

# Northern Ireland Assembly Committee for Education – Inquiry into the Education and Training Inspectorate and the School Improvement Process

## Further comments from ParentsOutLoud

### Introduction

The comments below were compiled in response to a request by the Committee to forward information, obtained by us through Freedom of Information requests, from ETI, Ofsted and Education Scotland, and to provide the Committee with an analysis of that information.

Our analysis is below. However, as we undertake our work for ParentsOutLoud in an entirely voluntary and spare-time capacity, we cannot guarantee that the analysis is entirely comprehensive, and we would urge the Committee to study the responses provided by the three bodies, in addition to considering our comments below.

We would also like to highlight some evidence of the positive potential which external evaluation – when combined with self-evaluation – can have on the overall standards of a school’s provision. There is recent research evidence that **schools in England which are judged by Ofsted to be in need of improvement do subsequently improve, although the change may take a few years.**<sup>1</sup> There is also recent research evidence that **schools in England judged to be ‘satisfactory’ were more likely to improve if they had follow-up inspections than if they were not followed up.**<sup>2</sup>

We also believe that **Ofsted has been instrumental in helping to create a climate in which many schools judged to be ‘good’ are very anxious to further improve to become ‘outstanding’**. Indeed, the CfBT Education Trust has produced a report which demonstrates how schools are doing this.<sup>3</sup> At Appendix 1 and as an example of this ethos, we enclose a copy of a recent letter to parents from an Oxford secondary school which had just been rated ‘good’, and which explained to parents how it was immediately embarking on efforts to make the school ‘outstanding’ by addressing issues highlighted by Ofsted.

---

<sup>1</sup> Allen, R. and Burgess, S. (2012) “How should we treat under-performing schools? A regression discontinuity analysis of school inspections in England.” Working paper. Available at: <http://www.bristol.ac.uk/cmpo/publications/papers/2012/wp287.pdf>

<sup>2</sup> Preliminary results from one part of the European Inspection Project. See: <http://schoolinspections.eu/preliminary-results-from-the-head-teacher-survey/>

<sup>3</sup> Dougill, P. et al. (2011) *To the next level: good schools become outstanding*. CfBT Trust. Available at: <http://cdn.cfbt.com/~media/cfbtcorporate/files/research/2011/r-to-the-next-level-good-schools-become-outstanding-2011.pdf>

## Accessibility of information

ETI's procedures for informing parents of a forthcoming inspection appear to be similar to those of Ofsted and Education Scotland, although Ofsted requires that all schools provide certain information about the inspections system on the school's website at all times.

**Unlike Ofsted, ETI does not require schools in Northern Ireland to publish a link to a copy of their most recent inspection report on the school's website.** (It is also not required in Scotland, but is considered good practice). As per our previous submission, **we believe this should be mandatory.**

Schools in Northern Ireland and Scotland are required to inform parents, once an inspection report is published, how that report can be accessed. **Ofsted requires schools to provide all parents with a copy of the report within five working days of the receipt of that report. We consider Ofsted's practice in this regard to be desirable, if feasible, as it would encourage schools which have achieved less than an 'oustanding' rating to outline to parents how they plan to improve, and, where some concerns have been raised by the inspection report, to outline to parents how they intend to address those particular issues** (as in the example in Appendix 1). It also enables parents to appreciate the strengths of a school, whatever rating is achieved. However, we consider ETI's current practice to be acceptable.

## Criteria used to assess schools/inspection type

### Framework for inspections

ETI has confirmed that the document *Together Towards Improvement* is its framework for inspections. While this is published on its website, the document's subtitle and introduction both state that it provides guidance for schools on self-evaluation. While we feel that the guidance for self-evaluation is valuable, and must be retained and disseminated to both schools and parents, we remain of the view that ETI must publish a separate document which sets out the criteria for school inspections, which is clearly labelled as such, and which can easily be found by parents seeking such information. We believe that Ofsted represents best practice in this regard, as per our previous submission.

However, we are impressed by the self-evaluation guidance produced by Education Scotland, *How Good is our School?*<sup>4</sup> As this contains helpful examples of good and poor practice for each quality indicator, we feel its content would probably be of more value to most schools than *Together Towards Improvement*. It is also more attractively presented which may help motivate schools to practice self-evaluation.

---

<sup>4</sup> Available at: [http://www.educationscotland.gov.uk/Images/HowgoodisourschoolJtEpart3\\_tcm4-684258.pdf](http://www.educationscotland.gov.uk/Images/HowgoodisourschoolJtEpart3_tcm4-684258.pdf)

## Full primary school inspections

**We would ask the Committee to note ETI's response to Q6 'Does ETI carry out any full, standard inspections (as opposed to focused inspections) of primary schools?' As the Committee will see, ETI does not answer 'yes' to this question. In short, the answer would appear to be 'no'.** This is quite contrary to the practice of Ofsted and Education for Scotland. We are especially concerned at the following extract from its response to this question:

The focused inspection (typically five days) of primary schools and a short inspection (typically two days) conducted in small primary schools or in those deemed to be low risk have been replaced since September 2013. There is just one approach to primary school inspection with the differentiation being between low risk/small schools (2 days) and higher risk/larger schools (5 days).

**We are concerned that this may amount to a 'rebranding' of what were previously short and focused inspections, without actually ensuring that full inspections take place.** We carried out an analysis of 10 short inspection reports published in 2013 (taking the first 10 listed alphabetically on ETI's website). We found that, **while they covered the same areas as the focused reports, they were only about half the length.** Moreover, there were no comments on the specific quality of teaching in literacy, numeracy and ICT in any of the short reports. Indeed, **in eight of the ten short reports, no more than four to six lines of print was devoted to overall teaching quality.**

We accept that a larger school will take longer to inspect than a smaller school. However, the resulting report should be consistent in the level of detail and analysis.

**We would also ask how schools are deemed 'low risk' or 'high risk'.** At present, there is no transparency surrounding this definition. Many primary schools have not been properly inspected for many years. In those instances, we fail to see how ETI could determine whether a school is 'low risk' or 'high risk'. Moreover, we do not believe that it is sufficient for ETI to rely a school's results and the views of the District Inspector in making this assessment. A school might be proficient at ensuring that its pupils perform in standardised tests, but still have poor quality teaching e.g. teaching which fails to really engage pupils. Moreover, we do not believe that one person, making occasional visits to a school, can properly assess the effectiveness of that school on an ongoing basis.

## Inspection of specific subjects and the development of skills at primary level

All three inspection bodies were asked whether they inspected the quality of provision with regard to a number of specific curriculum areas and areas of communication during full primary school inspections (or focused primary school inspections in the case of ETI). Only Education Scotland gave an unequivocal 'yes' in respect of any of the areas we listed. This was with regard to play-based learning in P1 and 2. ETI states:

The provision for numeracy and literacy is evaluated on all primary school inspections. Other areas of the curriculum are evaluated as a matter of course through observation of lessons.

As it did not answer 'yes, we take this to mean that the teaching of other areas of the curriculum are inspected if a teacher happens to be covering that area of the curriculum while the inspection is

taking place. With the exception of Education Scotland on play-based learning, we do not think the responses of the other inspection bodies are any more satisfactory in this regard. **We believe it is vital that the delivery of the full breadth of the curriculum is assessed at primary level. We are especially concerned that the delivery of science, physical education and the development of key generic skills (e.g. ability to work in group, research skills, creativity) should be assessed.**

### **Inspection of parental and student communication at primary and post-primary level**

We are heartened that ETI states

**All inspections include an evaluation of the extent to which children are consulted about the ongoing development of the school..**

**However, we would like the results of that analysis to be reflected in all inspection reports.** We are less satisfied with ETI's response with regard to the assessment of a school's communication with parents. **We believe that ETI should have a similar commitment to that given by Ofsted:**

**Inspectors must consider how effectively the school engages with and promotes the confidence of parents, including how well the school gathers, understands and responds to the views of parents.**

**The results of that analysis should be included in all inspection reports.**

### **Post-primary inspections**

**We were confused by inconsistencies in the information which ETI sent us with regard to post-primary inspections.** Firstly, at one point it stated that post-primary inspections generally took 3 days (Q18) , whereas, elsewhere, it stated that they generally took 5 days (Q22). Moreover, at one point in its response, ETI stated post-primary inspections were 'tailored to a school's priorities for improvement' and that a 'range of subjects' is investigated during post-primary inspections (Q14) while, elsewhere, it stated that a 'whole school approach' is now taken (Q22), and that all or most teachers are observed (Q20).

**We believe that ETI needs to be questioned more closely on the extent to which it is assessing the delivery of all areas of the curriculum when it inspects post-primary schools.** However, we note that neither Ofsted nor Education Scotland assess the delivery of the full range of the curriculum either.

**Only Education Scotland stated that its post-primary inspections always assessed the quality and quantity of physical education provision. We believe that ETI must do likewise, given the prevalence of child obesity and overweight.**

We believe that the delivery of all key areas of the curriculum should be properly assessed. **We are particularly concerned that the provision (including teaching quality) of science, ICT, Design and Technology, careers advice, and the development of skills relevant to employment and business should be assessed at post-primary level in all inspections.** This is especially important in the light

of continual complaints from employers about the lack of sufficient relevance of the school curriculum to the needs of employers and business, and in the light of the fast-changing nature of our increasingly technology-driven world.

## **Input to inspections by parents and pupils**

### **Input by parents**

ETI has now published on its website (as of 4<sup>th</sup> December 2013), a copy of a sample parental questionnaire. This is a very welcome development. We believe that the sample questionnaire is very good, although we remain unclear from ETI's response why this is labelled 'sample', and whether this does represent the questionnaire which is used.

Education Scotland appears to provide a copy of the questionnaire to each parent. **While we think ETI's questions in its sample questionnaire are better (being slightly more comprehensive), we think the positive and informative style of the covering letter which is issued to parents by Education Scotland is one which should be emulated by ETI**, especially in the light of recent poor parental response rates to surveys.<sup>5</sup> If ETI is only achieving low parental response rates, then we think it should issue a similar hard copy letter and questionnaire to all parents. We further believe the results of this survey should be published as part of the inspection report.

In our submission, we emphasised that parents often feel daunted at the idea of approaching the principal, Board of Governors (and/or Education Board) with concerns. We would like to make a new proposal in this regard, further to our previous submission. **Where a concern is serious and a parent feels they cannot approach the school, or where the parent has approached the school to no avail, we believe that parents should be able to contact the relevant District Inspector direct about their concerns, without having to make a formal complaint to the relevant Education Board or be identified to the school, if they are concerned about the consequences of being identified.**

Where the concern is serious but non-urgent, the District Inspector should follow up on the matter on his/her next visit to the school and report back on the outcome of his/her own inspection of the issue. He/she should seek to make his/her own assessment with regard to the concern raised, rather than simply relying on what the school states it is or is not doing. **Where parents remain dissatisfied with the response of a District Inspector, we believe that parents should be able to contact ETI direct. Ideally, however, we would still like all parents to be able to contact ETI direct with serious concerns if, for any reason, they are unhappy about pursuing other avenues.**

---

<sup>5</sup> See: [http://www.educationscotland.gov.uk/Images/ParentQuestionnairePrimary\\_tcm4-684853.pdf](http://www.educationscotland.gov.uk/Images/ParentQuestionnairePrimary_tcm4-684853.pdf)

## Input by pupils

We welcome the fact that ETI speaks to a random selection of pupils and not those simply selected by the school. However, we would like ETI to incorporate the following good practice from the other bodies:

- Ensuring the full range of different types of pupil are spoken to (Ofsted)
- Issuing a pre-inspection questionnaire for pupils (Education Scotland)
- Speaking to a larger number of primary pupils than ETI does currently at primary level (Education Scotland, although this depends on the size of the school)
- Speaking to a number of focus groups of post-primary pupils (Education Scotland)

## Inspection resources

Table 1 overleaf provides a comparative analysis of the expenditure by ETI, Ofsted and Education Scotland on school inspections in a recent 12 month period. We believe that ETI should improve its financial reporting system so that it knows how much is being spent on each type of inspection in any given year. We note that there are significant differences between Ofsted and Education Scotland in terms of the average expenditure on full primary and post-primary inspections. This may be accounted for, to some extent, by the fact that Education Scotland's inspections *appear* to be wider-ranging and more intensive than Ofsted's.

Table 2 overleaf provides a comparative analysis of the number of primary and post-primary school inspectors which work for each body, and the ratio of staff inspectors to full school inspections. It should be noted that media reports state that Ofsted contracts out its school inspections to three private companies. It is not clear from Ofsted's response to our questions whether its staff inspector figures include inspectors working for these companies. However, although the figures in Table 2 suggest that Ofsted makes far more efficient use of its inspectors, we would have some concerns about the use of private companies for school inspections. There have been well-publicised complaints about the quality and experience of some of the inspectors employed by these companies. Whether justified or not, the apparent 'privatisation' of school inspections in England does seem to have intensified hostility against Ofsted.

What concerns us about the figures in Table 2 is that **it would *appear* that each staff inspector in both ETI and Education Scotland is only carrying out a very small number of full school inspections in any one year. This obviously raises two issues – whether resources are being managed as efficiently as they might be, and whether staff inspectors are gaining sufficient ongoing experience of full inspections to ensure that their work is fair and well-informed.** One might argue that the Ofsted inspector who carries out 27 full inspections in one year will have much more relevant experience and a much better overview than one who is carrying out only three full inspections a year.

**Table 1: comparative annual expenditure and performance of inspection bodies (2011/12 for Ofsted, and 2012-13 for ETI, and 2013 for ETI's full inspection figures\*)**

Body/school sector	Total expenditure (£)	Total number of full inspections (as % of all that type of school)	Average expenditure per inspection (£)	% of budget spent on delivering services
<b>ETI</b>	<b>5,747,793</b>			<b>100%</b>
Primary schools full inspections	Not provided	66 (8%)	Unable to calculate	n/a
Post-primary school full inspections	Not provided	32 (15%)	Unable to calculate	n/a
<b>Ofsted</b>	<b>178,754,000</b>			<b>73%</b>
Primary school full inspections	30,274,230	4,530 (27%)	6,683	n/a
Post-primary schools full inspections	10,368,742	901 (26%)	11,508	n/a
<b>Education Scotland</b>	<b>29,795,000</b>			<b>73%</b>
Primary schools	1,649,000	101 (5%)	16,327	n/a
Post-primary and all-through schools	728,000	31 (9%)	23,484	n/a

\*ETI did supply figures for the number of full post-primary inspections for 2012-13. However, its figure for primary school inspections appeared to include short inspections. Therefore, we used our own figures which covered 2013. Some of the information relating to Ofsted is from its 2011/12 Annual Report.

**Table 2: Inspection personnel resources**

Inspection body	No of primary & post-primary school staff inspectors	Approx ratio of primary/post-primary staff inspectors to annual no of primary/post-primary full inspections	No of freelance & sub-contracted inspectors
<b>ETI</b>	37	1:3	None*
<b>Ofsted</b>	200	1:27	1
<b>Education Scotland</b>	47	1:3	139*

\*Most of the 'freelance' inspectors used by Education Scotland are head teachers and other professionals who join 2-3 inspections annually. While ETI told us that it employs no freelances, it refers elsewhere to Associate Assessors and we assume that they may have a similar role to the professionals used by Education Scotland.

It must be borne in mind that ETI has also been deploying inspectors for short inspections, inspections focused on very specific areas, and follow-up inspections. This is also true of Ofsted, however, as its inspectors also carry out follow-up monitoring visits and inspections focused on

specific subjects. Therefore, **it is not immediately obvious why the ratio of staff inspectors to full primary/post-primary inspections is so small in the case of either ETI or Education Scotland. We believe that this is an issue which the Committee should pursue.**

We also asked each body about the personnel resources which they deploy for each school inspection. Ofsted was unable to answer the question in the terms in which we put it. However, it is clear that a comparison could be made if the Committee was able to question it further on this issue. It would appear that the resources deployed by ETI for individual inspections compare well with Education Scotland in terms of the ratios of inspector to size of school, although ETI and Education Scotland presented this information in different ways. We now appreciate that we should have asked about the number of 'inspector days' rather than inspectors for different school sizes. Again, this is an issue which the Committee may wish to pursue.

We should emphasise that **we believe that ETI must be allocated sufficient resources, including personnel resources, to enable all schools to be fully inspected on a regular and reasonably frequent basis.**

**We are very satisfied with the extent to which teaching is observed at both primary and post-primary level by ETI during full (or closest to full) inspections** i.e. that:

- All teachers are normally observed twice during primary inspections
- All teachers are normally observed at least once and often more frequently at smaller and medium-sized post-primary schools
- Most teachers are observed at least once at larger post-primary schools

**We would urge the Committee to ensure that ETI's current budget cuts and its planned increased frequency of inspections do not result in a reduction in the extent and depth of teacher/teaching observation.**

This level of teacher observation compares well with that outlined by Education Scotland. The Committee will note that Ofsted's response on this issue completely lacks any transparency. We believe that ETI's approach to the observation of teachers and teaching is very satisfactory, and should be maintained. Teachers can vary widely in their levels of skill, and it is vital that as many as possible are observed directly.

## **Length between inspections**

We are concerned that **ETI was unable to verify the data on the length between the publication of full inspection reports relating to certain Belfast schools which we presented to the Committee**, referring us simply to the website search facility, the accuracy of which we had queried in the first place. (We still await a response from ETI to a similar request with regard to the data we presented on inspection reports relating to schools in the Omagh area). We believe it is essential that ETI has a robust database which enables it to determine the inspection history of all schools.



We think that **ETI's practice and policy on inspection frequency**, as detailed in its response to us and in the Chief Inspector's response to BBC Evening Extra, and as illustrated in our own research, **falls far short of acceptable practice. In particular, its new 'risk-based' approach lacks transparency.** We appreciate that a similar policy is pursued by Education Scotland, and are unconvinced by Education Scotland's 'sampling' model which could leave schools going for many years without an inspection. We note that the ETI Chief Inspector promised, in her BBC interview, that all schools would be receiving an 'intervention' every three years by 2016. However, an 'intervention' may mean an event which is much less than a full inspection.

We still believe that the former Ofsted approach remains the best one i.e. a full inspection of each school every three years. While we would support the close and more frequent monitoring of schools which only achieve satisfactory or less, as practised now by Ofsted, we do not believe that it is sufficient to inspect 'good' schools only once every five years, and 'outstanding' schools potentially even less frequently, as Ofsted now appears to do.

We reiterate that schools can change significantly over the course of a few years, and that we now live in a technology-driven world where the needs of employers and society are changing at an ever faster rate. Moreover, parents need up-to-date, objective information about the quality, strengths and weaknesses of schools when they are selecting a school for their child.

## **Thematic reviews**

As the smallest of the three inspection bodies which we examined, it is to be expected that ETI would produce fewer thematic reviews than the other two. At the same time, principals and teachers in Northern Ireland have the same need for expert advice and dissemination of good practice as their counterparts elsewhere. In addition, parents in Northern Ireland have a right to know about the strengths and weaknesses of the provision of different subjects and the quality of education across Northern Ireland. Moreover, we would expect that the Department of Education would wish to be well-informed about the state of all aspects of school education across Northern Ireland, so that resources can be effectively targeted on addressing areas of significant weakness.

Table 3 shows the number and type of thematic reviews published in 2013 which focused on primary and post-primary education, and whether or not any press release was published. (ETI was unable to provide any information on publicity, but its press releases are published on its website).

While the Education Scotland and Ofsted subject-focused reviews clearly identified strengths and weaknesses in curriculum delivery, and provided clear guidance on how schools might address common weaknesses, the ETI review focused only on very descriptive examples of good practice, and there was little analysis. The ETI report did not provide any sense of the 'state of play' across Northern Ireland with regard to the two subject areas in question. We felt the report would probably be of limited use to teachers, and was certainly not particularly informative for parents and others with an interest in education.

Education Scotland produced the most attractive reports and made the best use of case studies. These reports are clearly more expensive to produce, but we suspect they are more likely to be read by teachers as a result.

The Department of Education might well have to invest additional resources if ETI is to emulate Ofsted and Education Scotland in the number of reviews it produces on specific areas of the curriculum. However, we believe that this would be a very worthwhile investment.

<b>Table 3: Thematic reviews in 2013</b>					
<b>Inspection body</b>	<b>Number of thematic reviews</b>	<b>Subject-based or curriculum area reviews</b>	<b>Reviews of other areas</b>	<b>Number of press releases relating about thematic reviews</b>	<b>Subjects and areas of curriculum examined, and type of schools investigated</b>
ETI	6	1	5	1	<ul style="list-style-type: none"> <li>English and Maths at post-primary level</li> </ul>
Ofsted	11	7	4	8	<ul style="list-style-type: none"> <li>Music – primary &amp; post-primary</li> <li>Citizenship – primary &amp; post-primary</li> <li>RE – primary &amp; post-primary</li> <li>Careers guidance – post-primary</li> <li>Personal, social, health &amp; economic education – primary &amp; post-primary</li> <li>Literacy – post-primary</li> <li>PE – primary &amp; post-primary</li> </ul>
Education Scotland	4	4	0	2	<ul style="list-style-type: none"> <li>Science – 3-18 years</li> <li>Social studies – 3-18 years</li> <li>Health and wellbeing – 3 – 18 years</li> <li>Creativity – 3-18 years</li> </ul>

**Dr Liz Fawcett and Roisin Gilheany on behalf of ParentsOutLoud**

**24<sup>th</sup> January 2014**

## **Appendix 1: letter from Oxford secondary school to parents, following an Ofsted inspection report (Matthew Arnold School - published on school website)**

### **OfSTED Inspection February 2013**

*Letter from the Headteacher to all parents/carers:*

Dear Parents and Students

I am very pleased to attach the OfSTED Report on the school's performance following our recent inspection. We are proud of our school and very pleased that the OfSTED Inspection recognised the school's many strengths.

The Inspection is based on our own self-evaluation, the school's results over the past three years and the evidence that the inspectors gathered during their two days in the school.

The inspection concluded that Matthew Arnold School is a very well-led and managed school where students achieve well, are happy and safe. Students' behaviour is respectful and courteous and there are good relationships between teachers and students. The teaching is good and enables students to achieve standards above the national averages. Progress from KS2 to KS4 is well above national average and the students then go on to achieve high academic standards in the sixth form. The school's governance is very strong; supporting and challenging us in our continual drive for improvement.

The school was judged as "good" overall and the inspection showed that we are very effective in meeting our students' needs and that, with the exception of a small number of individuals, students achieve very well.

The two aspects identified by the inspection team that need further work to secure "outstanding" overall are those areas we have also identified and already started to address through our school improvement plan. One aspect for further work is to increase the proportion of outstanding teaching across the school and the other is to make sure that all our students make equally good progress.

I am very confident that we have the capacity and the drive to continue to make improvements to the quality of teaching and to raise the standards of attainment for those few students who are currently less successful.

I want to thank all the parents and carers who have provided feedback, both through the Parent View Survey during the Inspection and also through the Parents' Evening Questionnaires and the Annual Parents' Survey. The views you express are very valuable in helping us to know what we are doing well and where we need to improve. I also want to thank the students and staff who made sure that their pride in our school was very much in evidence during the inspection.

Please do read the full report; it describes the many strengths of the school in detail and highlights those areas where we are already making improvements.

Thank you for your continuing support for the school. I will continue to ensure that we are doing our best for every student.

Yours sincerely

*Mrs  
Headteacher*

*K*

*J*

*Ryan*

