

Estyn – listening, learning and changing together

Phase two consultation: Estyn's inspection arrangements from September 2021

This is the second in a series of consultations about how inspection can best support schools and other providers to manage the many changes taking place in education.

Between 2020 and 2024 we plan to make changes to our work:

- in the transition year 2020-2021 we propose to pause our school inspections so that inspectors can work with schools on the curriculum changes. (Phase one)
- in September 2021 we propose to amend our inspection arrangements, to align with the changes to education in Wales. (Phase two)
- before 2024 we will also pilot inspections that focus on validating schools' self-improvement processes. (Phase three)

At each stage we will work with you to shape our plans. During summer 2019 we asked you about what we should do to support schools during the transition year. In this consultation we ask for your views on our inspection arrangements from September 2021.

Context

In 2017 we introduced new inspection arrangements. At the same time, and in the context of ambitious education reforms, Her Majesty's Chief Inspector commissioned an independent review of school inspection in Wales. The review's report 'A Learning Inspectorate' was published in June 2018. It makes a series of recommendations on how we might adapt our work to contribute constructively to education reform. This consultation is part of our response to 'A Learning Inspectorate', focusing specifically on our inspection arrangements.

What's in scope?

This consultation relates to the following sectors:

- primary schools, including nursery schools
- secondary schools
- all-age schools
- special schools
- pupils referral units
- independent schools

Non-maintained nursery settings, initial teacher education, Welsh for Adults and **local authorities** are not included, though the feedback may also inform future inspection arrangements in those sectors.

Further education colleges, Adult Learning and work-based learning providers will have a separate consultation during 2020.

Some aspects of what and how we inspect are legal requirements. Any changes to these aspects would take a little longer and be subject to further consultation.

How to submit your views

There are two ways of completing and submitting your response:

- 1 Complete the online questionnaire at <https://www.estyn.gov.wales/consultation-our-inspection-arrangements-september-2021>
- 2 Print this document and post your response to:

Consultation Officer
Estyn,
Anchor Court,
Keen Road,
Cardiff
CF24 5JW

The consultation will launch on 4 October 2019 and will close on 2 December 2019. Please make sure all postal responses arrive at Estyn by this date.

Confidentiality

The information you provide will be held by us and individual responses will not be shared with anybody outside Estyn. The information will be used to help improve how we inspect education and training in Wales. If you disclose your identity, it will be treated in confidence.

Key information about you

Please choose one option below which best describes the capacity in which you are completing this questionnaire.

Learner <input type="checkbox"/>	Parent/carer <input type="checkbox"/>	Education professional <input type="checkbox"/>	Member of the public <input type="checkbox"/>	Other(please specify) Third Sector (Charity)
-------------------------------------	--	--	--	---

The National Deaf Children's Society is the national charity dedicated to creating a world without barriers for deaf children and young people. We support deaf children, young people and their families with all types of hearing loss, from mild to profound, including unilateral and temporary hearing loss.

Deafness is not a learning disability and with appropriate support, deaf children can achieve on a par with their hearing peers. Unfortunately, Welsh Government statistics reveal that deaf children in Wales are experiencing attainment gaps at every key stage.

Which sector are you most interested in? (Please select one option).

Non-maintained nursery settings	<input checked="" type="checkbox"/>	Pupil referral units	<input checked="" type="checkbox"/>
Primary schools	<input checked="" type="checkbox"/>	Special schools	<input checked="" type="checkbox"/>
Secondary schools	<input checked="" type="checkbox"/>	Independent special schools and colleges	<input checked="" type="checkbox"/>
All-age schools	<input checked="" type="checkbox"/>	Local government education services and regional consortia	<input checked="" type="checkbox"/>
Independent schools	<input checked="" type="checkbox"/>	Other (please specify):	<input type="checkbox"/>

Part 1: Estyn's common inspection framework

The common inspection framework tells everyone what we look at on an inspection. Currently, there are five broad inspection areas (IAs). Presently, inspectors evaluate each area separately, and report their findings along with a summative grading.

More information about our common inspection framework can be found on our website: <http://www.estyn.gov.wales/inspection/inspection-explained/common-inspection-framework>

Q1: How important is it that we continue to inspect each of these areas?

	Very important	Important	Not very important	Not at all important	Unsure
Inspection area 1: Standards Pupils' standards, the progress they make and how well they develop their skills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspection area 2: Wellbeing and attitudes to learning	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspection area 3: Teaching and learning experiences	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The quality of teaching, the curriculum and the provision for pupils to develop their skills					
Inspection area 4: Care, support and guidance Support for pupils, including those with special educational needs and those who may be vulnerable to underachievement; personal development, spiritual, moral and cultural development; the school's arrangements for safeguarding	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspection area 5: Leadership and management The quality of leadership and management; improving the quality of the provision; professional learning and the use of resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please use the box below to provide suggestions on:

- 1) any areas we should prioritise more on our inspections
- 2) or areas we need to place less emphasis on than we do currently.

The National Deaf Children's Society Cymru believes extra emphasis should be placed on a school's performance and approach to supporting learners with Additional Learning Needs (ALN). Welsh Government statistics demonstrate that too many ALN learners are not reaching their full potential. This, combined with the new duties placed upon schools under the forthcoming ALNET Act, emphasises the requirement for a strong and distinct focus on ALN within the new inspection framework.

Since the needs of learners with varying types of ALN can differ so widely, it is important to focus on specific ALN types in line with the pupil population. We welcomed the opportunity to work with Estyn in 2018 on [supplementary inspection guidance for hearing impaired pupils](#) and believe such ALN specific guidance assists in this approach. Our response to this section of the consultation highlights

many of the points underpinning this supplementary guidance. The National Deaf Children's Society Cymru considers that embedding these core points within the framework would further strengthen the accountability of schools on support for ALN and deaf learners. For this reason, we also believe it would be beneficial for the framework to reference and signpost to Estyn's supplementary guidance on various ALN types.

- **Inspection area 1-** In light of Welsh Government statistics, which demonstrate significant attainment gaps between deaf learners and their peers, it is imperative that progress levels of deaf children are monitored distinctly from their peers to ensure that teaching strategies, resources and the learning environment are adapted to meet need.

The emphasis on progression steps within the new curriculum potentially risks exacerbating a culture of low expectations for deaf children. We believe that Estyn has a key role to play in ensuring that deaf learners are pushed to meet their full potential and that a lack of appropriate support is not the reason for deaf children remaining on lower progression steps.

- **Inspection area 2-** ALN learners can be particularly vulnerable to feelings of isolation and difficulties with emotional wellbeing. This is certainly the case for deaf children and young people. Being deaf in a hearing orientated society presents many challenges for deaf children and young people. The vast majority of deaf learners attend mainstream schools and may be the only, or one of just a few deaf children in their school. Research demonstrates that deaf children are at risk of isolation, bullying and have a greater incidence of mental health problems due to potential for delayed language and the general communication barriers they experience.

We believe it is important inspectors pay extra attention to how deaf children are supported to take part in activities that promote wellbeing. Whole class/ school activities should be inspected on how they are inclusive and able to meet the needs of all learners, including those with deafness. An inclusive approach should also be applied to extra curricula activities, playtime activities, clubs and school councils amongst others. It could be helpful for inspectors to consider how and whether children with ALN and those without ALN interact with one another, as research indicates that whilst non-disabled children do not possess negative attitudes towards their disabled peers, they are less likely to include them in their friendship groups.

When examining attitudes to learning, inspectors should be mindful that barriers placed in front of deaf children can impact their attitudes. For example, communication barriers can lead to concentration fatigue, or misunderstanding of information.

- **Inspection area 3-** ALN learners will often require adaptations in order to access the curriculum. For deaf learners, this could include aspects such as raising deaf awareness; correctly using technology; and considering acoustic environments. Within this inspection area, we would welcome a specific focus on the provisions in place for deaf children to fully participate

in the curriculum and the specific measures being undertaken to help develop their skills through teaching methods and learning experiences that are tailored to their individual needs. In light of significant and persistent attainment gaps for ALN learners, we would also welcome specific consideration of whether high expectations are in place for all pupils, including those with ALN.

- **Inspection area 4-** We would welcome a particular focus on how effectively the school is supporting learners with ALN through duties within the Additional Learning Needs and Education Tribunal Wales Act. Under the new Act, schools have a key role to play in initiating (and often co-ordinating IDPs). It is imperative that this system is operating effectively and that parents and pupils are meaningfully engaged in the process, as well as aware of their rights. We believe Estyn has a key role to play in holding this system to account. For example, we would welcome consideration of:
 - Whether families and young people are appropriately engaged in the IDP process and aware of their rights.
 - Whether there is good awareness of clear pathways for learners, families, staff and other relevant professionals to initiate the IDP process.
 - The quality of IDPs provided to pupils by the school.
 - Whether schools are working co-operatively with local authorities, nurseries and colleges within the IDP process.
 - Whether specialist support is being accessed effectively to inform IDPs.
 - Whether reviews are fully considering a learner's progress.
 - The ability and skillset of staff to meet support outlined within IDPs. (For example, level of BSL for Communication Support Workers who are working with BSL users.)
 - Trends of appeals/complaints relating to the IDP process

As identified elsewhere, given the particular vulnerabilities and needs of ALN learners, we are keen for the new framework to include a focus on support for this group. For example:

- How ALN and deaf learners are supported to be fully and socially included in the school. For example, whether deaf awareness is raised among all staff and pupils at the school so that a deaf pupil can communicate effectively in the classroom, dining hall and reception desk.
- Whether pupils who use sign language are able to communicate with others within the school community. A school might run a signing club to help facilitate this
- Whether support equipment is used appropriately.
- Whether ALN and deaf learners have access to role models.
- We note that the inspection guidance details how inspectors should consider the effectiveness of impartial advice and guidance relating to future career choices. Children with ALN require specialist careers advice to ensure they are aware of their rights and the range of employment support options available.

- **Inspection area 5-** We believe it is important that ALN matters are on the agenda within school leadership teams. For example, consideration could be given to:
 - Whether there is clear evidence of the ALNCo working effectively with a school leadership team in order to plan appropriately for this group of learners.
 - Evidence of regular training on relevant ALN matters
 - Whether the leadership team specifically monitors progress of ALN learners to ensure that provision is effective
 - Whether efforts are made to seek feedback from families of ALN learners on how effective the school is at meeting their specific needs
 - Whether appropriate policies are in place to support ALN learners
 - Whether the school has made relevant accessibility adaptations to a school building
 - Whether the needs of ALN learners factor into decision making processes.

Part 2: Summative gradings

We currently use the following summative gradings and descriptions in our reports to describe aspects of providers' work.

Summative gradings	What the judgement means
Excellent	Very strong, sustained performance and practice
Good	Strong features, although minor aspects may require improvement
Adequate	Strengths outweigh weaknesses, but important aspects require improvement
Unsatisfactory	Important weaknesses outweigh strengths

We are proposing to stop giving summative gradings for each inspection area of a school and PRU's work from September 2021. Instead, we would write our evaluations and judgements of each inspection area of the framework in the narrative within the report. We think that this will help schools and PRUs to focus on the messages in the report rather than on summative gradings. This will help the school and PRU to learn from the inspection and to plan its improvement. We have trialled this approach in our inspections of local government education services, and feel that it works well.

We will continue to provide a summary identifying the school/PRU's strengths and priorities for improvement.

We will also continue to make it clear in an inspection report when a school requires significant improvement or special measures which are statutory levels of follow-up, prescribed in legislation.

Q2: To what extent do you agree with our proposal to stop using summative gradings for each inspection area?

Strongly agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Unsure/no opinion <input type="checkbox"/>
--	---------------------------------------	--	---	---

Please use the box below to give us your opinions and state the reason(s) why you chose the option above:

Historically, there are cases where reporting of ALN has been buried in amongst the main body of the report findings. We'd like to see ALN distinctly highlighted in the key summary of reports so that these important findings are prominent for both staff and families.

Part 3: Follow-up activity in maintained schools

During an inspection, inspectors consider whether the school needs any follow-up activity. Significant improvement and special measures are statutory levels of follow-up, prescribed in legislation. These levels of follow-up will remain.

Estyn review is a non-statutory level of follow-up. Inspectors check on the progress of schools in Estyn review through a desk-based review, and may visit the provider to check progress a year or so after the inspection.

We are considering whether we still require Estyn review. Currently Estyn review is for schools where inspectors have concerns about aspects of the school/PRU's work, but those concerns are not serious. Removing it could enable inspectors to focus their follow-up work on schools causing the most concern and are in the statutory category of significant improvement or special measures.

Q3: Should we remove Estyn review?

Yes <input type="checkbox"/>	No <input type="checkbox"/>	Unsure / no opinion <input type="checkbox"/>
-------------------------------------	------------------------------------	---

If you wish to provide any further comments or suggestions about this proposal, please use the comments box below:

We believe that, if there are concerns surrounding the schools performance regarding any area pertaining to ALN, there should be a second review. As children with ALN are a protected and vulnerable group, it is essential that due regard is placed on ensuring they have equality of learning opportunity and the correct support to ensure they can achieve their individual potential. Under the new ALNET Act, schools will hold a much greater responsibility for ensuring the needs of ALN learners are met. We therefore believe that any learning establishment where there are concerns surrounding ALN in any of the five Inspection Areas should receive a review to ensure these issues are rectified.

The National Deaf Children's Society Cymru would also welcome a formal system in place where schools demonstrating failings in relation to ALN are required to work with their Local Authorities/ specialist services to address their ALN focussed gaps.

Part 4: Inspecting A level/vocational learning in school sixth forms

Since 2017 we have strengthened how we report on school sixth forms. Currently we write about the sixth form across all inspection areas but this information is not collated into an overall summary of the sixth form. We would like to report on sixth-form standards and provision separately to the main report so that our evaluations are clearer to the reader.

Q4: Should we have a separate section in secondary school inspection reports to capture standards and provision in the sixth form?

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Unsure/ no opinion <input type="checkbox"/>
--	--------------------------------	--

If you wish to provide any further comments or suggestions about this proposal please use the comments box below:

We know support for deaf learners can look different at a post-16 level and that deaf young people often face challenges in post-16 education. It would be useful for inspections to have a distinct assessment category for sixth form, which includes a clear section on support for ALN learners. This is particularly important in helping families to make informed choices around post-16 provision.

The National Deaf Children's Society is aware that deaf young people often face challenges in transitioning out of further education and onto work/higher education. We would strongly urge that Estyn considers the support a sixth form offers to help

ALN learners make this transition, such as access to specialist careers advice and information on Access to Work and DSA.

Part 5: Notice period

We give providers notice of an inspection. This is because we give parents, pupils, staff and governors time to complete pre-inspection questionnaires. In addition, we allow time for the Reporting Inspector to contact the provider and plan the inspection activities.

In our consultation in readiness for the changes in 2017, many respondents favoured reducing the notice period. As a result, since 2017, providers across most sectors have 15 working days' notice before a core inspection. We no longer inform providers of an autumn inspection before the six-week summer holidays.

We are proposing to reduce the notice period to 10 working days. This will still give parents, pupils, staff and governors time to complete pre-inspection questionnaires and also reduce the waiting time for schools and PRUs from notification to the start of the inspection.

Q5: We are proposing to reduce the notice period to 10 working days from September 2021. To what extent do you agree with this proposal?

Strongly agree	Agree	Disagree	Strongly disagree	Unsure/no opinion
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you wish to provide any further comments or suggestions about this proposal please use the comments box below:

We have reservations around whether ten working days is sufficient time to engage with parents and pupils.

Given the particular vulnerability of deaf and ALN learners, we believe that particular effort should be exerted to consult with these learners and their families.

The ten day timeframe could present difficulties in the resourcing of accessibility requirements for consultation work, such as interpreters.

We believe that the consultation process should allow the submission of feedback through whatever medium allows parents and children to fully express themselves. For individuals and families who use BSL as a first language, for example, responses should be welcomed in BSL.

We would welcome the opportunity to further discuss with Estyn ways in which consultation with learners and parents could be made accessible for deaf children and adults.

Part 6: General comments

We are committed to improving the way we work and are interested in your views on how we can carry out our work more effectively.

Q6a: Please use the box below to provide feedback on any other aspects of Estyn's inspection arrangements.

As highlighted throughout this response, we were delighted to have worked with Estyn on [supplementary guidance for inspectors on hearing impairment](#). We believe it would be greatly beneficial if the new inspection framework could emphasise the importance of considering the specific needs of the ALN learners enrolled at a school. As such, it would be helpful for the framework to cross-reference Estyn's supplementary guidance on various ALN types.

Q6b: We would like to know your views on the effects that the proposals in this consultation would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Supporting comments

Additional information

If you are responding on behalf of an organisation, please use the box below to state the name of the organisation.

National Deaf Children's Society Cymru.

The National Deaf Children's Society is the national charity dedicated to creating a world without barriers for deaf children and young people. We support deaf children, young people and their families with all types of hearing loss, from mild to profound, including unilateral and temporary hearing loss.

Deafness is not a learning disability and with appropriate support, deaf children can achieve on a par with their hearing peers. Unfortunately, Welsh Government statistics reveal that deaf children in Wales are experiencing attainment gaps at every key stage. We are keen to work with the Welsh Government, Estyn and others to address this attainment gap.

If you are happy for Estyn to contact you again in relation to your comments please provide your contact details below.

Campaigns.wales@ndcs.org.uk
029 20373474

In spring 2020, we will be establishing a 'virtual parent/carers' panel'. The panel will enable parents/carers' to share their experiences and influence decisions to help shape the way forward for Estyn.

If you are interested in being part of this forum, please email us at:
NIA21@estyn.gov.uk

Thank you for taking part in our consultation. We will use the information we receive to develop our inspection work. The new inspection arrangements will start in September 2021.

If you have any questions regarding the consultation, please email us at:
consultation@estyn.gov.wales