

*From Professor Robin Alexander, MA, MEd, PhD, LittD
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Ms Christine Gilbert HMCI
Ofsted
Aviation House
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Dear Christine,

Inspection 2012: new inspection framework

At our meeting earlier this year you said you would invite the Cambridge Primary Review's comments on the new inspection framework and we are grateful to have received both a copy of the framework and an invitation to respond.

We have completed and returned the online consultation form as required. However, in view of the unique character and profile of the Cambridge Primary Review as the most comprehensive enquiry into English primary education since the 1960s, we would hope that our submission is not treated as just one among many and that it is recognised that our responses are grounded in a considerable range and depth of evidence, from both research and inspection and from international as well as national sources.

I am therefore taking the liberty of attaching to this letter our responses to a number of questions which deal with matters which are of particular concern to the Cambridge Primary Review and which have featured prominently in our reports and our recent and ongoing discussions with DfE and Ofsted. This of course is just a selection: I have not attached our entire set of responses.

As it happens, once we move beyond the items pasted below, our responses tend to move from 'disagree' to 'agree'. Thus, for example, we agree that inspection intervals should be reduced for schools deemed satisfactory, with a notice to improve or in special measures, and that Ofsted should respond positively to most requests for inspection.

We have five serious reservations about the consultation form and the way it encourages or discourages particular responses to the framework document.

1. Many of the consultation questions combine two or three questions yet require a single response. Thus, for example, 'To what extent do you agree with our approach to using value-added measures and to making comparisons with similar schools?' asks whether respondents agree with Ofsted's proposed procedure but begs two other questions: 'Do you agree with the principle of value added?' and 'Do you agree that schools should be compared on the basis of unspecified criteria of similarity?' In such cases there are no response options, which is why we have had to provide sometimes lengthy comments.
2. On one or two issues of considerable importance no response at all is invited. For example, paras 43-46 outline proposals for dealing with schools previously judged to be outstanding or good, and refer to the proposal to exempt the former from inspection. We believe that this is an unwise and risky decision, because schools can deteriorate (and indeed improve) very quickly following

changes in their leadership, staffing or other circumstances. Yet in the form it is not possible to comment on this vital matter.

3. There is no opportunity to comment on the inspection process other than in relation to broad criteria and matters like risk assessment and inspection intervals. But the way an inspection is conducted, and the competence, conduct and expertise of inspectors, are vital matters and – as you know – they have occasioned a great deal of concern ever since Ofsted was established.
4. Nor is it possible to comment on the four priority inspection headings listed in para 4 (presumably because these are in the 2011 Education Bill). You may recall that at our meeting in January we expressed concern about the apparent downplaying, other than in relation to literacy, of the curriculum dimension of the work of schools, and our concern is deepened now that the government has said that it wishes to give schools greater freedom in what they teach. There is a real risk that if or when this happens government, parents and the electorate will have little or no effective means for monitoring the quality of what schools choose to do beyond what is statutory or tested. We believe that the scope and balance of the curriculum, and the resources available to secure high standards in all its aspects, should be added to the list of priorities for inspection, more than ever now that the range and detail of curriculum requirements is to be reduced.
5. Finally, the familiar Ofsted grades remain firmly in place, despite the fact that the grade 'satisfactory' is so ambiguous – and indeed *unsatisfactory*. Some schools regard 'satisfactory' as a seal of approval which implies that no further effort is needed; yet we have also been told that many inspectors see 'satisfactory' as meaning no more than mediocre. At this critical borderline in the quality of schools there really needs to be greater precision in relation to the terms used. But again, there is no opportunity in the response form to comment on this.

I hope that what we say, in the attached and above, is helpful. As our final report makes clear, the Cambridge Primary Review strongly supports the principle that schools in a public system of education should be fully accountable to parents, government and the electorate for what they do, and that external inspection is an essential part of this process. Any concerns we have, therefore, relate not to the principle of inspection but to its criteria and procedures, and we would like Ofsted to note that the particular concerns we raise here aim to strengthen rather than weaken accountability because they attend to childrens' achievement and the quality of teaching and leadership in all aspects of the curriculum rather than just some of them; and because we challenge the current assumption that the quality of children's education and the standards of their achievement can be defined and assessed merely by proxies such as literacy or numeracy tests, useful though these are.

We would be very happy to discuss these matters with you and your colleagues.

With best wishes.

Yours sincerely,



Robin Alexander

**INSPECTION 2012:
RESPONSES FROM THE CAMBRIDGE PRIMARY REVIEW TO SELECTED QUESTIONS
IN THE MARCH 2011 PROPOSED INSPECTION FRAMEWORK**

Q1 To what extent do you agree with our proposed approach to judging achievement?

A Disagree

Q2 Comments or suggestions?

We disagree not with the imperative of judging achievement but with its definition, which is far too narrow. It is true that literacy is paramount and that securing and improving standards in this should be a priority for both teaching and inspection. However, Ofsted's own evidence consistently shows a close association between standards in literacy and numeracy and the range and quality of the wider curriculum. It is also absolutely essential, in the primary phase which is the Cambridge Primary Review's central concern, that schools should go well beyond the teaching of literacy and provide all children with a broad, balanced and well-taught curriculum both as a matter of basic educational entitlement and to secure the necessary foundation for their later learning and choice. If schools do this, then they should be no less accountable for pupil's achievement in this wider curriculum than in literacy. Yet we also know, again from Ofsted's evidence, that too many primary schools concentrate their attention on what is tested and/or inspected, to the detriment not only of children's education overall but also, in many cases, of the very standards in literacy and numeracy which by narrowing the focus of inspection the Government seeks to highlight and improve.

For all these reasons, it is essential that the definitions of 'attainment', 'standards' and 'quality' which inform school inspections should be broadened to cover all aspects of the curriculum. The evidence referred to above shows that it is unsafe to presume that literacy can be treated as a proxy for the totality of children's education. Nor is it sufficient – as currently happens - merely to check for breadth without probing to establish how far breadth is linked with quality and standards. Judging breadth in terms of whether something appears in a school's prospectus or timetable is pointless.

Further, we know from international practice and research that in the early and primary years focusing on literacy without giving close attention to oracy is counterproductive. In many high-performing countries there is a synergy between literacy and oracy which is much less common in Britain, and this also reflects the now well-established psychological and neurological evidence that cognitively-challenging talk is essential to the advancement of children's thinking, understanding and learning - in literacy and across the entire curriculum.

We therefore recommend that the proposal at the end of Q13 should be amended to read:

Our proposal is to judge pupils' achievement in all aspects of their education by giving attention to **in primary schools, a particular focus on pupils' attainment in literacy and oracy by the age of six and by the time they leave school, together with their progress and attainment in all other aspects of the curriculum ...**

In this matter, we draw to Ofsted's attention the following recommendations in the final report of the Cambridge Primary Review:

80. Current notions of 'standards' and 'quality' should be replaced by a more comprehensive framework which relates to the entirety of what a school does and how it performs ... However, we warn against moving from indicators of what can fairly be observed and judged to so-called measures of what cannot in fact be measured.

81. Monitoring the performance of the national system of primary education is technically challenging and requires a form of data collection which is different from that which is optimal to promote school and classroom improvement. New provision is recommended, using robust national sampling and building on the lessons of the Assessment of Performance Unit and work in Scotland.

82. A new model for school inspection should be explored, with a substantially increased focus on classroom practice, pupil learning and the curriculum as a whole, and within a framework of accountability which directly reinforces processes of school improvement.

83. Every effort should be made, at school, local and national levels, to ensure that curriculum, pedagogy, assessment, inspection and teacher training all pull in the same direction and are clearly informed by educational aims and procedural principles such as those proposed in this report.

84. We take it as axiomatic that in a public system of education teachers and schools should be fully accountable to parents, children, government and the electorate for what they do. We reject any suggestion that our proposals for the reform of assessment and inspection imply otherwise. For us, the issue is not whether schools should be accountable, but for what and by what means, and the evidence shows that current approaches are in certain respects unsatisfactory. By insisting on a concept of standards which extends across the full curriculum rather than part of it, we are strengthening rather than weakening school accountability.

Q3 To what extent do you agree with our proposed approach to using value-added measures and to making comparisons with similar schools?

A Disagree

Q4 Comments or suggestions?

The Cambridge Primary Review is strongly committed to equity and reducing inequality. It supports the value-added principle only if it is conceived and administered with absolute fairness and without providing a disincentive to schools to take children from disadvantaged backgrounds. Our own consultations on the proposed changes have exposed anxieties about such side effects.

Q5 To what extent do you agree that we should judge behaviour and safety in this way?

A Disagree

Q6 Comments or suggestions?

Again, our use of 'disagree' should not be taken as reflecting opposition to the need to make children's behaviour and safety a focus of inspection. Like the Steer Committee, the Cambridge Primary Review has argued strongly from the evidence that there is a tendency to discuss and treat behaviour and behaviour problems in isolation from learning, teaching and wider aspects of the life of a school. We therefore would like to see judgements of pupil behaviour related, where appropriate, to the quality of teaching, reflecting the Cambridge Review's recommendation (58):

The Review strongly supports the view of Sir Alan Steer's group on pupil behaviour that 'the quality of teaching, learning and behaviour are inseparable' and the principle that the management of behaviour and the management of learning should be aligned and consistent.

Q7 To what extent do you agree that inspectors should judge the quality of teaching as proposed?

A Disagree

Q8 Comments or suggestions?

Again, our 'disagree' reflects the problem that once again the forms invites a single response to two questions: (i) whether the quality of teaching should be judged, and (ii) whether it should be judged as proposed.

We agree absolutely that the quality of teaching should be a central focus of inspection, but we disagree on the proposed procedure for making the judgement. The Cambridge Primary Review has assembled and evaluated a vast array of research and inspection evidence on what makes for high quality teaching. The elements highlighted in para 24 of the consultation document - subject knowledge and its classroom applications, assessment for learning, constructive dialogue and feedback, attention to individual needs, high expectations and challenge, opportunities for pupils to extend their learning - are very close indeed to our own summation, and we therefore welcome and endorse the proposed focus, though we would prefer 'subject knowledge' to read 'pedagogical content knowledge' so as to emphasise that the knowledge in question covers not just the subject in its mature form but also what is needed to translate it into viable and appropriate learning experiences in the classroom.

Having said that, there is a mismatch between what is listed and the final sentence of para 24. This makes 'subject understanding and the use of assessment' nodal points for judgements on the quality

of teaching but it omits what research shows is no less important: the quality and cognitive power of the classroom interaction through which teaching and learning are mediated. We would therefore like this to be amended to:

We propose therefore to focus on all these aspects but to consider (i) teachers' pedagogical content knowledge, (ii) the quality and cognitive power of the classroom interaction which they promote and (iii) their use of assessment for learning as key contributory factors in judging the quality of learning.

Even with this addition, a problem remains, for in para 25 Ofsted effectively says that the definition of quality will be as proposed in para 24 but will it will applied largely or exclusively to the teaching of reading. Further, the judgement of quality in reading appears to be reduced to whether or not schools use synthetic phonics, which remains a contested method and is of course not the only way successfully to teach reading. There are also the problems, referred to earlier, of the narrow definitions of both literacy and what counts as standards overall. Having regard both to our shared concern about the importance of literacy and the Cambridge Primary Review's concerns about the wider curriculum, we therefore propose that the second sentence of para 25 be amended to read:

In judging the quality of teaching we propose to include a specific judgement on the teaching of literacy, including oracy, in primary schools, and the teaching of literacy in secondary schools, but also to include judgements on the quality of the curriculum overall and of the teaching of each of its subjects or aspects.

Q9 To what extent do you agree that inspectors should judge the quality of leadership and management as proposed?

A Disagree

Q10 Comments or suggestions?

Same problem as with all preceding questions - two questions embedded in one, and we agree with one but not the other.

The effectiveness of school leadership is critically important and must be judged. However, despite the fact that - in line with the Cambridge Primary Review's own recommendations - the quality of the curriculum and curriculum leadership are referred to in para 31, this is not taken up in the formal proposal in para 34. Ofsted is aware of the CPR's deep concerns about the capacity of many primary schools to conceive, plan and teach a curriculum which is of a consistently high quality in all its aspects, and the Secretary of State has accepted our recommendation (final report, recommendation 127) that this matter be investigated. The enquiry in question is currently under way, and the issue is of even greater importance in the context of the Secretary of State's intention to give schools greater freedom in what they teach beyond what is defined as 'essential knowledge in the core subjects'. How schools use this freedom must be properly monitored so that nationally we avoid the kind of situation on which HMI reported in 1978 and Ofsted has reported on many times since 1992: excessive variation in the quality of curriculum provision beyond the subjects that are required and/or tested, sometimes to the extent of mandated subjects being taught so perfunctorily that they might as well not be taught at all. To tackle this problem, the judgement of school leadership should align with the more comprehensive definition of standards and quality in teaching and the curriculum that we propose above and all this should be reflected in para 31.

We therefore request the following amendment:

We propose to judge the effectiveness of leadership and management by how well ... schools plan and manage the curriculum as a whole and secure high standards of teaching and learning in all its aspects ...

Q11 To what extent do you agree we should give most weight to the quality of teaching and pupils' achievement when making a judgement about the overall effectiveness of the school?

A Strongly agree

Q12 Comments or suggestions?

We agree, subject to the earlier concerns being addressed. As drafted, the definitions of outcomes in para 35 and of pupil achievement, teaching quality and so on in para 36 reflect the narrower views and definitions to which we have objected. We would also like *progress* as well as achievement to be judged. We therefore request this amendment to the highlighted proposal in para 36:

We propose to judge the overall effectiveness of a school by giving particular attention to the judgements about: the progress and achievements of all pupils in all aspects of the curriculum, behaviour and safety