

By email: Consultation.IdentifyingSchool@education.gov.uk

ADCS response to the consultation on identifying schools for improvement support

1. The Association of Directors of Children's Services Ltd. (ADCS) welcomes the opportunity to respond to this consultation on proposals for a clearer approach to offering improvement support to schools. ADCS is the national leadership organisation in England for directors of children's services (DCSs) under the provisions of the Children Act (2004). The DCS acts as a single point of leadership and accountability for services for children and young people in a local area, including children's social care and education.
2. ADCS members continue to believe that more needs to be done to create coherence across the school system and would welcome a common accountability framework for all schools with unambiguous guidance on the role of key players in the system. Indeed, the education reforms since 2010 have introduced myriad new players into the 'middle tier', including over 1,000 multi-academy trusts (MATs), eight regional schools commissioners (RSCs) and multiple headteacher boards (HTB).
3. This consultation follows the Department for Education's (DfE) publication of its 'principles for a clear and simple accountability system' in May 2018. It provides clear guidance on when schools will be offered improvement support and when academisation, or re-brokerage, will be required. However, as yet the DfE has not consulted on or provided further clarity on the role and remit of different players in the school system despite assurances that this would happen. ADCS would welcome further clarity on this and the opportunity to respond to such proposals.

Identifying schools for improvement support

4. The proposal that all schools judged as Requires Improvement (RI) by Ofsted will be eligible for support is both equitable and easily understood. As some types of schools are not included in the floor and coasting standards, the use of an RI judgement allows for more schools to receive offers of support and this is a welcome development. Ofsted's new draft Education Inspection Framework (EIF) seeks to ease teacher workload and focus on the substance of education while also placing a greater emphasis on exclusions and 'off-rolling'. It is therefore welcome that schools will be offered support based on these new criteria that seek to move towards a more inclusive education system.
5. ADCS agrees that those schools already judged as RI during the 2018/19 academic year should also be eligible for support after 1 September 2019. In Ofsted's 2017/18 annual report, the Chief Inspector noted that of the 2,470 full inspections undertaken in 2017/18, 37 per cent of schools were judged RI. Further, with regard to all state funded schools, 11 per cent are currently judged as RI, an increase from 9 per cent in 2016/17. Given the periodic nature of inspection, it is important that schools requiring improvement can be offered support in advance of their next inspection to address issues.
6. The consultation does not provide detail on what an offer of support, or more intensive support, will look like. However, we know from previous announcements that this will consist

of an offer of £16,000 and/or three days of advice from a national leader of education. This is a step in the right direction, however, this investment is likely to be insufficient where significant issues are identified, especially in a context of reduced funding and cuts to school budgets.

School accountability

7. Paragraph 30 notes that schools that are judged Inadequate by Ofsted will be required to become sponsored academies, or re-brokered in the case of Inadequate academies. However, ADCS members believe that such schools should have the option of returning to the local authority family of schools if the governing body believes that this will deliver better outcomes for learners. In 2018, the Education Policy Institute (EPI) found that whether a school is in a MAT or is local authority maintained is a less important factor than being part of a high performing group. Both MATs and local authorities feature at the top, and at the bottom, of the EPI's performance tables.
8. Local authorities have a legal responsibility to champion the needs of the most vulnerable children and young people and ensure fair access to school places for all learners. However, local authorities cannot legally intervene in an academy school that is causing concern. Identifying a new sponsor can be a lengthy process leaving schools in a state of limbo where they are unable to make important long-term decisions. ADCS urges the government to consider allowing schools to return to a high performing local authority family in such situations.
9. ADCS members remain concerned that the role of different players across the school system is unclear. These proposals are the first step to creating a clearer accountability system. More action, including providing greater clarity about how key players can work together to challenge and support all schools, for the benefit of learners, would be welcome.
10. If you would like to discuss the points raised in this response, ADCS would welcome DfE officials to attend a meeting of the Educational Achievement Policy Committee. Please contact matt.cunningham@adcs.org.uk in the first instance.