIS** | 88.6% | 84.0% |
|  |  |  |
| **Yr 7** | **Yr8** |  |
| 1 long term sick | 2 school refuser |  |
| 1 school refuser | 1 school refuser - now attending | |
| 1 medical | 1 medical |  |
|  |  |  |
| **Yr9** | Yr10 |  |
| 1 long term med | 2 school refuser |  |
| 4 poor attenders | 3 long term medical |  |
| 1 Family - mother passed away | 4 poor attenders |  |
| 1 MECES - court |  |  |
|  |  |  |
| **Yr11** |  |  |
| 2 school refuser |  |  |
| 2 long term medical |  |  |
| 3 poor attenders |  |  |

**Current information with regard to numbers for September 2019**

248 places have been offered for next year’s Y7 with 182 students on the waiting list. There has been a significant increase in our applications this year which has meant that we only reached half way through the sixth criterion on our Admissions Code (designated primary schools) and did not reach criteria 7 (aptitude) or 8 (distance.) We are aware that we had 285 first choices.

There is usually movement in the couple of months after the offer day on 1st March, but there is a possibility of a significant number of appeals.

We will consult on our Admissions Code this year (for implementation in 2021/22) as a consultation every seven years is a minimum requirement. We will need to consider with care the implications of a different position for the aptitude criterion, or whether we continue to have an aptitude criterion at all.

**Sixth Form**

We have interviewed over 300 external students for potential places in Y12 from September 2019. As we know, this is but an indicator of interest at present as many Y11s apply to several sixth forms so they have choice once they know their results. We can never have a real indication of numbers until after results.

It is also worthy of note that despite great care being taken to ensure that we have the right students on the right courses, retention, with competition from apprenticeships and employment with training, has become a greater challenge. Reasons for leaving have been appropriate for the individuals concerned but this does affect post-16 finance as retention is one of the criteria that affects funding.

Current Year 13

* 16 students left during the first year of their courses
* 5 students reached the end of Year 12 and decided to re-sit the year, studying new courses
* 18 students left at the end of Year 12 (11 achieved poor grades D and below in some/ all of their subjects)

Current Year 12

* 5 students have left this year already (1 student was resitting the year)
* 3 students are unlikely to be SHS students for very much longer, all due to changing aspirations

**Annual Surveys**

The three annual surveys for parents, staff and students have been published on weebly for your perusal. They are very positive with no particular pattern to the comments. Inevitably, we focus on the negative and I am very sorry to learn that one member of staff is not proud to be part of Shenfield High School. However, the overall statistics for all the surveys are very encouraging and we will focus on comments which indicate we could communicate more effectively or reiterate our practices to ensure full understanding.

**Alumni project**

Our student senior team – the Head Boy, Head Girls and their deputies – identified that they would like to set up an Alumni Project this year. I am very grateful to Andy Williams for agreeing to support the project as this expands our capacity when staff are hard pressed. Sadly there have been a number of delays to getting this up and running and the exam season is now nearly upon us. However, huge thanks to Andy for having an initial meeting with the students. Although it is unlikely that a great deal of progress will be made this year, it maybe that the next team can pick up the baton.

**Progress Manager Project**

Four Progress managers have been appointed to work with Y7 to Y10, alongside Jane Martin who is overseeing Y11. As explained in the December report, we are using our new assessment system to identify students who are causing us concern over several subjects, because either their attitude to learning or current grade is not meeting expectations. This assessment data is reviewed regularly and progress managers or other colleagues who focus on disadvantaged or SEN students mentor them to ensure better progress is made. We will review the project at the end of the year.

**Improvement headlines – notes of actions and progress.**

1. **Continue to develop a research-informed approach to school improvement with decisions based on our shared ethos**. We have a number of research associates working in collaboration with Gill Power to develop their own practice-based research. These colleagues are being supported by Katie Raine who has taken on the role of research assistant alongside her role as Performing Arts Technician. Some colleagues are using their research as a performance review focus. SLT have been using research to guide their discussions this year on assessment, parental engagement and setting.
2. **Develop an inspirational and engaging KS3 curriculum.** We have reaffirmed our already adopted view that Key Stage 3 is a 3-year programme and should be designed to be engaging and inspiring. When the new specifications for GCSE were introduced with their greatly increased content, it was difficult to see how all the content could be covered in the time we had. This meant, along with schools nationwide, we backward planned from the GCSE end-point to ensure there was appropriate coverage. We found ourselves using GCSE style assessment for much younger GCSE students. We have moved away from this and are focusing on building the required skills in KS3 lessons and PREP but keeping GCSE content as a two-year course in all subjects other than the core. Team Leaders are sent articles related to curriculum weekly in the Briefing minutes. They have been prompted to consider elements in certain department meetings and encouraged to review through their TIPS. Many departments have used the CPD session on Assessment to ensure it is used to support learning not track it.
3. **Use quality assurance processes to support G4S live mark book and the proactive use of new KS3 assessment systems to support teaching and learning and intervention decisions.** We review data regularly to ensure that current grades are updated and the recording of attitude to learning is dynamic and based on behaviour and PREP. As this is new it remains a work in progress but we are convinced that this is more likely to show us the students who are underachieving so that we can do something about it earlier. The progress Manager Project is a key part of this work. We are currently working on ensuring that mark books are appropriately set up so that useful data can be collected and that this yields actions for both intervention with individual students and in the classroom.
4. **Develop department-led interventions in support of disadvantaged students, with impact measured and noted in Team Improvement Plans, and in addition focus on raising the aspirations of Pupil Premium students, embedded in research-informed projects.** Through the analysis of data and in association with the work of Progress Managers, PP students underachieving are supported by a member of staff with specific responsibility for PP students. Students assigned to the member of staff are mentored and supported. Further development required to ensure departmental focus on the aspirations of disadvantaged students and analysis recorded in Team Improvement Plans. (TIPs)
5. **Further develop the work of CADRE 86 and Cadre Associates with a focus on parental engagement**. Cadre 86 has evolved into our group of research associates with a diverse range of projects based on the particular interests of staff. Parental engagement has been developed through the Parent Council and a number of events led by staff to engage parents in understanding our curriculum and its demands. The Parent Council is particularly focusing on PREP and how parents can support their children in ensuring that it becomes an expected part of their daily routines. The recent Parent Survey demonstrates that parents are now very keen to support PREP and are beginning to support their children more outside of the classroom.
6. **Development of PREP and the super-curriculum.**  On the basis of work with the Parent Council, a half termly on-line PREP newsletter is produced for each year group giving PREP resources for every subject. As can be seen from the parent survey, the response to PREP has been positive but, as with any change on this scale, will remain a major focus for school improvement and development. The super-curriculum remains a major strength of the school with a great deal provided. We are encouraging parents to also support this through things they do as a family. PREP has adopted a new tag line: ‘PREP is not optional, it’s a way of life’ to ensure that students continue to understand the importance of completing PREP in order to be successful.
7. **Continued focus on literacy development with a particular emphasis on making text book content accessible**. Some staff training based on Alex Quigley’s ‘Closing the Vocabulary Gap’ took place in the Autumn, with a second one planned for later in the year. Action research is taking place into case studies around an American project called Whole Class Reading which has had success in building reading confidence. Ben Clifford and tony Taylor are also working on literacy programmes to support reading comprehension, and not just word level programmes. In addition, Ben Clifford will embark on some literacy-based work with the Science Department in the Summer term.
8. **Catch-Up strategies and Club 100 to be implemented in Y7 and for identified students in Y8**. BC and RD overseeing work with these identified group with impact to be evaluated later in the year.
9. **Continue and further refine personalised CPD provision**. The year began with 50 staff attending ResearchED on a Saturday which meant that along with keynote speeches all 50 staff were able to choose several different workshops during the day to meet their own interests and needs. There is an extensive programme during the year that staff are able to attend in school to meet the required CPD quota. This has included whole staff training on behaviour management by an outside provider we saw at ResearchEd, CPD Book Club, meeting this year to discuss Daniel Willingham’s “Why Don’t Students Like School,” and a number of other sessions led by staff members, eg “Closing the Vocabulary Gap,” “Assessment Practices,” and “Twitter, Technology and Trying Something New.” The majority of staff in the survey stated they felt CPD adequately supported their development.
10. **Continue to focus on e-safety and CSE, ensuring practice is in line with new directives and publications.** Parents and students given regular advice through various media. New approaches towards staff training include timely tutor training and support in line with the tutor programme and its delivery.
11. **Review management of the site as numbers grow**. (Deployment of space; student management systems) For September 2019 we will be moving some departments around to make best use of space. Business Studies will move to the T Block, taking over some rooms formerly used by Design Technology. Health and Social Care will move into the H block, and English, History Geography and MFL will have ownership and more consistent use of the other H and E rooms, rather than having to move round the school. This represents much better use of our available space. In the meantime, we are investigating whether we are able to make a CIF (Condition Improvement Fund) bid for a dedicated Sixth Form Block as we grow further. We are also awaiting confirmation of a bid for funds to convert one of the old technology rooms into a CCF classroom. Work has also been done to ensure that 240+ year groups can continue to be accommodated at social and eating times.

In addition, we have added another improvement headline focussed on gaining the Platinum ArtsMark Award, with the possibility of being designated a cultural hub. Exploration of this is ongoing.

**Ofsted Consultation**

The draft new Ofsted Framework for implementation from 2019 is open for consultation. Despite the promising focus on curriculum intent, implementation and impact, the reality has caused some consternation in the profession. There are a variety of issues but the one that most concerns our school is the emphasis on the Ebacc. The paragraphs below show the built-in contradiction and politicisation of what is supposed to be an independent inspectorate.

*160. Schools taking radically different approaches to the curriculum will be judged fairly. The inspectorate recognises* ***the importance of schools’ autonomy to choose their own curriculum approaches****. If leaders are able to show that they have thought carefully, that they have built a curriculum with appropriate coverage, content, structure and sequencing and are able to show that it has been implemented effectively, then inspectors will assess a school’s curriculum favourably.*

*162. At the heart of an effective key stage 4 curriculum is a strong academic core: the EBacc. The government’s response to its EBacc consultation, published in July 2017, confirmed that the large majority of pupils should be expected to study the EBacc. It is therefore the government’s ambition that 75% of Year 10 pupils in state-funded mainstream schools should be starting to study EBacc GCSE courses nationally by 2022 (taking their examinations in 2024), rising to 90% by 2025 (taking their examinations in 2027). It is important that* ***inspectors understand what schools are doing to prepare for this to be achieved, and they should take those preparations into consideration when evaluating the intent of the school’s curriculum****.*

The approach that Shenfield High School takes to the Ebacc is that there is the opportunity for any student who wants to take the Ebacc to do so. We have worked hard to ensure that the quality of provision in the EBacc subjects encourages students to choose them with confidence and we have made reference to the link to the so-called “facilitating subjects” at A Level and the Russell Group’s publication “Informed Choices. We have ensured that our curriculum organization in KS4 meets our Progress 8 accountability - despite the fact that it straitjackets some students into subjects they do not want to do and will not necessarily succeed at – but we have stopped short of making all the EBacc subjects compulsory. There remains little evidence as to why this particular set of subjects has been selected and why other subjects have been left out. We are already aware of the struggle that the “bucket 2” subjects are for some of our students, but we are in the position that if we do not insist that all students take a “bucket 2” GCSE subject, our Progress 8 will be significantly affected. We are currently discussing the possibility of allowing some students to do Entry Level qualifications, but we are aware this will definitely affect our headline accountabilities even though the lower level qualification mat be more suitable for particular students.

As a school that promotes the arts and sport, I would want to continue to allow students to take subjects they want to take and not be forced to take the EBacc. However, the push from the DfE, and now Ofsted, is becoming stronger and we must be aware of this as we proceed. I think we have a perfectly appropriate rationale for our curriculum choices and this is what makes Shenfield the school it is.

I have already responded to the consultation in a personal capacity. I would urge governors to do the same, and/or for us to draft a collective response. I have included as appendices the draft response from ASHE, the Headteacher’s Roundtable response, and the initial response from ASCL. As you will see, they each highlight other important concerns but the issue around the EBacc push is the most significant one for our school.

Published newsletters can be viewed via the link:

<http://www.shenfield.essex.sch.uk/newsletters/overview.aspx>

Please follow us on twitter [Shenfield High Sch](https://twitter.com/ShenfieldHigh)@ShenfieldHigh

**Dates for your diary:**

28th March Full Governing Body

4th April Easter Concert

24th April Shenfield Musician of the Year

30th April Shenfield Spring Showcase

7th May Standards and Performance

20 June Performing Arts Awards Evening

4 July Summer Concert

10th July PREP4Sept.

11 July Sports Awards Evening

**Carole Herman**

**March 2019**

**Appendix 1**

**Ofsted consultation responses.**

**Key Points to be made in ASHE response to Ofsted consultation**

**Proposal 1 To what extent do you agree or disagree with the proposal to introduce a ‘quality of education’ judgement? Neither agree nor disagree**

* Broadly agree with judging ‘quality of education’ in terms of intent, implementation and impact of the school’s curriculum
* Agree that it should look at teaching, assessment, attainment and progress

**Specific areas with which we disagree:**

Paragraphs 160 and 162 appear to be at odds with each other, with 160 emphasising “the importance of schools’ autonomy to choose their own curriculum approaches” whilst 162 emphasises the government’s ambition for an EBacc curriculum for the majority of pupils and that “inspectors understand what schools are doing to prepare for this to be achieved, and they should take those preparations into consideration when evaluating the intent of the school’s curriculum”.

160. Schools taking radically different approaches to the curriculum will be judged fairly. The inspectorate recognises **the importance of schools’ autonomy to choose their own curriculum approaches**. If leaders are able to show that they have thought carefully, that they have built a curriculum with appropriate coverage, content, structure and sequencing and are able to show that it has been implemented effectively, then inspectors will assess a school’s curriculum favourably.

162. At the heart of an effective key stage 4 curriculum is a strong academic core: the EBacc. The government’s response to its EBacc consultation, published in July 2017, confirmed that the large majority of pupils should be expected to study the EBacc. It is therefore the government’s ambition that 75% of Year 10 pupils in state-funded mainstream schools should be starting to study EBacc GCSE courses nationally by 2022 (taking their examinations in 2024), rising to 90% by 2025 (taking their examinations in 2027). It is important that **inspectors understand what schools are doing to prepare for this to be achieved, and they should take those preparations into consideration when evaluating the intent of the school’s curriculum**.

We are concerned at this introduction of a specific government policy into the draft Ofsted framework for two significant reasons:

* First, it suggests a politicisation of the Ofsted framework when Ofsted should be independent of government;
* Second, it removes the curriculum freedom and autonomy which is often vaunted as one of the key advantages of academy status.

**Proposal 2 To what extent do you agree or disagree with the proposed separation of inspection judgements about learners’ personal development and learners’ behavior and attitudes? Agree**

* Broadly agree that “the behaviour and the attitudes learners of all ages bring to learning is best evaluated and judged separately from the provision made to promote learners’ wider personal development, character and resilience.”

**Proposal 3 Is concerned with Early Years No response**

**Proposal 4 To what extent do you agree or disagree with the proposed focus of section 8 inspections of good schools and non-exempt outstanding schools and the proposal to increase the length of these inspections from the current one day to two days? Strongly disagree**

* Doubling the length of a section 8 inspection of good and non-exempt outstanding school from 1 to 2 days contradicts the recent strategy of having full inspections for schools that are causing concern at any level and operating shorter “light touch” inspections of good schools.
* The length of inspection will, in fact, increase to 2½ days when account is taken of the afternoon of on-site preparation by the lead inspector.

**Proposal 5 To what extent do you agree or disagree with the proposed introduction of on-site preparation for all section 5 inspections, and for section 8 inspections of good schools, on the afternoon prior to the inspection? Strongly disagree**

* As indicated above, we consider that this is an unnecessary extension of the length of an inspection from 1 or 2 days to 2½ days.
* We also believe that a 10am notification of inspection, followed by the arrival of the lead inspector 2-3 hours later gives insufficient notice for the school to make necessary practical arrangements for an inspection. The headteacher may be off-site at some distance from the school for the day and it is unreasonable to expect a headteacher to abandon all plans for that day and return to the school. The previous notification by around 12.30pm, followed by arrival of an inspection team the following day was much more reasonable in allowing time for arrangements to be made.
* We also believe that most lead inspectors would prefer to do their preparation in their own home office space away from the distractions of the school before arriving fully prepared to begin the inspection the following morning.

**Proposal 6 To what extent do you agree or disagree with our proposal not to look at non-statutory internal progress and attainment data and our reasons why? Disagree**

* We believe thatinspectors should be open to reviewing and discussing the internal performance data that a school is using. Avoiding this discussion may make it difficult for a school to explain and show the progress and pace of pupils’ improvement.
* We agree to some extent that there is currently too much pressure on schools to provide frequent and regular internal data, ironically largely driven by DfE and Ofsted demands over the last few years. This has had an impact on the workload of all staff, including the headteacher and senior leaders. However, we are not sure that Ofsted should be so prescriptive about, for example, the number of data collection points during a year.

**Proposal 7 Is concerned with non-association independent schools No response**

Simon Thompson

March 2019

**Headteachers’ Roundtable – S Tierney**

**Response to Ofsted Draft Education Inspection Framework**

**Executive Summary**

The Draft Education Inspection Framework and associated handbook does not currently support the development of an inspection system that is intelligent, responsible and focused or capable of supporting school improvement.

1. The support for certain curricula, within the inspection handbook, in particular the proposed implementation of the Ebacc, shows a lack of independence by the inspectorate and no evidential base. The Ebacc and new content heavy GCSE syllabi are limiting the range and balance of subjects studied and the completion of GCSE in two years; there is no recognition of this in the draft inspection framework or handbook.

2. Whilst the inspection handbook refers to a broad curriculum or broad range of subjects on nine separate occasions only once does it refer to a balanced curriculum. The support for the aesthetic aspect of the curriculum and the creative arts will be further undermined if this framework is implemented.

3. The juxtaposition between promotion of certain subject based curricula with the generic *intent, implementation and impact* is confused and unhelpful particularly when set against academy freedoms. The inspection handbook appears less applicable in an Early Years or Specialist School setting.

4. The proposed separation of inspection judgements about learners’ personal development and learners’ behaviour and attitudes; increased tariff for the Section 8 inspections, of good schools and non-exempt outstanding schools, and no notice inspections lack merit and a coherent rationale.

5. Proposals not to look at non-statutory internal progress and attainment data are understandable but not sensible. Work scrutiny has limitations that will lead to the same issues of unreliability that Ofsted is seeking to address through its current proposals.

6. The tone and content of the handbook is unacceptable, in part, particularly with respect to leadership; this raises concerns about its development, the lack of engagement with the wider profession during its writing and the likelihood of inconsistent and idiosyncratic implementation.

7. Safeguarding should be removed from the inspection framework and be externally audited as part of an on-going continuous improvement process.

8. Given the adverse impact of inspection on workload and recruitment & retention of staff, lack of efficacy for a number of “stuck schools” and absence of independent empirical evidence to support the four point grading system; full consideration should now be given to moving to a no grading inspection system with a narrative style report on a school’s strengths and areas to develop.

The proposals from Ofsted include most of the demands of the current framework plus additional elements. The implementation of this draft inspection framework, as currently proposed, will add significantly to workload, at a time the Department for Education’s Recruitment & Retention Strategy is promising a period of stability.

Prior to a far ranging review of the accountability system, including the current narrow use of metrics within performance tables, it would be preferable to adapt the current inspection framework.

**Provisional response of the Association of School and College Leaders (ASCL) to Ofsted’s consultation on the 2019 education inspection framework**

ASCL welcomes Ofsted’s consultation on the 2019 education inspection framework. The decision to publish not only the draft framework but also the draft handbook and underlying research suggests that Ofsted is taking a genuinely consultative approach to the significant changes it proposes.

We have produced this provisional response to the consultation in the same spirit. We will submit a full response in due course. In the meantime, however, we hope that the points we raise below will prove useful both to school and college leaders seeking to engage with the consultation, and to Ofsted in gaining early sight of the views of ASCL members.

The views expressed here are a result of extensive consultation with ASCL Council, our policy-making body, which consists of around 60 ASCL members elected to represent their region or sector. We have also drawn on discussions with around 1000 members during our series of regional information conferences in the autumn term and a further 400 members at ASCL events since the consultation was formally launched.

**The direction of travel**

ASCL supports Ofsted’s ambition to ensure that the inspection system is responsible, focused and intelligent, as laid out in the inspectorate’s 2017 corporate strategy. The direction of travel towards an inspection system which goes beyond performance measures and focusses more on the curriculum, as part of a broader evaluation of school effectiveness, is welcome.

We also welcome the fact that Ofsted appears be taking a phased approach to the proposed changes, to give schools time to properly consider their curriculum. This is something which ASCL strongly encouraged the inspectorate to do. It is imperative that schools feel supported in thinking deeply about any changes they wish to make to their curriculum, rather than rushing into change, or trying to second guess what inspectors will be looking for. This is a process which can take several years, and schools must be able to feel confident that inspectors will recognise and support this.

We also support the proposal that ‘minor weaknesses in safeguarding arrangements that are easy to put right’ could lead to a requires improvement grade for leadership and management, rather than inadequate, providing children are not at risk of harm.

**Delivering on the intent**

However, ASCL members have highlighted a number of areas of concern which would, we believe, undermine the ability of Ofsted to deliver on its commendable ambition. We would encourage the inspectorate to consider these concerns, and the proposals put forward below to mitigate them.

**1. The risk of curriculum narrowing**

We are concerned that there are unresolved contradictions running through the quality of education section of the revised framework, particularly in relation to school autonomy.

Paragraph 160 states: ‘The inspectorate recognises the importance of schools’ autonomy to choose their own curriculum approaches’. This seems at odds with statements about the length of Key Stage 3 and EBacc entry, which seem to suggest schools need to make particular curricular choices in order to receive a favourable judgement.

ASCL understands that the EBacc is a government ambition rather than an Ofsted policy. However, its inclusion in the criteria for the quality of education is problematic. Firstly, the wording in the handbook refers to 75% entry by 2022, but does not make it clear to inspectors that this is a national ambition, to which individual schools should not be tied. This is a significant error which is likely to lead to unintended consequences during inspection.

Moreover, we do not believe that there are sufficient, or sufficiently evenly distributed, teachers of MFL in the system to meet the government’s EBacc target. Consequently, some schools and regions are disproportionately likely to suffer adverse judgements for reasons beyond their control. It cannot be acceptable that schools will be judged by criteria they have no means of achieving.

During the current recruitment and retention crisis, it is vital that leaders maintain curriculum and teaching quality as well as breadth. The increased focus on the EBacc risks incentivising schools to make curricular choices that cannot be delivered satisfactorily due to system issues beyond their control. This is not in the interests of pupils. The high stakes nature of inspection should not be used to leverage increased EBacc entries.

Overall, any reference to the EBacc as part of inspection is flawed, and runs counter to Ofsted’s strategic aim of providing responsible and appropriately focused inspection.

**ASCL proposes:** Discrete paragraphs and criteria in relation to the EBacc should be removed. If this is deemed impossible, inspectors could report to parents and government regarding EBacc entries and plans in text comments without incorporating flawed judgement criteria into the handbook.

**2. The use of internal data**

ASCL supports the recommendation of the Department for Education workload advisory group that 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. 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. Firstly, it risks putting more emphasis on historic outcomes – the opposite of Ofsted’s ambition. 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. 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. This could make such schools less attractive to sponsors, and have an adverse impact on school improvement.

Fundamentally, there is a tension between the ambition to make inspection more valid and reliable, while potentially ignoring information which could help to achieve this. 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.

We believe the current proposal does not reflect Ofsted’s ambition for inspection to be intelligent.

**ASCL proposes:** Ofsted should amend this proposal to reflect the established evidence-gathering protocol that states that, while inspectors can’t ask for internal data, they will look at the evidence a school provides – including internal data.

**3. The introduction of on-site preparation**

ASCL has become increasingly concerned about the proposed introduction of same-day notice inspections. As with our concerns about the tone of some wording in the handbook (see point 4 below), the move to same-day notice might be interpreted as a sign of mistrust in the profession and risks undermining the professional two-way relationship between the school or college leader and the inspector. Although the activity is called ‘preparation’, the reality for leaders is that, once inspectors are on site, the inspection has started. This move towards, in all but name, no-notice inspections will have a significant impact on the wellbeing of school and college leaders.

We also have practical concerns about this proposal. For example, the proposal is likely to make schools ‘in window’ less open to collaborative work and CPD, due to concerns that such work would risk leaders being off-site during the vital opening phase of an inspection. This would not be in the interests of schools, teachers or pupils. And, in terms of the inspection workforce, the implication that inspection would take up three days for serving school leaders carrying out inspections might dissuade leaders from being inspectors.

Moreover, given that many leaders teach classes and supervise lunch/breaktimes, same-day notice will inevitably lead to disruption for pupils. A central tenet of current practice is that pupils should not be adversely affected by inspection activity. Putting this at risk is not consistent with Ofsted’s intention to deliver responsible inspection.

ASCL does, however, support the longer-term ambition to provide better and more context-driven conversations at the start of inspections. Given that most schools will receive a Section 8 inspection, the move towards a two-day inspection should create the extra time to facilitate this without the need for same-day on-site preparation time.

**ASCL proposes:** The two-day Section 8 and Section 5 inspections provide sufficient time for richer conversations at the start of inspections. The same-day on-site preparation proposal should be dropped.

**4. The tone of the handbook**

Too much of the handbook as it stands is written in language which undermines the integrity and professionalism of leaders. For example, sections referring to ‘off-rolling’, ‘gaming’ and ‘pupils who are not in school during the inspection’ seem predicated on mistrust of school leaders. While ASCL would join Ofsted in unequivocally condemning the small minority of cases where these practices take place, the tonal underpinning of the handbook risks creating an expectation that leaders are widely engaged in these behaviours.

In our view, the language in these sections fosters a climate of suspicion, rather than inspection, and undermines the opportunity to improve the professional working relationship and dialogue between leaders and inspectors.

**ASCL proposes:** Ofsted should review the language of the handbook, and consider in particularly whether the sections on ‘off-rolling’ and ‘gaming’ should be rewritten or removed.

**Conclusion**

We hope the provisional feedback provided here will help leaders to consider their own response to the consultation, and that it will also give Ofsted more time to act on key areas of concern.

ASCL remains committed to engaging with Ofsted to improve the quality of inspection. We support the direction of travel expressed in the revised framework and hope that, if the concerns outlined above are addressed, this will be a significant step towards Ofsted achieving its ambition to provide responsible, focused and intelligent inspection – as part of a much-needed overhaul of the current accountability system in England.

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