

Consultation response summary

Consultation and pupil feedback on proposed changes to how association independent schools in England are inspected from September 2023

Feedback table and modifications



Introduction

- ISI is formally approved by the Secretary of State for Education to inspect more than 1,290 independent schools in England, which together educate over 500,000 children and young people each year.
- On **16 May 2022** ISI launched a consultation. This was to understand the views of key stakeholders on ISI's proposals for a new inspection framework from September 2023. The consultation closed on **23 September 2022**.
- Respondents had access to a [draft proposed inspection framework](#) document, which was published as part of the consultation process. This detailed document set out ISI's principles and method of inspection.
- ISI planned and delivered a comprehensive communications and stakeholder engagement programme to raise awareness of the consultation and to inform schools, associations and other stakeholders how to take part. During the consultation period, the [consultation microsite](#) attracted over **6,100** unique visitors and generated **16,400 page views**.
- In total, **1,025** participants responded to the consultation. Submissions were also received from associations and organisations who represent a large number of the schools that ISI inspects (including the Independent Schools Council). Due to the number of organisations and individuals represented within these responses, each submission was sent to ISI decision makers alongside the overall consultation analysis.
- ISI commissioned [The Consultation Institute](#) to provide an independent quality assurance review of the consultation process, to ensure that good practice has been adopted.

Summary of consultation feedback and ISI's response

- The following table provides a high-level summary of consultation feedback and ISI's responses.
- The percentages in the % column relate to respondents' views expressed on each proposal in the online survey (quantitative data – key below). The *Summary of open text responses* column provides a thematic analysis of all written elements included in the consultation responses (open text responses on the survey and the responses from associations, which mainly took the form of letters). A summary of ISI's response to the consultation feedback is in the final column.

- Please note that the proposed framework and any modifications will be subject to further development during the pilot phase and may be subject to further change before the final framework is published in Spring 2023.

KEY Agreed Neither agreed or disagreed Disagreed

Question	%	Summary of open text responses	ISI's response
Proposal one: Prioritising school leadership and pupil wellbeing			
To what extent do you agree or disagree that inspectors' evaluation of leadership and management should come first in our reports?	<div style="text-align: center;"> <div style="width: 73.7%; background-color: #4F7942; margin: 0 auto; height: 20px;"></div> <div style="width: 12.8%; background-color: #FFC300; margin: 0 auto; height: 20px;"></div> <div style="width: 13.6%; background-color: #C00000; margin: 0 auto; height: 20px;"></div> </div>	<ul style="list-style-type: none"> Consensus on the importance of leadership and management, with a high number pleased to see this given a prominent status Some suggested starting with a judgement on pupil outcomes, which would include a focus on the quality of education being provided Some concern about the conflation of governance with leadership and management 	<ul style="list-style-type: none"> The structure of the framework will change so that reporting will start with a summary section of overall inspection findings, followed by the section on leadership, management and governance Inspectors evaluate and report on the impact of leadership at all levels in a school because the <i>Independent School Standards</i> refer to the skills, knowledge and actions of <i>those with leadership and management responsibility at the school</i> Inspectors understand the distinction between the differing roles and responsibilities of governance and leadership / management, and this will continue to be a focus of inspector training
To what extent do you agree or disagree that the section on leadership and management should summarise the findings of the whole inspection?	<div style="text-align: center;"> <div style="width: 68.4%; background-color: #4F7942; margin: 0 auto; height: 20px;"></div> <div style="width: 15.7%; background-color: #FFC300; margin: 0 auto; height: 20px;"></div> </div>	<ul style="list-style-type: none"> Some felt this established clear accountability and emphasised the important connection between leadership and the quality of a school's provision Some suggested this places too much emphasis on leadership and management 	<ul style="list-style-type: none"> The structure of the framework will change so that reporting will start with a summary section of overall inspection findings, followed by the section on leadership, management and governance Inspectors will evaluate and report on the impact of leadership at all levels in a school because the <i>Independent School Standards</i> refer to the skills, knowledge and actions of <i>those with leadership and management responsibility at the school</i>

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	16.0%	<ul style="list-style-type: none">Some suggested summary should be centred on pupils' experience across all aspects of school life, and should sit separately from the leadership and management section	<ul style="list-style-type: none">The detailed structure of the inspection report will also be informed by the pilot and development phase
To what extent do you agree or disagree that we should use the five headings of the statutory definition of children's wellbeing as the sections for our inspection reports?	66.0%	<ul style="list-style-type: none">Mixed sentiment from associations and other respondents	<ul style="list-style-type: none">The <i>Quality of education, training and recreation</i> section will be given greater prominence. It will be moved to follow immediately after the section on leadership and management. The evaluation of the quality of education will contain clear reporting of pupils' progress and outcomesThe scope of evaluation for pupil wellbeing (as specifically defined in <i>s10(2) of the Children Act 2004</i>) is set by reference to the existing scope of the <i>Independent School Standards</i>, which schools currently have to meet. No new evaluation measures are being introduced
	14.2%	<ul style="list-style-type: none">Many felt the five headings provided a holistic and pupil-centred structureOthers concerned that the importance of educational outcomes was being downgraded or diminished	
	19.8%	<ul style="list-style-type: none">Some considered it too complex and highlighted challenges in accurately and reliably measuring wellbeing	
Proposal two: Evaluation measures and areas for action			
To what extent do you agree or disagree with this overall approach for evaluating and reporting on the quality of provision in schools?	73.6%	<ul style="list-style-type: none">Contrasting opinions about whether the four evaluations would enhance or reduce the clarity of inspection reports	<ul style="list-style-type: none">The proposals include provision for each section to report clearly and with supporting evidence whether provision at the school meets or does not meet all the relevant <i>Independent School Standards</i> consistently

Question	%	Summary of open text responses	ISI's response
	<div>12.2%</div> <div>15.2%</div>	<ul style="list-style-type: none"> Some felt the evaluations would be helpful to highlight and disseminate good practice across the sector Some disagreed with the avoidance of blanket judgements across a whole section of provision Some questioned the ease with which parents could make comparisons with schools inspected by Ofsted 	<ul style="list-style-type: none"> Each section of the report may also detail where there is exceptional practice / significant strength in aspects of the school's provision, with demonstrable impact, or where there is a cause for concern ISI is considering how best to recognise and report significant strengths in a school's provision Inspectors receive mandatory training on all aspects of inspection practice, including evaluating evidence consistently and making judgements
To what extent do you agree or disagree with the option of reporting examples of 'exceptional practice with demonstrable impact'?	<div>74.2%</div> <div>10.5%</div> <div>15.4%</div>	<ul style="list-style-type: none"> Many highlighted the importance of recognising and celebrating the range of positive – and often innovative – practice in schools Consensus on the importance of having clear criteria and ensuring these were well understood by schools and inspectors Some concern about the gap between meeting all the relevant standards consistently and exceptional practice with demonstrable impact 	<ul style="list-style-type: none"> Many of the Independent School Standards are evaluative. Both the evaluative language used in reporting against these standards, and the opportunity for inspectors to report on areas of significant strength, will enable inspection reports to capture the nuance and complexity of school life and report effectively on the range of quality of provision and its impact Any recognition of exceptional practice across all aspects of school provision, however framed, will include evidence of positive impact and outcomes for pupils as a result of leaders' effective decision making and planning
To what extent do you agree or disagree with the proposed criteria for exceptional practice with demonstrable impact?	76.9%	<ul style="list-style-type: none"> Consensus on the importance of having clear criteria and the need for consistency in how inspectors interpret these 	<ul style="list-style-type: none"> Further development of the principles of inspection contained in the proposed framework will be considered during the pilot process, including the method of reporting of particular strengths in a school's provision

Question	%	Summary of open text responses	ISI's response
	<div>10.8%</div> <div>12.4%</div>	<ul style="list-style-type: none"> A few respondents suggested that the criteria need to be developed further and are not workable in their current state. This included requests for detailed documentation and case studies for schools to understand expectations and how to meet the criteria Some respondents raised concern about the ability to measure and provide evidence for some aspects of the current criteria. For example, no risk of detriment to other pupils 	<ul style="list-style-type: none"> Further consideration of criteria and methods of reporting of particular strengths in a school's provision, including an assessment of unintended consequences, will form part of the piloting process
To what extent do you agree or disagree with the option to include an evaluation of cause for concern?	<div>87.6%</div> <div>6.7%</div> <div>5.7%</div>	<ul style="list-style-type: none"> Consensus on the importance of specific and serious and/or multiple failings in a school's provision being acted on promptly Importance of all stakeholders being informed on the difference between not meeting all of the relevant standards and cause for concern 	<ul style="list-style-type: none"> Inspectors draw on the experience of the independent school sector and have appropriate specialist knowledge Inspectors will continue to receive mandatory training on all aspects of inspection practice, including evaluating evidence and making judgements The reasons for any <i>Independent School Standards</i> being unmet will be reported, with clear inspection evidence
To what extent do you agree or disagree that the basis for reporting a cause for concern should be 'specific and serious and/or multiple	<div>90.9%</div>	<ul style="list-style-type: none"> Consensus that the basis for reporting a cause for concern is correct, although the criteria need to be further developed and more specific 	<ul style="list-style-type: none"> The criteria for cause for concern are linked to a school's failure to meet the <i>Independent School Standards</i> – either a serious failing in a particular instance, or multiple failings

Question	%	Summary of open text responses	ISI's response
failings in the school's provision'?	<div>5.8%</div> <div>3.4%</div>	<ul style="list-style-type: none"> Some respondents highlighted that in the draft inspection framework the threshold criteria were less extensive and detailed compared with those for exceptional practice with demonstrable impact Other respondents reinforced points made in previous answers about the importance of ensuring there is consistency in reporting Some respondents and associations also raised concern about an over-reliance on pupil voice, without balance and triangulation of evidence 	<ul style="list-style-type: none"> Further consideration of criteria and method of reporting of causes for concern in a school's provision will form part of the piloting process The views of pupils form an important element of inspection evidence. Inspectors always consider the views of pupils alongside other inspection evidence in evaluating provision and reaching judgements Inspectors will also be keen to hear from school leaders about the ways they hear the views of pupils and what conclusions they draw, and actions they take in response
To what extent do you agree or disagree that areas for action should be included in all reports?	<div>83.9%</div> <div>8.4%</div> <div>7.8%</div>	<ul style="list-style-type: none"> Considerable number of respondents felt this was a sensible and pragmatic approach, which could help support school improvement and add value to the inspection process Some respondents felt this was not appropriate and inspectors would not have sufficient knowledge or context about a school in order to make recommendations Some provided feedback that the wording <i>areas for action</i> should be changed, particularly for any school found to meet all standards consistently 	<ul style="list-style-type: none"> Proposed areas for action will flow from the inspection evidence and findings Inspectors do not recommend specific methods but will highlight areas of provision that leaders should prioritise Further consideration of the wording of <i>areas for action</i> or <i>development</i> will form part of the piloting process

Question	%	Summary of open text responses	ISI's response
To what extent do you agree or disagree that, where all standards are met, areas for action should be helpful developmental next steps, and should be agreed with school leaders?	<div>87.5%</div> <div>7.0%</div> <div>5.5%</div>	<ul style="list-style-type: none"> Some repetition with answers provided to the previous question General support that areas for action would contribute positively towards school improvement, although there would need to be sufficient clarity and substance provided to ensure school leaders are supported to effectively implement any recommendations A number of respondents emphasised the importance of involving school leaders in all discussions Some respondents highlighted the importance of consistency and inspectors having the knowledge and credibility to deliver recommendations 	<ul style="list-style-type: none"> ISI will continue to emphasise the importance of effective communication between the inspection team and school leaders and staff on inspection Inspectors will continue to receive specific training on establishing constructive professional relationships with school leaders and staff as part of the inspection process Inspectors will continue to receive mandatory training on all aspects of inspection practice, including evaluating evidence and reaching judgements Inspectors draw on their experience of the independent school sector and have appropriate specialist knowledge
To what extent do you agree that, where standards are unmet, areas for action should describe action that is needed to improve provision, and should be discussed with school leaders?	<div>94.1%</div> <div>3.7%</div>	<ul style="list-style-type: none"> A high number of respondents emphasised the importance of having clear action points where standards are not met Some respondents said this proposal had the potential to contribute positively towards school improvement Some respondents suggested that school leaders should be fully involved in 	<ul style="list-style-type: none"> ISI will continue to emphasise the importance of effective communication on inspection. Inspectors will continue to receive specific training on establishing constructive professional relationships as part of the inspection process Inspectors will continue to receive mandatory training on all aspects of inspection practice, including evaluating evidence and making judgements

Question	%	Summary of open text responses	ISI's response
	2.2%	<p>agreeing actions, as part of a collaborative and supportive process</p> <ul style="list-style-type: none"> Some feedback questioned whether inspectors would have sufficient knowledge or context about a school 	<ul style="list-style-type: none"> Inspectors draw on their experience of the independent school sector and have appropriate specialist knowledge Areas for action will be framed in a way that describes the urgency of any necessary actions
Proposal three: Introducing a single type of routine inspection			
To what extent do you agree or disagree with moving to a single type of routine inspection?	<div>76.6%</div> <div>13.8%</div> <div>9.6%</div>	<ul style="list-style-type: none"> Many respondents thought this brought improved consistency and simplicity to the inspection process Some also thought this would give an improved ability to track the progress of a school over time. This was particularly welcomed by parents Other respondents and associations were supportive of having a single type of inspection, although opposed to each school being routinely inspected twice within an inspection cycle 	<ul style="list-style-type: none"> ISI considers that moving to one type of routine inspection will decrease the burden of the inspection process for both schools and inspectors The manageability of inspections for school leaders and staff as well as for inspectors is an underlying principle of inspection and aim for ISI. ISI is mindful of the impact of inspection and will work to ensure that any potential disruption will be minimised. Feedback on this will be taken during the pilot process The frequency of routine inspection within an inspection cycle is set by the Department for Education
Proposal four: Introducing an associate inspector role			
To what extent do you agree or disagree with the proposal to introduce associate inspectors?	75.1%	<ul style="list-style-type: none"> Consensus on the value of being an inspector on professional development 	<ul style="list-style-type: none"> ISI is committed to extending understanding of effective quality assurance by providing opportunities for school staff to be involved in the

Question	%	Summary of open text responses	ISI's response
	<div>15.8%</div> <div>9.2%</div>	<ul style="list-style-type: none"> Large number supported the opportunities this could bring to the sector Other respondents and some associations outlined their preference for the number of Team Inspectors to be increased instead Call for clarity around their exact involvement whilst on inspection 	<p>inspection process. ISI will continue to develop strategies to facilitate this</p> <ul style="list-style-type: none"> Any opportunity offered to shadow an ISI inspection will have clear protocols. Any participants will have to adhere to ISI's <i>Code of Conduct</i> and their role on inspection will be very clearly defined

The main consultation report provides a more detailed:

- Overview of the consultation process, methodology and conclusions
- Breakdown of quantitative and qualitative responses
- Summary of responses to feedback on individual questions and the overall consultation process
- The section on *Pupil feedback* presents findings from a survey of 200 independent school pupils (undertaken by *BritainThinks*).

Modifications from the consultation feedback

Please note that the proposed framework and any modifications will be subject to further development during the pilot phase and may be subject to further change before the final framework is published in Spring 2023.

The emphasis and structure of the proposals:

- The structure of the framework will change so that reporting will start with a summary section of **Overall inspection findings**, followed by the section on **Leadership, management and governance**. The framework will emphasise that leadership and management refers to leadership throughout the school as stated in the Standards.
- The **Quality of education, training and recreation** section will be given greater prominence. It will be moved to follow immediately after the section on leadership and management. The evaluation of the quality of education will contain clear reporting of pupils' progress and outcomes.
- The structure of the framework will be simplified. The proposed separate sections on **Pupils' social and economic education**, and **Pupils' contribution to society** will be combined into one section: **Pupils' social and economic education and contribution to society**. This section will include evaluation of careers provision.
- The section on **Safeguarding** will form the concluding section of the framework. To promote clarity, the word 'safeguarding' will replace the proposed section heading '**The protection of pupils from harm and neglect**'.
- ISI will offer to work with school leaders and governors to develop mutual understanding of **the purpose of school inspection** and effective quality assurance in education. ISI will promote school leaders' confident articulation the impact of their leadership and management at all levels.
- The detailed structure of the inspection report will also be informed by the pilot and development phase.

The focus on wellbeing

- ISI will continue to emphasise that the framework does not place any additional responsibility on schools or introduce additional requirements that are not already contained in the Standards.
- School leaders are already required to '**actively promote the wellbeing of pupils**'. The definition of '**wellbeing**' is clearly articulated by statute and incorporated in the Standards. Evidence of effective provision can be clearly demonstrated as stated in the framework across many aspects of school life which are covered by the Standards.
- The proposed framework supports school leaders in articulating the impact of their leadership by providing a structured approach to demonstrating how they meet this existing requirement.
- Hearing the views of pupils continues to be an important aspect of inspection practice and is triangulated with other inspection evidence. Inspectors will continue to be interested to hear from school leaders how pupil voice is heard and acted upon by the school.

Proposals for evaluation

- Inspection reporting will continue to be evaluative, both in the text of the report and through identifying strengths and areas for development.
- Further consideration of criteria and methods of reporting of particular strengths in a school's provision will form part of the piloting process.
- Any recognition of exceptional practice, however framed, will include evidence of positive impact and outcomes for pupils as a result of leaders' effective decision making and planning.

As a result, the revised structure of the framework and inspection report that will be included in the piloting and development phase will be:

- **Summary of inspection findings**
- **Section 1:** Leadership, management and governance
- **Section 2:** Quality of education, training and recreation to include pupil outcomes
- **Section 3:** Pupils' physical and mental health and emotional wellbeing
- **Section 4:** Pupils' social and economic education and contribution to society, to include careers provision
- **Safeguarding**

Reporting on the *Early Years Foundation Stage* and *National Minimum Standards for Boarding* will be included as applicable.

Next steps

- During the autumn and spring terms 2022–23, ISI will undertake a series of pilot visits across a sample of volunteer association independent schools. These will allow ISI to further refine its inspection methodology and test operational systems before publication of a final inspection framework.
- The publication of ISI's new inspection framework is dependent on approval from ISI's Board and the Department for Education which is the regulator for independent schools in England.
- ISI is committed to ensuring schools and other stakeholders have sufficient time to prepare for the introduction of a new framework. Therefore, ISI is aiming to publish a final framework in **March 2023** (subject to the above approval process).

- The new inspection framework will not become effective until the start of the new inspection cycle in **September 2023**. Inspections before this date will continue to use ISI's current framework.
- During the summer term 2022–23, ISI is committed to delivering a range of engagement activities for all stakeholders and publishing further resources for schools and other partner organisations. A comprehensive programme of inspector training will also be delivered in advance of the new framework becoming effective.

ISI would like to thank all associations, schools and other stakeholders for their engagement in this consultation. We are committed to keeping all stakeholders informed about the framework development process and ensuring all feel prepared for the introduction of a new inspection framework in September 2023

To keep up to date with the development of the framework, please visit www.framework.isi.net