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Education

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Dear Peter

**INQUIRY INTO THE EDUCATION AND TRAINING INSPECTORATE AND THE
SCHOOL IMPROVEMENT PROCESS**

You will be aware that Dr David Hughes, Director of Curriculum, Qualifications and Standards and Mrs Noelle Buick, Chief Inspector, ETI will be attending the Committee in relation to the Committee's Inquiry into the Education and Training Inspectorate and the School Improvement Process.

In advance of the meeting scheduled for 12 November 2014, I attach the Department of Education's response.

Yours sincerely

Veronica

VERONICA BINTLEY
Departmental Assembly Liaison Officer

DEPARTMENT OF EDUCATION RESPONSE TO THE REPORT OF THE COMMITTEE FOR EDUCATION ON ITS INQUIRY INTO THE EDUCATION AND TRAINING INSPECTORATE AND THE SCHOOL IMPROVEMENT PROCESS

Outline

The purpose of this paper is to provide an update to the Committee in advance of the oral evidence session on the Report of the Committee for Education on its Inquiry into the Education and Training Inspectorate and the School Improvement Process, scheduled for 12th November 2014.

The paper considers each of the Committee's recommendations. It sets out the Department of Education's (DE) current position and provides an outline of any work that is being taken forward or planned in respect of the recommendations.

Introduction

DE's vision for school improvement is set out in Every School a Good School (ESaGS). The inspection, support and advice provided by the Education and Training Inspectorate (ETI) in its work 'to promote improvement in education and training in the interest of all learners' is an integral part of the school improvement process.

With regard to this, DE welcomes the acknowledgement that, 'professional, independent, broadly-based inspection of schools is and should continue to be an essential component of the school improvement process.' This reflects the evidence provided by almost all stakeholders who appeared before the Committee and the findings of the independent post-inspection survey conducted by the Northern Ireland Statistics and Research Agency (NISRA), which reported that 80% of Principals stated that the inspection process helped the organisation to plan for and promote improvement in the outcomes for learners.

Inspection is a catalyst for improving the quality of education for our young people; simultaneously raising expectations and building capacity.

Through its evaluation of the work of schools and other organisations ETI identifies practice that is good or better which can be shared. It also identifies practice that is not good enough and needs to improve

Inspection also promotes self-improvement within the school. The inspection process encourages schools to ensure that all learners feel part of the life and work of the school and that they achieve their full potential which leads ultimately to improved prospects for their wellbeing, future education and employment.

A school's self-evaluation and the inspection process are complementary, and the relationship between the two is central to promoting improvement. Internal self-evaluation that is complemented by external evaluation helps to ensure objectivity.

Evidence shows that ETI is willing to open itself up to scrutiny. Within the period of this Inquiry, the inspectorate has been subject to scrutiny through the Customer Service Excellence standard which was positive about its work.

As part of a wider study into our education system, published in December 2013, the inspection and school improvement arrangements here were also subject to a positive

review by the Organisation for Economic Co-operation and Development (OECD). Indeed, the Department welcomes the Inquiry's endorsement of the findings of the OECD review which indicated that ETI has '*a broad and legitimised inspection framework. The framework covers not only the outputs and teaching and learning processes but also the provision for learning, pastoral care and leadership and management. These broad areas are supported by international research on the characteristics of effective schools. In particular, the focus on leadership and management is coherent with the heightened importance of self-evaluation and a move to a more proportionate external evaluation approach*'. (OECD 2013)

The Department welcomes this report, particularly where it can add promote school improvement and add value to and help the inspection process to be even better at promoting improvement in the interest of learners.

RECOMMENDATION 1:

The Committee recommends that in line with Every School a Good School, the Department should adequately resource school improvement services so as to equitably support improving outcomes in all schools across Northern Ireland not just for those in or near Formal Intervention.

DE accepts this recommendation.

Every School a Good School highlights that the primary responsibility for school improvement rests with schools themselves and the equity we are seeking relates to schools' capacity, through effective self-evaluation and planning, to deliver a high quality educational experience for all our pupils.

It is recognised that in striving to ensure that the characteristics of a good school are embedded universally, schools may require support to develop and deliver school improvement. The nature and source of that support may differ depending on the context of the school but at its core will be the school itself, its managing authority and the Inspectorate.

The Inquiry heard that, working within the constraints of their budgets, the managing authorities provide support to schools, prioritising those schools where the quality of provision has been identified as less than satisfactory and then those found to be 'satisfactory', those with wide gaps between the highest and lowest achievers and those with low performance in literacy and numeracy. The ETI also supports schools through the interim and follow-up inspection process. The impact of this focus has been very positive with 80% of schools improving the quality of their provision by at least one performance level in their follow-up inspection. The Inspectorate also provides valuable support for schools through the District Inspector role, reviewing action plans and supporting other parts of the Department in implementing all aspects of the school improvement policy.

Support for school improvement is of course not limited to those schools where provision is found through inspection to be satisfactory or less than satisfactory.

A key element of school improvement is the process by which schools conduct a thorough, and regular, process of self-evaluation. The Department, including the ETI, and managing authorities have all worked to promote and support this process across all schools. This has involved face to face and online training for schools and their Boards of Governors, the production of guidance materials on self-evaluation and quality improvement planning and a number of conferences, which all principals were invited to, relating to the self-evaluation process and how this may be used effectively within a school context to bring about improvement.

Equally important in supporting all schools is the dissemination of practice which drives improvement. Examples available to all schools via ESAGS.tv, the Boards' own websites and the NISPLAN website all provide the opportunity for schools to share their experiences with others facing similar challenges. Area Learning Communities, ETI conferences and cluster groups established by the Boards are also vehicles for sharing practice.

The Department recognises the importance of maximising the impact of finite and increasingly constrained resources. Work is already underway looking at the gaps in school improvement support and continuing professional development for teachers to identify what these are and how they might best be addressed.

RECOMMENDATION 2:

The Committee recommends that school improvement services should be aligned with school inspection in a single organisation in line with the practice in Scotland. The governance arrangements for the new inspection and improvement service must ensure the professional independence of inspection with an appropriate separation between this and the improvement function - as is the case in Education Scotland.

This is one of several recommendations that would require legislative change. The Department will continue to have in mind the Committee's view, but currently has no plans to make the recommended changes.

DE is clear in its policy and practice that inspection is an integral part of and aligned with the school improvement process.

ETI seeks to promote school improvement through the inspection process, the follow-up process after inspection, district inspector work and through the dissemination of good practice which includes inspection reports, surveys and conferences. The current structures do not prevent the ETI undertaking improvement work, including for example, the Promoting Improvement in English and mathematics project in 19 schools.

While part of the Department, ETI carries out its inspection functions independently. Like Education Scotland, ETI enjoys full operational independence and reports 'without fear or favour' wherever it has the first hand evidence to do so.

The Standing International Conference of Inspectorates (SICI) identifies that governance arrangements for inspection can and do vary widely in line with the nature of particular education systems. The model adopted in Scotland is one of a number of options. Indeed, whilst much has been said about the benefits of the system in Scotland, it remains relatively new. It would be prudent to conduct further study of the advantages of such a system and any difficulties that may have emerged as the system is embedded.

Should such an analysis find that an inspection and improvement service would improve the quality of education provision; the Department would certainly consider that option.

RECOMMENDATION 3:

The Committee recommends that ETI better communicates its inspection methodology and clearly sets out the process of external moderation for school inspections - indicating how the latter has been applied in each individual inspection report and that it desists forthwith in sharing draft inspection reports with DE or maintaining anything other than transparent communication channels with all stakeholders.

DE accepts this recommendation in part.

ETI already goes to considerable lengths to communicate its inspection methodology and, in keeping with this recommendation, the process is and will continue to be kept under review to ensure improvements are identified and implemented.

Details of the inspection process are documented and available to all stakeholders on the ETI website which has recently undergone a review. Presentations at Boards of Governors' and Principals' conferences regularly provide an opportunity for ETI to present information and answer questions on the inspection methodology.

For schools which are being inspected an important part of the inspection process is the pre-inspection visit by the Reporting Inspector who explains to the school leadership and staff, the inspection process.

Over the past 18 months ETI has also been developing procedures to more actively involve school leaders in the inspection and moderation process. The ETI has already piloted a process of conducting 'paired observations' with school principals during inspection and district inspector visits. In this way, school leaders can see how lessons, and the learning that takes place in them, are evaluated and a common understanding of what 'good' looks like can be developed. The fact that the school representative will be present during the moderation process should also make the process much more transparent.

The process of moderation of the inspection findings is also made clear both in inspection guidance and in the summary of key findings which is left with the school Board of Governors at the end of the spoken report back. This summary has a clear statement which reads: 'Inspection performance levels are provisional, subject to moderation through ETI's quality assurance process and are not final until the report is published'

This recommendation also calls for the sharing of draft reports with DE officials to stop. As reported to the Inquiry, this does not happen. Other parts of DE have no input into the inspection process until the final evaluation has been made and has been communicated to the school.

RECOMMENDATION 4

The Committee recommends that the school inspection complaints procedure should explicitly allow for the possibility of a revision to an inspection finding and that consideration should be given to a reformed school inspection complaints procedure which would allow for investigation by personnel outside of the inspectorate or the Department of Education.

DE accepts this recommendation.

The current complaints process does allow for organisations inspected by ETI to challenge inspection findings. Any change to a professional judgement made by an inspector can only be made by the Chief Inspector. Should a complainant remain dissatisfied with how the complaint was handled there is recourse to the Ombudsman.

The ETI undertakes a review of its complaints procedure on a regular basis taking stakeholders' views into consideration.

The most recent review was conducted in 2012 and updated in September 2013. The complaints process was agreed with the Assembly Ombudsman having taken account of the guidance contained in the Parliamentary and Health Service Ombudsman's publication, "Ombudsman's Principles" which covers the best practice and principles of good administration, good complaint handling and remedy.

In response to this recommendation, the ETI will be conducting a further review of the complaints procedure for publication in September 2015. This will, involve stakeholders as appropriate, and will give full consideration to this recommendation as part of this process.

RECOMMENDATION 5:

The Committee recommends that the inspectorate co-operates with GTCNI in the redesigning of post-inspection surveys and customer service assessments so as to ensure independent and robust assessment of the school inspection and improvement service.

DE agrees in principle that post-inspection surveys and customer service assessments should provide independent assessment of the service, and that stakeholders should be consulted as part of the process of survey development.

Post-inspection evaluations are conducted on ETI's behalf by NISRA and the Department is content that the construction and administration of the evaluation tool used to evaluate the inspection process is robust.

ETI is committed to continuous improvement. Consequently, and as part of the on-going review of the evaluation process, ETI will request that NISRA should engage with appropriate education stakeholders, including GTCNI, to consider their proposals for questionnaire content. NISRA will remain responsible for survey methodology and design.

RECOMMENDATION 6:

The Committee recommends that anonymous questionnaires should only be included in a school inspection when the need for such a measure has been identified by inspectors and in the absence of a reliable, independent (parent, pupil, staff and governor) survey which has been undertaken by the school as part of the School Development Plan process.

DE notes this recommendation but would point out that ETI does not use anonymous questionnaires. All questionnaires have to be signed (in the case of parents' questionnaires) or submitted with the teacher's reference number (in the case of teachers' questionnaires). What is anonymous, however, is the information that is passed to the inspection team. The inspection team only sees a high-level summary of the responses and an anonymised copy of any written comments submitted with the questionnaire.

DE is however in agreement that it is good practice for schools to be consulting with parents, staff and pupils, but also recognises the value of these stakeholders being given an opportunity to input directly and specifically to the inspection process.

Some schools, particularly those which are advanced in the self-evaluation process, will have the outcomes of their own surveys already available and will be using these as part of their school development planning process. The ETI will, of course continue to consider

any data the school has collated by way of its own questionnaires, should it be offered as evidence during an inspection.

Evaluations are not based solely on the outcomes of the surveys conducted by ETI but they can point to an area for further enquiry by the inspection team. The inspection team will use its collective experience and professional judgement on the weighting to place on any questionnaire return.

RECOMMENDATION 7:

The Committee recommends that in line with the practice in other jurisdictions, alternative inspection report publication measures should be adopted – specifically two school inspection reports should be produced – the first should be a detailed, formative inspection report which would be made available to the school only; the second should be a plain English, high level, public domain summative report which informs parental understanding of a school’s strengths and weaknesses.

This recommendation will remain under consideration while work continues on improving the quality of inspection reports, taking cognisance of the needs of stakeholders and best practice from Inspectorates across these islands and Europe.

To supplement the written report, ETI has developed the ‘running record’ which will contain the evaluations of the inspection in more detail together with the evidence base. The record is being used on all post-primary inspections and has been extended to primary inspections during the academic year 2014-15. Further work is needed to determine how this information will be made available.

To enhance further a school’s understanding of how performance levels have been determined and how any issues might best be addressed the role of the representative is currently being piloted. The representative will be the principal, or his/her nominee, who will sit in on moderation discussions where evaluations are being made and will therefore be fully aware of the issues and the evidence on which the judgements were made and be provided with an opportunity to make representations or provide additional evidence on behalf of the organisation.

RECOMMENDATION 8:

The Committee recommends that in line with the practice in other jurisdictions, less pejorative descriptors be adopted for public domain summative inspection reports and accompanied by plain English statements of a school’s strengths and weaknesses.

This recommendation will remain under consideration while work continues to review the descriptors for use in inspection reports.

As part of its continuous improvement agenda, and taking account of feedback from stakeholders, ETI has already identified the need to consider the performance level descriptors in used in its reports and is in the process of reviewing the language of the descriptors used in the concluding paragraphs of reports. Any proposed amendments will be discussed with key stakeholders prior to implementation.

RECOMMENDATION 9:

The Committee recommends that in order to fully exploit the unique good practice experience and understanding of school context of District Inspectors, they should always have a role in the inspection of schools in their districts and should be allocated sufficient District Time to allow adequate provision of pastoral support for schools.

DE notes this recommendation.

ETI business planning guidelines state that, where possible, the District Inspector should be a member of the inspection team. Where follow-on work is required after an inspection, this will normally be led by the District Inspector which means that he/she will have the opportunity to visit the school on up to two occasions on interim visits and will then lead the follow-up inspection.

The Department's understanding is that the Committee's recommendation regarding pastoral support for schools relates to the programme of district visits. A district inspector may make a 'pastoral visit' to a school after a traumatic event that affects the life work of the school has happened but these visits are quite distinct and, hopefully, rare.

The district visits complement and supplement the centrally determined inspections and provide a valuable opportunity for the District Inspector and school to engage professionally, outside the context of the formal inspection programme.

This different context does not in any way lessen the need for inspectors to adhere to the principles governing inspection and at all times report as they find in order to promote improvement in the interests of learners.

The ETI remains committed to the development of the role of the District Inspector and intends to continue to allocate as much resource to this role as is available.

RECOMMENDATION 10:

The Committee recommends that the Department should review its inspection practices for the IME sector and bring them into line with the inspection of immersion education provision in other jurisdictions – specifically the requirement to undertake inspections of IME schools and units in the Irish language.

DE has considered this recommendation very carefully, including in the context that the statutory duty that is placed on it to encourage and facilitate Irish-medium education. The Department accepts the need to ensure that inspection in Irish-medium schools and units is designed appropriately to reflect the level of immersion within the school or unit. In this context, ETI continually reviews its inspection practice and seeks to deploy the most suitable teams for inspection work in any sector, including the Irish-medium sector, within the constraints of current resourcing.

ETI is also exploring ways of strengthening its capacity to inspect Irish-medium education, including seeking assistance from Department of Education and Science (DES) Inspectors in the south.

RECOMMENDATION 11:

The Committee recommends that a reliable standardised baseline of attainment at key pupil junctures be introduced in order to provide a common objective formative measure of pupil value added by schools in all educational phases. The Committee further recommends that the Department engage a broad and representative cross-section of teachers to determine the best use of the baseline and the selection of other factors in the development of a robust indicator of school effectiveness which would complement other existing measures.

The Department notes the recommendation and accepts the point it makes about measurement of pupil value-added. It remains of the view that moderated teacher assessment at the end of Key Stages 1, 2 and 3 of the cross-curricular skills of Communication and Using Mathematics represents the best means of introducing a common, objective measure that can be used not only to determine the level of attainment but also the progress made by pupils.

Additionally, work is being undertaken to develop a 'dashboard' of measures which together will provide a quantitative profile of a school's context and performance which complements the qualitative evaluation of the school provided by inspection. In line with the Committee's recommendation DE has already planned to establish a panel involving practising teachers, principals and teacher union members to inform this work. .

RECOMMENDATION 12:

The Committee recommends that in line with the OECD findings, measures should be adopted to more effectively promote a self-evaluation culture supported by training and guidance for school staff and governors; advice from District Inspectors; and including greater engagement with parents.

DE accepts this recommendation and welcomes consideration of any additional measures that might usefully be adopted, building upon advances that have been made in recent years.

Our school improvement policy is based on the recognition that very many schools are already performing well and have a strong focus on improvement. Sustained improvement will best be achieved in a context where schools are supported and trusted to devise their own school improvement strategies and to identify themselves what support they need in implementing them. This is a key aspect of our wider policy of accountable autonomy. Self-evaluation leading to sustained self-improvement is at the core of the school improvement policy.

The Department, the ETI and managing authorities have produced a range of materials and guidance which promote, develop and support a culture of self-evaluation within the school system.

Generic and bespoke training on a range of school improvement issues, including self-evaluation and the effective use of data, is available to schools and their governors in a range of formats including a number of relevant programmes available on ESaGS.tv.

ETI has issued and disseminated many documents highlighting, promoting, and providing guidance for self-evaluation procedures including Evaluating Subjects, Evaluating Careers,

Evaluating Pastoral Care, the Reflective Teacher, and culminating in Together Towards Improvement which is also the framework for inspection.

DE and ETI welcome the many positive comments received on the work of the District Inspectors and, as outlined in response to recommendation 9, the ETI intends to continue to allocate as much resource to this role as is available.

DE also recognises the importance of engagement with parents and accepts that it would be beneficial to have a more structured means through which to involve and consult with parents at a system level. This is covered in more detail in response to Recommendation 14.

RECOMMENDATION 13:

The Committee recommends that District Inspectors should take a greater role in the mentoring, auditing and quality assuring of self-evaluation in schools. The Committee further recommends that in the longer term, when self-evaluation is effectively embedded in schools, consideration should be given to a revised inspection regime.

DE accepts this recommendation in principle, recognising the valuable role played by the District Inspector and agreeing that all schools should be truly self-evaluative. ETI continuously reviews its inspection regime, and in doing so will continue to have in mind the Committee's view for the longer term.

As acknowledged by the Committee, District Inspectors are already engaged with schools in supporting and providing a challenge to their school development planning and self-evaluation processes. Indeed, with the resources at its disposal ETI does and will continue to do as much as it can to promote, and quality assure, the self-evaluation process in schools. Inspections place a great emphasis on the school's development plan and the process by which the plan was generated. Such processes should include a significant level of self-evaluation.

ETI deploys a risk-based approach to inspection. For example, where schools are assessed as having an effective self-assessment process in place, a more appropriate model of inspection can be applied: for example, the sustaining improvement inspection. This risk based approach has been endorsed by the OECD which stated that self-evaluation by schools provided 'a good evidence base for introducing a more proportionate approach to school inspections'.

RECOMMENDATION 14:

The Committee recommends that, in line with OECD recommendations, the Department should establish a parental consultation platform and that this should be used to inform the development of understandable and accessible information on school inspection and school improvement for parents and should also be used to explore enhanced engagement options for parents relating to school and education policy.

DE accepts that it would be beneficial to have a more structured means through which to involve and consult with parents at a system level. DE will give consideration to how this could best be achieved and resourced to ensure that a wide range of parental views and

opinions can be captured about a range of education policy matters. The creation of the new Education Authority provides an opportunity to put such arrangements in place.

In relation to schools' policies, Every School a Good School highlights the importance of schools being connected to their community and parents. This is reflected in The Education (School Development Plans) regulations which require schools to have in place strategies which promote links with the parents of pupils at the school; and to outline the arrangements made by the Board of Governors to consult and take account of the views of parents in the preparation of the school development plan.

The central importance of parental engagement is also reflected in the quality indicators published in Together Towards Improvement, which includes evidence that, as well as receiving clear information about policies, the curriculum programme and the operation of the school, parents are encouraged to become involved in promoting their child's learning –i.e. that their views are sought and acted upon.

Parents also have the opportunity to complete questionnaires as part of the school inspection process

RECOMMENDATION 15:

The Committee recommends that the Education and Training Inspectorate should be renamed as the “Northern Ireland Education Improvement Service (NIEIS)”. The explicit focus of the rebranded organisation would be improvement through inspection.

The Department will continue to have in mind the Committee's view, but there are currently no plans to rename the Inspectorate.

DE firmly believes that inspection is an integral and effective part of the school improvement process. Through the follow-on process after inspection, district inspector work and the dissemination of good practice, ETI supports and promotes improvement throughout the education system. This focus is reflected in the organisation's mission statement *‘promoting improvement in the interest of all learners’*

The Inspectorate aims to improve the learning experiences and the standards achieved throughout the education, training and youth services. It provides inspection services on behalf of DE Department of Education and the Department for Employment and Learning and for the Department of Culture, Arts and Leisure, the Department of Agriculture and Rural Development, the Criminal Justice Inspection and the United Kingdom Borders' Agency (Home Office).

The current name takes all of the ETI's inspection roles into consideration and its mission statement is aligned with the focus of the Committee's recommendation.

RECOMMENDATION 16:

The Committee recommends that the new “Northern Ireland Education Improvement Service” be statutorily independent from the Department of Education and that research be undertaken to establish the most appropriate governance model for the new organisation. The new model should allow the independent organisation to inspect school effectiveness; advise impartially on DE policy and undertake

supporting longitudinal data analysis studies of the effectiveness of education policy in all phases.

The Department currently has no plans to establish a new organisation but will continue to have in mind the Committee's view.

It is the Department's position that operationally the ETI carries out its inspection functions in a manner that is fully independent from the Department of Education and reports 'without fear or favour'. In addition to inspecting school effectiveness, the ETI provides impartial advice on wider education policy and undertakes research and evaluation of aspects of education policy at the request of the Department.

The Standing International Conference of Inspectorates (SICI) points out that structural arrangements are no guarantee of increased effectiveness; rather the more important consideration is whether inspection promotes high standards of education. The evidence of follow up inspection and the findings of the post inspection surveys is that the current inspection process supports schools to improve.

As part of its continuous improvement agenda the inspection regime will continue to be kept under review by the Department and within ETI.