



Sir Martyn Oliver
His Majesty's Chief Inspector
Office for Standards in Education, Children's Services and Skills
By Email

31 May 2024

Dear Sir Martyn,

Reading Borough Council's representation to Ofsted's Big Listen.

Introduction and context

Ruth's loss continues to be felt deeply by the Reading school community. Following Ruth's untimely death, we have taken a number of steps to better understand and respond to what impacts on headteachers' wellbeing, to support their positive wellbeing and to develop our collective action in response to Ofsted inspection. This learning has informed our submission to you as set out below.

This representation is on behalf of Reading Borough Council but is also informed by the views of our local school leader community, who have been so deeply effected by Ruth's loss, and are all passionate advocates wanting to see change for a fairer, inclusive better system, that genuinely improves education for all children.

It is important that our local Headteachers are being given the opportunity to contribute directly to the Big Listen. In addition to the representations here, I would also invite you to meet with me and local school leaders to hear more about our local experience, and potential ways forward, some of which are included below.

We have set out our response as much as we can against the questions in the Big Listen consultation, however we believe that the Big Listen is missing the Big Questions. We would not want the Big Listen to miss important opportunities to consider bolder, more fundamental change, which we believe would lead to meaningful improvements for families, schools and society as a whole. The House of Commons Education Committee on Ofsted's work with schools: First Report of Session 2023–24 highlights important areas of improvement and we would encourage Ofsted to publish a response to the recommendations set out in this report, as part of the Big listen response.

We also recommend that Ofsted should look closely at the Caversham Primary School (November 23) inspection evidence considered, and the conduct of the Caversham Primary School inspection, to inform the outcomes of the Big Listen.

We agree with your statement in the Big Listen questions that “Inspection should not be a process to ‘get through’ – the point of inspection is to raise standards and improve lives.” However, the evidence that inspection achieves this aim, or that the questions asked in the Big Listen will help us achieve this aim, is not clearly set out. It would be helpful as part of the Big Listen response, that Ofsted sets out why they believe the chosen model of inspection is the best way to raise standards and improve lives, the evidence for this, and how it achieves these aims.

One word judgements

The Big Listen does not ask questions regarding one-word judgements. This is a critical issue which the Big Listen should address.

We do not believe that one-word judgements adequately describe the quality of a school to parents and communities. We believe one-word judgements should be abolished. We recommend that they are replaced with a dashboard approach, with an appropriate focus on inclusion, which we outline further in our response below.

Judgements should add value by capturing the unique quality and value which each school has in its community. Ofsted Inspectors should be freer to use broader descriptions, rather than replacing one-word judgements with any new standard phrases which could repeat the mistakes of over-simplification, be misinterpreted or reduced.

Alongside the problematic nature of one-word judgements, limiting judgements are a blunt instrument and should be abolished. The experience at Caversham Primary illustrates that a school can be a high-quality school, a joy to attend for its pupils, and be subject to a disproportionate final Ofsted judgement based on a specific, discrete, fixable set of issues. Limiting judgements are even more punitive being attached as they are to one-word final unfavourable Ofsted inspection judgements and critical decisions regarding the long-term future of schools and school leaders through the forced academisation process. This creates an impossible high stakes and personal accountability culture which is a root cause of so much distress for so many school leaders. We have seen no evidence that forced academisation leads to the stated Ofsted objectives of raising standards and improving lives. Therefore, the forced academisation process as a result of an unfavourable Ofsted outcome should also be abolished.

Timeliness of publication

The Big Listen does not ask directly regarding timeliness of Ofsted inspection report publication. Ofsted should strive to publish reports in a more timely fashion without long delays over holiday periods. We recommend that Ofsted take a flexible approach and publish swiftly, and consult and agree the timetable with individual schools and settings.

Ofsted Complaints and Appeals Policy

We recommend that the Ofsted complaints and appeals policy should be clarified and opened up to scrutiny. Consideration should be given to having clearer and more transparent processes for raising concerns about both the judgement and/or the conduct of the inspection team. There are ways to do this that could include peer review by experienced headteachers.

Partnership working with Local Authorities

The Big Listen is silent on the role of the Local Authority regarding school inspections. Our experience is that Ofsted are sometimes unclear on the role of the Local Authority and that there are missed opportunities in the current framework to enhance the understanding of inspectors with the local context and view of the Local Authority. A stronger and clearer link should be articulated within the Education Inspection Framework to set out how the Local Authority can support schools in sharing local context and insight with inspectors; and how regular, formal dialogue with the Local Authority helps improve lives and raise standards. We have developed a local area based model of risk assessment and contextual analysis which could helpfully inform Ofsted's approach and we would be keen to share and discuss further.

Our response informed by the Big Listen Questions is summarised below.

What Ofsted's priorities should be when reporting on outcomes, and why, and what can be improved

Related to the abolition of one-word judgements, we recommend a Belonging and Inclusion Dashboard is adopted to assist Ofsted to report on outcomes for children. The Dashboard should support and challenge schools to demonstrate how well they do for the children in most need, and how engaged the most vulnerable and disadvantaged children are in their school. Belonging, presence and inclusion should be reflected and rewarded when reporting outcomes.

The Ofsted stated intent of removing a focus on curriculum could prejudice schools with contextual challenge. The framework does not currently do enough to consider and recognise contextual challenges, which for areas outside of the better-funded areas such as London and the Opportunity Areas mean schools are not recognised for the quality of education provided with reference to the complexity of their local context. We recommend a more strength-based approach, building on school self-evaluations and with more weighting to local intelligence and contextual information. This could help Ofsted inspectors, who after all have limited time and engagement with schools, to secure the most informed view.

We do not agree that the length of time between notifying schools and settings of an inspection and carrying out the inspection should be "short."

Headteachers knowing that they are in the Ofsted 'window' creates significant additional stress and anxiety for a relatively long period of time. We recommend that frequency and scheduling of inspections needs further consideration and that all Ofsted inspections should be planned and announced. Timing and frequency could be informed by constructive dialogue with local

authorities who have the overall responsibility for promoting high standards in schools in their area.

The Big Listen asks about how important it is that inspections make clear what a school does to support children with SEND and make it clear how well the most disadvantaged pupils learn, achieve, and are supported. It is positive to see these factors recognised as important, but it is even more important for Ofsted to set out *how* it judges these areas, not just recognising them. The context and lived experience of pupils should always be taken into consideration and form part of the evidence base.

It is troubling that one question in the Big Listen asks **if there is an unintended consequence of the inspection process in that it may result in schools keeping pupils in the classroom who may put other pupils at risk and who may benefit from offsite provision, or may “require suspension or even exclusion.”** This question does not model inclusive ethos and values. Moreover the inspection process should be a positive learning experience, which recognises and celebrates inclusive practice, which we know promotes standards and improved outcomes for all pupils.

Changes proposed Safeguarding review

We support the proposal to withhold finalising inspection judgements for three months, where safeguarding has been identified with areas for improvement, to allow schools to fix the identified issues. This is the right first step.

We believe a bolder approach to safeguarding review is required. Consideration should be given as to whether school inspectors should be carrying out safeguarding judgements as part of the school inspection at all. Our experience with Caversham Primary School is that inspections were 12 years apart and did not provide a consistent view on safeguarding. Ofsted inspectors may not be best placed to provide an experienced, informed and proportionate assessment of safeguarding culture and practice on infrequent limited (in terms of time) visits. We recommend that a methodology for regular assurance on the issue of safeguarding in schools be developed in partnership with Local Authorities, who hold the wider safeguarding responsibility.

We have developed our own annual assessment model which we would be keen to share as one such model that could be applied.

The Education Committee have the following to say on this matter, referencing the Coroners Inquest concerns about the policy of judging a school ‘inadequate’ solely due to safeguarding:145 *Conducting more regular safeguarding audits should also help to reduce the number of schools to which this applies. However, it should never be the case that schools in this situation are judged as ‘inadequate’, and receive an academy order, solely due to minor administrative errors capable of being resolved within a short space of time. 146. The Department should consult on the best approach to increasing the regularity of safeguarding inspections through a less intensive compliance audit. In doing so, it should look at whether this should be done by local authorities or by a separate, independent body, and make the case for the appropriate resource to be provided. In its routine inspections of schools, Ofsted should continue to inspect how well schools respond to serious safeguarding issues and how effectively children are protected in practice.*

Pause Policy

The now-adopted Ofsted policy on pauses is the right first step. The policy should be enhanced to allow inspections to be paused for longer periods where it is clear that either some administrative work could easily be carried out to rectify a problem or where a school staff member is distressed. The length of a pause should be mutually agreed between school leaders and Ofsted inspectors.

We welcome the opportunity to participate in a meaningful debate on how we improve standards and lives through our accountability system, which has had and continues to have such a significant, particular and personal impact on our local schools and wider community.

Yours Sincerely

Lara Patel

A handwritten signature in blue ink that reads "Lara Patel". The signature is stylized with a large, sweeping flourish at the end.

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