

## **OfSTED Consultation: OfSTED Strategic Plan 2007-2010**

### **UCET Response**

1. UCET welcomes the opportunity to comment on the OfSTED Strategic Plan 2007-2010 and commends OfSTED's willingness to consult on its Plan and to encourage the wider educational community to contribute to its development. It is a timely example of one of the strategic priorities identified in the Plan: to secure 'better consultation' by 'engaging with service users'.

2. There are several features of the Plan which are to be applauded. Firstly, it is model of lucidity. Secondly, it is structurally coherent. There is a strong logical relationship between the OfSTED's statutory responsibilities and its three central preoccupations: to serve children and learners, to drive improvement, and to secure value. These, in turn, provide the basis for six strategic priorities, and for each of these targets are specified which, for the most part, may serve as criteria against which OfSTED's effectiveness will be assessed. Thirdly, the Plan affirms a strong commitment to enhanced performance. Finally, the Plan is marked by a firm cohesiveness of purpose and a strong sense of strategic direction, a feature that is especially noteworthy, given that the Plan will govern the work of what were formerly four separate inspection and regulatory bodies.

3. That said, there are five features of the Plan which UCET considers merit further consideration. The first of these concerns the distinction between reducing costs and securing value for money, both of which are targeted in the Plan. Since a reduction of costs is achievable without maintaining or enhancing the quality of a service, it is inappropriate to use the reduction of costs to £186 million by 2008-09 as a measure of value for money. Bullet point 2 on page 20 is therefore mis-categorised as a value for money target.

4. Secondly, the Plan does not articulate a clear relationship between the quality of inspection and its impact. If these are indistinguishable, why postulate separate strategic targets for 'better outcomes' and 'better inspection'? Is it consistently possible to trace a causal connection between inspection and the improvement of provision? Would an aspect of provision that stubbornly showed no improvement despite repeated inspections point to inadequacies in the inspection process? If the impact of inspection is separable from the quality and rigour of inspection why are two clear examples of impact used as targets which relate to the quality of inspection (bullet points 2 and 3 on page 17)?

5. Thirdly, if impact is not an essential measure of the quality of the inspection process, what measures would be appropriate in this regard? On page 17 three criteria of quality are presented: inspection should be 'coherent, rigorous and proportionate'. Proportionality presents no difficulties: it is widely acknowledged that inspection should be proportionate to risk in the sense that the expenditure of effort in inspection should be related to the scope for the improvement of quality. It is reasonable therefore that the Plan should declare a commitment to 'sensitive risk assessment'. But what targets would constitute appropriate measures of success with regard to the coherence and rigour of inspection?

6. The Strategic Plan suggests that one of the indicators of coherence is 'a high quality, well coordinated and targeted service, and several targets are identified on page 17 to

demonstrate how such a service is to be characterised. However, leaving aside the rational ordering of a national system of inspection, how will the actual inspection process be made more coherent for individual service providers? There are sufficient assurances to indicate that the process will be systematic and sharply focussed. Coherence in that sense suggests a limited number of key themes that will structure the whole process. Some of these structuring themes might be included in the list of possible targets for 2010 on page 17.

7. Rigour in the inspection process may be equated with objectivity, a term that is used twice in the Plan to describe OfSTED's mode of operation. These terms are ambiguous. On the one hand they may denote a commitment to independence of judgement, impartiality, and the reporting on educational and other provision with impunity. On the other hand, these terms may refer to the robustness and validity of the inspection process itself. With regard to the first of these senses, the Strategic Plan offers no comfort to those who look for any weakening of the rigour and objectivity for which OfSTED has become renowned. But how is objectivity in the second sense to be enhanced? What tests are proposed to ensure that inspection judgements are well grounded and reliable? How is the educational and the wider community to be assured that the evidential base of OfSTED's work is as valid as it can possibly be? How objective is a process that apparently relies heavily on the aggregation of subjective assessments? Conceivably, OfSTED might be persuaded, indeed, to add a fourth criterion to be used in measuring the effectiveness of inspection: transparency.

8. The fourth issue UCET wishes to raise concerns the extent to which OfSTED uses external points of reference in the evaluation of its own work. Given OfSTED's own espousal of the principle of externality of scrutiny as a way of enhancing the quality of provision, it is surprising that much of the evidence that will be used to assess OfSTED's effectiveness will be OfSTED-generated. Without in any way questioning OfSTED's integrity, would it not be reasonable to expect the Strategic Plan to set out a strategy whereby OfSTED would be exposed to the same degree of externality of scrutiny as it applies to the inspection of schools and other agencies?

9. Finally, since the Strategic Plan is the first that will govern the activities of what were formerly four separate inspection and regulatory bodies, might it not be an important strategic objective to be able to demonstrate by the end of the planning period how far these four agencies had merged into a coherent professional cadre with a strong sense of corporate identity, operating consistently the same demanding standards and expectations across all spheres of its work?

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7 May 2007