

The response of Baker Dearing Educational Trust to current consultation on the Draft Education Inspection Framework (Sept 2019).

Submitted by: Ken Cornforth, Director of Education on behalf of Baker Dearing.

Introduction and overview of response

The objects of Baker Dearing Educational Trust are to advance the education of children, young people and young adults by technically-oriented study at new or existing colleges. As such the Trust is licensor to fifty University Technical Colleges for 14-19 year olds. Licensed UTCs maintain a unique character and educational contribution.

In response to the current consultation on the draft Education Inspection Framework for September 2019, Baker Dearing Educational Trust:

- recognises the **well-founded educational case** for the new framework, which builds on compelling research of how knowledge and understanding are learned.
- acknowledges as **fit for purpose**, the revised judgement areas in the evaluation schedule.
- supports the **holistic approach** to considering *quality of education*, and in particular the coherence of *curriculum intent, implementation and impact*.
- endorses the **separation** of behaviour and attitudes and personal development
- welcomes the inclusion of the section: *Applying the EIF in junior, middle and studio schools, and university technical colleges*. This section confirms the DfE's disapplication of the EBacc requirements and recognition of the unsuitability of the Progress 8 measure for 14-19 UTCs. Baker Dearing identifies a small number of additional contextual notes for inclusion in this section.

and

- appreciates the intent of the proposal to visit a school the day prior to its inspection, but recommends that the views of school leaders should be paramount in determining a model which secures the original intent whilst overcoming the risks and practical challenges as expressed by principals and headteachers.

Detailed submission – structured in accordance with the online consultation facility

Proposal 1: Introduction of ‘quality of education’ judgement

Baker Dearing strongly agrees with this proposal and submits the further commentary below.

1.1 Quality of education - measurement

Arriving at a single judgement of the quality of education, which does not place an over-emphasis on examination outcomes will be a considerable challenge. Furthermore, in so doing, it is important to pre-empt unintended consequences of the new approach such as new misconceptions around the existence of an ‘Ofsted favoured’ curriculum model.

In the draft criteria, a good quality of education requires pupils to be '*ready for their next stage of education, employment or training*'. This should be measured by the extent to which pupils do indeed go on to secure that progression and at an appropriately high level (relative to starting points).

The securing of ambitious, high quality destinations requires pupil leavers in secondary schools to convince a range of **challenging external ‘assessors’** (such as company HR professionals and higher education admissions tutors) that they possess the composite knowledge, skills, personal attributes and values to justify investment. On this basis therefore, we would argue that for secondary schools, **pupil destinations** can be formulated to provide a reliable and sufficiently well-correlated **proxy measure** for the **quality of education** provided by the school. That ‘measure’ would take the form of a leaver destinations profile which supports a conversation regarding:

- progression levels compared to final levels of attainment
- progression levels compared to pupil starting points
- the destinations profile in the context of local and regional demand
- fitness for purpose of the curriculum (in terms of intent and implementation) in securing ambitious destinations for all pupils
- the destinations profile of key cohort groups such as:
 - disadvantaged students as compared to that for the non disadvantaged cohort, together with measures taken to address any gaps
 - pupils with SEND and adjustments made to optimise progression in terms of level, interest and aptitude
 - gender cohorts, and the degree to which those profiles are not diminished by stereotype.

In regard to the three constituent elements of its working definition of the curriculum we recommend that the framework affirms:

- the importance of holistic curriculum planning towards end points defined in terms of progression to **appropriately ambitious destinations** (*intent*)
- that to be consistent with such intent (above), learning requires the development of a comprehensive set of **employability skills and professional attributes** (*implementation*)

- the inclusion of such skills and attributes in the **assessment of curriculum outcomes**, or by the destinations proxy previously described. Hence in coming to a view on progress in learning, Inspectors should give due recognition to the acquisition of knowledge, skills and values which equip pupils as highly employable and work-ready young professionals. (*impact*)

In further reference to the assessment of impact, the criterion for Good (para 184: Impact. Bullet 2) states: ‘Pupils are ready for the next stage of education, employment or training. They have the knowledge and skills they need and, where relevant, they gain qualifications that allow them to go on to destinations that meet their interests and aspirations and the intention of their course of study.’

This is not entirely consistent with para 177 (bullet 5): ‘Inspectors will also consider whether pupils at ages 16 and 18 are ready for the next stage **and are going to** appropriate, high-quality destinations’. The phrase ‘and are going to’ should be a critical indicator of the school’s impact. Hence we recommend that para 184: Impact bullet 2 should be amended to conclude with the final phrase: **‘and succeed in doing so.’**

In identifying sources of evidence for assessing curriculum impact, para 180: bullet 3 references: *‘nationally published information about the destinations to which its pupils progress when they leave the school’*. Given that such nationally available information can be more than two years out of date, we recommend that the reference should be extended to include **‘and verifiable information provided by the school for its most recent leavers’**

1.2 Cultural capital – essential knowledge for educated citizens

Implicit in the interpretation of *cultural capital* should be familiarity with the most significant applications of *‘the best that has been thought’* in the fields of science, engineering and technology, in other words the best that has been invented, designed and built. Furthermore the definition of cultural capital should imply awareness of the significant global challenges that will shape the lives of educated citizens in the second and third quarters of the 21st century. We ask that such an understanding be conveyed at the appropriate point in the framework and evaluation schedule ie para 163.

1.3 Leadership and management – governance

The curriculum intent of a school must be consistent with its vision, ethos and values. Such high level characteristics are the responsibility of the Governing Body. Hence in meeting such responsibility, governors must take ownership of that initial curriculum intent. Effective governance requires engagement with the formation of curriculum intent and subsequently influencing, monitoring and holding school leaders to account in that regard.

Baker Dearing notes that:

- governance is not referenced in the draft criteria for outstanding leadership and management. We recommend that the criteria for outstanding in this judgement area should include a statement along the lines: ‘Governors routinely monitor the school’s adherence to its vision, ethos and strategic direction, and in so doing regularly review curriculum intent and its subsequent impact. For pupils at ages 16 and 18 this includes ‘being ready for the next stage **and progressing to** appropriate, high-quality destinations’.

- In the case of UTCs, Governing Bodies (whether single academy trusts or local governing bodies within multi-academy trusts) must have a majority of governors nominated by the employer partners and university. As such they must ensure compliance with the Funding Agreement with the Secretary of State to provide technical learning within a broad and balanced curriculum. The first of the three core functions of governance: ‘ensuring clarity of vision, ethos and strategic direction’ should therefore be understood by Inspectors in terms of securing a *curriculum intent* which feeds the talent pipeline into the UTC’s technical sector. We would ask that this is noted in appropriate text in the helpful section within the draft framework: Applying the EIF in junior, middle and studio schools, and university technical colleges. (Page 89)

Proposal 2: separation of judgements

Baker Dearing strongly agrees with this proposal and submits the further commentary below.

2.1 Personal development

Baker Dearing endorses the proposal to judge ‘personal development’ separately from ‘behaviour and attitudes’. Through our continuous dialogue with the country’s employer network, we can affirm the critical importance of the personal attributes identified in the personal development section of the evaluation schedule (para 202). Such attributes are essential for engaged, considerate and productive individuals. It is entirely appropriate therefore that the intent and quality of the curriculum in developing such attributes should be given due weight in the manner proposed. Having considered in full the list of *dimensions* of personal development (para 202), we would seek additional reference in terms of pupils ‘developing an international perspective and understanding of key global challenges’ or similar.

Para 210 identifies the criteria for personal development to be judged as good. Due to its significance we consider the final bullet: ‘*Secondary schools prepare pupils for future success in education, employment or training by providing: unbiased information to all about potential next steps and high-quality careers guidance and opportunities for encounters with the world of work*’ is not a sufficiently comprehensive or challenging requirement. We contend that in all secondary schools, preparation for future success through *encounters with the world of work* should additionally be *visible across its programmes of study*, in order to be considered good. For example through application of new knowledge to real-life problems and industrial or commercial contexts.

Proposal 3: Early years

As this proposal is specific to the inspection of early years education, Baker Dearing is not submitting a response.

Proposal 4: Increasing short inspections from one to two days

Baker Dearing agrees with this proposal although with the qualifying commentary below.

4.1 Given the significant changes proposed under the new framework then Baker Dearing recognises a need for the lead inspector to be onsite for a period of possibly two days. This assumes that a Section 8 inspection would not be simply a rerun of the previous process under which the school was inspected. However we would recommend:

- a consistent adjustment with regard to schools currently judged outstanding
- the original one day Section 8 inspections return in due course, for those schools previously judged good or outstanding under the new 2019 framework.

Proposal 5: on-site preparation

Baker Dearing supports the underlying wish of Ofsted to:

- provide schools the opportunity to communicate fully with inspectors in preparation
- enable inspectors and school leaders to carry out preparation collaboratively wherever possible
- allow the school a clear role in preparation work.

However we strongly recommend that the views of school leaders should be paramount in determining a model which secures the underlying intent whilst overcoming the risks and practical challenges as expressed by principals and headteachers through the consultation.

In presenting its position, Baker Dearing submits the further commentary below.

5.1 Effective preparation

UTCs have a unique character and educational contribution and represent less than 2% of all secondary schools. Baker Dearing therefore recognises and welcomes the intent to provide arrangements which allow school leaders to be confident that inspectors have, on commencement of the inspection, a secure understanding of the school's distinctive character and context. Due to the atypical nature of UTCs, this is likely to require sharing information with inspectors which would not normally be anticipated in a secondary inspection, yet is significant to a valid application of the Evaluation Schedule to the UTC. Examples include the opportunity to:

- receive advance information on the skills needs of the UTC's specialist sector and in particular its local employers, as insight into the UTC's *curriculum intent*.
- secure meetings with employer nominated governors
- receive substantiated data on the previous year's leaver destinations.
- receive and have explained, comprehensive information on cohort entry profiles from KS3, which includes attendance, behaviour, KS3 regression indicators, and measures of attainment at atypical admission points
- receive summary guidance on how a UTC's baseline assessment model works.

5.2 Identifying appropriate arrangements

There is clearly a range of arrangements and mechanisms available for securing such effective preparation. This includes dedicated website pages, extended teleconference and e-mail exchange, off-site or on-site prior meeting. Baker Dearing recommends that in identifying suitable arrangements, Ofsted is steered by the responses and observations of headteachers nationally, including those submitted by the Principals of UTCs. Current school leaders are well positioned to convey to Ofsted the risks and practical challenges presented by the detailed proposal to visit the day before inspection.

Proposal 6: non-statutory internal progress and attainment data

Baker Dearing broadly agrees with the proposal but with the significant qualifiers (in relation to the context of UTCs) presented in the commentary below.

6.1 Implications for schools with atypical admission age

Baker Dearing broadly welcomes the proposal in terms of the aim of not creating unnecessary work for teachers. However in the case of schools such as UTCs which have an atypical admission age and often unusual cohort entry profiles, it is essential to:

- establish baseline positions across a range of characteristics: eg attainment, aptitude, behaviour and attendance.
- monitor progress across all such characteristics in order to make swift adjustments to provision across a much shorter time frame than available to secondary schools which educate pupils over a five year period.

Given often untypical cohort entry profiles, school-administered baseline assessment and subsequent internal performance data enable UTCs to plan and assess the early impact of their provision. This includes provision planned for cohorts which present additional complexity due to their arrival, at the start of Key Stage 4, from schools with a diverse range of provision and expectations.

In particular, inspections of UTCs carried out in the autumn term will be assessing the learning, personal development and behaviours of pupil in Years 10 who have only been at the UTC for a few weeks. These pupils represent 50% of the school's pre-16 roll. It is essential that in these cases, the UTC has the opportunity to demonstrate its early impact on this 50%, together with emerging trends. This is especially challenging for UTCs with abnormally high proportions of students who, across a range of characteristics, are considered to have 'regressed' during KS3. Internal assessment of progress by reference to this range of characteristics will support the UTC's account for the position that inspectors observe.

Hence Baker Dearing recommends that in the case of UTCs:

- KS4 entry baseline performance data must be received and recognised by inspectors in order to make valid judgements of the UTC's quality of education and in terms of their pupils' personal development and behaviour.
- Internal performance data against a range of baseline measures must be used to support, inspectors' interpretation of their observations in coming to a valid '*rounded view of the quality of education*' for pupils in the UTC.

Baker Dearing therefore requests that these two contextual exceptions be noted in appropriate text, in the section within the draft framework: *Applying the EIF in junior, middle and studio schools, and university technical colleges. (Page 89)*

Ken Cornforth 25th March 2019