

Moving towards a MAT inspection framework

What trust-level inspection must achieve

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Contents

Introduction.....	2
1. What inspection must achieve.....	3
2. What inspection should look at.....	5
3. What good evaluation looks like in practice.....	8
4. What happens after inspection?.....	12
5. What NGA is asking for.....	14
Conclusion.....	15

Introduction

What trust-level inspection must achieve, and why it cannot be an extension of school inspection

Multi academy trust (MAT) inspection is on its way, with the legislation in place and national policy direction laid out. What is not settled are the key details which will determine whether it works: what inspection should look at, how it should reach a judgement, who those judgements are for, and whether the inspectorate has the capacity and credibility to deliver.

This paper builds on a fundamental NGA position: we support the introduction of proportionate MAT inspection, but it must be designed as a genuinely trust-level framework and not simply manifest as an extension of school inspection. A trust is an organisation in its own right, not simply the sum of its schools, and it needs to be inspected as one. That is, before anything else, a question about governance, which is the ground on which NGA has most to contribute.

The question has changed

The debate about whether trusts should be inspected is, to all intents, over. A system that continues to judge educational quality school-by-school, when so many of the decisions shaping that quality are taken at trust level, is incomplete. NGA has made this argument consistently, pointing to the proliferation and maturity of the MAT model, and it was recognised by the Children's Wellbeing and Schools Act 2026 which established the legislative basis for trust inspections.

Settling this argument has exposed a much harder problem. There is no real precedent in the English system for inspecting a group of schools that form a single organisation. The convenient option is to treat trust inspection as an extension of school inspection. This would bring familiar methodology stretched to fit a larger unit. NGA's central argument is that this would fail, because the organisation being inspected is genuinely different.

The Department for Education (DfE) and the Charity Commission recognise a trust as a single legal entity that sets strategy, deploys resources, builds central capacity and holds executive leaders to account across many schools and communities. For MAT inspection to succeed, the inspectorate would also need to ensure that this was the basis for how it inspects – knowing foremost what a trust is and therefore only then inspecting it for what it is.

Inspecting a MAT well means answering a question that school inspection has never really had to ask: not how is this school performing, but how is this organisation governing, leading, spending, learning, and crucially, improving the schools in its care?

The sector is by no means resisting this. When NGA last surveyed trustees, 83% of those who expressed a view said that the trust, as the accountable body, should be the focus of inspection. Those governing want their organisations held to a clear and transparent standard, in part because the absence of one leaves trust quality to be inferred, often inconsistently and without transparency. The appetite for scrutiny largely exists. The harder task, and the subject of this paper, is to design scrutiny that does the job.

1. What inspection must achieve

For a trust trying to understand how it is being judged, the present landscape is incoherent. Ofsted inspects its schools one at a time. The DfE, through Regions Group, decides whether it is fit to grow or to take on others. Regional improvement for standards and excellence (RISE) leads and facilitates support and ongoing conversations around a trust's development but may be triggered by a range of indicators such as pupil progress or notices to improve. All rest on a different and partial view of overall trust quality – not immaterial but also not an independent, holistic assessment of how well the trust governs and leads.

The result is a system in which the same trust can be judged strong enough to rescue another school and at the same time, by a different part of the same department, too weak to expand. Recent trusts with financial black holes point to the deeper problem: a celebrated school improvement record can mask devastating financial and resourcing mismanagement, even for nationally recognised names. And these cases are more common than most realise. The high-profile failures reported in the press are only the visible edge of it. Beneath them sit governance, financial and contextual problems that no national oversight routinely catches.

This is not a hypothetical complaint. The government's own interim RISE evaluation records advisers' frustration that supporting trusts were sometimes chosen without clear criteria, by teams with limited knowledge of the trusts involved. One adviser put it plainly:

"The regional teams will come up with a few names, but it feels very arbitrary. Sometimes they don't know the MATs particularly well."

RISE adviser, quoted in the government's interim evaluation

Commissioning guidance has brought welcome clarity to process, but it describes how decisions are made; it does not assess how well a trust performs. Quality, in other words, is inferred, largely from a patchwork of partial signals and never independently tested. NGA's view is that the first thing MAT inspection must achieve is to close that gap and link all those signals together, by providing a single, independent and transparent evidence base on trust quality that the rest of the accountability system can rely on. Done well, inspection replaces guesswork with a common standard the system currently lacks. Done badly, it simply adds one more partial judgement to an already crowded field.

The three-pronged purpose of MAT inspection

The first purpose of MAT inspection is coherence — a clear, shared account of trust quality so policymakers can compare and contrast without enforcing homogeneity. The second is improvement: as with school inspection at its best, it should not merely identify underperformance but drive better practice across the system, highlighting what effective trusts do and making it usable by others. It should also test something the system currently takes largely on trust: whether a trust genuinely has the capacity to improve schools beyond its own. That capacity is assumed every time a trust is matched to a struggling school or cleared to grow, yet it is rarely evidenced. A trust's record with the schools it already runs is not the same question as its capacity to turn around new ones. A framework that cannot tell the two apart will keep producing the mismatches the sector has already had to live with.

The third purpose concerns public money. Trusts exercise discretion over how funding is pooled, top-sliced and redistributed across their schools, and the larger ones now govern tens, or even hundreds, of millions of pounds. Financial governance has strengthened a great deal since the early years of the programme: the Academy Trust Handbook, tighter audit expectations and the Department's intervention powers have between them reduced the financial failures that once dominated the headlines. But compliance with the rules is not the same as good strategy.

A trust's choices about what to centralise, where to invest and which schools to protect or to stretch are governance judgements. At present, no one is independently assessing whether those choices are working well and representing value for the trust community and the general taxpayer. There is no equivalent gap elsewhere in the public sector, where the Care Quality Commission inspects NHS trusts as organisations and not only hospital by hospital. As one trustee put it to us:

"The MAT has power. Power should mean responsibility. Those with responsibility for using public money should be accountable."

NGA member, *The schools system: the voice of MAT trustees*

2. What inspection should look at

If inspection is to assess the organisation rather than the average of its schools, it needs a clear object of judgement. NGA's view is this should be the trust dividend: the tangible and sustained benefits that ought to arise from being part of a trust rather than a collection of standalone schools. As individual trusts have matured, as has the trust system, this dividend has become clear, as we explained in *The Mature MAT Model* (2024).

In practice the dividend will often be visible through a shared, high-quality and inclusive curriculum and specialist teaching expertise; faster and better-targeted school improvement drawn from central capacity; stronger professional development and career paths; greater financial resilience through economies of scale; all of which are driven through stronger governance, achieved by harnessing the unique value of all four dimensions of trust governance (see *Governing in 4D*).

The dividend cannot be derived from a spreadsheet of school grades, and this is where trust inspection departs most sharply from school inspection. A trust is more than the sum of its parts. Inspection that aggregates or averages school judgements would measure the wrong thing: it would reward trusts that took on already-strong schools, penalise those that took on difficult ones, and tell us very little about the organisation itself. NGA's position is that inspection should instead be built around three questions:

- **How is the dividend achieved?** Is there a genuine organisational strategy for how the benefits of the trust model are planned, resourced and sustained, and do the trust's governance arrangements help achieve this?
- **How is it experienced across different schools and communities?** Is the benefit consistent and equitable, or is it concentrated in some schools and largely absent in others?
- **How does the trust know and what does it do when the dividend is not landing?** How do leaders use data, challenge and local intelligence to identify the gap and close it by redirecting resources?

Anchoring inspection in these questions keeps it focused on organisational effectiveness and improvement, and it does so without prescribing a single model. Trusts differ enormously in size, phase, geography and ethos, and a framework that judges efficacy by conformity to one structure would suppress the very innovation the trust sector was created to encourage. The consistency should lie in the principles and the impact, not in the organisational chart.

Evaluating the trust dividend

1. How is it achieved?

Is there a genuine organisational strategy driven by the board?

Key evidence areas:



Clearly defined long-term vision



Board ownership and regular strategic review



Strategy explicitly visible in board agendas, minutes and the quality of challenge

2. How is it experienced?

Is the benefit consistent and equitable across different school contexts?

Key evidence areas:



Equitable distribution of resources, funding and central expertise



Real responsiveness to local tier contexts and community intelligence



Consistent positive impact across diverse geographical and socioeconomic school communities

3. How does the trust adapt?

How do leaders use data and challenge to identify and close gaps?

Key evidence areas:



Continuous oversight of educational, financial and management data



Timely, targeted executive and board intervention when the dividend is not landing



A robust improvement logic that replaces system guesswork with a common standard

Judging the organisation: governance across four dimensions

Assessing a trust as an organisation means being precise about where its governance and leadership sit. NGA's *Governing in 4D* framework sets out effective trust governance as operating across four interdependent dimensions:

1. **The trust board**, which holds ultimate accountability, providing strategic leadership while delegating intelligently
2. **The executive**, providing specialist professional expertise to enhance scrutiny and enable effective governance
3. **The local tier**, through which the trust stays rooted in and empowered by the communities it serves
4. **The members**, who safeguard the trust's charitable purpose

A trust's quality results from none of these alone. It lies in how well they work together: in the flow of challenge and information between them, and in whether strategic decisions are informed by what is happening in classrooms and communities.

The implication for inspection is direct. It is not enough to examine each layer in isolation – inspectors must assess the interaction between them. Is the board's strategy real or nominal? Is the executive truly enhancing oversight without creating duplication or undermining lines of accountability? Is local governance empowered to connect the trust to its communities and improve organisation-wide decision making? The distinction matters in practice.

NGA's 2026 Annual Governance Survey shows that 96% of trusts now operate some form of local governance – or 99% if you remove the 'don't knows'. This is up from 88% in 2021, but structure is not the same as substance, and three-quarters of trustees themselves say inspection should examine how effectively boards use intelligence from the local tier to inform their strategic decisions. A framework that counts local governance bodies without testing whether they actually function would miss the point.

NGA is well placed to inform inspection here, because our External Reviews of Governance (ERG) have generated a substantial evidence base on how organisational intent and governance practice diverge, and what that divergence looks like in the documents trusts produce. Our evidence base, for instance, shows that boards struggled where trustees had not been involved in creating or reviewing the trust vision, leading to it failing to drive board business strategically. Where that happens, boards become reliant on executive proposals and accountability blurs. These are not abstractions; they are precisely the failure modes a credible inspection framework needs to be able to detect, by testing whether a trust's stated vision shows up in its agendas, its minutes, its performance monitoring and the quality of its challenge, rather than only in its prospectus.

A primary audience for trust inspection reports should be the body legally accountable for every school in the organisation and the only one able to act on a system-level finding – the trust board. That has consequences for how reports are written. If trustees are the key audience, which we argue they should be, findings need to be framed around strategic decisions, governance quality and organisational capacity. In practice, this means the capability of the organisation to provide, improve and sustain its schools, which covers both operational excellence and governance excellence. This requires enough specificity to be acted on at board level, rather than offered as a summary of outcomes the board already knows. That action could be direct delivery in the case of strategic concerns, or oversight and scrutiny of the actions of executives if the concerns are more operational. The reports should also inform parents of what a trust judgement means, so they are not left to guess what it means for their child's school. Equally as fundamental, the designed framework must be explicit about how trust and school-level findings relate to one another.

3. What good evaluation looks like in practice

Through the development of the quality descriptors, the Department has already outlined what trust inspection should cover, from quality of education and the management of resources to governance, wellbeing and securing improvement. NGA's view is this is broadly on the right track, and the white paper's proposed improvements as part of new "trust standards" rightly adds vital emphasis on inclusion, value for money and community collaboration. In *Governing in 4D*, we explored how the new trust standards could reflect the uniqueness of trust governance too.

But a set of domains is not yet a holistic method, and their value will depend entirely on how they are applied. The same headings can produce a searching organisational judgement or a shallow checklist. For example, on governance and leadership, inspection will need to distinguish the board's strategic oversight from the executive's delivery and the local tier's community empowerment, and evaluate how the three connect within the specific context of the trust.

NGA's governance reviews suggest where the real evidence can be obtained. Does the published strategy shape board agendas and minutes? Are performance indicators used consistently to test progress? Is the board's challenge aligned to its stated priorities, or merely reactive to whatever the executive happens to bring to it? NGA's framework for assessing governance effectiveness is built around exactly this kind of grounded, document-based evaluation, and it can inform an inspection methodology that judges practice rather than presentation.

Using school-level evidence well

While we argue for clear differentiation and avoidance of duplication, school inspection evidence still matters. It would be untenable for a trust to be judged effective while its schools were consistently failing, or ineffective while they consistently thrived. But that evidence must be used as a signal of trust impact, not as the judgement itself. Recent school inspections might offer corroboration if the school has been part of the trust for a significant period of time, but it is questionable how useful a three- or four-year-old report would be in assessing the trust, especially in instances of significant development or change i.e. mergers, growth, or executive leadership changes. How the trust has reacted to that historic inspection outcome would likely be more relevant. Either way, inspection must avoid re-inspecting schools by the back door or quietly averaging their grades into a trust verdict.

Scale and diversity

MATs vary hugely in terms of geographies and levels of socio-economic disadvantage of the communities that they serve. The Confederation of School Trusts (CST) has previously and rightly insisted that any approach must provide a fair and accurate account of groups with different characteristics, including specialist trusts. Trust diversity is not only a healthy reflection of the autonomy given to trusts to innovate and improve; it also reflects the huge diversity in the communities and pupils trusts serve across the country. Any inspection framework must protect that diversity and space for innovation as it is a necessity for the government's welcome vision of a system of community-rooted trusts.

International practice is instructive here. Dutch inspection of school groups focuses on the board's capacity to steer a multi-layered organisation, using school-level evidence to test whether executive leadership maintains quality across settings without re-measuring each school. It is alert to what the research calls decoupling – the risk that central policies look strong on paper but never reach the classroom. This could create a strong foundation for England. School evidence would be read intelligently as a signal of organisational steering, where there is transparency about how it feeds the trust judgement, including how genuine conflicts between the two levels are resolved. Appreciating the nuances of scale and diversity means evaluating the trust from different angles.

This leads to a practical question that needs to be at the heart of the developing system: how do trust and school inspection cycles align, and what happens when their judgements diverge? A trust judged effective while several of its schools are not, or the reverse, is not necessarily an error, but it is something that should be anticipated. The system cannot start operating until resolutions for this dilemma are found. A system in which the two levels generate contradictory signals with no account of how they relate would simply recreate, at trust level, the very incoherence trust inspection is meant to resolve.

The risks that must be designed out

One design failure serious enough to undermine the whole reform, is the risk that trust inspection would reward raw performance over improvement and context. This could have the potential devastating effect of discouraging strong trusts from taking on the schools that most need them. As NGA has long pointed out, and even Ofsted has acknowledged, school level judgements strongly correlate with the socio-economic profile of a school's intake and have struggled to fully reflect a school's context. A trust inspection framework which draws too heavily on individual school judgements therefore risks importing these challenges and potentially exacerbating them by deterring trusts from supporting those schools most in need of additional capacity.

Those designing trust inspection should be mindful of how and why trusts choose which schools they take on, with trusts taking on “undesirable” schools considered as part of an equity driven judgement process. In fact, NGA's position on this is clear – these trusts should be celebrated and given extra credibility for the moral and ethical contributions they are seeking to make to both the system as a whole and to individual communities. A high-stakes trust judgement that does not properly weigh starting point and trajectory turns every struggling school into an organisational risk, and a board safeguarding its trust's stability would be acting rationally to avoid it.

NGA makes the case strongly that the consequence would be genuinely perverse, where not one but two inspection frameworks intended to drive improvement could concentrate good trust leadership where it is needed least and pull it away from the communities that need it most. This is not a marginal concern to be managed with reassurance from the Department, because even the perception that taking on a challenging school will damage an inspection outcome is enough to change behaviour. The framework must therefore reward improvement over time, weight context honestly, including deprivation, SEND prevalence and the state of schools on entry, and make that weighting visible.

A second fundamental risk is the potential workload implications of this new form of inspection. Trust and school leaders are already stretched, and inspection shapes behaviour more powerfully than almost anything else in the system. In 2024, 51% of those governing identified Ofsted as the single biggest factor shaping practice in their school or trust. Introduced carelessly, MAT inspection will mean “more Ofsted”, with more preparation, more evidence production and more anxiety.

The test NGA applies is a simple one: the benefit to pupils has to justify the burden created. That means minimising duplication with school-level processes, resisting demands for new evidence trusts must manufacture, and designing the process, as single-school inspection has belatedly begun to, around the wellbeing of the leaders who experience it. A chief executive's professional judgement shapes every school and community in the trust, so the impact of trust central team decisions are more far-reaching than any single headteacher's. That is the argument for concentrating scrutiny where the consequential decisions are made — and concentrating it there should lighten the load the existing framework places on individual schools, not stack a new layer on top of it.

The diversity of the trust sector means that no framework, however carefully designed, will be ready to operate at scale without being tested first, and tested in a way that carries no sanction while the methodology is still being refined. A pilot should span the real range of the sector: large established trusts and small newer ones, different phases, different regions and different operating models. Its central question should be whether the framework, in practice, disadvantages trusts working in the hardest contexts or those that have taken on schools needing significant improvement. The findings should be published, and the framework revised where they expose a problem, rather than risk unintended consequences once in full operation.

Capacity and credibility: can it be delivered?

A good framework is necessary but not sufficient, and the harder question, the one the sector keeps coming back to, is whether the inspectorate can deliver it and whether it will be believed when it does. The context of design should continue to be mindful of mixed confidence levels in Ofsted. NGA fully appreciates the inspectorate is part-way through implementing a new school-level framework and wider inspection reform. Under sustained public scrutiny, with capacity and attention already stretched thin, NGA agrees with many others in the sector that Ofsted's capacity to deliver a whole new framework for a different type of organisation is not optimal. Designing a credible regime for a level of the system that has never been inspected, while that work is still going on, is a substantial undertaking, and we urge the inspectorate to seek continued consultative discussions with sector experts including NGA at each stage.

NGA's ERG programmes, while not designed to cast a judgement over holistic trust performance, does reach into many of the areas Ofsted do not currently exercise judgement in. This evidence points convincingly to the external validation of a trust requiring expertise that single-school inspection does not build: trust governance, school improvement at scale, and organisational leadership across finance, workforce and estates. NGA reviews show how holding leadership to account in a single school is mostly a matter of a governing board's willingness to challenge a headteacher but in a trust it is a question of scale and structure, of maintaining informed oversight across many schools through central and local tiers at once. An inspector without direct experience of how a trust works is likely to miss what matters most, and the sector will know it.

NGA has had direct feedback from a number of MAT CEOs that in their view, most senior HMIs do not have the relevant MAT experience due to the relative youth of the trust system. International experience reinforces the point that where systems have moved to inspecting groups of schools, doing it credibly has required sustained investment in specialist training, new inspection tools and a genuine grasp of multi-level accountability.

This will not be solved by training alone. NGA's view is that it requires the deliberate and visible recruitment of people with current or recent experience of leading and governing trusts, including chairs, trustees, governance professionals as well as chief executives, alongside sustained specialist training. It requires balanced teams that combine that experience rather than relying on a single professional background, reflecting the real diversity of trust size, phase and model. And because recruiting from the sector raises real and perceived conflicts of interest, it requires genuine transparency.

Those conflicts have to be managed openly. Inspectors drawn from trust leadership will inevitably have worked with, competed against or governed near the trusts they are asked to judge. The answer is not to exclude that experience, since it is the very thing that makes the judgement credible, but to be rigorous about recusal, transparent about deployment and honest that the price of expert inspectors is a visible and trusted system for handling the relationships they bring with them. Credibility must be built deliberately, and it is a precondition for the whole exercise rather than a by-product of it.

4. What happens after inspection?

A judgement is only as good as what follows it, and at trust level the stakes of getting this wrong are high in both directions. Intervention that is too blunt triggers structural upheaval that harms the very pupils it is meant to protect; intervention that is too weak lets underperformance persist across multiple schools. NGA's position is that the response should follow a clear and proportionate sequence.

There is a prior question, though, about the form a trust judgement should take. Single-word grades exist to give parents a quick signal, and they serve choice more than they serve improvement. At trust level, where the primary audience is a board that has to act on the finding, a reductive headline grade may obscure more than it reveals. A trust with real weaknesses in its central functions may still run strong schools, and a single label cannot hold that complexity. There is a serious case for trust outcomes that are more qualitative and diagnostic than graded, giving boards enough to act on while remaining intelligible to the staff, parents and communities trying to work out what it means.

Outcomes must be proportionate and transparent. A finding should signal the level of concern, the improvements expected and the likely consequences, in language that is meaningful to trustees, leaders, staff, parents and communities. It must be explicit that weakness in a trust's central functions does not necessarily mean its individual schools are failing.

Support should come before structure. Where a trust is underperforming, the default response should be targeted improvement rather than rebrokerage. Academy transfers are significant events for the schools and communities they affect, and they belong at the end of the ladder rather than the start. But improvement-first cannot mean improvement-indefinitely, and the framework has to state plainly what triggers the move from support to formal intervention, with firm timelines and defined consequences.

Where governance is the root issue, the first response should be a governance review. An External Review of Governance, examining board effectiveness, the scheme of delegation, the quality of challenge and the flow of information across tiers, addresses the problem at source and often prevents escalation. It is proportionate, evidence-based, and an area where NGA's existing methodology can directly inform the inspectorate's.

Intervention has to be sensitive to regional capacity. In parts of the country imposing structural intervention without a viable alternative can leave schools worse off. It also compounds the disincentive described above, because trusts in low-capacity regions will be the most wary of taking on risk they cannot offload. Regional context must therefore shape what intervention is feasible.

Inspection must be integrated with the Department's existing architecture, including commissioning, warning notices, academy transfers and RISE, rather than bolted alongside it. Establishing an independent evidence base on trust quality is undone if it becomes one more parallel process. Inspection findings should explicitly inform commissioning and RISE matching, and the intervention ladder should be legislated, sequenced and visible in advance, so that every actor, from Ofsted and the Department to regional directors and the trusts themselves, is working from the same assessment.

5. What NGA is asking for

NGA asks government and the inspectorate to:

1. **Build inspection around the trust dividend**, the value a trust adds across its schools over time, anchored in three questions:
 - how the dividend is achieved
 - how it is experienced across different contexts
 - how the trust monitors and adapts when it is not being achieved
2. **Evaluate the distinct dimensions of governance and leadership**, the trust board, the executive, the local tier and the members, and assess how effectively they work together in practice rather than how they appear on a structure chart.
3. **Use school-level evidence contextually**, with clear and transparent protocols showing how school findings inform, but do not dictate, trust-level judgements, and how conflicts between the two levels are resolved.
4. **Design out the disincentive to take on struggling schools** by recognising improvement trajectories and context, including deprivation, SEND and starting points, rather than raw performance, and by making that weighting explicit.
5. **Build specialist capacity** through sustained training and the deliberate, transparent recruitment of inspectors with direct experience of trust governance and leadership, deployed in balanced teams.
6. **Keep it proportionate**, minimising duplication and workload, resisting demands for manufactured evidence, and ensuring the benefit to pupils justifies the burden created.
7. **Pilot before full implementation** across a representative range of trusts by size, phase, geography and model, to test the methodology and surface unintended consequences, and publish the findings.
8. **Establish clear, proportionate post-inspection pathways, with improvement support** before structural change, a targeted governance review where governance is the root issue, regional context taken into account, and full integration with the Department's accountability and intervention architecture.

Conclusion

MAT inspection can strengthen the system or destabilise it, and the difference will lie almost entirely in the quality of its design. The arguments for trust-level accountability are settled and, as this paper has set out, well evidenced. The risk now is not that inspection fails to arrive, but that it arrives as a stretched version of school inspection, producing judgements the sector cannot use and will not trust, on a part of the system that works in a fundamentally different way.

The alternative is a framework built from the right question. Not how is this school performing, but how is this organisation governing, leading and improving the schools in its care, and is the trust dividend being felt, equitably and sustainably, by every child in every school across the trust? That is a harder question than school inspection has ever had to answer. It calls for better tools, deeper expertise and a more honest engagement with complexity. But a system that is organising itself around trusts has an obligation to answer it.

It also places trust governance at the centre. The trust board is the single legal entity accountable for every school in the organisation; it is not simply the subject of inspection but its primary audience, and the mechanism through which any finding becomes improvement. Boards that can interrogate an inspection outcome and turn it into strategic action are the difference between inspection as an external event and inspection as a genuine driver of change. The governance of trusts is not a footnote to MAT inspection. It is its foundation, and NGA is committed to working with government, the inspectorate and the wider sector to build it well.

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About us

NGA is the national membership association for governors, trustees and governance professionals in England's state schools and trusts.

We empower those in school and trust governance with valuable resources, expert support and e-learning to shape stronger governance. Together, we're raising standards and ensuring every pupil can thrive today – and tomorrow.



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