

Estyn – listening, learning and changing together

Phase two consultation: Estyn's inspection arrangements from September 2021

This is the second in a series of consultations about how inspection can best support schools and other providers to manage the many changes taking place in education.

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

- in the transition year 2020-2021 we propose to pause our school inspections so that inspectors can work with schools on the curriculum changes. (Phase one)
- in September 2021 we propose to amend our inspection arrangements, to align with the changes to education in Wales. (Phase two)
- before 2024 we will also pilot inspections that focus on validating schools' self-improvement processes. (Phase three)

At each stage we will work with you to shape our plans. During summer 2019 we asked you about what we should do to support schools during the transition year. In this consultation we ask for your views on our inspection arrangements from September 2021.

Context

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

What's in scope?

This consultation relates to the following sectors:

- primary schools, including nursery schools
- secondary schools
- all-age schools
- special schools
- pupils referral units
- independent schools

Non-maintained nursery settings, initial teacher education, Welsh for Adults and local authorities are not included, though the feedback may also inform future inspection arrangements in those sectors.

Further education colleges, Adult Learning and work-based learning providers will have a separate consultation during 2020.

Some aspects of what and how we inspect are legal requirements. Any changes to these aspects would take a little longer and be subject to further consultation.

How to submit your views

There are two ways of completing and submitting your response:

- 1 Complete the online questionnaire at <https://www.estyn.gov.wales/consultation-our-inspection-arrangements-september-2021>
- 2 Print this document and post your response to:

Consultation Officer
 Estyn,
 Anchor Court,
 Keen Road,
 Cardiff
 CF24 5JW

The consultation will launch on 4 October 2019 and will close on 2 December 2019. Please make sure all postal responses arrive at Estyn by this date.

Confidentiality

The information you provide will be held by us and individual responses will not be shared with anybody outside Estyn. The information will be used to help improve how we inspect education and training in Wales. If you disclose your identity, it will be treated in confidence.

Key information about you

Please choose one option below which best describes the capacity in which you are completing this questionnaire.

Learner <input type="checkbox"/>	Parent/carer <input type="checkbox"/>	Education professional <input checked="" type="checkbox"/>	Member of the public <input type="checkbox"/>	Other(please specify)
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Which sector are you most interested in? (Please select one option).

Non-maintained nursery settings	<input type="checkbox"/>	Pupil referral units	<input type="checkbox"/>
Primary schools	<input type="checkbox"/>	Special schools	<input checked="" type="checkbox"/>
Secondary schools	<input type="checkbox"/>	Independent special schools and colleges	<input checked="" type="checkbox"/>
All-age schools	<input type="checkbox"/>	Local government education services and regional consortia	<input type="checkbox"/>

Independent schools	<input type="checkbox"/>	Other (please specify): Post 16	<input checked="" type="checkbox"/>
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Part 1: Estyn's common inspection framework

The common inspection framework tells everyone what we look at on an inspection. Currently, there are five broad inspection areas (IAs). Presently, inspectors evaluate each area separately, and report their findings along with a summative grading.

More information about our common inspection framework can be found on our website: <http://www.estyn.gov.wales/inspection/inspection-explained/common-inspection-framework>

Q1: How important is it that we continue to inspect each of these areas?

	Very important	Important	Not very important	Not at all important	Unsure
Inspection area 1: Standards Pupils' standards, the progress they make and how well they develop their skills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspection area 2: Wellbeing and attitudes to learning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspection area 3: Teaching and learning experiences The quality of teaching, the curriculum and the provision for pupils to develop their skills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspection area 4: Care, support and guidance Support for pupils, including those with special educational needs and those who may be vulnerable to underachievement;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

personal development, spiritual, moral and cultural development; the school's arrangements for safeguarding					
Inspection area 5: Leadership and management The quality of leadership and management; improving the quality of the provision; professional learning and the use of resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please use the box below to provide suggestions on:

- 1) any areas we should prioritise more on our inspections
- 2) or areas we need to place less emphasis on than we do currently.

We agree that all these inspection areas are important. However, within this, it is important that measures and criteria within them accommodate appropriate flexibility to allow purposeful application to specific sectors.

For example, with reference to Inspection Area 1, Wales has no shared processes and metrics for benchmarking and progress measuring of learners with autism, learning difficulties and disabilities at pre-entry levels. This inevitably problematises the measuring of standards and validity of comparisons across and within the sector. We offer that a focus on 'what matters most to learners' and a reduced emphasis on performance or qualification data, which is not always relevant for all learners with learning difficulties and/or disabilities would enhance education and training outcomes for this group of learners.

It is also the case that the often very specific and high needs of learners results in comparable challenges in the assessment of approaches to teaching and learning and the delivery of essential skills. For example, for young people with autism, learning difficulties and disabilities, specific reference to consideration of the outcomes and the impact of teaching and learning would be most relevant. This could include a range of meaningful destinations and outcomes that where appropriate, relate to independence and personal growth and not just to further/higher education or employment.

Of note, specific reference to pupils special educational needs should arguably not just be in Inspection area 4, but integral in all Inspection Areas.

It is important that common Inspection arrangements do not detract providers from quality improvement activities to the production of evidence solely for inspections that is of limited relevance to the work they are commissioned to do.

Part 2: Summative gradings

We currently use the following summative gradings and descriptions in our reports to describe aspects of providers' work.

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

We are proposing to stop giving summative gradings for each inspection area of a school and PRU's work from September 2021. Instead, we would write our evaluations and judgements of each inspection area of the framework in the narrative within the report. We think that this will help schools and PRUs to focus on the messages in the report rather than on summative gradings. This will help the school and PRU to learn from the inspection and to plan its improvement. We have trialled this approach in our inspections of local government education services, and feel that it works well.

We will continue to provide a summary identifying the school/PRU's strengths and priorities for improvement.

We will also continue to make it clear in an inspection report when a school requires significant improvement or special measures which are statutory levels of follow-up, prescribed in legislation.

Q2: To what extent do you agree with our proposal to stop using summative gradings for each inspection area?

Strongly agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Disagree <input checked="" type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Unsure/no opinion <input type="checkbox"/>
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Please use the box below to give us your opinions and state the reason(s) why you chose the option above:

While we can see the relevance here in general terms in relation to Schools and PRUs, we have disagreed fearing a danger of information on quality of provision for children and young people with autism, learning difficulties and disabilities being 'buried' by the dropping summative judgments.

As ALN transformation in Wales progresses it is crucial that children, young people and parents/carers are able to access accurate and transparent information on the quality of providers. Moreover, that there is equity and transparency in the rigour by which provision for comparable groups is inspected. E.g. Post-16 education and training for young people with autism, learning difficulties and disabilities across general and specialist further education colleges.

A lack of independent advice and guidance for children, young people and their parents and carers is a very real and likely consequence of Welsh ALN transformation. Hence, accessible information on Estyn's judgments on the quality of providers is likely to play an increasingly important role in supporting understanding for stakeholders outside of the education sector.

Additionally, there is a danger that by removing the judgements;

- providers will not be sufficiently held to account for meeting their statutory duties;
- learners, their families and commissioners will have inadequate information to support them in making informed decisions about post-16 options or comparing the quality of provision;
- of less information being published overall (and less specific detail) on providers' ability to meet the needs of young people with autism, learning difficulties and disabilities
- references to specific quality issues relating to young people with high being lost within an Estyn report, and of being minimal in reports for larger settings, even though actual numbers of such learners could be relatively high ;
- it may be more difficult for providers to improve their provision in response to inspection findings.

Part 3: Follow-up activity in maintained schools

During an inspection, inspectors consider whether the school needs any follow-up activity. Significant improvement and special measures are statutory levels of follow-up, prescribed in legislation. These levels of follow-up will remain.

Estyn review is a non-statutory level of follow-up. Inspectors check on the progress of schools in Estyn review through a desk-based review, and may visit the provider to check progress a year or so after the inspection.

We are considering whether we still require Estyn review. Currently Estyn review is for schools where inspectors have concerns about aspects of the school/PRU's work, but those concerns are not serious. Removing it could enable inspectors to focus their follow-up work on schools causing the most concern and are in the statutory category of significant improvement or special measures.

Q3: Should we remove Estyn review?

Yes <input type="checkbox"/>	No <input type="checkbox"/>	Unsure / no opinion <input checked="" type="checkbox"/>
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If you wish to provide any further comments or suggestions about this proposal, please use the comments box below:

While we recognise limitations on resources, it is important that those Education Providers who can benefit from Estyn's work through the Review processes can continue to do so in a timely manner. There is a danger of false economy as removing resource from the 'Estyn Review' level will lead to an increase in those requiring support for significant improvement or being in special measures.

Part 4: Inspecting A level/vocational learning in school sixth forms

Since 2017 we have strengthened how we report on school sixth forms. Currently we write about the sixth form across all inspection areas but this information is not collated into an overall summary of the sixth form. We would like to report on sixth-form standards and provision separately to the main report so that our evaluations are clearer to the reader.

Q4: Should we have a separate section in secondary school inspection reports to capture standards and provision in the sixth form?

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Unsure/ no opinion <input type="checkbox"/>
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If you wish to provide any further comments or suggestions about this proposal please use the comments box below:

We believe that this would be a very positive move and that it is important that the education and training needs of young people are differentiated from those of children.

We believe it is essential to inspect sixth forms separately, firstly to ensure that post-16 education and training is inspected comprehensively and on an equal basis to colleges, secondly to ensure that the process of inspection takes into account the differences required in teaching and learning with older teenagers/adults and focuses more on the relevant outcomes and destinations of this cohort.

It will furthermore ensure that young people, parents and carers can access impartial information about their options and be able to make comparisons between post-16 providers.

Part 5: Notice period

We give providers notice of an inspection. This is because we give parents, pupils, staff and governors time to complete pre-inspection questionnaires. In addition, we allow time for the Reporting Inspector to contact the provider and plan the inspection activities.

In our consultation in readiness for the changes in 2017, many respondents favoured reducing the notice period. As a result, since 2017, providers across most sectors have 15 working days' notice before a core inspection. We no longer inform providers of an autumn inspection before the six-week summer holidays.

We are proposing to reduce the notice period to 10 working days. This will still give parents, pupils, staff and governors time to complete pre-inspection questionnaires and also reduce the waiting time for schools and PRUs from notification to the start of the inspection.

Q5: We are proposing to reduce the notice period to 10 working days from September 2021. To what extent do you agree with this proposal?

Strongly agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Unsure/no opinion <input checked="" type="checkbox"/>
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If you wish to provide any further comments or suggestions about this proposal please use the comments box below:

As we are unclear on the ramifications of this move for schools and PRUs our response is neutral.

Part 6: General comments

We are committed to improving the way we work and are interested in your views on how we can carry out our work more effectively.

Q6a: Please use the box below to provide feedback on any other aspects of Estyn's inspection arrangements.

Following Special Education Needs and Disability (SEND) reform in England, we believe that ALN Transformation in Wales has the potential to have a similarly negative impact on education and training for young people with autism, learning difficulties and disabilities.

We await the publication of the final ALN code having been disappointed by the lack of reference within its Draft, to the quality of education and training provision for young people with complex needs.

We welcome the opportunity to feed feedback here and within any future consultations on what Estyn's role will be as ALN transformation is implemented.

As outlined above, we believe that future parity of inspection arrangements for young people with autism, learning difficulties and disabilities accessing Post-16 education will provide young people, their parents and carers with accurate and accessible information.

Other quality related matters for young people with autism, learning difficulties and disabilities are:

- (i) ***Individual Development Plan (IDP) outcomes and Local Authority processes for ending them; i.e the extent to which they are appropriately 'person' and not 'Local Authority'-centred. We are concerned that in situations where FEIs cannot meet individuals' ALN, Local Authorities may be pressured to cease IDPs on false or ill-informed premises resulting in young people with learning difficulties and disabilities being denied further education by the nature of their disabilities.***

- (ii) **Baseline assessments of education & training needs;** *i.e. that they are appropriate for young adults and not reliant on accredited learning outcomes. That benchmarking and progress recording mechanisms are transparent and supportive of individuals' education and training needs.*
- (iii) **Expectations of Post-16 education and training;** *i.e parity of opportunity across Wales. Particularly for young people with autism, learning difficulties and disabilities.*

Q6b: We would like to know your views on the effects that the proposals in this consultation 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?

Supporting comments

Don't know

Additional information

If you are responding on behalf of an organisation, please use the box below to state the name of the organisation.

Natspec

If you are happy for Estyn to contact you again in relation to your comments please provide your contact details below.

Kirsten Jones
Vice Principal for Coleg Elidyr & Natspec Wales Policy Director
Coleg Elidyr
Rhandirmwyn
Llandovery
Carmarthenshire
SA200NL

In spring 2020, we will be establishing a 'virtual parent/carers' panel'. The panel will enable parents/carers' to share their experiences and influence decisions to help shape the way forward for Estyn.

If you are interested in being part of this forum, please email us at:

NIA21@estyn.gov.uk

Thank you for taking part in our consultation. We will use the information we receive to develop our inspection work. The new inspection arrangements will start in September 2021.

If you have any questions regarding the consultation, please email us at:

consultation@estyn.gov.wales