



BACKGROUND

- 1 In March 2003, the Secondary Heads Association published a policy statement entitled *Towards Intelligent Accountability for Schools*. The report's recommendations are printed at Annex 1 below.
- 2 The report was widely discussed at the association's annual conference in Birmingham that month, being referred to by all the platform speakers, including the Secretary of State, Her Majesty's Chief Inspector for Schools in England and the Director General for Schools in the Department for Education and Skills.
- 3 The purpose of this paper is to examine the progress made towards a more intelligent accountability framework during the twelve months from March 2003.
- 4 In summary, the year has seen a substantial move in government thinking in the direction of intelligent accountability, and SHA looks forward to helping to shape these ideas as they are implemented. The general picture is one of optimism that over-accountability is being addressed. There remain, however, some areas in which no progress has been made and a small number of areas in which accountability has been extended.
- 5 Schools in Wales do not have the multiple funding streams or performance tables that exist in England and the Daugherty Review offers the prospect of a more intelligent approach to curriculum and assessment. However, the picture in Wales is not entirely positive and the Welsh Assembly Government continues to produce statutory guidance on matters that should be the concern of the individual school headteacher and the governing body.
- 6 In Scotland, progress is being made in the development of teaching and learning towards meeting the needs of the individual learner. Conversely, evidence is sadly lacking of the increased trust between national government, local authorities and schools essential to make such progress permanent. This is leading to a gradual increase in accountability for schools.

INTELLIGENT ACCOUNTABILITY

- 7 The government in London has adopted the notion of intelligent accountability, as SHA recommended, and is actively examining how best the current accountability regime could be slimmed down and made more effective. The new relationship with schools, outlined in the speech by the Minister of State for School Standards, David Miliband, in Belfast on 8 January 2004, closely follows the SHA definition of intelligent accountability. He said:

In the new relationship with schools, we need to move beyond defending the need for an accountability framework and respond to those who want it to work better to promote high performance.

He identified three key aspects for whole school improvement:

First, an accountability framework, which puts a premium on ensuring effective and ongoing self-evaluation in every school combined with more focused external inspection, linked closely to the improvement cycle of the school; second, a simplified school improvement process, where every school uses robust self-evaluation to drive improvement, informed by a single annual conversation with the education system on targets, priorities and support; and third, improved data flows, including to parents.

- 8 There are seven strands to the new relationship as outlined in the Belfast speech:
- school self-evaluation;
 - a new Ofsted inspection framework, linked closely to self-evaluation;
 - a simplified school improvement process;
 - a single conversation between the headteacher and a credible, experienced practitioner about the school's development priorities, targets and support needs;
 - an annual school profile to report school performance to parents and the community;
 - improved data, produced once and used frequently; and
 - improved communications between the school and government.
- 9 The proposals for a school profile and a single conversation are welcome as a more intelligent approach to communications and accountability, but these proposals have the capacity to add additional layers to the accountability structure unless their introduction is accompanied by reductions in other obligations on schools. This danger will have to be borne constantly in mind during the implementation of the school profile and the single conversation.
- 10 The annual report to parents is usually written by the headteacher on behalf of the governing body. This has become an onerous task, partly because of the tendency of ministers to add new statutory obligations to the report's contents. The proposal for a school profile, in principle, represents an improved accountability mechanism, although SHA will want to consider the detailed specification to ensure that it is not more burdensome than the accountability mechanisms that it replaces.
- 11 The new regulation allowing governing bodies, under certain conditions, to dispense with the annual meeting for parents is a step forward, but the conditions are too constraining and it remains SHA's view that the obligation to hold an annual meeting for parents, which is invariably very badly attended, should be removed. In its interim report, the Implementation Review Unit states that:

Schools should be held to account for how well they communicate with parents, but it is not necessary to regulate in detail how effective communication should be achieved.

SHA agrees wholeheartedly with this, which offers an intelligent approach to communication with parents. The annual meeting for parents is a one-size-fits-all approach that is manifestly not working and the obligation to hold such a meeting should be abolished.

- 12 The interim report of the Implementation Review Unit demonstrated that the IRU has the potential to make a real difference to the accountability structures for schools. SHA welcomes

the statement in the interim report that the IRU

put forward recommendations for the introduction of a new and systematic approach to impact assessment. We are pleased to be able to report that these recommendations were accepted and have recently been implemented.

This means that the impact of any new accountability measures will have to be systematically assessed by the DfES. This will be particularly important for measures arising from the green paper, *Every Child Matters*, and the Children Bill that followed it.

- 13 The IRU has also begun a year-long monitoring exercise in a sample of 30 schools to gain a full picture of the data schools are asked to provide. The IRU interim report states that this should lead to a programme of data rationalisation, which has already started with a reduction in the duplicate data collected by the Qualifications and Curriculum Authority (QCA).
- 14 SHA welcomes the scaling down of the system of external assessment of threshold judgements.

SCHOOL PERFORMANCE INDICATORS AND TARGETS

- 15 SHA welcomes the proposals in David Miliband's Belfast speech for improved data collection in schools. This will require greatly improved coordination between central government, local government, Ofsted, the Learning and Skills Council and other agencies in order to ensure that the data demands on schools are modified. In an intelligent accountability framework, schools should be able to produce a single data set, from which external agencies draw the information they require. This single data set should also form the basis for the single conversation and for the school profile.
- 16 The measurement of value added is now regarded as important, but SHA does not believe that the DfES is using the best methodology to calculate or to present value added information. The existing methodology does not provide a valid rank order of schools and gives no indication as to which schools have statistically significant scores. SHA believes that statistics should not be published without confidence intervals, so that readers can gain a better picture of the relative performance of different schools. With the present method of publishing value added information, readers are invited to draw statistically invalid conclusions from the data.
- 17 The prime performance indicator for schools – the proportion of 16 year olds gaining five GCSE passes at grade A* to C – remains in place. *Towards Intelligent Accountability for Schools* described how this acts as a perverse incentive for schools to concentrate on a particular tranche of pupils to the exclusion of others. Better output measures are available and should be used instead of the proportion with five A* to C passes.
- 18 SHA does not believe that LEAs should retain their role in target setting. SHA supports the principle of *intervention in inverse proportion to success*, but there remains a substantial number of LEAs where this is not observed and where schools are burdened by accountability conversations that do little more than enable the LEA to demonstrate that it is fulfilling its duty to monitor progress. Under the new relationship, SHA is pleased to note that target setting will become part of the single conversation.

- 19 Under the government's strategy paper for primary schools, *Excellence and Enjoyment*, targets at key stage 2 will be set by the schools themselves. This is in line with recommendation 14 in *Towards Intelligent Accountability for Schools*. SHA strongly believes that this process should be replicated at key stage 3.
- 20 The floor targets for schools in challenging circumstances regrettably remain in place, although it seems that the government is not carrying out its threat to close schools that do not meet the targets. There are signs of increasing recognition by the DfES of the breadth of the problems facing these schools. It also appears to be recognised that there is no point in closing a well-led school that is doing its best to raise the achievement of young people from very disadvantaged backgrounds. It remains the case that the floor targets should be abolished and a better balance of pressure and support used to help these schools.
- 21 SHA welcomes the proposals for a single conversation between the headteacher and a credible, experienced practitioner. There is an obvious parallel with the external adviser role, in which an experienced peer carries out the heads' performance review. In order to avoid duplication, SHA suggests that the role of the external adviser should be widened to embrace the single conversation. It is essential that this single conversation (in reality, a series of conversations) should be instead of, and not in addition to, the many lines of accountability described in *Towards Intelligent Accountability for Schools*.
- 22 There remain many areas in which accountability, and its associated bureaucracy, could be slimmed. In this context, SHA members mention the Connexions service and the administration required for statemented pupils.

PERFORMANCE TABLES

- 23 The first publication of national performance tables for 14 year olds marks a retrograde step. SHA believes that the government should be abolishing performance tables and it is very disappointing that this year, when ministers have adopted the language and aims of intelligent accountability, the performance tables should have been extended in this way.
- 24 Support for the SHA view on performance tables has come this year from the National Audit Office, which criticised the lack of contextualisation in the tables. In *Making a Difference*, the NAO states that performance tables:

are of only limited value in comparing the performance of different schools, types of school and the same school from one year to the next. This is because the academic achievements of pupils are influenced not only by the quality of education they receive, but also, to varying degrees, by external factors that are outside schools' control.

The NAO report found that, of the 621 schools ranked in the bottom 20 per cent at GCSE in 2002, only 272 remained in the bottom 20 per cent when academic performance is adjusted for the influence of external factors, and 60 of the schools moved to the top 20 per cent. The report recommended that performance information on schools should take into account external factors as well as prior attainment. The NAO also recommended that Ofsted should adopt the same approach. SHA strongly supports these recommendation.

25 The separate measures of value added for 11 to 14 year olds and for 14 to 16 year olds produced some particularly bizarre press headlines, debating the respective merits of selective and non-selective education on the basis of the flimsy evidence from a single year's statistics on value added in the separate age groups. Such is the power of performance tables to mislead.

26 Drawing conclusions from the value added statistics is indeed difficult. Ofsted, in its PANDA reports sent to schools, acknowledges that

there is some uncertainty about the stability over time of these value added statistics and recognises that many schools will experience considerable variation in value added figures from year to year.

The PANDA report as presently published includes very little data from which it is possible to draw valid statistical conclusions and is therefore wholly inadequate as a performance indicator. Since the grades published do not validly describe the performance of the school, their use invites erroneous and misleading conclusions. The following anomalies need urgently to be addressed;

- a grading system (A* - E*) which does not take account of confidence intervals in the data, and from which no conclusions can therefore validly be drawn. (Though the data provides no way of confirming this, it is likely that only A* and E* grades are statistically significant.)
 - a system of comparison with “similar schools” identified by cliff-edge cut-offs in the input data. This means that in extreme cases the inclusion or omission of one pupil can move a school's grade from A to E (or vice versa).
 - the continued publication of raw score data, which results in unfairly low grades for schools with intakes with poor prior attainment.
 - the continued use of declared free school meals eligibility as a defining characteristic for “similar schools”, which results in unfairly low grades for rural and some ethnic minority schools.
- 27 The purposes of school performance tables are said to be to raise standards and to give information to parents and the community. It is SHA's view that there are many other ways to raise standards, which do not have the damaging side effects of performance tables. Information to parents and the community will in future be produced in a much more thorough and acceptable form in the proposed school profile. There will, therefore, be no need for national performance tables and these should be discontinued.
- 28 In 2002, the Audit Commission recommended that the government should create new systems for recognising and celebrating the work of schools with children who have special educational needs. (Audit Commission, 2002) In the DfES strategy paper on special educational needs, *Removing Barriers to Achievement* (DfES, 2004), it was pleasing to note that the government recognises the problems created by performance tables for schools with a large number of children with special educational needs. SHA supports the government's aim to develop performance indicators that better reflect the job done by schools for children with special needs. However, SHA does not believe that it is adequate to extend the performance tables to report achievements in all approved qualifications, as the strategy paper proposes.
- 29 *Towards Intelligent Accountability for Schools* advocated the joint reporting of the examination results of consortia and groups of schools and colleges. In the Tomlinson interim report, no mention was

made of this, but the report stated that the final report, due in autumn 2004,

will also consider the implications of the proposals for ... performance measurement and accountability systems, such as inspection arrangements and performance tables.

CURRICULUM AND ASSESSMENT

- 30 Although the management structure of QCA has been strengthened in the last year, QCA has not been made independent of the DfES, as SHA recommended. The way in which the new National Assessment Agency relates to schools has yet to be seen.
- 31 The national curriculum remains far too detailed. Nevertheless, SHA welcomes the increased flexibility for schools arising from the changes to the statutory curriculum at key stage 4.
- 32 The progress of the national education system continues to be monitored by the aggregation of individual pupil test scores and not by random sampling tests, as SHA recommended.
- 33 Following the publication of *Excellence and Enjoyment* (DfES, 2003), a pilot is taking place in which greater reliance is placed on teacher assessment at key stage 1. SHA believes that this pilot should be extended to key stage 3 as soon as possible.
- 34 The Tomlinson interim report recognised that the extent of external examinations must be reduced and that greater reliance must be placed on the professional judgement of teachers through internal assessment. Tomlinson offered support for the SHA proposals for *chartered examiners* – senior professionals externally accredited to carry out internal assessment to external standards. During the last year, SHA has presented seminars on chartered examiners at QCA and in the qualifications section of the DfES, where there is considerable interest in the scheme.

INSPECTION

- 35 The new framework for inspection, introduced in September 2003, is linked more strongly than the previous framework to school self-evaluation, but there have been some serious shortcomings. The raising of the bar for satisfactory teaching to 90 per cent has inevitably produced an increase in the number of ‘failing’ schools. At a time when the system is improving – as the chief inspector himself reports – this has shaken the confidence of schools in the consistency of the Ofsted accountability mechanism and has heightened the level of anxiety among teachers. There have been operational difficulties too. The sampling of observed lessons has sometimes concentrated too heavily on areas of weakness and this skewed sample has pushed some schools into serious weaknesses or special measures. Some schools have found that the flexibility of the new inspection framework has worked well, but there appears to have been a loss of consistency between inspection teams, which has adversely affected some schools in an extremely serious way. Ofsted should carry out an urgent review of the operation of the framework.
- 36 The new self-review forms and the ability for heads to influence the pre-inspection commentary have been improvements. An intelligent system of inspection should relate to a school’s context in this way, but this has not always been evident in the conduct of inspections since September 2003.

- 37 In contrast to the problems of the 2003 Ofsted framework, David Bell's speech on 10 February and the consultation document, *The Future of Inspection*, offer the prospect of an inspection system that is closely linked to school self-evaluation. Ofsted inspection will be, in effect, a validation of a school's self-evaluation system, as SHA has long recommended. The proposals promise a more professional approach to inspection through the greater involvement of HMI as lead inspectors and this should raise the quality and consistency of inspecting.
- 38 The greater reliance on school self-evaluation is in line with SHA's long-held views on quality assurance for schools. School self-evaluation is an important component of intelligent accountability. In industry, where self-evaluation is the basis of modern quality assurance procedures, the aim is to have a 'balanced scorecard' of accountability measures and this should be our objective too. It is not enough to judge a school by examination results and attendance statistics, School self-evaluation will focus mainly on the quality and outcomes of learning, but it will also enable schools to give due weight to their achievements in pursuit of their wider aims in the development of young people.

POST-16 ACCOUNTABILITY

- 39 The notion of intelligent accountability for colleges has not yet been adopted as SHA recommended, although the Learning and Skills Council is streamlining its procedures; and the Bureaucracy Review Group has begun to carry out a role in post-16 education similar to that of the IRU.
- 40 Reports from pilot schools suggest that the first audit of individual student returns has gone well and is a sensible way to collect data for monitoring and accountability. Colleges would welcome a similar approach, but there is little sign that data collection from colleges is to be rationalised and slimmed down. The adoption of intelligent accountability would do much to free colleges from the bureaucratic burdens from which they have suffered in recent years.
- 41 Despite guidance from the national LSC that strategic area reviews should not place an additional accountability burden on schools and colleges, some local LSCs or their consultants are carrying out a data collection exercise that duplicates information already supplied to the LSC, LEA or DfES.

FINANCIAL AUDIT

- 42 Within the new relationship, it should be possible to have an efficient, effective way of auditing school financial procedures. Intelligent accountability demands a reduction from multiple audits to a single audit of all areas of expenditure. This should be carried out by external auditors in a single activity.
- 43 The school improvement plan includes resource allocation for improvement and should therefore be adequate for monitoring the use of the Leadership Incentive Grant (LIG) and other dedicated funding. There should be no requirement for a separate plan for LIG or any other funding source, including specialist school funding.

- 44 The report of the auditors would be used to inform the single conversation between the headteacher and the experienced practitioner, as outlined above. The single conversation will also examine the match of funding to development priorities.
- 45 It is SHA's view that the number of funding streams should be greatly reduced and that we should move away from the bidding culture that has prevailed in recent years.

WALES AND SCOTLAND

- 46 Accountability in Wales and Scotland is more firmly routed through local education authorities than in England. The Headteachers' Association of Scotland (HAS) has produced a version of *Towards Intelligent Accountability for Schools* in the Scottish context and SHA Cymru has done the same in Wales.
- 47 The Welsh Assembly Government (WAG) continues to produce statutory guidance on detailed micro-management of schools. One such example this year has been a circular on school uniform, advising on suitable uniform colour. Estyn, on the other hand, offers more intelligent accountability and has produced a new framework in which external inspection is clearly linked with school self-evaluation. Differentiated inspections offer a sensible approach.
- 48 The Welsh Assembly Government has created a School Workload Advisory Panel (with a similar role to that of the Implementation Review Unit in England), but the Welsh Assembly Government has not demonstrated the same level of commitment to rationalise and reduce accountability burdens as is evident in the DfES attitude to the IRU.
- 49 The current value added methodology and the increasing use of free school meals as an indicator suggest that the Welsh Assembly Government is not making progress towards the use of more intelligent measures of accountability. Nevertheless, schools in Wales welcome the more intelligent approach to the publication of performance information.
- 50 LEAs continue to have too great a role in the setting of targets for secondary schools in Wales. SHA believes that schools in Wales should set their own targets in the light of circumstances. There is, however, a more supportive approach than in England to schools in challenging circumstances, although this does not extend to performance information on pupils with SEN. Schools with a large number of statemented pupils continue to be disadvantaged in performance analysis.
- 51 There is no evidence that LEAs in Wales have understood the need for more intelligent accountability and the existence of 22 LEAs in a country with only 225 secondary schools does not help in this respect.
- 52 The Daugherty Review offers the prospect of major progress in Wales towards more intelligent accountability in curriculum and assessment. The initial report has recommended that progress of the education system should be monitored by random sampling, not by the aggregation of individual pupil results. This is in line with the recommendation in *Towards Intelligent Accountability for Schools*. The Daugherty report has also signalled a reduction in the number of external

examinations and national tests and a move towards the greater use of internal assessment by teachers.

- 53 In Scotland, national and local government rigidly control the management of state education. There is little or no direct contact between schools and the Scottish Executive Education Department (SEED) without the intervention of the local authority. Over the last 20 years, there has been an increase in central control of education but unlike in England, this has occurred without any consequent loss of operational control for local authorities. The quality of local authority interventions has not been helped by the existence of as many as 32 local authorities in Scotland.
- 54 Against a background of immense change of school management structures, job sizing and the 35-hour week, HAS has sought to reduce accountability of school leaders in Scotland to more manageable proportions. Local authorities are required by SEED to set targets for individual schools to meet the requirements of SEED's own national priorities. HAS and SHA strongly believe that the ownership of this process should lie with the school itself.
- 55 Quality indicators in Scottish schools remain defined by the HMIE document *How Good is our School 2*, a highly regarded document that is widely viewed as helpful.
- 56 Movement is taking place in curricular flexibility to permit Scottish schools to begin to address the needs of the individual. Pending the forthcoming national review of the centrally driven school curriculum in Scotland, due in 2004, monitoring of the S1 and S2 curriculum is changing from national testing to assessment, but some concerns are arising that schools may be left with requirements in both systems.
- 57 The national performance tables in Scotland have been replaced by individual school performance tables available on the national parentzone.com website. This has regrettably led to the media interpreting data to produce their own league tables.
- 58 The present amount of monitoring by both national government and Scottish local authorities remains a heavy burden on Scottish schools. From 2002 there has been an increase in the amount and scope of information required through the development of the national ScotExed electronic system. This has increased accountability of schools with little evidence of valuable use. At local authority level the ongoing development of quality assurance teams has been driven by the need to be seen to address local and national priorities. This has added to the accountability burden on schools and detracted from addressing the needs of individual schools.

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ANNEX 1

SUMMARY OF RECOMMENDATIONS FROM

TOWARDS INTELLIGENT ACCOUNTABILITY FOR SCHOOLS (SHA, MARCH 2003)

IN THIS PAPER, SHA RECOMMENDED THAT:

- 1 The government should review the accountability of schools and examine ways in which a slimmer accountability regime could better support schools in raising achievement and fulfilling their wider aims.
- 2 The government should adopt the notion of intelligent accountability for schools.
- 3 The government should also adopt the notion of intelligent accountability for colleges and should review their accountability structures accordingly.
- 4 Intelligent accountability is defined as *a framework to ensure that schools work effectively and efficiently towards both the common good and the fullest development of their pupils. It uses a rich set of data that gives full expression to the strengths and weaknesses of the school in fulfilling the potential of pupils. It combines internal school processes with levels of external monitoring appropriate to the state of development of each individual school.*
- 5 The governors' annual report to parents should be retained, but without the statutory requirements on its contents.
- 6 The requirement to hold an annual meeting for parents should be abolished and the time spent more productively on better ways of engaging with parents.
- 7 New lines of accountability should not be introduced for new initiatives and funding streams and that existing accountability measures should be used.
- 8 The excessively bureaucratic Leadership Incentive Grant guidance should be scaled down and that normal lines of accountability should be used for the spending of Leadership Incentive Grants.
- 9 All proposed new accountabilities should be vetted by the Implementation Review Unit.
- 10 Value added should be used as a performance indicator, based on z- scores as a sound statistical basis for the value added calculation.
- 11 The output measure in such a value added system should not be the proportion of students gaining five A*-C passes at GCSE, but the average points score of the best eight GCSE results.
- 12 Performance indicators for schools should be chosen in a way that minimises perverse incentives, since badly chosen performance indicators warp professional judgements and undermine the professionals making them.

- 13 LEAs should not be required to participate in school target setting.
- 14 Schools should set their own attainment targets in the light of circumstances and the prior attainment of individual cohorts of pupils.
- 15 Performance indicators and targets for schools should always be supported by the means for head teachers to deliver them.
- 16 For schools in challenging circumstances, the “floor target” of 25 per cent GCSE passes at grades A*-C should be abolished and targets based on value added should be substituted.
- 17 In line with the recommendation in the Audit Commission report, *Special Educational Needs: A Mainstream Issue*, the government should create new systems for recognising and celebrating schools’ work with children who have SEN.
- 18 National performance tables should be abolished and replaced by an obligation on schools to publish examination results and value added statistics locally, thus providing information to parents, prospective parents and the community that the school serves.
- 19 Schools and colleges are forming federations or consortia, examination results should be published for the group as a whole and not for the individual institutions.
- 20 QCA should be responsible to Parliament, not to the DfES
- 21 The government should establish a framework for the national curriculum, which schools should be able to interpret in their local context.
- 22 Progress of the education system should be monitored not by the aggregation of individual test results, but by random sampling tests, for which purpose a new body, similar to the Assessment of Performance Unit (APU) should be introduced.
- 23 Internal summative assessment should play a greater part in the examination system, with national curriculum tests at 7, 11 and 14, GCSE, AS and A level examinations relying more on internal assessment through the professional judgement of teachers.
- 24 The SHA proposals on chartered examiners should be piloted and, if successful, adopted nationally as soon as practicable.
- 25 Ofsted inspections should normally be a validation of the self-evaluation programmes in schools.
- 26 The Ofsted inspection framework should be sufficiently flexible to adapt to the state of development in individual schools.
- 27 Instead of frequent inspections, schools under special measures or in one of the other categories of “failure” should have an agreed programme of external support, with clear roles for external consultants to work with the head teacher on the action plan and the meeting of objectives.

- 28 The amount of external inspection and monitoring of the post-16 work of schools should be drastically reduced, as follows:
- LEA monitoring and LSC quality assurance processes should rely on data from Ofsted inspections and on existing data from the schools themselves.
 - Post-16 (shortly to be 14-19) Ofsted area inspections and LSC strategic area reviews (also to be 14-19) have considerable areas of overlap. LSC strategic area reviews should not impose additional visits or data demands on schools. They should be phased sensibly with Ofsted area inspections.
 - Post-16 inspection and review should be in inverse proportion to the proven quality of an institution.
 - Reviews of post-16 (or, in the future, perhaps post-14) performance should be an interactive process between the school and the LSC. This work should not be duplicated by LEAs. Reviews should occur no more frequently than once per year and should not be box-ticking exercises.
 - Financial audit procedures should be agreed between the LSC, LEAs and heads' representatives and should be administered by the LEA (from which information could be passed to the LSC).
- 29 A nationally agreed audit process for school funds should be produced.
- 30 External assessor posts should be abolished and that heads should report their pay threshold assessments to their governing bodies.
- 31 Schools should adopt their own performance indicators, in line with their aims and ethos.
- 32 Broader measures of school performance are required nationally, so that the wider aims of schools are not limited by narrow national performance indicators and targets; such a system should mature over time, with pilots of new arrangements being tried from time to time.

Executive summary

of

Intelligent Accountability for Schools: One Year On

- 1 The government has adopted the notion of intelligent accountability, as SHA recommended. The new relationship with schools, outlined in the Belfast speech by David Miliband closely follows the SHA definition of intelligent accountability. (para 7)
- 2 The proposals for a school profile and a single conversation are welcome as a more intelligent approach to communications and accountability, but these proposals have the capacity to add additional layers to the accountability structure unless their introduction is accompanied by reductions in other obligations on schools. (para 9)
- 3 The proposal for a school profile, in principle, represents an improved accountability mechanism, although SHA will want to consider the detailed specification to ensure that it is not more burdensome than the accountability mechanisms that it replaces. (para 10)
- 4 The obligation to hold an annual meeting for parents should be removed. (para 11)
- 5 The interim report of the Implementation Review Unit demonstrated that the IRU has the potential to make a real difference to the accountability structures for schools. It will be particularly important that the IRU scrutinises measures arising from the green paper, *Every Child Matters*, and the Children Bill. (para 12)
- 6 SHA welcomes the scaling down of the system of external assessment of threshold judgements. (para 14)
- 7 SHA welcomes the proposals in David Miliband's Belfast speech for improved data collection in schools. This will require greatly improved coordination between central government, local government, Ofsted, the Learning and Skills Council and other agencies in order to ensure that the data demands on schools are modified. In an intelligent accountability framework, schools should be able to produce a single data set, from which external agencies draw the information they require. This single data set should also form the basis for the single conversation and for the school profile. (para 15)
- 8 The DfES is not using the best methodology to calculate or to present value added information. The present methodology does not provide a valid rank order of schools and gives no indication as to which schools have statistically significant scores. SHA believes that statistics should not be published without confidence intervals. (para 16)
- 9 Better output measures of school performance are available and should be used instead of the proportion of students with five A* to C passes. (para 17)
- 10 SHA does not believe that LEAs should retain their role in target setting. (para 18)
- 11 Targets at key stage 3 should be set by the schools themselves, as is to happen at key stage 2. (para 19)

- 12 The floor targets for schools in challenging circumstances should be abolished and a better balance of pressure and support used to help these schools. (para 20)
- 13 SHA suggests that the current role of the external adviser should be widened to embrace the single conversation. It is essential that this single conversation should be instead of, and not in addition to, the many lines of accountability described in *Towards Intelligent Accountability for Schools*. (para 21)
- 14 There remain many areas in which accountability, and its associated bureaucracy, could be slimmed. In this context, SHA members mention the Connexions service and the administration required for statemented pupils. (para 22)
- 15 SHA believes that the publication of performance tables for 14 year olds marks a retrograde step. (para 23)
- 16 The government's performance information on schools should take into account external factors as well as prior attainment. Ofsted should adopt the same approach. (para 24)
- 17 The PANDA report is inadequate as a performance indicator. The published grades do not validly describe the performance of a school and so their use invites erroneous and misleading conclusions. The PANDA grading system, the comparisons with other "similar" schools, the continued publication of raw data and the use of free school meals eligibility need urgently to be addressed. (para 26)
- 18 Information to parents and the community will in future be produced in a much more thorough and acceptable form in the proposed school profile. There will, therefore, be no need for national performance tables and SHA believes that these should be discontinued. (para 27)
- 19 SHA supports the government's aim to develop performance indicators that better reflect the job done by schools for children with special needs. However, SHA does not believe that it is adequate to extend the performance tables to report achievements in all approved qualifications, as the SEN strategy paper proposes. (para 28)
- 20 The examination results of school/college consortia should be jointly reported. (para 29)
- 21 The progress of the national system should be monitored by random sampling tests, not by the aggregation of individual pupil test scores. (para 32)
- 22 The key stage 1 pilot in which greater reliance is placed on teacher assessment should be extended to key stage 3 tests. (para 33)
- 23 The SHA proposals on chartered examiners should be piloted and, if successful, adopted nationally as soon as practicable. (para 34)
- 24 SHA is concerned at the operation of the framework for inspection introduced in September 2003. Ofsted should carry out an urgent review of the operation of the framework. (para 35)
- 25 SHA welcomes the proposals in *The Future of Inspection*, which offer the prospect of inspection system that will be, in effect, a validation of a school's self-evaluation system, as SHA has long recommended. (para 37)

- 26 Under the new proposals, self-evaluation will focus mainly on the quality and outcomes of learning, but it will also enable schools to give due weight to their achievements in pursuit of their wider aims in the development of young people. (para 38)
- 27 The notion of intelligent accountability has not yet been adopted for colleges as SHA recommended, although the Learning and Skills Council is streamlining its procedures and the Bureaucracy Review Group has begun to carry out a role in post-16 education similar to that of the IRU. The adoption of intelligent accountability would do much to free colleges from the bureaucratic burdens from which they have suffered in recent years. (para 39, 40)
- 28 Intelligent accountability demands a reduction from multiple audits to a single audit of all areas of expenditure. This should be carried out by external auditors in a single activity. (para 42)
- 29 There should be no requirement for a separate plan for the Leadership Incentive Grant or any other funding source, including specialist school funding. (para 43)
- 30 The number of funding streams should be greatly reduced and we should move away from the bidding culture that has prevailed in recent years. (para 45)
- 31 The Welsh Assembly Government has not demonstrated the same level of commitment to rationalise and reduce accountability burdens as is evident in the DfES attitude to the Implementation Review Unit. (para 48)
- 32 The current value added methodology and the increasing use of free school meals as an indicator suggest that the Welsh Assembly Government is not making progress towards the use of more intelligent measures of accountability. Nevertheless, schools in Wales welcome the more intelligent approach to the publication of performance information. (para 49)
- 33 LEAs continue to have too great a role in the setting of targets for secondary schools in Wales. SHA believes that schools in Wales should set their own targets in the light of circumstances. (para 50)
- 34 The Daugherty Review offers the prospect of major progress in Wales towards more intelligent accountability in curriculum and assessment. (para 52)
- 35 In Scotland, national and local government rigidly control the management of state education. Local authorities are required by the Scottish Executive Education Department (SEED) to set targets for individual schools to meet the requirements of SEED's own national priorities. The Headteachers' Association of Scotland (HAS) and SHA strongly believe that the ownership of this process should lie with the school itself. (para 53, 54)
- 36 The present amount of monitoring by both national government and Scottish local authorities remains a heavy burden on Scottish schools. At local authority level the ongoing development of quality assurance teams has added to the accountability burden on schools. (para 58)