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Consultation – summary of response



School improvement guidance

Framework for evaluation, improvement and
accountability

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

School improvement guidance

Overview	This document summarises the responses received to a consultation on the Welsh Government's draft non-statutory guidance on school improvement and the new framework for evaluation, improvement and accountability and its implementation.
Action required	None – for information only.
Further information	<p>Enquiries about this document should be directed to:</p> <p>School Effectiveness Division The Education Directorate Welsh Government Cathays Park Cardiff CF10 3NQ</p> <p>e-mail: SchoolImprovement@gov.wales</p> <p> @WG_Education</p> <p> Facebook/EducationWales</p>
Additional copies	This document can be accessed from the Welsh Government's website at www.gov.wales/school-improvement-guidance
Related documents	Welsh Government consultation document - School improvement guidance www.gov.wales/school-improvement-guidance

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Mae'r holl ymatebion yn y ddogfen hon wedi'u dyfynnu yn yr iaith wreiddiol.
All responses included in this document are quoted in their original language.

1. Background

- 1.1. Welsh Government has developed non-statutory school improvement guidance that sets out a framework for evaluation, improvement and accountability for schools, local authorities, regional consortia and Estyn, and which aligns with the new curriculum for Wales. Robust evaluation and accountability arrangements to support a self-improving system' is one of the four enabling objectives of the new curriculum. The accountability framework is designed to align with the new curriculum principles, including the delivery of the four purposes, and the guidance document provides a guide to schools and those who support them in embedding effective evaluation and improvement arrangements whilst implementing the new curriculum and associated reforms.
- 1.2 The overarching purpose of the guidance is to help schools improve in order to give learners the best possible learning experiences and outcomes and, in this way, to raise standards and narrow the gap between disadvantaged learners and their peers. The new framework is designed to ensure that schools' performance is evaluated using a wide range of evidence and information, covering the breadth of school activity – including learner progress and well-being – when determining school improvement priorities. The framework moves away from a disproportionate emphasis on a small number of performance measures, based on external examination outcomes, which can lead to behaviours and choices by schools that are not necessarily in the best interests of learners.
- 1.3 The school improvement guidance will help strengthen schools' ability to self-evaluate and plan improvement robustly and effectively, drawing on a broad range of evidence, and supported by regional consortia. To support this, we are working with regional consortia, Estyn and schools in developing the National Evaluation and Improvement Resource ('the resource'). The resource will promote effective improvement processes, school-to-school collaboration, and provide practical guidance and resources to support meaningful and robust self-evaluation and improvement. It will include a series of prompts, designed to support schools to carry out meaningful and robust self-evaluation, accompanied by real life case studies of different examples of self-evaluation.
- 1.4 Within a self-improving school system, it is important that the different bodies – principally schools and governing bodies, local authorities, and regional consortia – understand their own roles and responsibilities, those of others, and the relationship between them. The guidance therefore sets out Welsh Government's expectations of the role and responsibilities of the different bodies, in relation to evaluation, improvement and accountability, in order to help the self-improving system to function efficiently and effectively. It emphasises that accountability should be seen as separate, if related, to evaluation and improvement activities.
- 1.5 Under the framework the national categorisation system would be replaced with a similar support process that does not require the publication of school categories, but allows regional consortia to agree with schools the support they need to improve. The new process would be designed to inform the deployment and brokering of support to schools in a way that is proportionate to their needs and flexible.

2. Consultation

- 2.1 A 6 week consultation on the new school improvement guidance launched on 27 January and closed on 15 March. Its purpose was to gather views on the clarity and usefulness of the school improvement guidance and the framework for evaluation, improvement and accountability. The school improvement guidance and framework for evaluation, improvement and accountability had previously been the subject of a 6 week focussed consultation with key stakeholders in 2020.
- 2.2 The main consultation was conducted on-line and consisted of five specific questions:
- *Do you agree with the importance of robust self-evaluation and improvement planning by schools, which draws on a broad range of evidence, as set out in the School improvement guidance?*
 - *Do you agree that the national categorisation system should end, but be replaced by a similar process, led by regional consortia, in which consortia agree with schools the support they need to improve, as set out in the School improvement guidance?*
 - *Do you agree with the distinction between evaluation and improvement activities, and the accountability system, as set out in the School improvement guidance? Is this distinction made clear?*
 - *Do you agree that the accountability system set out in the School improvement guidance will align with the new Curriculum for Wales and its principles?*
 - *Do you agree with the roles and responsibilities assigned to different bodies within the education system as set out in the School improvement guidance?*
- 2.3 Further questions invited the respondents' views on the effects the school improvement guidance will have on the diverse needs of individual learners, including those from disadvantaged backgrounds and those who share protected characteristics. Respondents were also invited to say whether they felt that the school improvement guidance could have any positive or negative impact on the Welsh language. Respondents were also invited to offer any additional comments that weren't covered by the other specific questions.

3. Overview of consultation responses

- 3.1. In total, the consultation received 82 responses. Of these, 55 were submitted via the Welsh Government's online consultation system and 27 by email. One response was blank and did not reply to any of the questions. Two responses were submitted in Welsh. Not all respondents commented on every question and some chose not to respond to the questions at all – choosing instead to provide thoughts and comments.
- 3.2 Responses were received from specific education organisations (for example, regional consortia and individuals working in local authorities). Other respondents included Estyn; the Office of the Children's Commissioner for Wales; primary and secondary schools and teaching unions; other national bodies, and twelve respondents who chose to remain anonymous. A further thirty five responders asked for their response to remain anonymous.
- 3.2. More detail on rates of responses to the individual questions posed (as well as examples of the responses themselves) is given below:

Question 1 - Do you agree with the importance of robust self-evaluation and improvement planning by schools, which draws on a broad range of evidence, as set out in the School improvement guidance?

Of the seventy five responses received to this question, sixty six responders (88%) agreed with the question, with four neither agreeing nor disagreeing and a further five (6.5%) disagreeing.

The majority of comments received are supportive of self-evaluation and improvement planning as set out in the school improvement guidance. Some responders seek assurance about the potential impact of the National Evaluation and Improvement Resource ('the resource') on school workload and the need for training to ensure that the resource is used as intended. Most responders who stated that they disagreed with the question raised the risk that the resource could be used incorrectly, with a resultant increase in workload. One commonly raised concern was that schools would attempt to address all the prompts within the resource rather than focussing on those which were most appropriate for them. Other respondees expressed concern that the resource is not yet generally available to view.

The following are examples of responses received to question 1:

"It is pleasing to see that progress of all learners along with the four core purposes and well-being will be an important feature in school improvement planning and evaluation. It seems sensible that the published summary of the school development plan contains information on the support that will be provided by the Local Authority and the Regional Consortium".

"It would have been beneficial to see the NEIR as part of this process but the principle that self-evaluation is robust and draws on a wide range of evidence is sound. It is also pleasing to see that the process of self-evaluation is being valued in the consultation over the documentation which has been the case previously".

“Self-evaluation does need to be robust. However there needs to be better guidance on how to measure improvement and what to measure against. With so many 'pointers' it is inevitable that schools will look to respond and provide evidence for every one, so workload will increase”.

“The School improvement Guidance...raises concerns about an imbalance in terms of time investment needed to meet the significant expectations outlined for self-evaluation coupled with the time needed to meet the accountability and transparency expectations. This will not leave schools much time to improvement plan and more importantly carry out planned improvement actions. There is a disproportionate focus upon evaluating and engaging in stipulated accountability and transparency arrangements”.

Question 2 - Do you agree that the national categorisation system should end, but be replaced by a similar process, led by regional consortia, in which consortia agree with schools the support they need to improve, as set out in the School improvement guidance?

Of the seventy three responses to question 2, fifty six responders (77%) agreed that the national categorisation system should end, but be replaced by a similar process as set out in the school improvement guidance. Three responders neither agreed nor disagreed and a further fourteen (19%) disagreed with the proposal.

Of the responses that agreed with the question overall, comments discussed the need for a cultural shift in expectations and understanding for the proposal to be successful. Other responders commented on the role of consortia and local authorities in providing support to schools.

However, a significant number of those responders who agreed with the proposed ending of the national categorisation system questioned the value of the suggested replacement system set out in the draft school improvement guidance. Whilst agreeing with question 2, these responders included comments such as that the proposed replacement system was not far removed from the current categorisation system and could lead to similar issues. The majority of those who disagreed with question 2 raised similar concerns.

The following are examples of responses received to question 2:

“We welcome the proposal to end categorisation as a formal national process with published outcomes. We have never been comfortable with the publication of school categorisations as it placed unnecessary added pressure in schools. Championing collaboration between schools and not competition is one of the most important features in this guidance. Removing categorisation will greatly assist with this process.

We also welcome that the guidance states that the fundamental role of the regional consortia is not primarily to challenge the school but to be a professional partner in the school's improvement, and that challenge should not be focus of the relationship. We recommend therefore that the term 'Challenge Adviser is removed from the guidance and replaced by 'Support Adviser'”.

“The proposal to potentially review the school category more regularly would enable greater accuracy in charting the school’s improvement journey. We would support a wider range of indicators being used in the new evaluation process to accurately capture the areas of good practice and those requiring development and support. In this way schools would be able to engage with the process positively and the public would have more confidence in the outcomes”.

“Once you have an external body grading schools according to the support that they need, then you will have unintended consequences. Categorisation or a similar process labels schools according to how able they are to improve. The consortia then operates to 'verify' the school's self evaluation judgement. This removes the professional judgement from the school and places it with the body who is directly accountable for standards to Welsh Government”

Question 3 - Do you agree with the distinction between evaluation and improvement activities, and the accountability system, as set out in the School improvement guidance? Is this distinction made clear?

Of the seventy one responses received to question 3, sixty responders (84%) agreed with the question, eight disagreed and three neither agreed nor disagreed.

A general theme in the comments was the need for further clarification of the role of Estyn and the increased frequency of school inspections in the proposed accountability system. Assurance was sought that the purposes of the evaluation and improvement activities supporting the progress of learners would be achieved, rather than activities being used for accountability purposes. Comments were also received seeking clarification about the role of regional consortia and challenge advisors within the new arrangements.

The following are examples of the responses received to question 3:

“In transitioning to a 'high trust' environment the evaluation and improvement resource which will support schools in undertaking robust, enquiry-based, self-evaluation is a significant improvement on the previously high stakes accountability model. The accountability system proposed as a safety net for when evaluation and improvement is not functioning effectively is sensible and proportionate, providing that all stakeholders maintain the commitment that it should not drive school improvement activity. Accountability should ensure that problems are identified and addressed... peer engagement should also be identified as a central pillar within evaluation and improvement planning cycles”.

“Rydym o’r farn bod y gwahaniaethau yn y gweithgareddau gwerthuso, gwella ac atebolrwydd yn cael eu diffinio’n glir yn y ddogfen. Fodd bynnag, mae’n holl bwysig fod y ddogfen yn tanlinellu ac yn atgyfnerthu’r egwyddor mai diben gweithgareddau gwerthuso a gwella yw sicrhau’r deilliannau gorau posibl i’r disgyblion”.

“Accountability is clearly described. However, this will require a significant cultural change, across all tiers but more importantly amongst the general public. How will this be achieved”?

“More detail is required... to show how it will work in practice, and, particularly the interrelation between Estyn, who will be increasing inspections in schools, and other elements of the accountability system. There is insufficient detail about inspections to judge whether these will over burden schools. There is a need to ensure that the implementation of these arrangements will not unduly overburden schools. They will need to be conducted with a positive and constructive approach with a view to enabling collaboration and the realisation of the new curriculum with confidence and creativity to meet the needs of the communities that the institutions serve”.

Question 4 - Do you agree that the accountability system set out in the School improvement guidance will align with the new Curriculum for Wales and its principles?

Of the seventy responses to question 4, forty five responders (63%) agreed, twenty one (30%) disagreed and two neither agreed nor disagreed. Of those responders who agreed that the accountability system set out in the *School improvement guidance* will align with the new Curriculum for Wales and its principles, several sought clarification about exactly what schools would be accountable for. Another common theme was the need for training to be provided at all levels of the education system, and others questioned the continued role of examination results in the proposed accountability system.

Themes running through the responses of those who disagreed with the question, include concerns about the proposed increased inspection frequency and its impact on school workload, and assurance sought about the use of examination data.

The following are examples of responses received:

“We agree that the accountability system set out in the School improvement guidance is likely to support the new Curriculum for Wales and its principles, because its overall intention and likely effect are to establish a collaborative culture between organisations at all tiers of the Welsh education system. The proposals are also likely to encourage greater innovation and flexibility in teaching and learning which are at the heart of the new Curriculum for Wales. In particular, the proposal to remove aspects of the current accountability system that have focused too much on measuring particular outcomes, is helpful”.

“A clear understanding of the detail of what a school is being held accountable for is needed ... This also cannot be driven by changing agendas it needs to be led by the 4 core purposes of our curriculum. Any deviation from this will impact on the paradigm of the curriculum”.

“Need clear and consistent national training, and ongoing discussions, with the school improvement officers who will be agreeing the levels of support, why and what. What about a school will be considered to determine its level of support”?

“It is important local authorities and consortia recognise their responsibilities to work in partnership with school governing bodies and educational practitioners to create a realistic school Improvement system. This will reassure and give confidence to governing bodies the system created will enable them to monitor

and report on their individual school improvement aims to local authorities and ultimately be recognised for the varied successes they achieve. The system needs to be very transparent as to how suitable support is available and obtained, to assist those schools' leaders who need to access it".

Question 5 - Do you agree with the roles and responsibilities assigned to different bodies within the education system as set out in the School improvement guidance?

Of the seventy responses to question 5, forty four responders (63%) agreed with the question, twenty one disagreed and two neither agreed nor disagreed. Of those responders who agreed with the proposed roles and responsibilities assigned to different bodies, some sought assurance about the level of training to be provided to all involved, potential consequences of the increased frequency of Estyn inspections and the role of consortia. Themes raised in comments received from responders who disagreed with the proposal included the importance of consistency in approach across the regions.

The following are examples of comments received :.

"It is paramount that Governing Body training events cover the new assessment arrangements and the new emphasis on measuring learner progress asap. The reduction of narrow measures such as pure data needs to be embedded. These sessions should not be optional for governors to attend but delivered to the whole Governing Body either as cluster events or to individual schools".

"It is ... important local authorities and regional consortia recognise the Welsh Government key expectation as to their 'supportive' roles in the new system".

"I do feel there is still too much difference between the regional support offer and I don't understand why every region isn't experiencing the same offer of support using the same documentation".

"[I] do not feel that more regular Estyn visits will improve standards - it will merely increase stress and worry for staff which in turn effects performance".

Question 6 – We would like to know your views on the effects that the framework for evaluation, improvement and accountability, as set out in the School improvement guidance, will have on the diverse needs of individual learners, including those from disadvantaged backgrounds and those who share protected characteristics¹.

Seventy seven responses were received to this question. A majority of responders were of the view that the school improvement guidance would either have a positive or neutral effect on the diverse needs of individual learners. A number of responders commented that there were many related issues which schools could not address on their own.

A selection of views expressed appear below;

“I foresee emphasis for improving happening on a wider scale now there seems to be less emphasis on competition and an overall judgement. This can only be a good thing for all groups of learners”

“As each school is very different in its diversity then it is the school (with the knowledge of the community that it is situated in) that will be best placed to put actions in to place that will drive the practises that will be needed to ensure that children from all backgrounds are accounted for and provisions made”.

“The emphasis put on learner progression supported by assessment arrangements that enable each individual learner to make progress at an appropriate pace and take into account their diverse needs is very welcoming. The guidance is very much about the needs of the child and how practitioners will be supported to engage in professional learning to ensure that they are able to signpost the improvement journey for all pupils...The guidance supports bespoke sustainable school improvement and learning leadership which in theory should then allow individual schools to make informed choices and decisions around equity and excellence”.

“These are systemic issues that schools cannot deal with alone and cannot be held accountable for, the responsibility for each of these areas sits with Welsh Government and in a transparent, evaluative, self-improving system, such honesty and clarity within guidance would go some way to bringing confidence that schools will not be held responsible for issues that lie outside their ability to address”.

¹ *The Equality Act 2010 places a duty on governing bodies to ensure that their school meets the requirements of equality legislation. The Act protects pupils from discrimination and harassment based on ‘protected characteristics’. These protected characteristics are disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.*

Question 7 – We would like to know your views on the effects that the School improvement guidance 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?

Sixty responses were received to this question. Generally, responders commented that the school improvement guidance would have a positive or neutral effect in this area. A number of responders commented that there was a lack of direct reference to the Welsh language in the guidance, or to the promotion or strengthening of the language. A selection of views expressed appear below;

“I believe it can have a positive impact with support for schools being more readily available, the sharing of good practice encouraged and a self-improving system promoted. This can only be positive for the opportunities to improve the use of Welsh in our schools”.

“The principles are implied in the framework but there is little direct reference to promoting Welsh language development. We believe that this should be further strengthened within the document”.

“Dylid cynnwys datblygiad a chyrhaeddiad ysgolion yn y defnydd o’r Gymraeg, sef ei safle ar y continwwm ieithyddol, fel un o’r meini prawf llwyddiant yn y dull categoreiddio newydd. Byddai hyn yn cefnogi agenda Cymraeg 2050: Miliwn o siaradwyr yn effeithiol a chydlynus ac yn dosrannu cyfrifoldebau Cynllun Strategol Cymraeg mewn Addysg yr awdurdodau’n effeithiol a grymus”

Question 8 – Please also explain how you believe the proposals contained in the guidance could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language**
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

Forty seven responses were received to this question. A selection of views appear below;

“I believe it can have a positive impact with support for schools being more readily available, the sharing of good practice encouraged and a self-improving system promoted. This can only be positive for the opportunities to improve the use of Welsh in our schools”.

“The guidance could possibly state that schools will need to make it explicit in their SIP how they are developing Welsh language skills amongst staff and pupils and how they are supporting the local authority WESP. Could there also be an emphasis on how the regional consortia promote the use of Welsh amongst the workforce?”

“It is about closely aligning the Curriculum for Wales’s developments to individual Local Authority WESPs”.

Question 9 - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Forty nine responders provided further comments. Some examples of views expressed are given below:

“The changes as a whole have the potential to be powerful school improvement tools. Ensuring that the processes function as expected and that each partner adheres to their remit will be a challenge and who will oversee this?”

“Throughout the document, and particularly in relation to school to school support (p.21) where “internal resource allocation” is referenced, we believe that ‘behaviour’ should be replaced with ‘social, emotional and mental health’. Greater emphasis should be made on well-being. In addition to recognising the difficulties pupils will be facing post pandemic, this will also align with the elements of Estyn inspections referenced on page 28”.

“A single overarching document illustrating how each of the above (and more) are aligned would be hugely welcome to bring coherence to a system under seismic change. Whilst [we agree] agree that schools should collect the information they deem relevant, how can they subsequently make meaningful comparisons to other schools? Some degree of comparator information is essential. Is there a need for some core elements to be agreed between partner / collaboration schools prior to the process”?

4. Responders

4.1 The consultation seeking views on the draft school improvement guidance received eighty two responses in total. Responders were not obliged to provide their details and twelve responders chose to remain anonymous. Thirty five responders asked for their response to be confidential.

4.2 Responses received include those from:

- Regional Consortia
- Local authority representatives
- Schools, governors, governors associations and individual teachers
- Teaching unions
- National bodies, including Estyn, Children's Commissioner, Catholic Education Service and Careers Wales
- Teaching unions
- Individuals

5. Welsh Government response

5.1 The Welsh Government welcomes the responses to the consultation.

5.2 The comments and issues raised in the consultation responses will be carefully reviewed and considered when preparing the school improvement guidance for publication in September 2021.

5.3 In advance of publication of the guidance, we address below two issues which were raised a number of times in responses.

5.4 National categorisation system

Consultation question 2 asked whether responders agreed that the national categorisation system should end, but be replaced by a similar process, led by regional consortia, in which consortia agree with schools the support they need to improve, as set out in the guidance.

As noted above, whilst 77% of responders agreed with the proposed changes set out in question 2, many caveated their agreement with concerns about the proposed replacement. These concerns were mirrored by the feedback received from those responders who either disagreed with the proposal or neither agreed or disagreed.

Welsh Government has considered this feedback and will take it into account when finalising the school improvement guidance for publication. In the meantime, school categorisation will not take place in academic year 2021/22. Regional consortia and local authorities will continue to work in partnership with schools to help provide them with the support they need to improve. Schools will not be assigned a published category as part of this support process.

5.5 National evaluation and improvement resource

A significant number of responders expressed concerns about the intended purpose of the national evaluation and improvement resource. The most commonly raised issues included the potential for misunderstanding about the use and purpose of the resource, and the associated risks of increased bureaucracy and workload. These concerns have been noted, and Welsh Government will ensure that further guidance for the next iteration of the resource web pages will be published on Hwb in September 2021. This will support the adoption by practitioners of the school improvement guidance.

Welsh Government is aiming to launch the pilot resource in November 2021. The launch will be accompanied by a feedback exercise; everyone with an interest is encouraged to take part.

6. Next steps

- 6.1 Welsh Government will issue non-statutory school improvement guidance in September, building on the feedback received through this consultation. This will provide everyone within the education system time to test the new evaluation, improvement and accountability arrangements and to continue to adapt and change their practice to support the transition to the new curriculum.