

Reducing The Burden Of Inspection

A REVIEW BY OFSTED AND THE DEPARTMENT FOR EDUCATION AND EMPLOYMENT STANDARDS AND EFFECTIVENESS UNIT

SUMMARY OF RECOMMENDATIONS

The review has identified 6 main ways of reducing the burden of inspection on schools and others while maintaining the integrity of the inspection system. These are:

- a) to reduce the total amount of information required from schools and others;
- b) to shift provision of information progressively from individual schools to central systems (pre-population);
- c) to increase progressively the use of ICT in creating and transferring information in line with the Information Management Strategy for Schools and LEAs;
- d) to reduce the number of different inspections, visits or surveys an individual school or other institution might be involved in by merging visits where at all possible - so that the system as a whole and individual schools within it are not overburdened;
- e) to identify and disseminate good practice in preparing for inspection; and
- f) to identify and report on school level bureaucracy and the demands placed on schools regularly.

The main specific recommendations flowing from this review are:

- The amount of information required for inspection will be reduced from Autumn 2001. In particular, the information collected from schools on their own staff, their qualifications and the subjects they teach will be streamlined and guidance will be provided on the scope, nature and length of the headteacher's statement. Further reductions will be possible from Autumn 2003 as a result of the consistent Financial Reporting Framework.
- All forms sent to schools and others prior to inspection should be pre-populated with data, where the information is held centrally. We will move progressively towards pre-population of all forms by Autumn 2003. Schools and others would still have the right to check and correct data but would not have to calculate it all from scratch. The information requested will be critically reviewed on a regular basis.
- The PICS and PANDA documents will be merged into one from Autumn term 2001. OFSTED will discontinue sending paper copies of the National Summary Data Report to schools. This will avoid duplication and cut by up to 80% the quantity of data inspected schools receive on paper from OFSTED.
- Greater use will be made of electronic transfer of information. From Autumn 2001, the forms needed for school inspections (Forms S1-S4) will be made available on the web and email will be used wherever possible. In the longer term, and in line with the Information Management Strategy, data held on schools and others will be accessible via the web so that schools can check their own data at any time.

- Improved guidance will be developed for schools and others preparing for inspection and incorporated into the relevant framework documents on their review (and by no later than Autumn 2003). These will include both examples of the types of documentation that are needed and of the types that are not.
- DfEE will consult OFSTED on proposals to evaluate the implementation of policy in schools and others in order to make the fullest use of inspections and to reduce to a minimum visits and information requests made by agencies commissioned by DfEE. Where ever possible, OFSTED and DfEE will look to combine inspections and visits to limit the number of times an individual school or area is visited. An initial scrutiny of current and planned inspection, evaluation and other visits will be completed for this purpose by Autumn term 2001. We will monitor on an on-going basis the number of interactions with individual schools and areas.
- DfEE and OFSTED will look to introduce and extend the period for which schools that have had Section 10 inspections should be exempt from other inspections, evaluation visits or surveys from Autumn term 2001.
- OFSTED and DfEE will continue to consult closely over the timings and nature of all data requests and surveys to schools and others to ensure that only the minimum necessary information is requested, that it is in the easiest form for schools and others to provide and that it is only collected once. This will include exploring the potential for shared databases between DfEE and OFSTED for use from Autumn term 2003 onwards.
- To monitor wider issues of bureaucracy, OFSTED will ask schools from Autumn term 2001 about sources of difficulty, their own efforts to reduce it, and the extent to which bureaucracy hinders management efficiency. This will be reported on as part of the inspection.

INTRODUCTION

1. This report is presented jointly by OFSTED and the Standards and Effectiveness Unit (SEU), following a joint review of the demands placed on schools and other bodies from the inspection process and related systems. The review was designed to deliver the Green Paper commitment:

“We will discuss with OFSTED how to achieve further substantial reductions in the bureaucracy associated with inspection within a few months” - ‘Schools: Building on Success’ paragraph 5.46

2. The evidence currently available from inspected schools provides a relatively positive picture with respect to the demands associated with inspection and suggests that there is not a widespread concern. OFSTED requests formal feedback from the head teacher and chair of governors following a school inspection and, in particular, they probe whether before the inspection "the requirements placed on the school for information and documentation were reasonable". The majority of schools agree with this statement - indeed, there are more schools that strongly agree with the statement than disagree (either strongly or not).

3. However, one in five primary school head teachers and one in ten secondary head teachers do still believe that the requirements placed on them are too great. As would be expected, given their size and other pressures, primary schools find the demands of inspection more difficult than secondary schools. The evidence does not suggest that the problems are huge, and inspections are relatively infrequent events, but schools and others would still, of course, welcome a further reduction in paperwork both from inspection and more generally. It is also reasonably clear that demands do not fall evenly between schools with some being visited more frequently than others.

4. At the review's outset it was agreed between OFSTED and SEU that the review should:

- **report quickly** - with this paper summarising our conclusions ready by May 2001;
- **focus on measures that could be implemented in the short term** (i.e. not measures that involve fundamental changes to the inspection system itself);
- **be based upon evidence currently available** (i.e. would not involve externals or new fieldwork).

5. It was therefore agreed that the review should focus on the following five questions:

- **Do we ask for the right information?** Do we make the best use of it? How can it be reduced? How can duplication (e.g. between DfEE data collections and OFSTED's) be eliminated?
- **How do we improve the process of obtaining information from schools and others?** Can more be done through electronic data transfer? Can more be collected from existing sources (i.e. not collected direct from schools/LEAs)?
- **How do we reduce the number of individual interactions between central government and the education system?** E.g. number of different inspections/evaluations that an individual school or area is involved in?
- **How do we improve schools' and others' understanding of the requirements on them? How do we better define what schools and others are not expected to produce?** Is there a perception in schools that they need to do more (e.g. updating of

plans) or produce more paper/information than they are required to? If yes, how can these perceptions be tackled?

- **Is there other school level bureaucracy we can eliminate?** Can we use the inspection system or other systems to tackle school level bureaucracy?

6. While the review has focused mainly on school inspections, the principles and approaches set out in this paper, where readily transferable, should also be applied to inspections of LEAs, post-16 colleges, early years providers, teacher training institutions and other educational establishments inspected by OFSTED.

DO WE ASK FOR THE RIGHT INFORMATION?

The issue

7. Inspections of all types require a basic set of information to ensure the inspectors are well prepared, make the best use of their time on site and keep this to a minimum, and to inform and guide the inspection. Data are also needed to inform national evaluations of programmes, for policy development, for accountability purposes and as a tool for school improvement.

8. Inspection data are collected via a series of forms (S1 to S4 for schools, F1 to F5 for LEAs) which set out the base data on which the inspection will be based and the self evaluation information (Annex A sets this out in more detail). For schools, all the data are provided by the school itself. LEA forms are pre-populated with central information.

9. The issue in this area is fourfold:

- a) can we reduce the amount of information we ask for?
- b) can we seek ways of collecting information more simply (eg. better-designed forms)?
- c) can we move the task of creating the information away from schools to the centre?
- d) can we ensure that we collectively do not ask schools for the same information more than once?

The proposed approach

10. OFSTED has been carrying out its own review of the information it requests from schools. The results suggest that immediate streamlining is possible. In particular, ***we propose (R1) that the data collected from schools on staff, their qualifications and the subjects they teach (Form S2) should be streamlined.*** These reductions could be implemented from Autumn term 2001. Further reductions should be possible from Autumn 2003 as a result of the data collection based on the proposed consistent Financial Reporting Framework, being developed jointly by the Audit Commission, OFSTED, DfEE and CIPFA.

11. As well as reducing the amount of information, we can also reduce the time and effort schools have to make in providing it. From 2002 the introduction of the Common Basic Data Set (CBDS) will mean that information on pupils and schools will be collected and analysed in a much more comprehensive manner. This should reduce significantly the information needed to be requested separately from schools and facilitate pre-population of all inspection forms before they are sent to schools. Our analysis also suggests that a great deal of pre-population

can be done in advance of the CBDS (as is already done for LEA inspections). **We propose (R2) that we should progressively move to pre-populate all pre-inspection forms by Autumn term 2003.** The schools' role would progressively change from the provider of data to checking and amending centrally provided data.

12. To make this happen OFSTED should explore further with DfEE the potential for pre-entry of data across the full range of its data collections and establish a timetable for delivery. Current plans for pre-entry of data for some Spring and all Summer term school inspections in 2002, should begin to be extended to all school inspections from Autumn term 2002. At LEA level, OFSTED should implement the changes to its LEA return (Form 4) proposed by the recent working group of stakeholders, including LEAs, and extend pre-entry of data to cover all data held by DfEE and other sources, such as the Department of Health. It should also review the material requested from LEAs more generally (including on Form 5) in the light of the next programme of LEA inspections.

13. The above approach will require greater collaboration between DfEE and OFSTED over the collection, analysis and sharing of data to allow up-to-date data to be used for pre-population and to reduce the amount of changing and updating schools will need to do. Greater collaboration in this area will also reduce the risk of the same data being collected more than once for different purposes. OFSTED is already establishing a new Data Collection and Use Scrutiny Group from May 2001. It will scrutinise all proposals for new data collections, whether regular or ad hoc, and have the power to accept (with or without amendments) or reject them. The Group will refer cross-departmental issues to the Star Chamber. **We propose (R3) that the Data Collection and Use Scrutiny Group in its first year should establish a formal and transparent policy for reviewing OFSTED's regular data collections, including those for its new remits, and set out how key stakeholders - including DfEE - will be consulted in that process. These reviews should incorporate the design of forms as well as their content.**

14. **We also propose (R4) that DfEE and OFSTED should explore the potential for shared access to their school and other databases.** We expect this to be possible from Autumn term 2003 onwards. This will need to include protocols about how data gathered for one purpose are used and publicly presented by both organisations. In advance of that, DfEE will make a validated data set of 2001 and 2002 key stage test scores available to OFSTED, in an agreed format, by the end of the relevant calendar year for use during Spring and Summer term inspections. This will include all of the changes provided for school performance tables and should largely avoid the need for schools to provide data corrections to inspection teams which have already been provided to DfEE and other agencies. In addition, DfEE and OFSTED will produce a protocol for dealing with revisions to key stage and Annual School Census data that will also cover the handling of revisions after the cut off point for the validated data set.

15. Specifically, **we propose (R5) DfEE and OFSTED should, as the norm, consult each other on data collection forms** so that their requirements are adequately reflected. Copies of the data collection instruments should be shared via their Statistics Units and the raw data collected from schools and other institutions should be available to both departments. Changes to the relevant data collection guidance will need to be considered in order to facilitate effective sharing of the data. DfEE and OFSTED should also consider how best this greater collaboration, and that in paragraphs 13-14, can be extended to include other organisations, such as LSC, QCA and the Audit Commission. And **(R6) a small DfEE/OFSTED working group should be established to review DfEE's data requirements from early years providers**, in the light of the information available from OFSTED's new registration database. The establishment of this group would follow further consultancy and mapping work on the information strategy for the early years sector.

16. In addition, we recommend the following changes designed to reduce bureaucracy further:
- a) **(R7) The PICSi and PANDA documents should be merged into one for 2001/02 inspections.** OFSTED should discontinue sending schools paper copies of the National Summary Data Report which acts largely as a reference document. This will avoid duplication and cut by up to 80% the quantity of data inspected schools receive on paper from OFSTED.
 - b) **(R8) OFSTED should review its policy on access to PANDAs and other data to ensure that all HMI have access for inspection purposes.** In particular, data on test scores and school context should not be recollected from schools by HMI when they are already available centrally. Schools should though continue to be able to present their own analysis of the data or to provide up-to-date data when that is not yet available to inspection teams.
 - c) **(R9) DfEE, LSC and OFSTED should set up a working group to review the timing of the Individual Student Record,** with inspection needs in mind, with the aim of minimising demands on post-16 institutions from September 2003 (earlier if practical).
 - d) **(R10) DfEE and OFSTED should consult on the updating needed to school management systems so that changes can be in place and extraction of data possible from the beginning of the Autumn term each year -** to meet the needs of inspection from Autumn term 2003.
 - e) **(R11) DfEE should produce a central and electronic register of available information held on schools and other education institutions** (including how the register would be updated) with an assessment of the extent to which it has the potential to reduce demands. This is already in hand.

HOW WE GET INFORMATION

The issue

17. Separate from the question of what data we need to collect, the processes used to collect it can also add or subtract from the demands placed on schools and other organisations. ICT in particular has the capacity to reduce the burden of collecting and analysing information. But against that the introduction of new ICT systems and the continuing churning of systems can significantly add to workload in the short term (through disruption and the need for retraining). The issues are therefore:

- a) How can ICT be used to ease the transmission of data; and
- b) When is the best time to introduce change so that churning is reduced to a minimum?

The proposed approach

18. The introduction of the Common Basic Data Set in 2002 will completely change the way data are collected and used. Given the lead times involved in establishing new ICT systems we do not believe it would be effective to consider new systems before then.

19. In the short term however we should look to make best use of existing systems and technology. In particular we should:

- a) ensure that all forms and other information needed for inspection preparation are available on websites. **We propose (R12) a simple electronic version of Forms S1 to S4 should be made available to schools from September 2001** on the OFSTED website, or on disk, that can be completed by schools on paper or electronically. **Further (R13) schools should be able to access PANDAs electronically from Autumn term 2001** via the new electronic PANDA website, which has security safeguards at an individual school level. OFSTED should review the need for paper copies of the PANDA from Autumn term 2002; and
- b) make as much use as possible of email to communicate with individual schools and others preparing for inspection.

20. In the longer term (after 2002) we should look to develop smart systems where schools and others can access and check their own data via the web at any time - not just when an inspection comes round. We propose:

- a) **(R14) OFSTED should trial whether pre-populated Forms S1-S2 could be made available to schools through the electronic PANDA website** with a view to "live" pre-population of forms during 2002.
- b) **(R15) DfEE should consider, with OFSTED, what changes are necessary to school management software** so that by Autumn 2003 it should be possible to transfer as much data for inspection purposes automatically as is possible. In order to achieve this, DfEE should consult OFSTED during Summer 2001 about the relevant data items which are likely to be required for inspection purposes, and when they will be needed, to enable it to take account of this in its planning and so that systems can be updated in time to meet the needs of inspection from Autumn 2003.
- c) **(R16) OFSTED should produce a list of information for HMI and their administrative staff of what is available through the web (eg. maps, LEA plans etc) and provide guidance to schools, LEAs and colleges on what would be useful to be on their websites for inspection purposes** by Autumn 2002. In particular, LEAs should be encouraged to put key documentation (such as their School Organisation plan, EDP and Asset Management Plan) on their web sites.

The recommended approach above is in line with and helps progress the wider objectives of DfEE's Information Management Strategy for Schools and LEAs, which was approved by Ministers in March 2000 and which is being implemented with OFSTED's support. £30 million of new capital money is being allocated in 2001-02 to improve schools' management ICT infrastructure and especially their capacity to hold and transfer standard data electronically. DfEE will be liaising with OFSTED to ensure that the improvements to schools' management systems will readily deliver data to meet inspection requirements.

THE NUMBER OF INTERACTIONS WITH SCHOOLS AND OTHERS

The issue

21. This issue is both about the numbers of inspections and evaluations and their distribution. The aim is to keep the overall number of visits to the minimum necessary and to prevent multiple inspection or survey of the same schools or areas so that some do not face significantly greater demands than others. This latter problem could arise simply by chance (a school's name coming up more than once into un-coordinated exercises) or as a result of multiple policies being aimed at the same school and thus multiple evaluations being in place (e.g. a school that is in special measures, an EAZ and in an EiC area.)

The proposed approach

22. OFSTED already seeks to limit the number of OFSTED visits to the same school, particularly following S10 inspections, through a booking system that refuses selection of schools recently inspected. It will also continue to consult with other inspectorates in order to co-ordinate inspection, particularly of LEAs, so that different inspection regimes do not make overlapping demands and, where possible, will make use of the results of self-evaluation, such as Best Value Reviews, undertaken by LEAs and others.

23. We propose to extend this approach by:

- a) ***(R17) looking to combine inspection, evaluation and other visits made by OFSTED and DfEE and conduct them where ever possible within the OFSTED programme.*** DfEE will consult OFSTED on proposals to evaluate the implementation of policy in schools and others in order to make the fullest use of inspections and to reduce to a minimum visits and information requests made by agencies commissioned by DfEE. In particular, OFSTED and DfEE should scrutinise their current and planned inspection, evaluation and other visits for Autumn term 2001 and judge the extent to which it is essential (i) that they are conducted and (ii) that they should take place at a separate time to other inspection visits. Where (ii) does not hold, the visits should be combined and conducted within the OFSTED programme. This process should not involve DfEE officials attending S10 inspections or apply to visits by DfEE staff for general information or staff development purposes. The aim of this recommendation is to reduce the number of separate visits conducted at the same school for similar purposes.
- b) ***(R18) introduce and extend the period for which schools that have had S10 inspections should be exempt from other inspections, evaluation visits or surveys.*** OFSTED, when it reviews the operation of its new selection system for inspection visits, should give due consideration to increasing the exemption period for primary schools - the period that the school can be guaranteed, with a few exceptions, no further inspection visits - from 12 weeks to nine months. DfEE, in consultation with OFSTED, should wherever possible introduce a visits and survey exemption period for schools with Section 10 inspections with a view to implementation from Autumn term 2001.
- c) ***(R19) any demands for information from schools, LEAs and others from OFSTED inspections or DfEE evaluation visits should be subject to tight control and staff should not ask for information (such as National Curriculum test results) that is already available centrally elsewhere, including at OFSTED.***

SCHOOLS PERCEPTIONS - including what they don't have to produce

The issue

24. There is some evidence that schools, LEAs and others 'over-prepare' for inspection visits by preparing unnecessary paperwork and updating plans prior to inspection. It is likely that this is to some extent fed by misunderstandings on schools' and others' part of what the requirements are and how much information is needed, or because inspection is used by school managers as an opportunity to instigate change.

The proposed approach

25. Currently, "Inspecting Schools: the Framework" spells out clearly what documentation is to be provided before a Section 10 inspection of a school - it varies depending on whether the school receives a full or short inspection. With the exception of Forms S1-S4, the documentation required by inspectors is limited to what schools would normally expect to have available and OFSTED requests that documentation should not be written specifically for the inspection.

26. The following are the key items asked for from the school during a full inspection:

- The current school development, management or improvement plan
- The school prospectus or brochure
- A timetable of the school's work
- A staff handbook, if one is available, and a list of key contacts
- A plan of the school
- The last inspection report
- The last annual report to parents
- Minutes of the meetings of the governing body or the equivalent
- Evidence of progress towards the targets set by governors
- Curriculum plans, policies, guidelines or schemes of work already in existence
- The outcomes of self evaluations carried out recently by the school
- The outcomes of any external monitoring or evaluations carried out since the last inspection
- Any other documentation the school wishes to be considered.

27. We propose ***that (R20) OFSTED reviews this list with a view to further streamlining it for inspections from Autumn 2001.*** In particular, OFSTED should identify to what extent: (i) all of these documents are necessary to have for all inspections, rather than on request (eg. minutes of the meetings of the governing body) (ii) they continue to be essential to collect from the school direct (eg. last inspection report) and (iii) whether the request for "any other documentation the school wishes to be considered" should be dropped or limited in some way. OFSTED should set up a similar process of review before the next programme of LEA inspections. We recommend ***that (R21) a checklist of items should be provided of what is and is not required prior to any inspection*** - a clear policy statement by OFSTED for each sector it inspects and for each type of inspection.

28. We also propose ***(R22) that OFSTED should provide improved guidance and good practice for schools and others in relation to the provision of pre-inspection documentation***, including guidance on what is expected from the headteacher's statement (Form S4), its scope and nature, and its maximum length by Autumn term 2001.

REDUCING OTHER TYPES OF BUREAUCRACY

The issue

29. We have also considered whether the inspection system could be used to reinforce the wider drive on school and LEA level bureaucracy - for example by OFSTED inspecting schools' own measures to reduce bureaucracy. The arguments in this area are finely balanced. On the one hand, knowing that it will be inspected would be a strong lever to make schools look at their own systems and consider whether they can be streamlined. On the other, we do not wish to add any additional requirements to the inspection system that might in themselves lead to extra paperwork (eg. schools writing their own anti-bureaucracy plans). Registered Inspectors

would also need additional training before they could properly inspect a school's administrative systems.

The proposed approach

30. On balance, we believe the benefits would outweigh the costs if we were to adopt a more limited model. We propose that **(R23) inspection teams should from Autumn 2001 discuss bureaucracy with the head teacher** of the school and explicitly raise in inspection reports any evidence of (i) school level bureaucracy and (ii) imposed bureaucracy (with the source) that could be readily avoided.

31. We do not believe the gains of fully inspecting administrative systems would merit the risks of the approach. However, inspectors might ask schools what use they made of the centrally available tools to reduce bureaucracy e.g. Circular 2/98 and the Cutting Burdens Toolkit. This would ensure schools knew of these central tools, would lead them to at least ask questions about why they were not using them and would provide useful feedback on the extent of their use.

32. We propose with respect to the paperwork sent to schools that **(R24) OFSTED should implement the Information Classification System for schools**, when available from the Public Sector Team at the Cabinet Office, for all the information it sends to schools.

Presented by:

OFSTED and Department For Education And Employment Standards and Effectiveness Unit
May 2001

INFORMATION COLLECTED BY OFSTED PRE-INSPECTION

Schools

1. OFSTED collects data on Forms S1-S4 from schools prior to their inspection; the implication being that data are collected from each school once every 4-6 years:

- Form S1 asks questions about the inspection (e.g. unsuitable dates, significant changes which will take place before the inspection etc) and collects a range of information about the school (including pupil data, organisation and staffing). The latter is used to inform the composition of the inspection team so that it matches the circumstances and curriculum of the school.
- Form S2 collects further factual information about the school, including pupil mobility in and out of the school and the attainment on entry of the latest intake. It operates on a different timetable to Form S1 and is sent direct by the school to the registered inspector.
- Form S3 asks the head teacher to state the extent to which the school fulfils its statutory requirements and to indicate the extent to which a range of monitoring and evaluation processes are in place.
- Form S4 provides an opportunity for the head teacher to contribute a personal statement to the inspection team giving his/her views of the school, its successes and the areas where he/she recognises that further developments are needed.

Local Education Authorities

2. OFSTED, with the Audit Commission, collects data on Forms 1-3 and 5 from LEAs before an inspection and on Form 4 from all LEAs annually (from last year):

- Form 1 provides information on services including details of SLAs, development plans and most recent evaluations for each service;
- Form 2 provides financial information (Audit Commission);
- Form 3 gives information on the discharge of LEA duties - strategic management, school improvement, SEN and access to schools/availability of places;
- Form 4 provides a comprehensive range of information on the LEA. It is collected annually so that comparisons can be drawn with the national picture and “similar” LEAs using the Statistical Neighbours methodology;
- Form 5 gives LEA information on schools to be visited, e.g. type of support provided.

Post-16 and Early Years

3 Data collection from post-16 colleges pre-inspection and early years providers during registration and inspection is at planning stage but is expected to largely replicate recent practice. In particular, Forms CS1 and CS2, being used for the summer term post-16 inspections, collect similar achievement and enrolment data to those requested by FEFC and enable the college to provide data from its kite marked software. A separate data collection currently supports area-wide inspections.

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