

OFSTED

Framework for Inspecting Schools

31 January 2005

1. NASUWT welcomes the opportunity to comment on *Framework for Inspecting Schools*.
2. NASUWT is the largest union representing teachers and headteachers throughout the UK.

GENERAL COMMENTS

3. NASUWT believes that the inspection of schools must:
 - place a minimal burden on schools;
 - take full account of the requirements of the National Agreement '*Raising Standards and Tackling Workload*';
 - not require schools to undertake any special preparation for inspection;
 - make use of the wealth of data that is already available and not require schools to prepare or collate data for the sole purpose of inspection;
 - shift from being a punitive inspection regime to one that is supportive and focuses on helping schools to improve;
 - focus on the school's management arrangements and processes, and their outcomes for pupils and staff in terms of efficiency, equity and effectiveness;
 - not duplicate other systems of monitoring, performance management and support;

- operate in unity with other systems of audit, performance management, advice and support, including that which is carried out by HMIs and LEAs; and
- provide judgements that are fair and in which the profession and the public can have confidence.

NASUWT asserts that *Framework for Inspecting Schools* fails to fulfil many of these requirements. NASUWT is keen to provide advice and support to OFSTED to address these concerns.

National Agreement ‘Raising Standards and Tackling Workload’

4. It is essential that both the Framework and the non-statutory guidance that supports the Framework take full account of the National Agreement ‘*Raising Standards and Tackling Workload*’. Inspectors should examine and evaluate the extent to which schools comply with the Agreement and are engaged in remodelling. OFSTED must also ensure that the requirements made of schools by the inspection process are consistent with the National Agreement. Inspection must not place bureaucratic burdens on schools. Inspections must be workload light.
5. NASUWT believes that the purpose of, and rationale for, school inspection remains unclear. On the one hand schools are being asked to be open and honest about their strengths and weaknesses, an approach which demands a supportive approach. On the other hand, inspectors have the power to judge a school or areas of school activity as unsatisfactory, a decision which could lead to the school being placed in Special Measures or being issued with an Improvement Notice. If the inspection regime is punitive rather than supportive, then schools are likely to undertake substantial preparation for inspection. NASUWT strongly recommends that the Framework is amended so that it is a supportive one.
6. Inspectors should make judgements about a school’s compliance with the National Agreement. NASUWT strongly recommends that both the

Framework and non-statutory guidance address the requirements of the National Agreement. The Union also recommends that OFSTED provide mandatory training and guidance for inspectors in order to ensure that they have the necessary understanding and expertise to evaluate a school's work on remodelling. OFSTED should consult the Workforce Agreement Monitoring Group (WAMG) before finalising the Framework and developing the non-statutory guidance.

A common inspection framework

7. NASUWT has a major concern about what 'common inspection' will mean in practice. The Union believes that there is a real danger that a common inspection framework will divert inspectors to explore an unreasonably wide range of issues and activities within schools. In particular, NASUWT is concerned that a common framework will steer the focus of inspection away from the school's primary activities: teaching and learning. Judgements about extended services in schools should be made separately from the inspection of teaching and learning in the school.
8. It is essential that the Framework, non-statutory guidance and other materials that support inspection explain very clearly what will and will not be covered by inspection. OFSTED needs to ensure that this information is given to inspectors, headteachers, school governors, and LEAs.
9. It is unclear how inspection judgements about different children's services will be integrated into an overall judgement about the quality of children's services. NASUWT believes that 'children's services inspections' have the potential to place additional requirements on schools, either in terms of additional inspections or in terms of the data that inspectors require from schools. NASUWT is strongly opposed to any developments which will increase the workload burdens on teachers and which direct resources from teaching and learning.

10. Further, it is unclear how performance against the five outcomes will be measured. OFSTED must ensure that any measures for schools are both meaningful and relevant to the school context. NASUWT strongly recommends that OFSTED consult WAMG when developing these measures.

School self-evaluation

11. NASUWT has serious concerns about OFSTED's current proposals for school self-evaluation. Whilst OFSTED proposes that schools will be free to develop their own models of self-evaluation, the reality is that the OFSTED Self-Evaluation Form (SEF) will drive the school self-evaluation process. The draft SEF fails to clarify what self-evaluation involves. It also provides a basis for self-inspection, not self-evaluation. This will help inspectors, but will not support practice in schools. NASUWT believes that the SEF should be revised so that it enables inspectors to have a proper dialogue with schools about their effectiveness, and the arrangements they have in place to secure school improvement.

12. NASUWT is extremely concerned that the OFSTED SEF will increase bureaucracy and workload burdens and divert resources away from teaching and learning. OFSTED's own evidence from the inspection pilots shows that some schools are spending up to 28 days completing the SEF. This is totally unacceptable and demonstrates the need for OFSTED to revise, refocus and reduce the form, and prepare clear guidance on what self-evaluation should and should not involve. The guidance should make it clear that a key purpose of self-evaluation should be to identify and free capacity for teaching and learning.

13. NASUWT believes that self-evaluation must be clearly linked to the school's core processes of managing teaching and learning, including the school's arrangements for performance management. Further, self-evaluation will only be effective if all staff are involved in the evaluation process. The SEF fails to make the links between self-evaluation and the

school's core processes. Worryingly, the SEF encourages schools to list examples of what they do. This exercise in bureaucratic form filling will not be welcomed by schools and would seem inconsistent with the principles governing school workforce remodeling and the new relationship with schools. NASUWT strongly recommends that the SEF questions are revised in order to minimise the bureaucratic burdens on schools.

14. The SEF does not acknowledge the importance of consultation or require schools to involve all staff in the self-evaluation process. NASUWT does not believe that schools can undertake an effective evaluation unless all groups of staff are consulted and involved in the evaluation. NASUWT strongly recommends that OFSTED amend the Form and related guidance so that it is clear that self-evaluation requires schools to consult all groups of staff and ensure that they are involved appropriately in the self-evaluation process.

15. NASUWT has particular concerns about the role of LEAs in preparing schools for inspection. Specifically, the Union has received feedback from schools which indicates that some LEAs are developing burdensome school self-evaluation arrangements, based upon the information needed for the SEF, and assumptions about what information may be required by inspectors. These LEAs responses are a result of the OFSTED SEF and the absence of clear school guidance and a national framework for school self-evaluation. NASUWT strongly recommends that OFSTED develop a national self-evaluation model and that LEAs are required to adopt this model. The model must be consistent with the objectives of the National Agreement on 'Raising Standards and Tackling Workload'.

16. The purpose of the draft guidance, *The New Relationship with Schools: Improving Performance Through School Self-Evaluation and Development Planning*, is unclear. Whilst the guidance sets out to explain how the SEF will be used in inspection, and how self-evaluation links to school improvement, it also starts to set out what self-evaluation involves. NASUWT recommends that OFSTED review what is included in the

guidance; that the guidance be made much briefer and that it is merged into a single guidance document which is attached to a revised and more streamlined SEF.

17. NASUWT has concerns about the content of the draft guidance. The guidance sets out six key questions which should underpin the self-evaluation process in schools. However, none of these questions address the issue of workload burdens and bureaucracy. OFSTED and the DfES must amend the key questions so that specific reference is made to minimising burdens and bureaucracy. For example, a question might be added which says: 'Does the self-evaluation process focus on improving outcomes in teaching and learning by minimising bureaucracy and workload burdens on staff?'

18. Further, *The New Relationships with Schools* guidance begins by stating that schools should engage in self-evaluation so that they can demonstrate that they are accountable to their stakeholders. NASUWT believes that both schools and inspectors should be given a very clear message: that the primary purpose of self-evaluation is to enable the school to improve its teaching and learning. Further, that self-evaluation should enable schools to improve their teaching and learning systematically, placing minimum burdens on staff. Demonstrating a school's accountability to stakeholders should be a by-product of self-evaluation, not the primary purpose. NASUWT suspects that this inaccuracy arises because the Self-Evaluation Form is not really about enabling schools to self-evaluate, but about schools being required to self-inspect. If the Form is intended to be used as a self-inspection tool, rather than self-evaluation tool, then both the Form and the accompanying guidance should be amended to state that this is the case.

HMI involvement in inspections

19. NASUWT welcomed the proposal, made in *The Future of Inspection*, which stated that HMIs would be more actively involved in the inspection

process and that, in many instances, HMIs would lead inspections. However, *Framework for Inspecting Schools* simply says that a 'greater number of inspections (will be) led by one of Her Majesty's Inspectors'. NASUWT is alarmed that OFSTED appears to be backtracking from the previous position.

20. Privatised subcontractors deliver a poor-quality and inconsistent inspection service. If inspection findings are to have credibility then OFSTED must replace the system of contracting inspectors through private companies. NASUWT strongly recommends that the number of HMIs is increased so that an HMI can lead every school inspection.

21. HMIs should have recent relevant teaching experience and be required to undertake regular and appropriate training. OFSTED must ensure that inspectors understand the contractual changes that have taken place in schools as a result of the National Agreement. For example, inspectors need to understand the important demarcation between the role of teachers and the role of support staff in schools.

Non-statutory guidance to support the Framework

22. NASUWT acknowledges the proposal to support the common inspection schedule for schools and colleges by issuing non-statutory guidance for schools covering the use of the schedule and conducting inspections. Non-statutory guidance will, as the introduction to the Framework points out, enable the guidance to be amended more easily and so take account of changing circumstances. However, this flexibility also means that the non-statutory guidance could be amended without appropriate consultation taking place. OFSTED must ensure that NASUWT, as part of the Workforce Agreement Monitoring Group (WAMG), is involved in any work to develop or amend the non-statutory guidance.

23. It is vital that both *Framework for Inspecting Schools* and the non-statutory guidance to support the Framework are consistent with key national

developments. Whilst the Framework makes reference to links between the inspection framework and national developments, this does not translate into practice. For example, NASUWT has received feedback from members in LEAs that are participating in the New Relationship with Schools/School Improvement Partner (SIP) trials which indicates that the SIP role is developing into something resembling a form of local inspection. This is totally inappropriate and is likely to add to the workload burdens of schools. It is essential that OFSTED works with the DfES and the school workforce social partners to clarify the relationship between inspection and the role of the SIP.

NASUWT recommends that:

- *the Framework, non-statutory guidance and other materials that support inspection make it clear that inspectors should focus on the school's primary role of teaching and learning, and that the inspection of other activities should only be to evaluate their contribution to teaching and learning;*
- *judgements about extended services in schools be made separately from the inspection of teaching and learning in the school;*
- *OFSTED consult with the WAMG before finalising the Framework and the non-statutory guidance to support the Framework;*
- *OFSTED consult with WAMG when developing the performance measures for evaluating the five key aims underpinning the inspection of children's services;*
- *OFSTED prepare guidance for schools and LEAs setting out what self-evaluation should and should not involve, and that the guidance set out a framework that is robust, workload light and which focuses on improving teaching and learning outcomes;*
- *OFSTED merge 'The New Relationships with Schools' guidance with the Self-Evaluation Form;*
- *OFSTED reduce the length of the Self-Evaluation Form considerably;*

- *the Self-Evaluation Form and related guidance make it clear that all school staff should be involved in the self-evaluation process;*
- *'The New Relationships with Schools' guidance be amended so that it is clear that the key purpose of self-evaluation is to enable schools to improve teaching and learning, not to demonstrate accountability to stakeholders;*
- *HMIs lead every inspection;*
- *OFSTED provide training for inspectors to enable them to understand how they should inspect compliance with the National Agreement;*
- *OFSTED work with the DfES and the school workforce social partners to clarify the relationship between the School Improvement Partners and inspectors, and to obviate any potential for increased workload burdens on schools.*

SPECIFIC COMMENTS

Overall effectiveness

24. NASUWT has serious concerns about the activities that will be considered when making the judgement about the effectiveness and efficiency of a school. The Union has specific concerns about the use of judgements that relate to integrated care and extended services in schools. As the Framework is currently worded, it appears that inspectors will be required to place strong emphasis on judgements about extended services when making a judgement about the overall effectiveness and efficiency of a school. This could mean that judgements about the overall effectiveness and efficiency of the school include judgements about activities that fall outside the school's primary remit of teaching and learning. The Framework and the supporting non-statutory guidance must make it clear that inspectors should only make judgements about how activities contribute to teaching and learning.

25. Schools may be under extreme pressure to provide extended services or integrated care. In some instances, this could be to the detriment of teaching and learning. NASUWT recommends that inspectors should examine why services exist, and distinguish between those services where the school has had control in making the decision and those where decisions are made by external bodies such as the LEA. Schools should not be penalised because they do not provide directly extended services. Nor should they be penalised for decisions that are largely outside their control.

NASUWT recommends that:

- *current wording in the Framework be amended so that it is clear that judgements about the overall effectiveness and efficiency of the school focus on the school's primary remit of teaching and learning;*
- *schools not be penalised because they do not directly provide extended services;*
- *inspection judgements make a distinction between extended services that have been developed by the school and services where external bodies have played a major role in decision making.*

Achievements and standards

26. The Framework includes a principle of inspection which states that inspection of providers will 'make use, as far as possible, of the existing documentation and systems of the organisations inspected and avoid placing unnecessary burdens on them'. However, this leaves open the possibility that inspectors could require schools to provide additional data which is used solely for the purpose of inspection. Worryingly, the draft Self-Evaluation Form requires schools to collate a substantial amount of data for the purpose of informing the inspection. It is vital that inspectors only draw on data that is already collected by schools, and that inspectors

do not require schools to produce any additional data. Further, schools must not be required to collate or adapt existing data for the purpose of inspection. If inspectors require data to be presented or compiled in a format other than one normally used by schools then inspectors, rather than the school, should undertake this task.

27. It is important that equality matters are examined and evaluated by inspectors. NASUWT therefore welcomes the requirement that inspectors should evaluate whether there are significant variations between groups of learners in terms of achievements and progress. NASUWT acknowledges the mandatory training on educational inclusion that OFSTED has provided for all inspectors. However, the training only scratches the surface of what are substantial and complex issues. Feedback from staff in schools indicates that there is wide variation between inspection teams in terms both of levels of understanding and how equality issues are addressed within the inspection. Therefore, NASUWT strongly recommends that OFSTED provide further training to ensure that all inspectors understand the importance of equal opportunities and know how to examine these issues within inspection.

28. In line with the earlier comments about common inspection, the non-statutory guidance which accompanies the Framework must make it clear that judgements about achievements and standards, especially those in the 'where appropriate' section, must do so only from the point of view of their contribution to teaching and learning.

NASUWT recommends that:

- *inspectors only use data that is already collected by schools;*
- *schools not be required to collate or adapt data for the purpose of inspection. Any additional work, if required, should be undertaken by inspectors;*

- *inspectors examine data on achievement and standards across the curriculum rather than focusing on a narrow range of priority subjects;*
- *OFSTED provide further training for inspectors to improve their understanding of how to address equality issues as part of inspection;*
- *the Framework and supporting non-statutory guidance make it clear that judgements about achievement and standards, especially those relating to extended activities, look only at how the activities contribute to teaching and learning.*

Quality of provision

29. NASUWT is strongly opposed to inspectors observing lessons and including judgements based on classroom observation in the inspection report. These observations are highly subjective and do not provide an accurate or representative picture of teaching across a school. Therefore, NASUWT cautiously welcomes the focus within the Framework on planning and programmes, on the basis that this suggests that inspectors will concentrate on the management of teaching and learning rather than direct observation. However, it is vital that the inspection of a school's planning and programmes does not result in teachers being required to produce detailed lesson plans, either for the purpose of inspection or as the result of pressure from school managers responding to what they perceive to be the requirements of inspection. NASUWT recommends that inspectors should evaluate schools in the context of how effectively they address the implications of the National Agreement and remodelling. This should include judgements about workload and the level of bureaucracy created by or resulting from the school's management and planning of programmes.

30. The Framework makes reference to inspectors evaluating, where appropriate, the extent to which enrichment activities and/or extended services in schools contribute to learners' enjoyment and achievement. In common with comments made above, both the Framework and the non-statutory guidance need to stress that judgements about enrichment activities and/or extended services must only focus on the extent to which they support teaching and learning.

31. Linked to this point, NASUWT has a specific concern with the requirement in 4. 'How well are learners guided and supported?' that inspectors should evaluate the extent to which the provision contributes to the learners' capacity to stay safe and healthy. The statement needs to be amended and supporting guidance needs to make it clear that judgements made in the course of the inspection will only look at this point from the perspective of its contribution to teaching and learning.

NASUWT recommends that:

- *OFSTED take steps to ensure that the increased focus within inspection on leadership and management does not lead, directly or indirectly, to teachers producing detailed lesson plans;*
- *inspectors make judgements about workload and the levels of bureaucracy created by, or resulting from, the school's planning and management of programmes;*
- *inspection of enrichment activities and/or extended services only make judgements about their contribution to teaching and learning;*

Leadership and management

32. There is a real danger that the increased emphasis on leadership and management within the inspection framework could result in senior managers increasing the workload burdens and pressures on staff within a

school. Therefore, inspection should include an evaluation of the extent to which leadership and management contribute to raising standards and minimising workload and bureaucratic burdens in schools. This should include an evaluation of the extent to which the school has achieved coherence and efficiency in its systems for auditing, monitoring, review and evaluation and the extent to which these address the implications of the National Agreement. NASUWT recommends that the Framework is amended so that the section on leadership and management includes an explicit requirement that inspectors evaluate the extent to which schools comply with the National Agreement, are taking steps to minimise bureaucratic burdens on staff, and are remodelling so that staff are employed in appropriate roles.

33. NASUWT supports the inclusion of the requirement for inspectors to evaluate how well equality of opportunity is promoted and discrimination tackled so that all learners achieve their potential. However, race equality legislation also requires schools to promote good race relations. Therefore, the Union recommends that the statement is broadened to include an evaluation of how well the school promotes good race relations. Also, NASUWT recommends that the statement is broadened to make explicit reference to staff since equalities legislation requires schools to promote equality of opportunity and tackle discrimination in employment. Further, the wellbeing of staff has a clear impact on learners and so the extent to which they are likely to achieve their full potential.

34. NASUWT recommends that inspectors should evaluate the extent to which issues relating to workload, work-life balance, and equal opportunities are an **explicit** and **integrated** part of all planning and decision making. Particular attention should be given to whether these issues are addressed within the school's main planning tool, for example the School Improvement Plan.

35. NASUWT acknowledges the role that other providers, services and organisations have to play in enhancing learning in schools. It is, therefore,

appropriate for inspectors to examine and evaluate the effectiveness of these links. However, inspectors must acknowledge that the primary role of the school is about teaching and learning, and that shortcomings caused by other services and organisations are outside the remit of inspection judgements made about the school.

NASUWT recommends that:

- *inspectors evaluate the extent to which leadership and management contribute to raising standards and minimising workload and bureaucratic burdens in schools;*
- *the Framework be amended so that the section on leadership and management includes an explicit requirement that inspectors evaluate the extent to which schools comply with the contractual requirements of the National Agreement and the wider remodelling agenda;*
- *the statement that requires inspectors to evaluate how effectively discrimination is tackled and equality of opportunity is promoted be broadened so that it also covers promoting good race relations and inspectors be required to evaluate the equality impact for staff as well as learners;*
- *inspectors evaluate the extent to which the workload, work-life balance and equal opportunities issues are an explicit and integrated part of all planning and decision making;*
- *inspection of school leadership and management concentrate on teaching and learning, and only evaluate the leadership and management of extended services and integrated services from the point of view of their contribution to, or detraction from, this primary role.*

Common grading scale for all inspection judgements and provision causing concern

36. NASUWT has serious reservations about the proposed grading of inspection and identification of 'failing' schools. The current inspection regime has led to a significant rise in the number of schools deemed to be failing and there is nothing to suggest that the new Framework will provide the basis for a fairer set of judgements to be made about schools, which reflect the realities of school improvement rather than the peculiarities and inconsistencies of the inspection regime. Indeed, the Union believes that the new Framework and system of categorisation may actually increase the number of schools that are identified as being of concern. NASUWT strongly opposes the proposal to create two categories of schools causing concern (schools which require special measures, and schools providing an acceptable standard of education overall but which require significant improvement in one or more areas of activity) and the plan to issue an Improvement Notice to schools that fall into the second category. NASUWT believes that the use of these categories means that inspection will be perceived by schools as simply punitive. As a result, schools will play to the requirements of inspection; they will not give honest self-evaluations which highlight areas where they really think improvements are needed. Any value to be gained from inspection and school self-evaluation is, therefore, seriously undermined.

NASUWT recommends that:

- ***OFSTED remove the category of schools requiring significant improvement in one or more areas, and that OFSTED undertake a major review of its grading of inspections so that inspections are perceived as being far more supportive.***

Principles of inspection

37. NASUWT recognises the intentions underpinning the principles of inspection but does not believe that they will be realised in practice. The continued, albeit reduced, reliance on contracted inspectors to carry out inspections means that variation in the quality of inspection is likely to continue. It is often difficult, and sometimes impossible, for schools or individual teachers to challenge inspection decisions, especially judgements about the effectiveness and efficiency of the school. It is essential that OFSTED regularly monitor and evaluate the quality of inspections and take immediate steps to deal with inspectors that do not adhere to the principles of inspection.
38. The principles of inspection include 'encourag[ing] rigorous self-assessment by the organisations inspected'. However, the proposed inspection regime remains one that is punitive. Schools are unlikely to provide rigorous and honest self-assessments when there is a possibility that any information they provide about areas for improvement will be used against them.
39. The principles of inspection state that inspection of providers will 'ascertain and take into account the views of learners and, where appropriate, their parents and carers, and look to involve them in inspections in other ways'. NASUWT has concerns about how this will be achieved. Schools should already have their own systems for collecting feedback from parents; it should be the role of inspection to verify the existence and appropriateness of the school's arrangements and not to duplicate these.
40. The principle that the inspection of providers will 'evaluate the work of inspected bodies in eliminating unlawful racial discrimination, promoting equality of opportunity and encouraging good race relations' is laudable. However, the principle also needs to address other areas of equality. Further, feedback from NASUWT members in schools indicates that there is wide variation between inspectors in terms of knowledge and understanding of race equality and other equality matters. OFSTED needs

to provide more training and support to inspectors if this principle is to be converted into practice.

41. NASUWT acknowledges the commitment to 'make use as far as possible of the existing documentation and systems of organisations', but wishes to stress that inspectors should be required to make use of only this data. It is essential that this expectation is made explicit so that schools are not required to undertake additional work in preparation for the inspection.

NASUWT recommends that:

- ***OFSTED amend the Inspection Framework so that inspections can actually fulfil the principles of inspection.***

Code of conduct for inspectors

42. NASUWT acknowledges the Code of Conduct, but has serious reservations about OFSTED's ability to effectively monitor whether the Code operates in practice.

43. The current system for monitoring the quality of inspection is woefully inadequate. Currently, monitoring only looks at either the inspection or the inspection report. The new inspection regime will place even greater emphasis on the judgements of individual inspectors. Monitoring inspection quality is, therefore, absolutely critical. OFSTED must regularly monitor every inspector and inspections should be monitored from start to finish. HMIs should play a central role in the monitoring process and OFSTED needs to ensure that it has enough HMIs to undertake this task.

44. NASUWT also stresses the need for OFSTED to gather confidential feedback from schools about the quality of inspection and the conduct of inspectors. The Union recommends that a body independent of OFSTED

is used to gather this information so that the anonymity of schools and teachers can be assured.

NASUWT recommends that:

- *every inspector is regularly monitored and that inspections are monitored from start to finish;*
- *a body independent of OFSTED be created which receives confidential feedback from schools on the quality of inspection and the conduct of inspectors.*

Complaints about inspections

45. NASUWT has serious concerns about the current complaints process and strongly recommends that OFSTED amend the process in order to deal with these concerns:

- The complaints procedure is heavily weighted towards the judgement of the inspector. NASUWT is particularly concerned that there is no effective appeals process to challenge an inspection judgement that relates to standards. The Union is also concerned that the current system makes it extremely difficult for individual members of staff to pursue complaints about an inspection.
- There is a lack of transparency in the complaints process. Complainants may be told that there is evidence to back up the inspection findings, but are not told what that evidence is. There needs to be much greater openness regarding inspection evidence.
- The timescale for making complaints is too rigid and excludes cases where it has taken time for the full evidence to become available. Timescales for making complaints should be amended so that

complainants have the time necessary to gather evidence. OFSTED should also consider introducing an independent advice line to enable schools to raise issues and concerns immediately following an inspection. Supporting this, OFSTED should produce clear guidance on how to make a complaint or raise concerns about the inspection process.

- The inspection process does not protect the confidentiality of individuals. It is often possible to identify individual teachers, particularly where departments are very small in size. Inspection should be about inspecting the institution, not individuals. NASUWT strongly recommends that OFSTED, in collaboration with school staff unions, undertake a review of the information that is collected for inspection with a view to identifying ways in which the anonymity of individuals can be protected.

NASUWT recommends that:

- ***OFSTED amend the complaints procedures so that schools and individuals have an opportunity to challenge inspection judgements, there is greater transparency in the complaints process, the time-scales for making complaints are more flexible, and the inspection process protects the confidentiality of individuals.***

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